goAML

WEB USER GUIDE FOR FILING SUSPICIOUS ACTIVITY REPORT BY GOVERNMENT AGENCIES (STR-G) THROUGH GOAML TO FMU.

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Guidance on Submission of Suspicious Transaction Reports by Government Agencies (STR-G)

1. Introduction

The Financial Monitoring Unit (FMU), Government of Pakistan is the central agency established under Section 6 of Anti- Money Laundering Act (AML Act, 2010) empowered to receive Suspicious Transaction Reports (STRs) and Currency Transaction Reports (CTRs) from the reporting entities. While Section 7(1) of the AML Act, 2010 has obligated reporting entities to file STRs with FMU in the manner prescribed by FMU. Keeping in view the best international practices and legal requirements of prompt reporting involving varying degree of suspicious activity and transactional circumstances, FMU has configured different customized STR reports i.e. Suspicious Activity Report **(STR-A)**, Suspicious Financial Transaction Report **(STR-F)** and Suspicious Trade-based Money Laundering Report **(STR-T)** respectively with the deployment of goAML software for the electronic filing of STRs by the reporting entities.

Under **Section 7(2) of the AML Act, 2010**, any government agency, autonomous body, SRB oversight body, designated agency and/ or AML/CFT Regulatory Authority (referred as Reporting Government Agency) may also share intelligence with FMU or submit suspicions in the form of STR. To facilitate the receipt and exchange of meaningful information from these competent authorities under the above provision, and in line with *Guidance on reporting requirements under section 7(2)* of AML Act, 2010 dated February 26, 2025, FMU has introduced a distinct report category, STR–Government Bodies **(STR-G)** in the goAML system.

The submission of Suspicious Transaction Reports (STRs) by competent government agencies can substantially enhance Pakistan's Anti-Money Laundering, Countering the Financing of Terrorism, and Countering Proliferation Financing (AML/CFT/CPF) framework by broadening the range and quality of information available to the FMU for generating the financial intelligence. Timely Reporting of suspicious activities would enable the FMU to integrate intelligence received from government agencies with STRs, CTRs and other information submitted by reporting entities, thereby strengthen inter-agency cooperation, and timely dissemination of actionable intelligence. This would enhance the detection and disruption of money laundering (**ML**) and related predicate offences, while supporting compliance with the FATF Standards on domestic cooperation and the timely exchange of information among competent authorities.

2. Key Features of STR-G

An STR-G may be submitted whenever a government agency has reasonable grounds to suspect that a transaction, assets or financial activity may be linked with ML, TF, PF or proceeds of a predicate offence, irrespective of whether an investigation has commenced, is ongoing or has been concluded. The submission of STR-G is to enable the FMU to undertake financial intelligence analysis and identify financial links and patterns that may not otherwise be apparent.

An STR-G, where possible, try to establish the nexus between the suspected predicate offence and the related financial activity. It may include relevant information, such as account details, transaction values, counterparties, beneficial ownership information, trade documentation, or other supporting records that may assist the FMU in developing actionable intelligence.

The procedure and reporting requirements for the submission of STR-G are set out in the following sections. The key features of the reporting framework are listed below**:**

i. The FMU's goAML system establishes a secure and centralized platform for electronic submission of STR-G, including the upload of supporting documents, thereby facilitating efficient, secure and streamlined reporting by government agencies.
ii. A dedicated field is made available for the reporting agencies to clearly articulate the reason(s) and grounds of suspicion, with a maximum limit of 4,000 characters.
iii. The reporting format includes extensive set of fields to capture primary/identity details related to the suspected individuals and entities, while allowing flexibility to populate mandatory data and, any available, supplementary information.
iv. The system provides a wide variety of red flag indicators that may be selected to support and categorize the reason(s) of suspicion.
v. An Action Tab in the goAML system enables the reporting agencies to specify any investigative, regulatory or enforcement measures taken related to reported matter.
vi. The FMU provides a dedicated support mechanism to facilitate government agencies with registration and reporting related queries.
vii. The reporting framework will be supported by awareness initiatives to inform government entities of option to submit STR-Gs to FMU under section 7(2) of AML Act, 2010

3. Authorization and Submission of STR-G

Each Reporting Government Agency intending to submit STR-Gs shall designate a **Focal Person** responsible for coordinating the preparation and submission of **STR-G** through the FMU's **goAML** reporting system.

The Reporting Organization shall formally nominate the designated Focal Person, along with his back-up, and submit an official request to the FMU for the creation of a goAML user account. Where operationally necessary, additional authorized officials may also be nominated to ensure continuity of reporting. Upon verification of the nomination, the FMU will create the requisite goAML user account(s) and provide secure access credentials to the authorized official(s).

Reporting Government Agencies need to ensure that access to the goAML system is restricted to authorized personnel only and promptly notify the FMU of any changes to the designated Focal Person Such a notification will facilitate the FMU to modify, suspend or deactivate user accounts, as the case may be.

The designated Focal Person shall ensure that STR-Gs are complete, accurate, and submitted promptly upon the establishment of reasonable grounds for suspicion. All information relating to STR-Gs shall be maintained in strict confidence and handled in accordance with the confidentiality provisions of the **Anti-Money Laundering Act, 2010**. Reporting Government Agencies shall implement appropriate administrative, technical, and organizational measures to safeguards the confidentiality, integrity, and security of information submitted to the FMU through the goAML system.

4. Process for Filling STR-G

Government entities, desiring to submit STR-G, will be required to register on the goAML first. For guidance related to registration, please refer to goAML Registration User's Guide available on FMU's website, if required. A tutorial video How to Register on goAML can also be referred to complete the process of registration. FMU has also developed another tutorial video How to Manage goAML Accounts for guidance related to administration of user accounts on goAML.

The step wise process for filing of STR-G through goAML is explained below:

4.1 Creating a Web Report on goAML

Go to the https://goamlweb.fmu.gov.pk/PRD/Home on internet browser. Press the LOGIN>> button to login with your registered credentials on goAML as illustrated below (Figure-1&2):

Figure 1

Figure 2

After logging in, STR-G can be created by opening the menu item New Reports > Web Reports, on top-left corner of the webpage under the goAML logo, from the main menu ribbon (Figure-3).

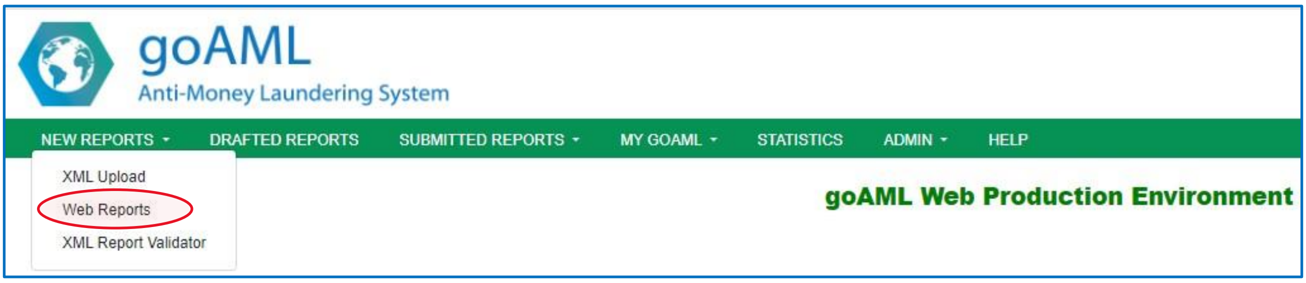


Figure 3

Following menu will open. The competent authorities/Government agencies shall click the drop-down menu under New report (Figure 4)

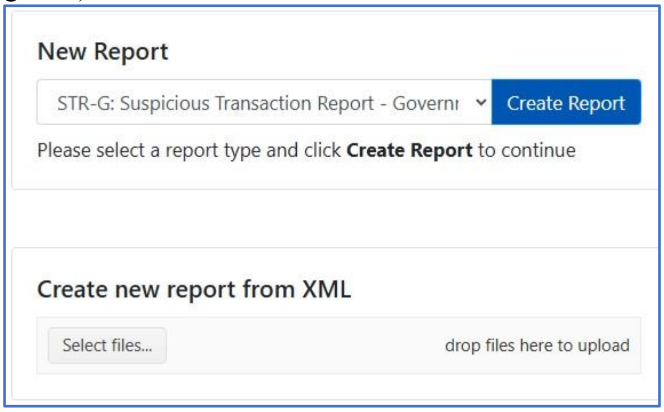


Figure 4

The different types of reports option will display. Among these report types *<u>"STR-G: Suspicious Transaction</u> <u>Report – Government Agencies"</u>* must be selected to create the report.

Once STR-G is selected click Create Report button (Figure 5)

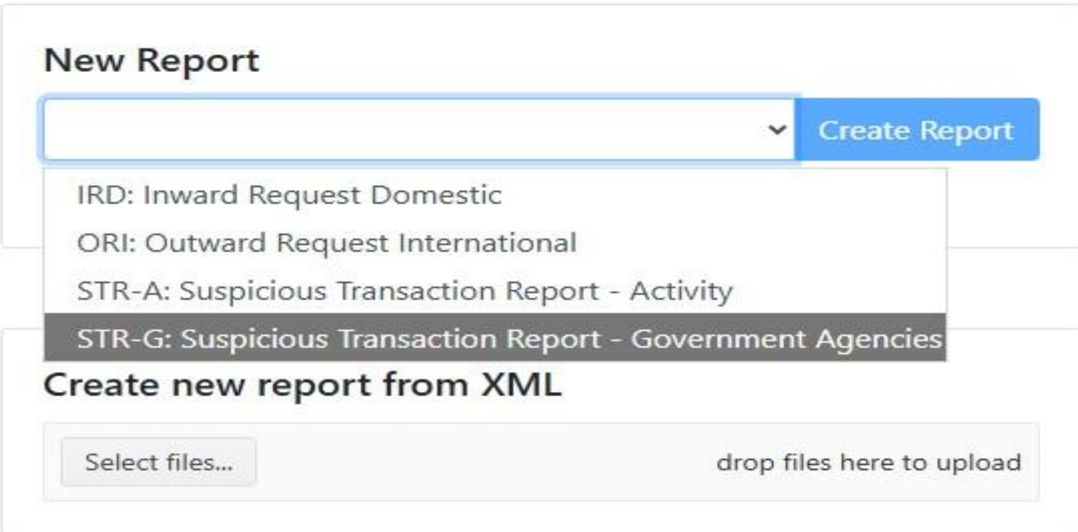


Figure 5

4.2 STR-G Report Cover

4.2.1 <u>STR-G Report Cover-Main Page Tabs</u>

After clicking on create STR-G, the screen illustrated below will appear on goAML web portal (Figure 6).

