



Annex 2: Completion of the Suspicious Transaction Report Form

The report consists of seven parts numbered from Part 1 to Part 7. It is important that ***as much information as possible*** be included in the report as this will enable the FIA to carry out meaningful analysis of the reported information and take appropriate action in accordance with the AML Act, 2013. All relevant fields must therefore be completed, where information is available.

Completing Part 1: Report Details

Part 1 of the reporting form captures basic information about the report being submitted. Part 1.1 requires the reporter to provide their own unique internal reference number, if such a number has been allocated to the report, for ease of reference and future correspondence.

Part 1.2 requires the reporter to state previously allocated reference numbers by the FIA (if any) with regards to the specific incident, transaction or report if the reporter wants a previously submitted STR to be associated with the current STR submission.

It is important to fill Part 1.3 (submission date) and to ensure compliance with the stipulated STR submission timelines.

Completing Part 2: Information on Reporting Entity/Person

Part 2 requires particulars from the Accountable Person making the STR. Reporters who are reporting on behalf of an entity must fill in the entity details (Part 2.1 and Part 2.4) as well as the contact details of the Money Laundering Control Officer (Part 2.3).

In Part 2.2, the reporter is required to categorize the Accountable Person according to the classifications listed in the second schedule to the AML Act, 2013.

Completing Part 3: Information on Suspicion

It is mandatory to complete Part 3 of the report as it is one of the most important parts of the form.

Part 3.1 requires the reporter to provide the particulars of the business entity (Part 3.1.1) or natural person (Part 3.1.2) being reported or conducting the transaction.



If the transaction was conducted by a person on behalf of an entity, both Part 3.1.1 and Part 3.1.2 should be filled.

In Part 3.2 and Part 3.3, the reporter is required to state in a comprehensive manner, the basis of the STR. The reporter must provide clearly and completely the events that led to the conclusion that the relevant activity is suspicious or unusual. The reasons for the conclusion being formed and the crime(s) which the reporter suspects have been committed should be stated.

Part 3.4 requires the reporter to provide actions taken internally within the entity with regard to the transaction e.g. referred for internal investigation, disciplinary processes, civil action, etc. It should be stated whether the suspect made any voluntary statements as to the source of the proceeds and the suspect's statement should be attached (if any).

Completing Part 4: Goods and Services

Part 4 of the STR form deals with the particulars of the property involved in the transaction that is being reported to the FIA. If multiple properties are involved in the transaction, details for each property should be provided on a separate page.

Such property can include land, buildings, vehicles, jewellery, trademarks and patents, securities or any other interests. Particulars of the owners of the property before and after the transaction should be clearly stated (if known). The reporter must indicate the shilling value of the property that is involved in the transaction. If it is an estimated value the reporter must indicate same in the field provided. If the property involved in the transaction has been disposed, the manner and amount involved in its disposition must be indicated.

Completing Part 5: Source Account of the Funds

This section seeks to capture information on the account of the entities or persons responsible for payment.

Part 5.1 requires the reporter to indicate how the transaction was conducted, for example cash, Electronic Funds Transfer, cheque, etc.

Part 5.2 deals with particulars of the account involved in the transaction. It also requires the reporter to indicate the information which the client may have provided as to the intended purpose of the transaction, for example that the *"transaction was conducted to purchase land"*.



If the account belongs to a business entity, the reporter must provide particulars of the owner of the account (Part 5.3) and Directors/Owners of Business Entity (Part 5.4)

Part 5.5 requires the reporter to provide details of the signatories to the account(s).

Completing Part 6: Particulars of the Destination of the Funds

This section captures information about the account that receives the money or proceeds/goods.

Part 6.1 requires the reporter to indicate how the transaction was conducted, for example cash, Electronic Funds Transfer, cheque, etc.

Part 6.2 deals with particulars of the account involved in the transaction. It also requires the reporter to indicate the information which the client may have provided as to the intended purpose of the transaction. If the account belongs to a business entity, the reporter must provide particulars of the owner of the account (Part 6.3) and Directors/Owners of Business Entity (Part 6.4)

Part 6.5 requires the reporter to provide details of the signatories to the account(s) (For both personal accounts and business entity accounts).

Completing Part 7: Documents attached to the STR Report

Part 7 requires the reporter to list all available documents that are related to the report and that the reporter used to arrive at the suspicion which is being reported. For example all account opening documentation; information required by the institution as part of its transactional obligations, account statements, and any other applicable documentation.