

SUSPICIOUS TRANSACTION REPORT (STR) FOR AN INTERMEDIARY

Kindly fill in CAPITAL. Read the instructions before filling the form.

PART 1 DETAILS OF REPORT

- 1.1 Date of sending report 2 | 0 | 0
D D M M Y Y Y Y
- 1.2 Is this a replacement to an earlier report ? NO YES (Tick ✓ as applicable)
- 1.3 Date of sending original report if this is a replacement report 2 | 0 | 0
D D M M Y Y Y Y

PART 2 DETAILS OF PRINCIPAL OFFICER

- 2.1 Name of intermediary
- 2.2 SEBI registration number
- 2.3 ID allotted by FIU-IND
- 2.4 Category of intermediary (Refer instructions)
- 2.5 Name of principal officer
- 2.6 Designation
- 2.7 Address (No., Building)
- 2.8 Street/Road
- 2.9 Locality
- 2.10 City/Town, District
- 2.11 State, Country
- 2.12 Pin code
- 2.13 Tel (with STD code)
- 2.15 E-mail

PART 3 DETAILS OF REPORTING BRANCH / FRANCHISEE ETC.

- 3.1 Name of Branch/Franchisee etc.
- 3.2 Code (if allotted)
- 3.4 Address (No., Building)
- 3.5 Street/Road
- 3.6 Locality
- 3.7 City/Town, District
- 3.8 State, Country
- 3.9 Pin code
- 3.10 Tel (with STD code)
- 3.11 Fax
- 3.12 E-mail

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SIN01

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PART 4 LIST OF INDIVIDUALS LINKED TO TRANSACTIONS		
	Name of individual	Code/ID (if allotted) Annexure
4.1		
4.2		
4.3		
4.4		
4.5		
4.6		
4.7		
4.8		
4.9		
4.10		
4.11		
4.12		
4.13		
4.14		
4.15		
<i>(Details of individuals should be furnished in prescribed annexure)</i>		Tick <input type="checkbox"/> to confirm
Number of additional sheets for PART 4 attached <i>(Leave blank if space provided above is sufficient and no extra sheet is attached)</i>		
PART 5 LIST OF LEGAL PERSONS/ENTITIES LINKED TO TRANSACTIONS		
	Name of legal person/entity	Code/ID (if allotted) Annexure
5.1		
5.2		
5.3		
5.4		
5.5		
5.6		
5.7		
5.8		
5.9		
5.10		
<i>(Details of all legal persons/entities should be furnished in prescribed annexure)</i>		Tick <input type="checkbox"/> to confirm
Number of additional sheets for PART 5 attached <i>(Leave blank if space provided above is sufficient and no extra sheet is attached)</i>		
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PART 6 LIST OF ACCOUNTS LINKED TO TRANSACTIONS		
Account Number	Name of First Account Holder	Annexure
6.1		
6.2		
6.3		
6.4		
6.5		
6.6		
6.7		
6.8		
6.9		
6.10		
<i>(Details of all accounts should be furnished in prescribed annexure)</i>		Tick <input checked="" type="checkbox"/> to confirm
Number of additional sheets for PART 6 attached <i>(Leave blank if space provided above is sufficient and no extra sheet is attached)</i>		

PART 7 DETAILS OF SUSPICIOUS TRANSACTION		
7.1 Reasons for suspicion <i>(Tick <input checked="" type="checkbox"/> as applicable. Multiple selection is possible. Refer to instructions)</i>		
Identity of client	Suspicious background	Multiple accounts
Activity in account	Nature of transaction	Value of transaction
Other reason (specify)		
7.2 Grounds of Suspicion <i>(Mention summary of suspicion and sequence of events)</i>		
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
<i>(continued on next page)</i>		

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7.3 Grounds of Suspicion (continued from previous page)

- 11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30

Number of additional sheets for PART 7 attached [] (Leave blank if space provided above is sufficient and no extra sheet is attached)

PART 8 DETAILS OF ACTION TAKEN

8.1 Whether the matter is/was under any investigation? (Mention the name of agency, person and contact details)

- 1
2
3
4
5

Number of additional sheets for PART 8 attached [] (Leave blank if space provided above is sufficient and no extra sheet is attached)

DO NOT FILL. FOR FIU-IND USE ONLY
ACK. NO. []
DATE [] 2 | 0 | 0 []
D D M M Y Y Y Y

Signature []

Name []
(Should be same as the person mentioned in PART 2)

SUSPICIOUS TRANSACTION REPORT (STR) FOR AN INTERMEDIARY INSTRUCTIONS

GENERAL INSTRUCTIONS

The Prevention of Money Laundering Act 2002

Under the Prevention of Money Laundering Act 2002, every intermediary shall furnish details of suspicious transactions whether or not made in cash.