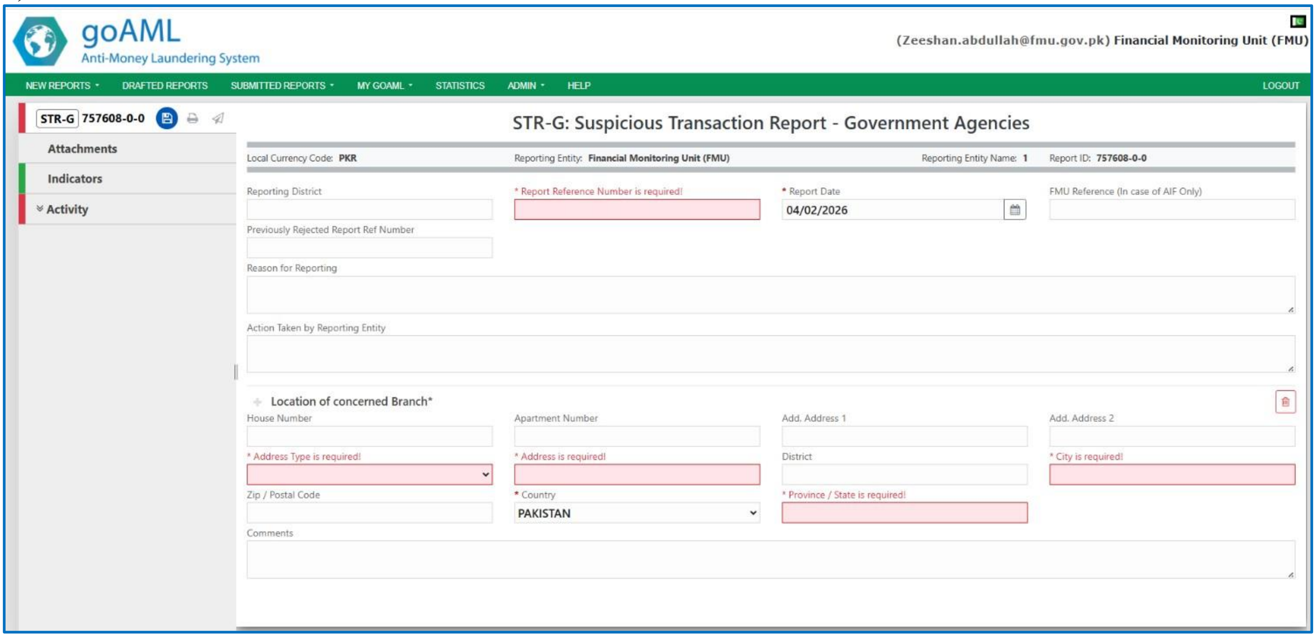


Figure 6

The STR-G Report Cover/Main page is split into two main areas. First, the left <u>Navigation panel</u> that allows the user to jump to different areas of the report i.e. *Attachments, Indicators* or *Activity*. Second, on the right side provides set of fields related to each of these areas of the report.

The *<u>Red</u>* bar besides each of the Navigation Panel areas indicate that the data for that tab is either incomplete or invalid. All the red bars must be green for the report to be submitted.

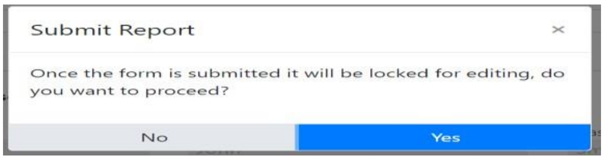
On top left an auto-generated report ID <u>(like STR-G 757608-0-0)</u> tab will appear for the newly generated STRG.

Figure 7

The *<u>Red</u>* bar against the STR-G number again indicates that the data is either incomplete or invalid. <u>This report ID tab in the Navigation Panel</u> is selected by default.

Tabs without a red or green bar *indicate optional fields*. Information should be provided in these fields where available. For example, the Attachments tab in Figure 6 has no color bar, which means attachments may be added, if available.

The actions on the Report Tab on the right side of report ID, include following:

	Undo Delete	This is only shown after a Delete operation (When clicked, the deleted object will be restored).
	Save	Saves the report. This can be done at any time and allows the user to re-open the report for completion.
	Print Preview	This opens the report in a print ready format. If there are changes made in the report form when the report was last saved, the button will be disabled. Once the report is saved it will be enabled again.
	Submit	Once the form is complete and valid, the bars on the left of each tab will appear as green and the submit button will be enabled. Clicking the submit button will show the dialogue box below:  Once the form is submitted it will not be possible to edit or re-submit the report. Selecting 'Yes' will submit the report and return the user to the report type selection screen. The report will now be available in Submitted Reports grid.

4.2.2 **STR-G Cover Page-Contents:**

Following is the the STR-G cover page (Figure 8).

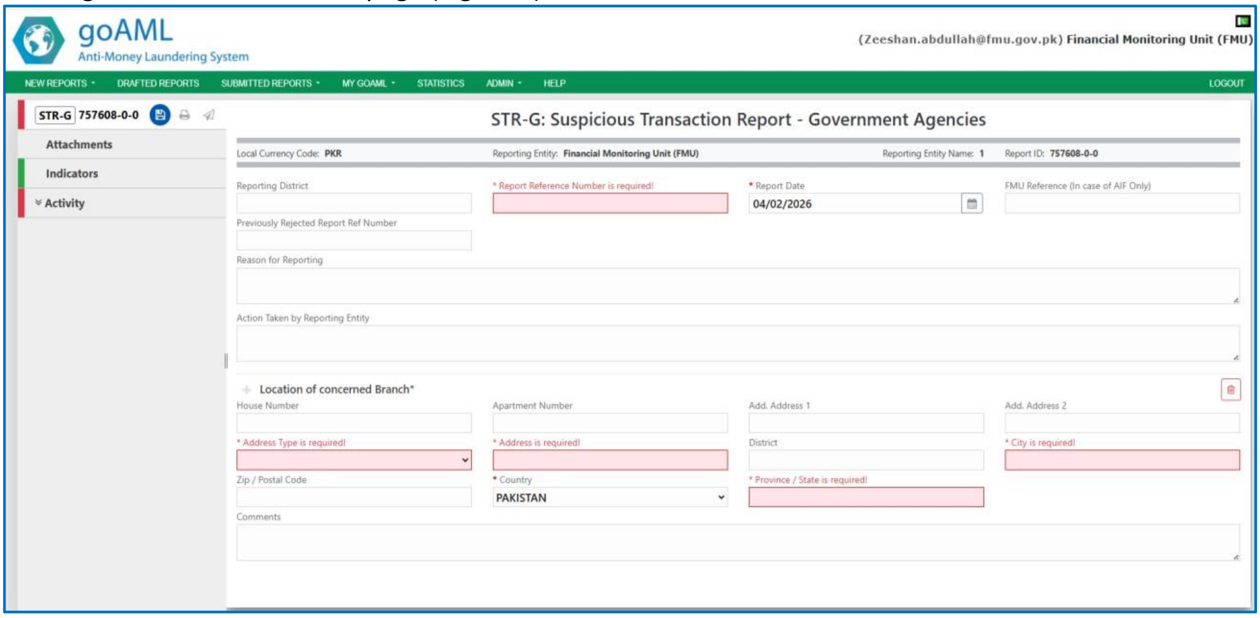


Figure 8

The details of each field in STR-G report cover are provided below:

- Reporting District: The reporting district is the district where the major suspicious activity/transactions(s) occurred. A list of districts is available on the FMU's website and the selection of district is required to be made from the list. Please ensure no spaces are provided in the District field.
- Report Reference Number: It refers to the reference number of the reporting agency/ organization within their organization for report identification. *Please note that this is not an auto-generated reference and is as per the internal records of the Investigating and prosecuting agency/Government organization.*
- Report date: Report date is the date of the STR submission, which will be automatically selected by goAML.
- Previously Rejected Report Reference Number: If a new STR is being submitted owing to the rejection of the same previously, the previously rejected report reference number may be provided reporting government agency.
- Reason for Reporting: Reason for reporting involves the analysis of the suspicious transactions or activity of the individual/entity to be reported which is linked with Money Laundering, Terrorism financing, and other predicate offences (see Figure 9 below).

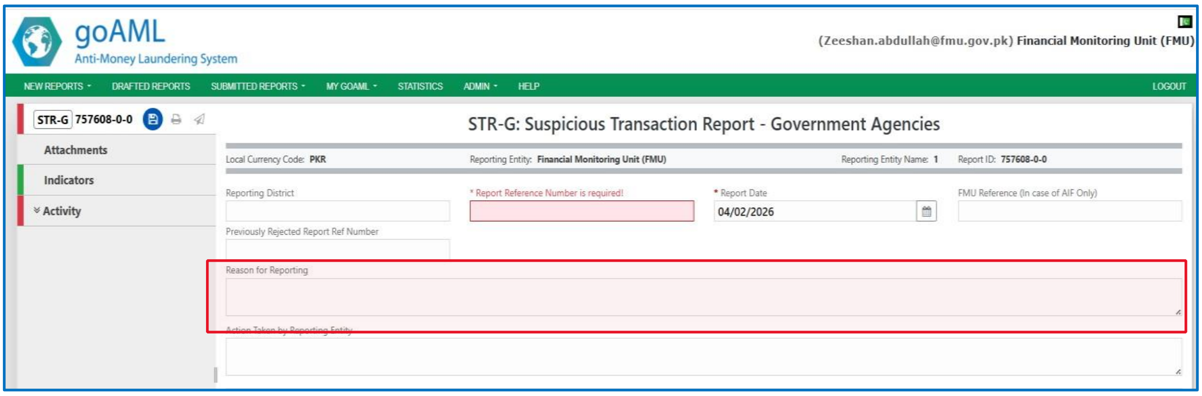


Figure 9

STR-G require the following minimum information to establish the reason for suspicion:

1. Reason for Suspicion; Reporting Government Agency, while reporting STR-G, should at least narrate the reason for suspicion in goAML in a manner such as:
   a. Background of the case;
      i. regulatory enforcement
      ii. intelligence gathering and/or
      iii. criminal investigation
   b. Clear and concise narration of the underlying reason covering **Who** is involved (Suspect name, Profession, Residential City name, etc.), **What** is the suspected criminal activity and underlying predicate offense (Corruption, Terrorism, Drugs trafficking, Human smuggling, Smuggling, Tax evasion, Fraud, Cyber Crimes etc.), **When** the relevant events or suspected crime occurred, **Why** does the agency, autonomous body or authority suspect ML, TF or PF; and **How** was the suspected activity conducted i.e. through financial/ non-financial sector, illegal Hawala/ Hundi etc. and cross border movement of illegal proceeds if any.

c. Character Limit — The word limit to report Reason of reporting is 4000 characters. However, additional information can be annexed.

