

Website user guide

Part 4. Reporting

FIU Latvia, rev. 3.0.1

Last change: 01.09.2024.

The document is intended for users of the Latvia's Financial Intelligence Unit's website at https://goaml.fid.gov.lv. This part of the manual describes creation and submission of reports.

Disclaimer: The document provides guidance on how to manually create and submit reports by using online forms and what to take into account when preparing reports in XML format.

Users of the https://goaml.fid.gov.lv website – entities and other persons in accordance with Article 3 and 3.1, respectively, of the Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing ("Law"), as well as the authorities entitled to request information from the Financial Intelligence Unit in accordance with Article 56 of the Law ("reporting entities") – must choose the appropriate type of report by themselves, choose the relevant indicators and fill-in the report form to the extent and quality required.

The document will be modified following the changes in the functionality of the goAML system and in other cases if such a need arises from the point of view of data analysis or legislation.

In case of uncertainties, we invite you to contact the user support info.goAML@fid.gov.lv.

FIU-LV revision	Date	Author	Explanation
1.0.0	01.08.2021	FIU Latvia	The initial version of the document covering interface, functionality and online forms of the reporting application.
1.1.0	18.10.2021	FIU Latvia	 Indicators' group "C" added; Report type list and indicators' group "B" amended.
2.0.0	24.07.2023.	FIU Latvia	 Updated information and visuals on goAML web application user interface in accordance with the newest version 5.2; Updated typology list; Updated CTR indicator list; Removed deprecated information on institutions user selection (Reporting system user 2.3.2.).
3.0.0	01.06.2024	FIU Latvia	Updated information and visuals on goAML web application user interface in accordance with the newest version 5.4.
3.0.1	01.09.2024	FIU Latvia	The list of reports has been supplemented with a new report type - SARN which adapted to the non-financial sector.

Content

1	Intro	oduct	ion	5
2	Subi	missi	on of Web Reports	5
	2.1	Rep	ort Types	. 6
	2.2	Nav	igation, form fields and actions	. 9
	2.2.	1	Report Navigation Panel	. 9
	2.2.	2	Form Fields	11
	2.2.	3	Actions with data objects	12
	2.3	Rep	ort Main Page	14
	2.3.	1	Report Main Page Form	14
	2.4	Atta	chments	15
	2.5	Indi	cators	16
	2.6	Tran	sactions	18
	2.6.	1	Transactions List	18
	2.6.	2	Transaction Form	21
	2.6.	3	How to download and upload transactions	25
	2.7	Acti	vity	27
	2.8	Com	monly Used Web Report Forms	29
	2.8.	1	Account Form	29
	2.8.	2	Natural Person Form	32
	2.8.	3	Entity Form	34
	2.8.	4	Goods and Services Form	36
	2.8.	5	Address Form	37
	2.8.	6	Phone/Contact Form	38
	2.8.	7	Email Form	39
	2.8.	8	Identification Document Form	40
	2.9	Savi	ng Drafts and Submitting Reports	41
3	Subi	missi	on of XML Reports	42
	3.1	XML	Report Validation	42
	3.2	XML	Report Upload	43
	3.2.	1	Upload File Rules	43
	3.2.	2	Report Numbering	44
4	Thin	igs to	Know After Report Submission	44
	4.1	Rep	ort Lists	44
	4.2	Rep	ort Statuses	46

5	Useful	I Information	47
	5.1 R	eport Indicators and Their Meaning	. 47
	5.1.1	Occasions when a threshold declaration (CTR) shall be submitted	. 47
	5.1.2	Crime indicators of suspicious transaction or activity ("A" group)	. 48
	5.1.3	Additional indicators for suspicious transaction or activity (group "B")	. 49
	5.1.4	Information request indicators (group "C")	. 49
	515	Typology indicators for suspicious transaction or activity (group "T")	50

1 Introduction

This guide is intended for users of the https://goaml.fid.gov.lv website ("Website") who, in accordance with the https://goaml.fid.gov.lv website ("Website") who, in accordance with the Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing ("Law"), use this Website in order to report suspicious transactions and activities, submit threshold declarations (collectively referred to as "Reports") to the Financial Intelligence Unit of Latvia ("FIU") or exchange other information with the FIU.