Suspicious transaction means a transaction whether or not made in cash which, to a person acting in good faith –

- (a) gives rise to a reasonable ground of suspicion that it may involve the proceeds of crime; or
- (b) appears to be made in circumstances of unusual or unjustified complexity; or
- (c) appears to have no economic rationale or bonafide purpose.

How to submit

The principal officer of the intermediary designated under PMLA, 2002 must submit this form by post to the Director (FIU-IND). In urgent cases, the form should also be sent by fax.

By Post Director (FIU-IND)
 Financial Intelligence Unit-India
 6th Floor, Hotel Samrat
 Chanakyapuri, New Delhi -110021
 India

By Fax +91-11-26874459

EXPLANATION OF SPECIFIC TERMS

PART 1: DETAILS OF REPORT

- 1.1. Date of sending report is the date on which the principal officer sends the report to Director (FIU-IND).
- 1.2. Replacement report is a report submitted in replacement of an earlier STR. When a replacement report is submitted, date of submitting original STR may be mentioned and the complete STR has to be submitted again.

PART 2: DETAILS OF PRINCIPAL OFFICER

2.3. ID allotted by FIU-IND may be left blank till the same is communicated by FIU-IND.

2.4. Category of the intermediary

- | | |
|-----------------------------|--------------------------------------|
| "A"- Stock brokers | "J"- Investment advisers |
| "B"- Sub-brokers | "K"- Depositories |
| "C"- Share transfer agents | "L"- Depository Participants |
| "D"- Bankers to an issue | "M"- Custodian of securities |
| "E"- Trustees to trust deed | "N"- Foreign institutional investors |
| "F"- Registrars to issue | "O"- Credit rating agencies |
| "G"- Merchant bankers | "P"- Venture capital funds |
| "H"- Underwriters | "Q"- Collective investment schemes |
| "I"- Portfolio Managers | "R"- Mutual Funds |
| | "Z"- Others |

PART 3: DETAILS OF BRANCH / FRANCHISEE ETC.

Particulars of the branch/franchisee in which the reported accounts are maintained should be submitted in this part.

PART 4: LIST OF INDIVIDUALS LINKED TO TRANSACTIONS

Client code/number may be given if allotted by the intermediary. Enclose a separate Annexure A for each individual.

PART 5: LIST OF LEGAL PERSONS/ENTITIES LINKED TO TRANSACTIONS

Enclose a separate Annexure B for each legal person/entity. Include the details about individuals (Director/Partner/Member etc.) related to the reported legal person/entity in PART 4.

PART 6: LIST OF ACCOUNTS LINKED TO TRANSACTIONS

Enclose a separate Annexure C for each account.

PART 7: DETAILS OF SUSPICIOUS TRANSACTION

Reason	Examples of suspicious transaction
Identity of Client	False identification documents
	Identification documents which could not be verified within reasonable time
	Non-face to face client
	Doubt over the real beneficiary of the account
Suspicious Background	Accounts opened with names very close to other established business entities
	Suspicious background or links with known criminals
Multiple Accounts	Large number of accounts having a common account holder, introducer or authorized signatory with no rationale
	Unexplained transfers between multiple accounts with no rationale
Activity in Accounts	Unusual activity compared to past transactions
	Use of different accounts by client alternatively
	Sudden activity in dormant accounts
	Activity inconsistent with what would be expected from declared business
Nature of Transactions	Account used for circular trading
	Unusual or unjustified complexity
	No economic rationale or bonafide purpose
	Source of funds are doubtful
	Appears to be case of insider trading
	Investment proceeds transferred to a third party
Value of Transactions	Transactions reflect likely market manipulations
	Suspicious Off market transactions
	Value just under reporting threshold amount in an apparent attempt to avoid reporting
	Large sums being transferred from overseas for making payments
	Inconsistent with the clients apparent financial standing
	Inconsistency in the payment pattern by client
	Block deal which is not at market price or prices appear to be artificially inflated/deflated