- *Action Taken*: If any action has been taken against the individual/entity, the LEA or any other reporting government agency needs to add the same in the field "*Action Taken by Reporting entity*" (Figure 10):

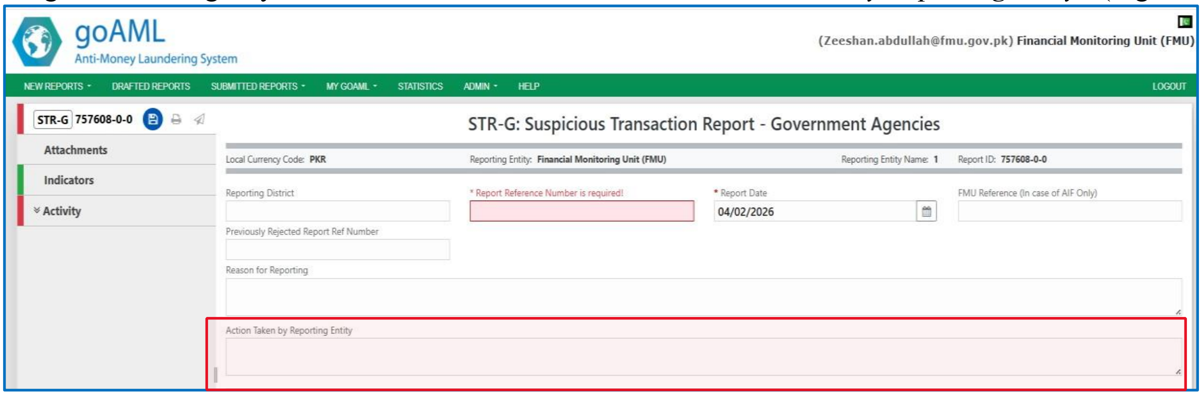


Figure 10

The "Action Taken" field records any enforcement or administrative measures already initiated by the reporting agency or other competent authority (e.g., search, seizure, arrest, freezing of assets). It provides critical context for analysts while developing Financial Intelligence. Moreover, required set of actions from FMU for support in the case under consideration can be stated in this field, if any.

4.3 Attachments

4.3.1 Attachment Tab

Selecting the Attachments tab will allow the goAML user to upload the documents with the report. The uploaded document shall also be shown in this attachment tab (Figure 11).

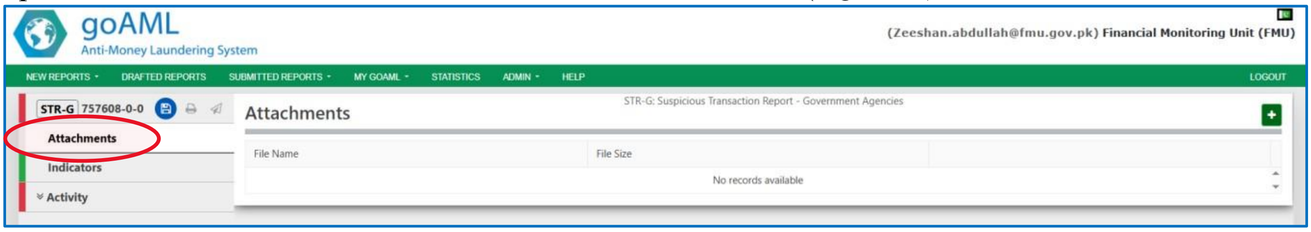


Figure 11

All the documents related to the STR-G should be attached in the <u>'Attachments'</u> tab on the left banner. The attachments should include relevant documents, as well as the documents related to the account, person and entity. Some references are given below:

- FIR copy / Inquiry/Investigation Report
- Court Orders
- Challans/References filed in Court
- Intelligence source report

- Threat Report
- Seizure Memos
- Inquiry authorization
- Financial Records (Account Opening Forms, Statement of Accounts etc.)
- Identity documents (CNIC, Passport, Incorporation documents, NTN etc.)

The attachments can be added by clicking the green button containing the plus sign (+).

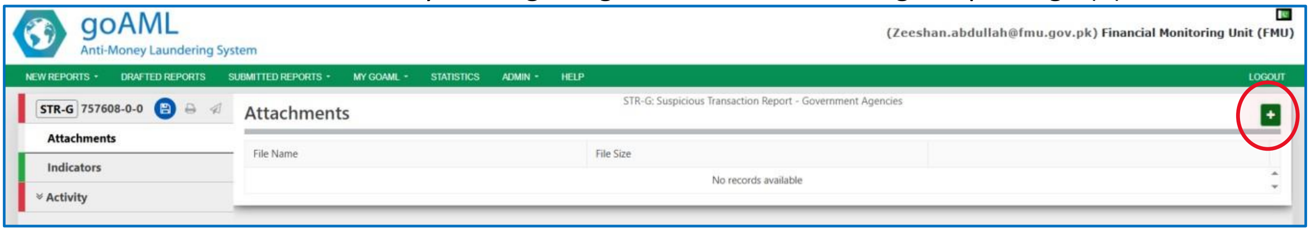


Figure 12

After pressing the button, a pop-up will appear for uploading the file as shown below:

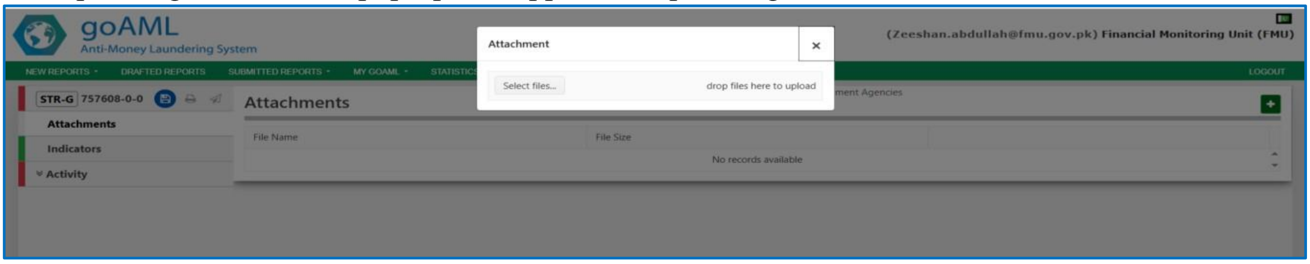


Figure 13

Click Select files or Drag and Drop the files to upload:

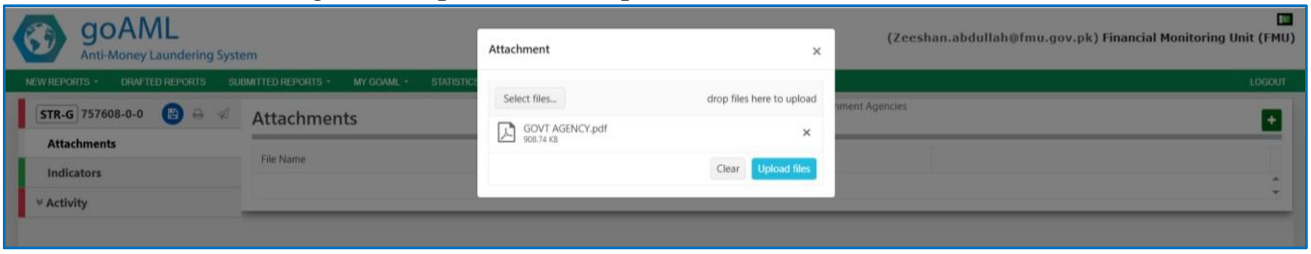


Figure 84

Multiple attachments can be added in the same manner and multiple selections of attachments at the same time is possible.
The total number of attachments uploaded will be shown in a badge next to the Attachments header (Figure-15).

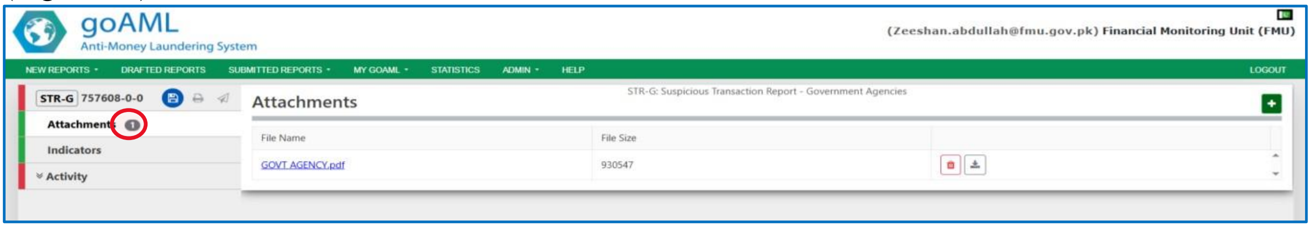


Figure 15

4.3.2 Attachments Form

To see the attachments uploaded, click the attachment tab; the attachments form will appear and displays a list of the attachments that have been uploaded for the report (Figure-16). To delete any of the attachment, click the red highlighted bin button ( ).

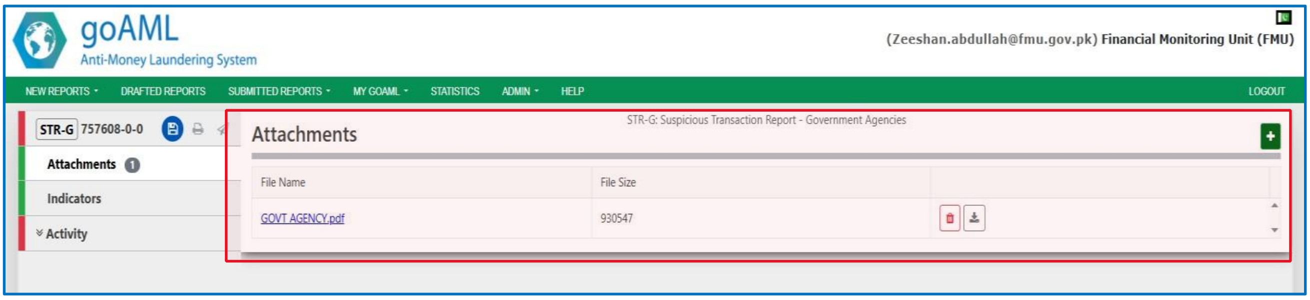


Figure 16

4.4 Indicators

4.4.1 Indicators Tab

Clicking the Indicators tab from the left bar will show the list of indicators for possible offense/suspicion/issue related to the STR-G being filed. The reporting agencies are required to select the most relevant indicators to support reason for suspicion. Unnecessary / wrong selection of report indicators may result in rejection/ nonacceptance of the report. (Figure-17).