The FIU provides Website users with the following manuals:

- 1. User Registration
- 2. User Account Management
- 3. Transactions in goAML
- 4. Reporting (this document)
- 5. Other Correspondence With the FIU

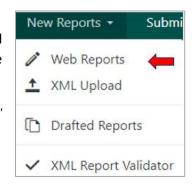
Obliged entities under the Law ("Obliged entity") and other users may submit reports in two ways:

- **Web Report**. Reports may be created manually by filling-out an online form. This is the recommended way of reporting if the number of reports and transactions is small.
- XML Upload. Reports may be created in XML format, e.g., exported from users' business applications, and uploaded on the Website. This is the recommended way of reporting if the number of reports or transactions is large. If the number of reports is relatively small, but they include many transactions, then there is an option for semi-automated reporting. It means that only transaction data are prepared in XML format and then uploaded to manually created reports.

2 Submission of Web Reports

To go to the online reporting form, select "New Reports" and then "Web Reports" from the main menu of the Website while logged in.

Figure 1. New reports in the main menu section: 'WEB reports', 'XML upload' 'Draft Reports' and 'XML Report Validator'.



2.1 Report Types

In order to start drawing up the report, select an appropriate report type.

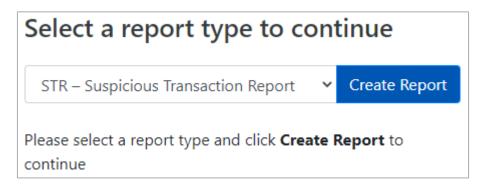


Table 1. Report types.

Report Type	Report Type Description and Use
SAR — Suspicious Activity Report	The report is submitted by Obliged entities and other persons in accordance with Article 31 of the Law. The report contains information on suspicious activity (in cases when there is no information on the date and amount of the transaction) involving at least one report party – individual, account or legal entity. It is mandatory to specify the significance of the party involved.
	The report should contain at least one indicator characterising the alleged criminal offence and at least one typology indicator.
	If the suspicious activity is related to taxation, the indicator "BVID – Information to be provided to the State Revenue Service" has to be provided (only applicable to Obliged entities).
SARN — Suspicious Activity Report (Non-financial sector)	SARN report is a subtype of SAR report described above, so the SAR report type is not available to the legal entity groups that have access to a SARN report.
	The report is submitted by separate groups of subjects of the Law, which represent the Non-financial sector.
	The report has changes to the conditions for filling in fields, adapting them to the Non-financial sector, for example, reducing the values of classifiers, hiding certain fields in the goAML forms, etc.
STR — Suspicious Transaction Report	The report is submitted by Obliged entities and other persons in accordance with Article 31 of the Law. The report contains information on at least one suspicious transaction.
	The report should contain at least one indicator characterising the alleged criminal offence and at least one typology indicator.
	If the suspicious transaction is related to taxation, the indicator "BVID – Information to be provided to the State Revenue Service" has to be provided (only applicable to Obliged entities).

STRA – Suspicious Transaction Report with Refraining	The report is submitted by Obliged entities and contains information on at least one suspicious transaction and/or information on refraining from executing a transaction in accordance with Article 32 of the Law.
	The report should contain at least one indicator characterising the alleged criminal offence and at least one typology indicator.
	If the suspicious transaction is related to taxation, the indicator "BVID – Information to be provided to the State Revenue Service" has to be provided (only applicable to Obliged entities).
CTR — Threshold Declaration	Threshold declaration is submitted by Obliged entities. The report contains at least one transaction.
	An indicator specifying the <u>Occasions when a threshold declaration (CTR)</u> shall be submitted.
	Obliged entities may combine multiple threshold declarations with the same indicator into one report. In these cases, it is convenient to prepare a transaction list in XML format and upload it to a Web report (see. 2.6.3 How to download and upload transactions).
ATL — Additional Transaction List	Additional transaction information shall be provided by Obliged entities in cases when STR or STRA report exceeds the maximum of 1000 transactions per report or transaction information is submitted in addition to an activity report (SAR).
	When submitting an ATL report, the same reporting entity properties and indicators of the related STR/STRA/SAR report must be provided.
DRF — Response File to FIU Request	Obliged entities use this type of report to provide information and documents at their disposal in response to a FIU request.
	The BATB indicator is required. Since this is a transaction report (see STR) which requires at least one transaction, a "DUMMY" type transaction is used.
	For more on how to draw up a response report, see user guide part "Other Correspondence With the FIU".
TAI — Information Request to FIU in criminal or operational proceedings	Law enforcement authorities shall use type TAI report, when submitting a request to the FIU in operational or criminal proceedings according with Article 56 (1) of the Law.
	An information request indicator (except COTH) must be provided.
	This is an activity report (see SAR). It is required to attach a digitally signed request document.