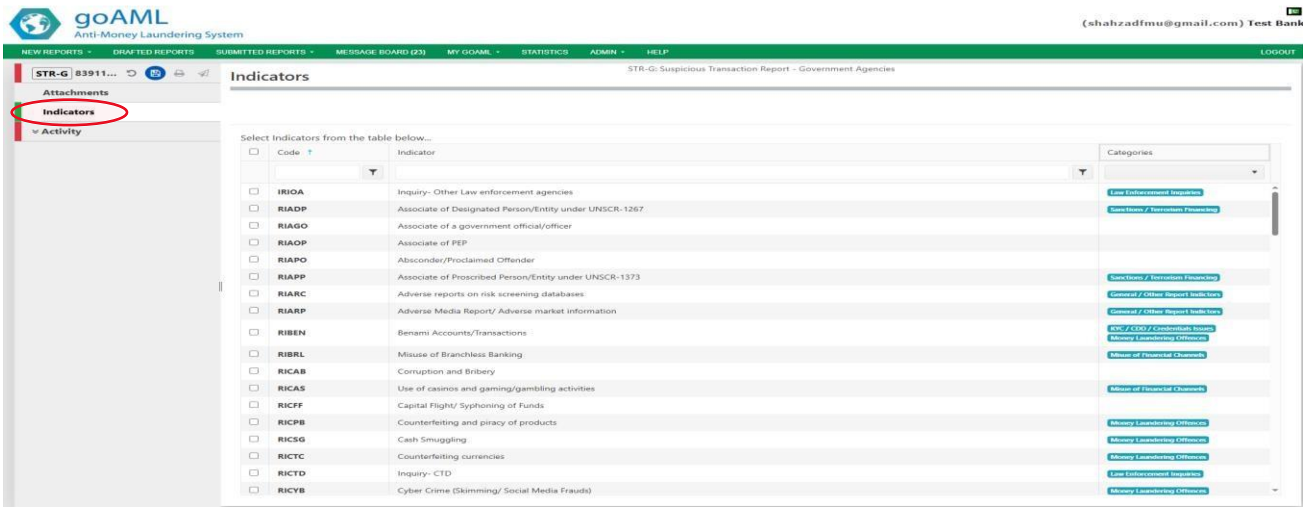


Figure 17

The total number of indicators that have been selected for the report is shown on a badge next to the indicato’s header(Figure18).

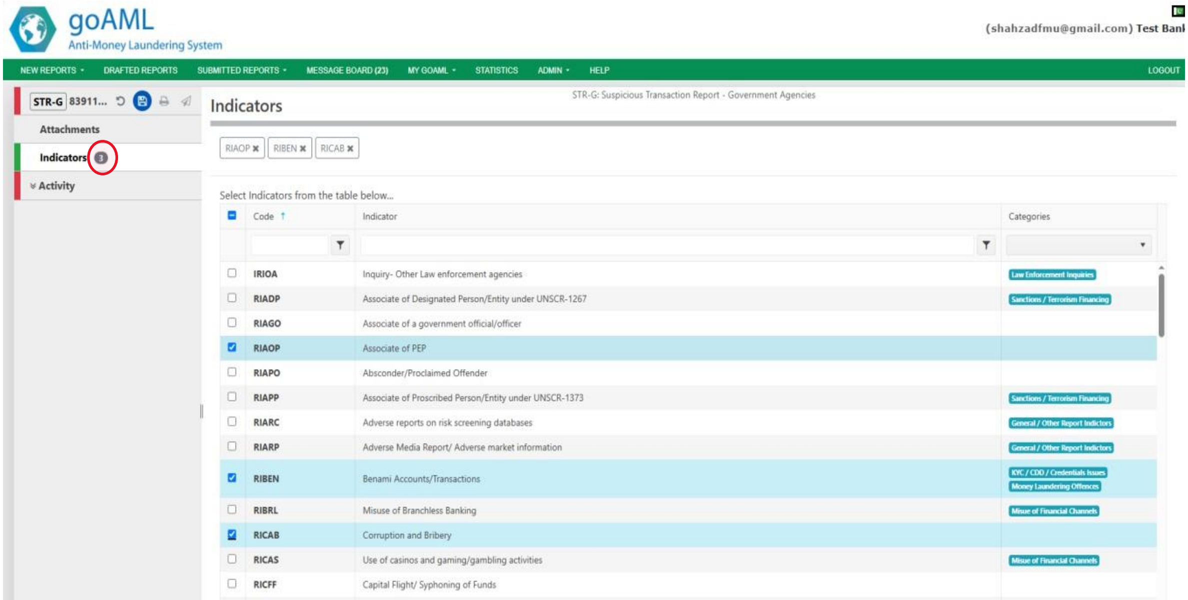


Figure18

4.4.2 **Particulars of Indicators List**

The indicators tab consists of three main columns.

1. *Code*: The first column contains the code of the indicators, which can be filtered out using box below the code column heading.
2. *Indicator*: The name of the indicator is provided, and it can also be filtered out by typing the specific red flag or indicator name.
3. *Categories*: Categories column has a drop-down menu to filter the indicators based on categories including:
   - Law Enforcement Inquiries
   - Virtual Asset Report Indicators
   - Sanctions / Terrorism Financing
   - General / Other Report Indicators
   - KYC / CDD / Credentials Issues
   - Money Laundering Offences
   - Misuse of Financial Channels
   - Proliferation Financing
   - TBML – Techniques Indicators
   - TBML – Documentary Discrepancies Indicators

4.5 Activity

Activity tab on the left side will display the sections related to Account, Person, and Entity. Reporting Agency must enter the relevant information in these sections while filing an STR-G(Figure-19).

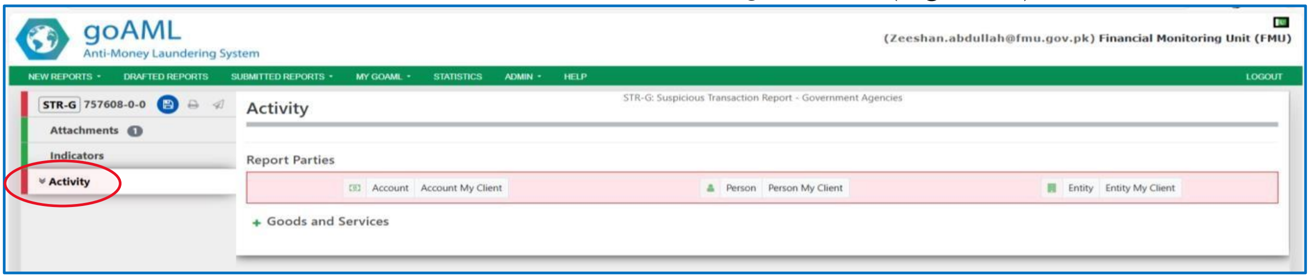


Figure 19

4.5.1 Report Parties

Report Parties refer to the suspected Accounts, Persons or Entities and related parties against whom the STR-G is filed.

This section includes the following:

1. *Person*: Enter the details of the person(s) involved in the suspicious activity.
2. *Entity: Enter the details of any company, organization, or business involved in the suspicious activity, if applicable.*
3. *Account: Enter the details if any suspected account identified or found by the Reporting Government Agency.*

4.5.2 Person

This section is used to record complete information about the person involved in suspicious activity.

Reporting Government Agency must fill in this section when a person has been identified or traced during their inquiry/ investigation. Click the button to add the person and fill out the respective information if in knowledge of Reporting Government Agency like; marital status, date of birth, nationality, CNIC No., address, email, phone number, identification number, employment history etc. as shown below (Figures 20 and 21). The Reporting Government Agency can add multiple persons by clicking the said button.

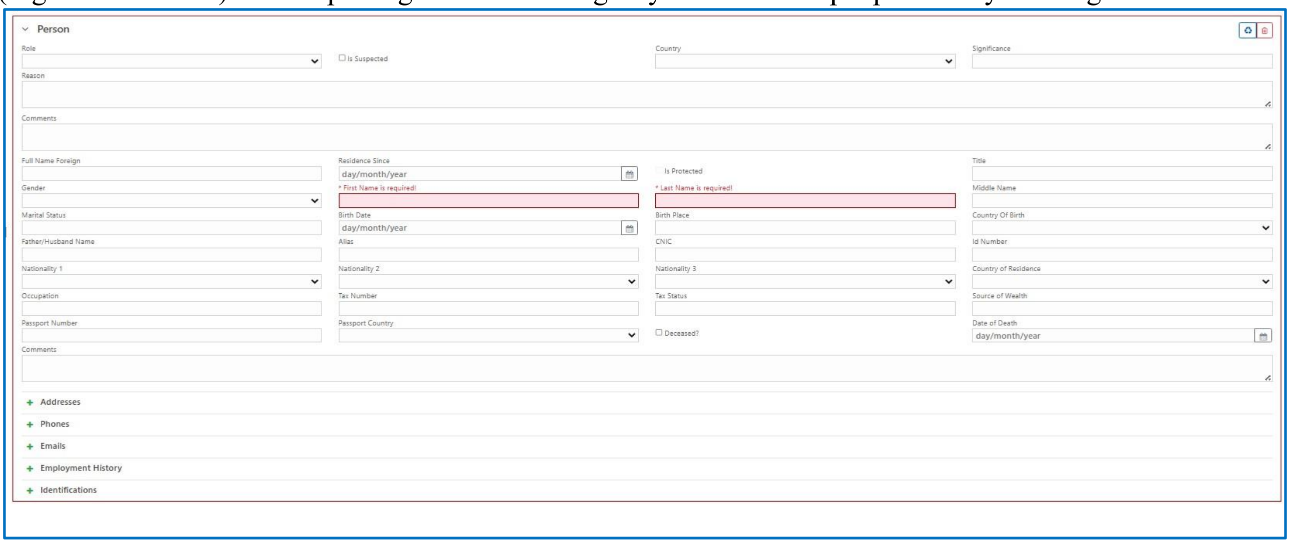


Figure 20

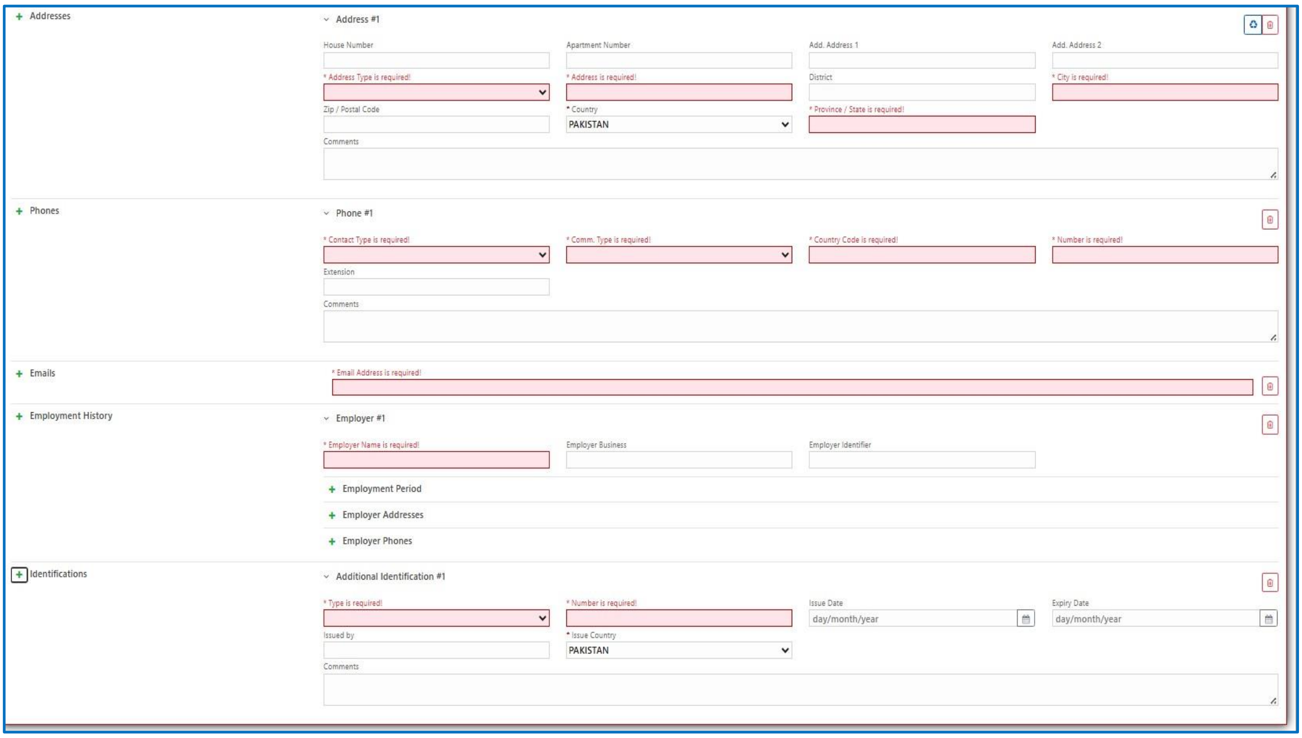


Figure 21

4.5.3 **Entity**

This section is used to record complete information about the Entity involved in suspicious activity. Reporting Government Agency must fill in this section when an entity has been identified or traced during investigation. Click the

button to add the entity and fill out the respective information if in knowledge of Reporting Government Agency like; Entity type, nature of business, registration number & date, emails, URLs, addresses, phones, names of directors etc.as shown below (Figures 22, 23, 24, 25 and 26). The Reporting Government Agency can add multiple entities by clicking the said button.

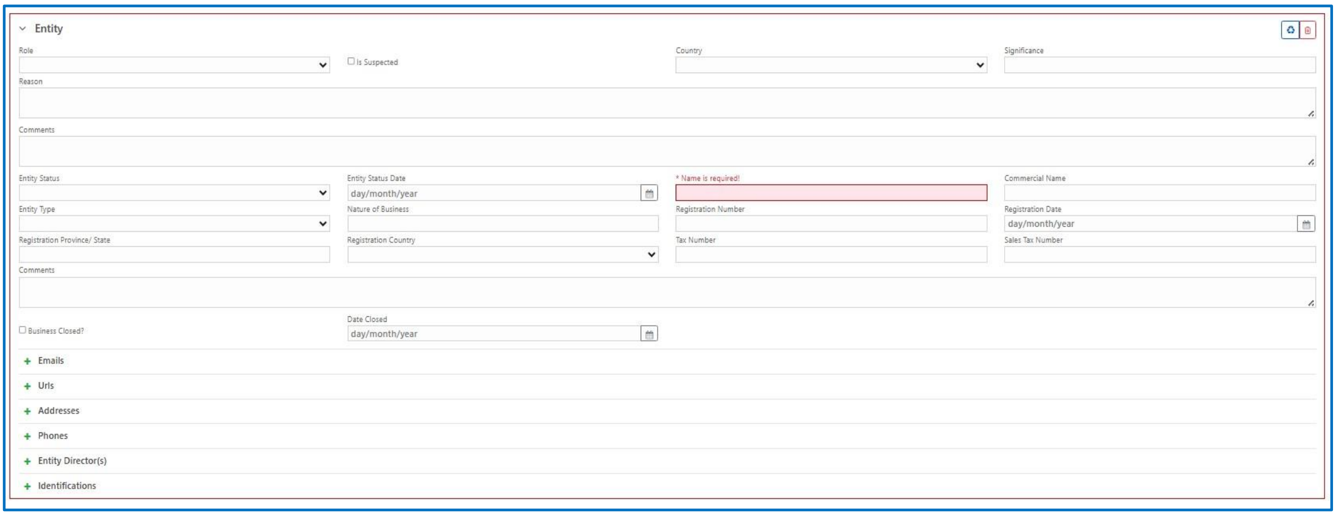


Figure 22

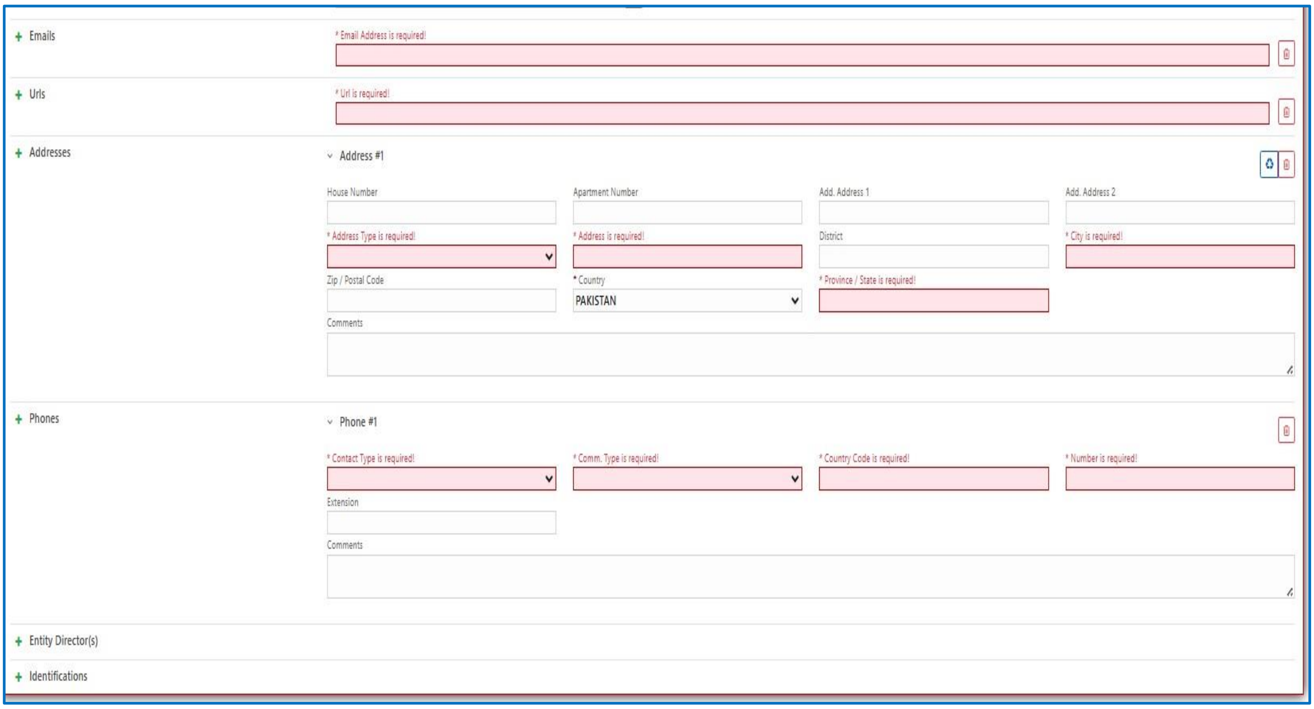


Figure 23

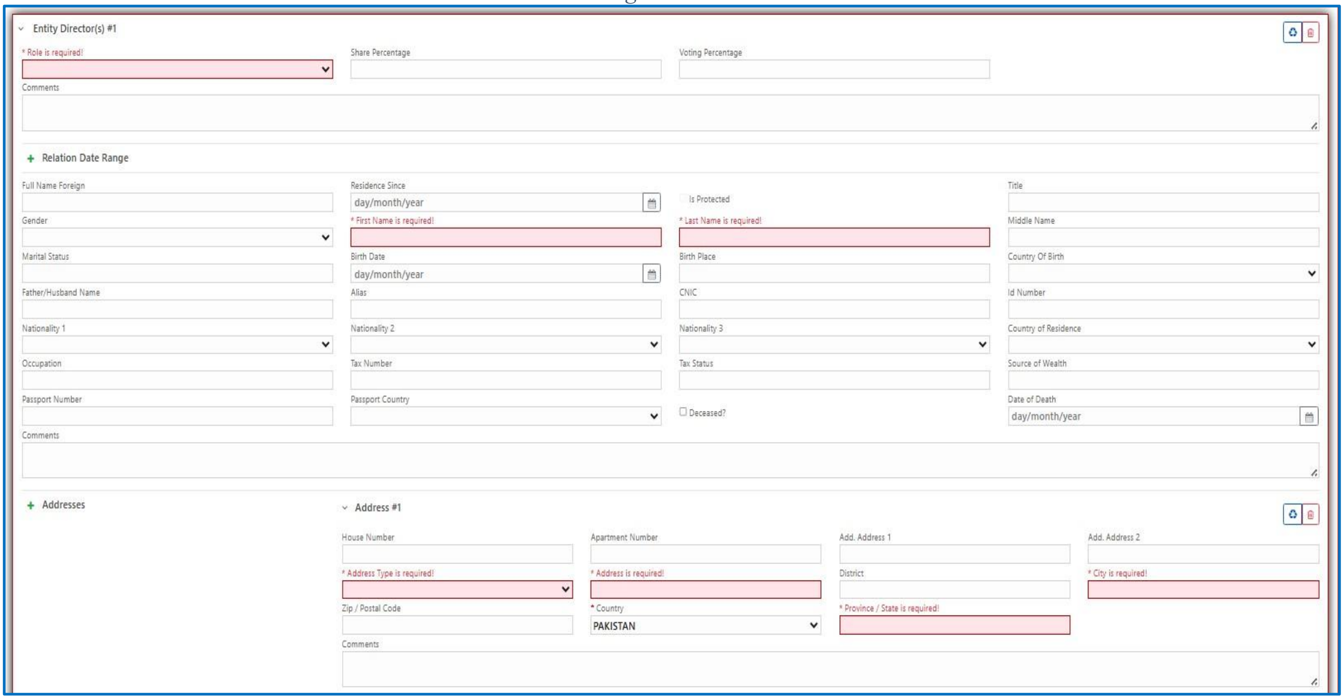


Figure 24

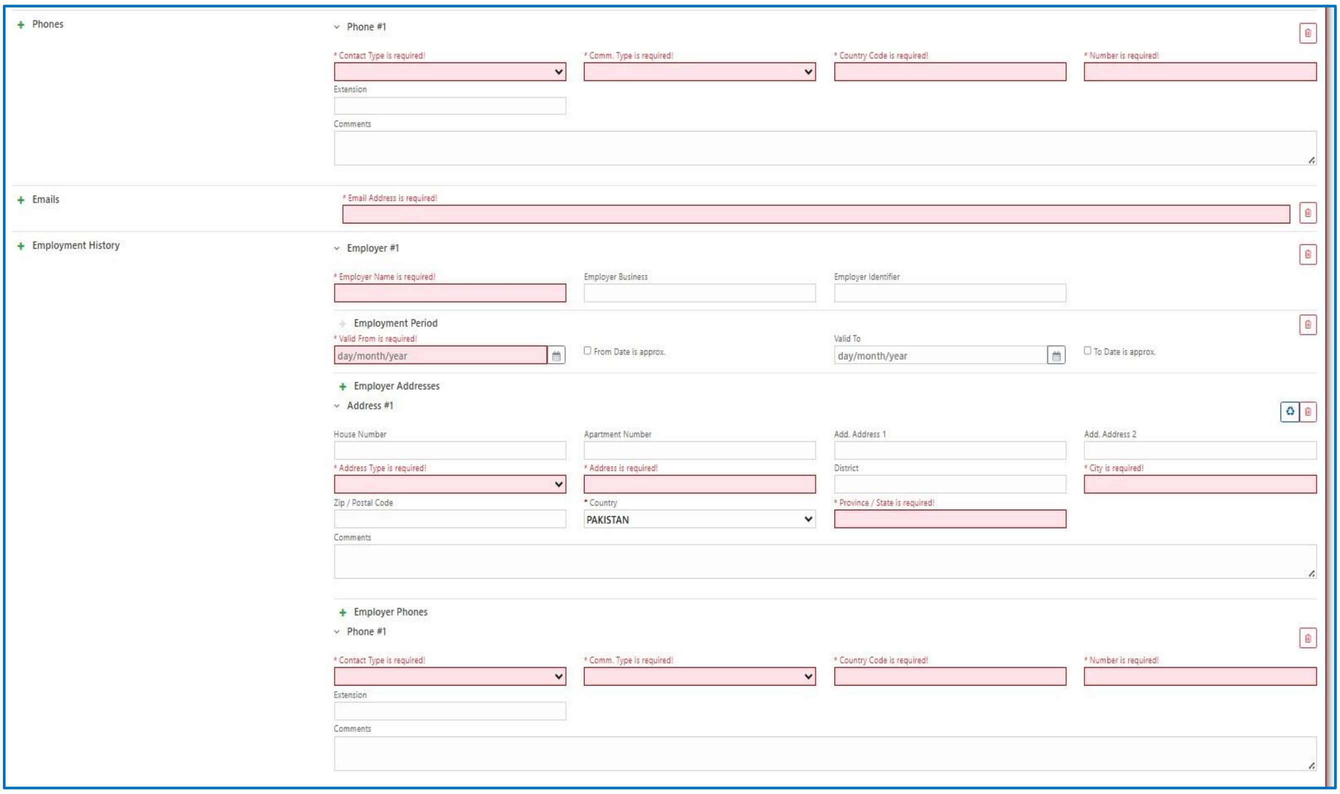


Figure 25

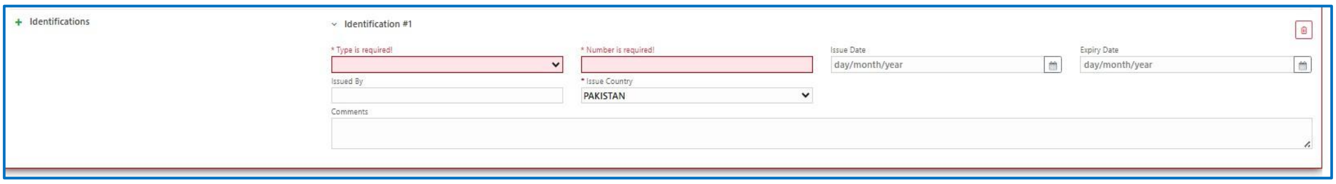


Figure 26

4.5.4 <u>Account</u>

This section is used to record complete information about the account involved in suspicious activity. Reporting Government Agency must fill in this section when it has knowledge of any suspected account that has been identified or traced during inquiry/investigation. The Reporting Government Agency can add multiple accounts in a STR-G by clicking button (Figures 27, 28, 29, 30, 31, 32 and 33).

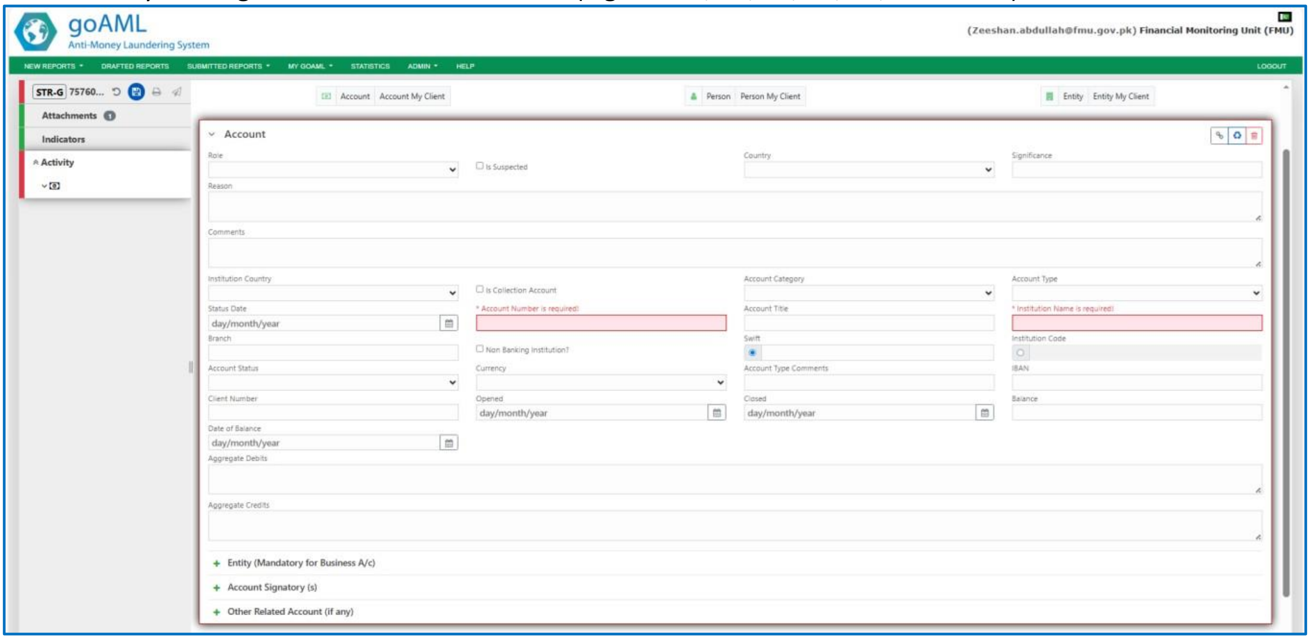


Figure 27

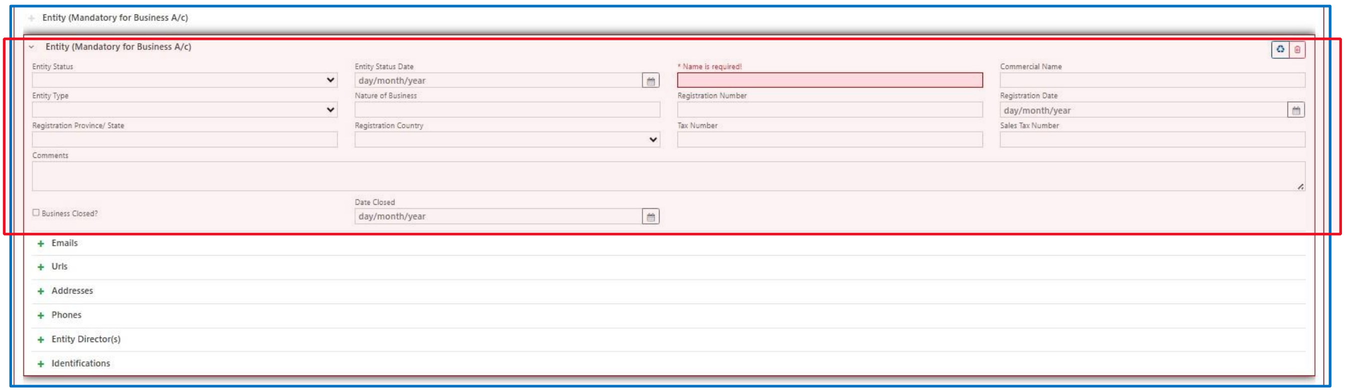


Figure 28

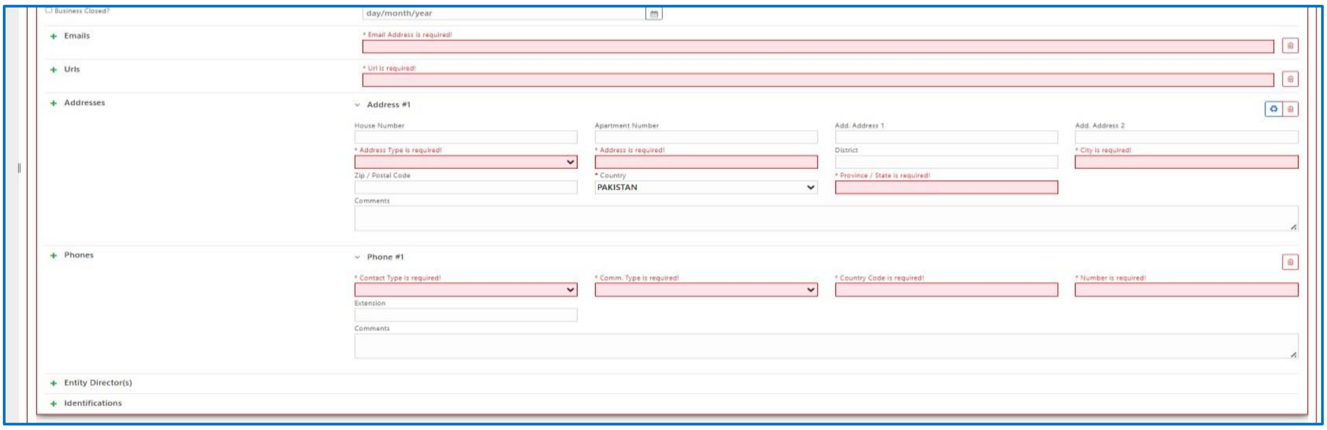


Figure 29

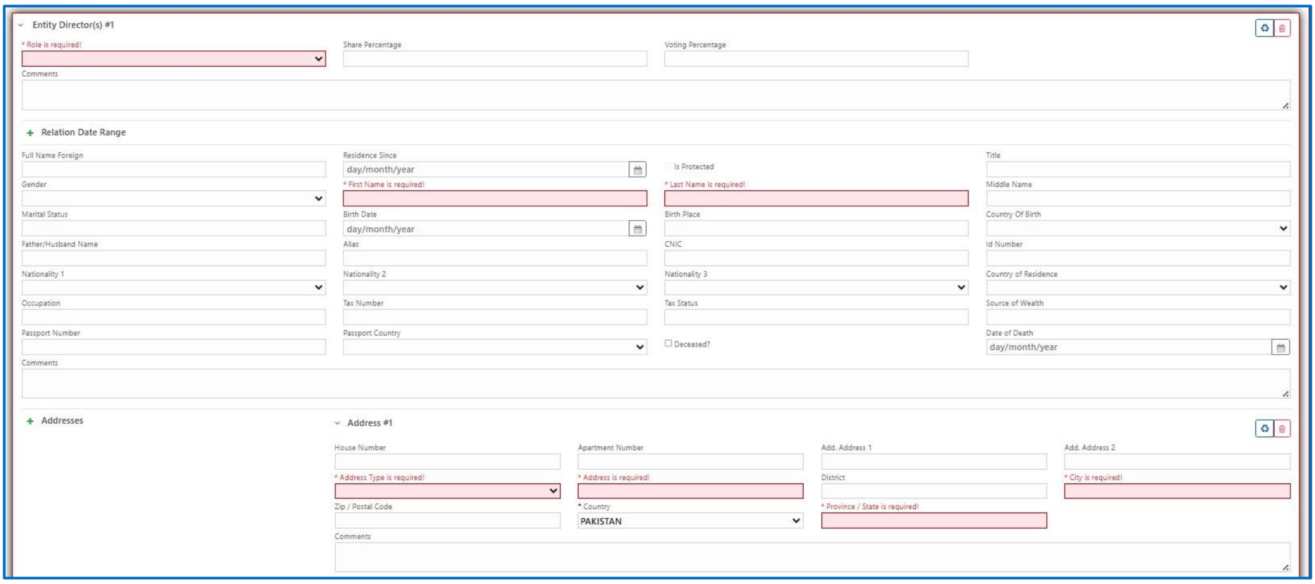


Figure 30

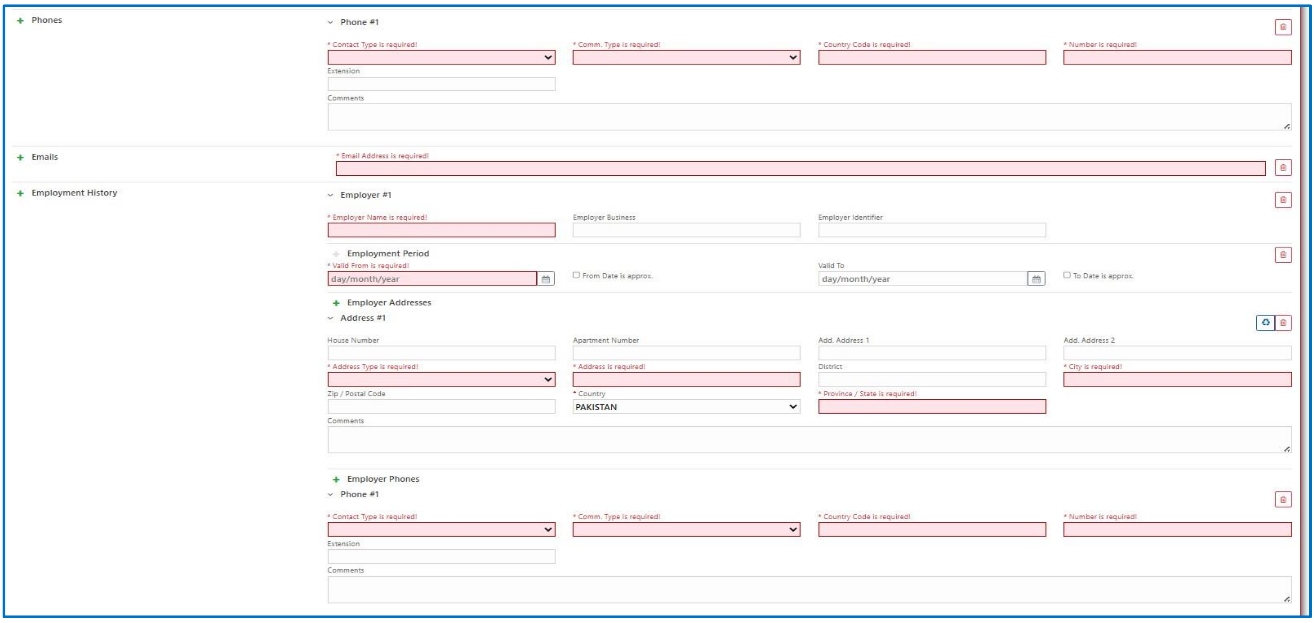


Figure 31

Figure 32

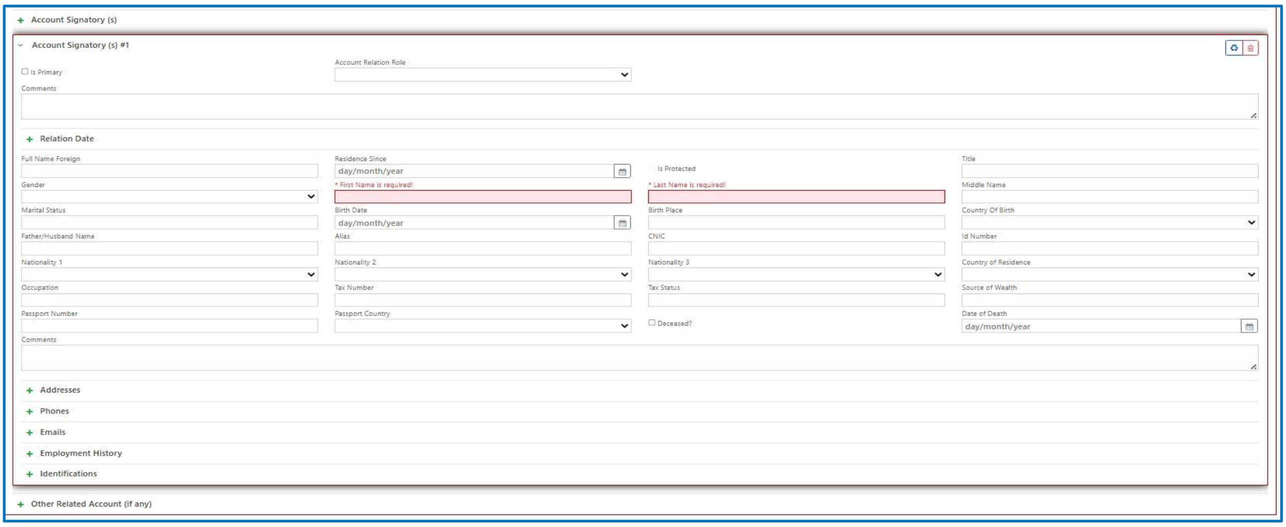


Figure 33

The details of each field are provided below:

- *Role:*
  Select the role of the account in the suspicious activity (e.g., main account, beneficiary, intermediary).
- *Is Suspected:*
  Tick this box if the account is directly involved in the suspicious transaction.
- *Country / Institution Country*
  Select the country where the financial institution is located.
- *Significance*
  Briefly explain why this account is important to the case.
- *Reason*
  Clearly mention the reason for reporting this account (nature of suspicion).
- *Comments*
  Provide any additional information relevant to the account.
- *Account Number (Mandatory)*
  Enter the complete and correct account number.
- *Account Title*
  Enter the name of the account holder.
- *Account Category*
  Select the category (e.g. personal, business, government).
- *Account Type*
  Select the type (e.g., current, saving, foreign currency).
- *Institution Name (Mandatory)*
  Enter the name of the bank or financial institution. While entering Institution Name, suggestions also would be available and it is recommended that the Institution Name may be selected from suggestions for auto population of data in Institution Code / SWIFT / IBAN field.
- *Institution Code / SWIFT / IBAN* Provide these details if available.
- *Branch*
  Enter the branch name or code.
- *Account Status*

Select whether the account is active, dormant or closed.

- *Status Date*
  Enter the date of current account status.
- *Client Number*
  Enter the customer reference number (if available).
- *Currency*
  Select the operating currency of the account.
- *Opened / Closed Date*
  Enter the account opening and closing dates, if known.
- *Balance / Date of Balance*
  Provide the available balance and its date.
- *Aggregate Debits*
  Enter the total amount of outgoing transactions during the relevant period.
- *Aggregate Credits*
  Enter the total amount of incoming transactions during the relevant period.

4.6 REPORT SUBMISSION

Once the report is completed all the bars besides Tabs will appear green as illustrated below:

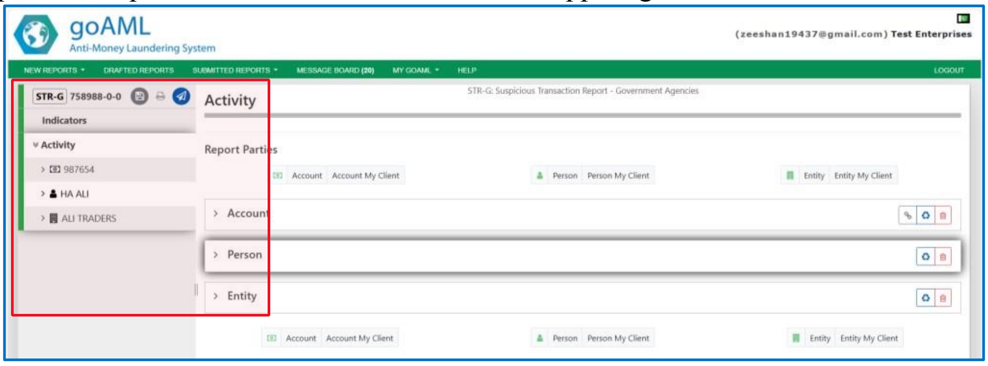


Figure 34

i. Preview Option: After clicking the submit option the report can be previewed by using the following icon as given below:

Figure 35

The preview screen will appear, as shown below. The report, if saved, will remain available in DRAFTED REPORTS <u>for 10 days</u> for submission and will be automatically cleaned up after that period.

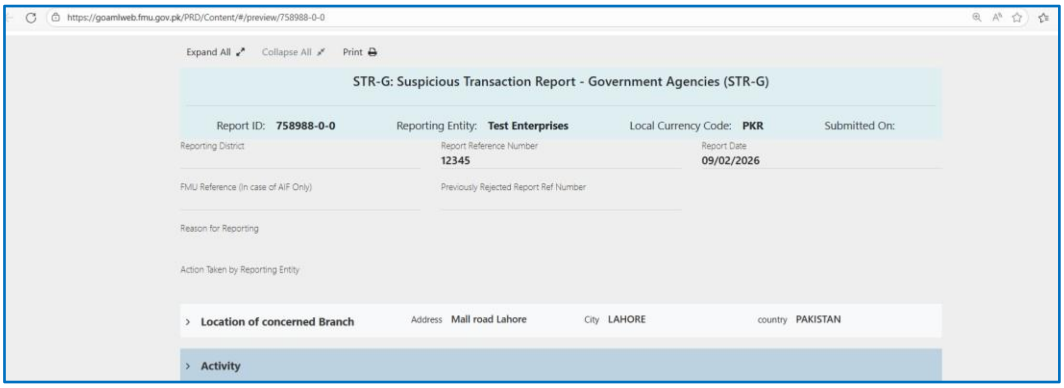


Figure 36

ii. Submit Report: After previewing the report, Reporting Agency can submit the report using the following icon as pasted below:

Figure 37

After submission of the report, Reporting Agency will have to wait for submission or otherwise of STRG from goAML. Submitted reports can be viewed from variable 'submitted reports -> web reports. Status of either accepted or non-acceptance can be viewed in the list.

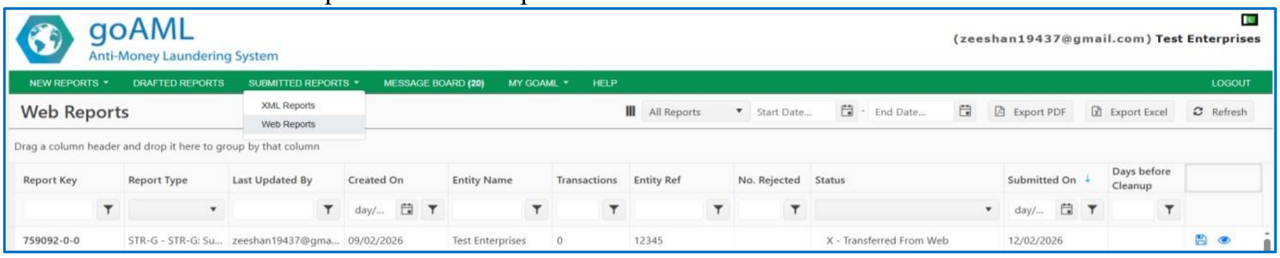


Figure 38

iii. Status of the Report- Message Board Notification: Moreover, Reporting Agency will be notified through message board as shown in screen below about acceptance or rejection of report.

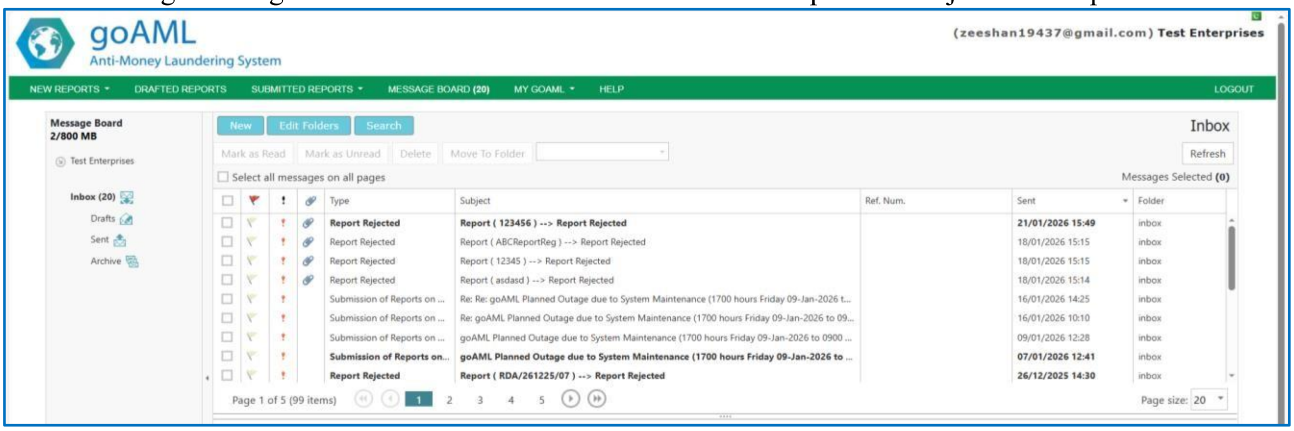


Figure 39

iv. Rejection and Resubmission of STR-G: The reporting organization may keep track on the Status of the submitted reports by accessing Web Reports from Submitted Reports.

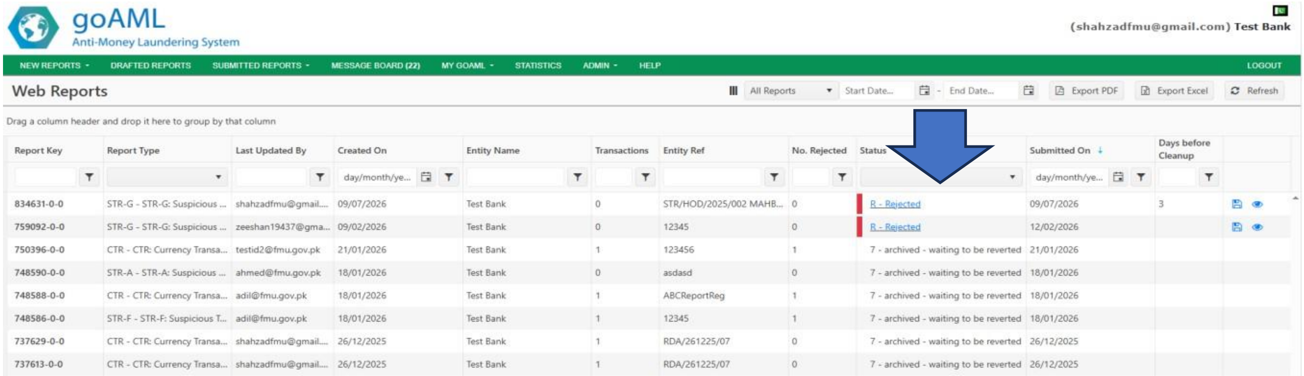


Figure 40

If a report is rejected for any reason, the reporting organization is required to submit the same report after facilitating necessary amendments. To review the rejection reason, the reporting organization can refer to the acknowledgement of that report or click the R - Rejected hyperlink of that report. Please click the Revert button after reviewing the rejection reason.

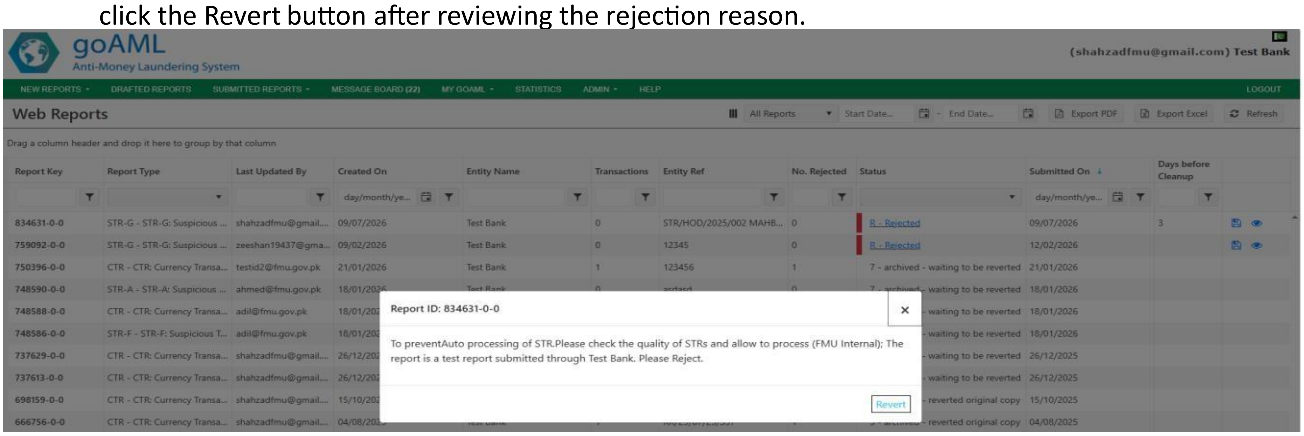


Figure 41

The report will then be available in the DRAFTED REPORTS. Please click on the DRAFTED REPORTS tab and click Edit ( ) button of the report to be amended. The report will then be available for any amendments/additions and after updating the report the reporting organization may click the Submit Report ( ) button for resubmission of the report.

v. Record Keeping: The reporting organization is required to keep electronic records of submitted reports and their acknowledgements. The reporting organization may access Web Reports from the SUBMITTED REPORTS tab and then click the preview ( ) button and then click Expand All. To save the preview of the report, click on Print button and click Save button after changing Printer as Save as PDF. Finally, name the file with the Report ID or name of main party of the report and click Save. To save acknowledgements, please access click on MESSAGE BOARD tab and save the acknowledgement of the report by clicking the PDF document attached in the related message in Inbox. Please ensure to download the PDF preview and acknowledgement within 10 days after the report is processed as afterwards the reports and acknowledgements would not be accessible on goAML web.

5. FMU Contact Points for STR-G Reporting Queries:

In case of any goAML related conceptual and compliance queries please do not hesitate to email us at: goamlhelpdesk@fmu.gov.pk. Or contact at +92-21-99095023 or +92-21-99095036