IRD — Request for Other Information to FIU	Law enforcement authorities and other authorities entitled to request information from the FIU in accordance with Article 56 (11), (2)., (3), (6) of the Law shall use type IRD report.
	The information request indicator "COTH" must be provided.
	This is an activity report (see SAR).

2.2 Navigation, form fields and actions

The Web report form is split into two main areas. On the left is the Navigation Panel, on the right – the main web form with fields to fill in.

2.2.1 Report Navigation Panel

The Navigation Panel contains tabs that allow the user to jump to different sections of the report form— the Report Main Page, Attachments, Indicators, Transactions or Activity forms. Each tab has a status bar (green or red) on left. The red bar indicates that the corresponding section is not yet ready for submission— the data for that section is incomplete or invalid.

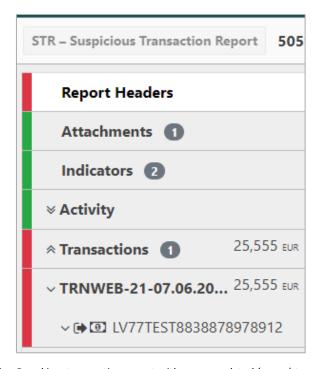


Figure 2. The Navigation Panel in a transaction report with one completed (green) transaction party form. The report is not complete for submission.

2.2.1.1 Report Identifier and Actions



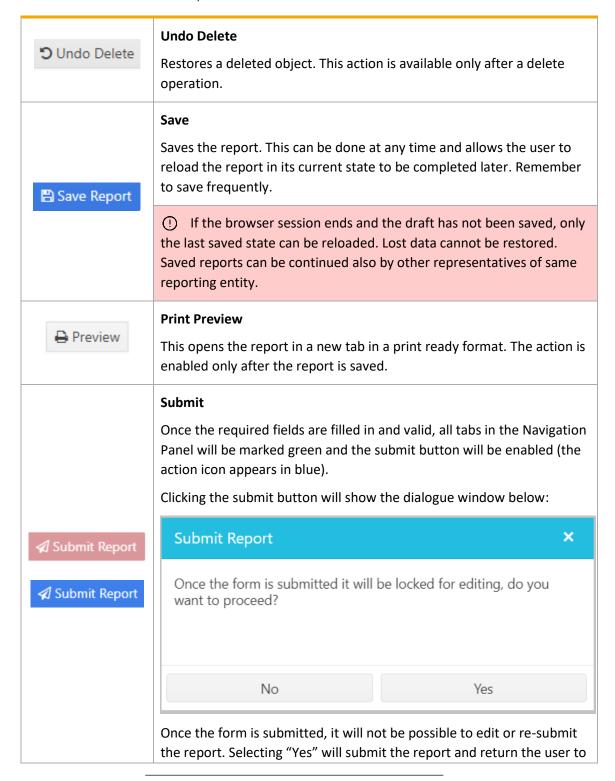
Figure 3. The Report Tab with report identifier and action buttons.

The upper tab of the Navigation Panel is the Report Tab. Initially, this tab is selected by default and opens the Report Main Page. It shows the report type, Report ID and the actions that can be associated with a report. The Report ID consists of the report sequence number, the file

number within a ZIP package (0 for Web reports) and the report version number (the initial version is 0). For example, "3752-0-1" tells that the sequential number is 3752, the file number within a ZIP package is 0 because it is a Web report, the report version number is 1 (it means that the report has been rejected once and reverted for correction).

On the Report tab, to the right of the report identifier (see Figure 3) are buttons with the following actions:

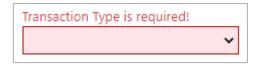
Table 2. Actions associated with a report.



the report type selection screen. The submitted report will now be available in "Submitted Reports" section of the main menu.

2.2.2 Form Fields

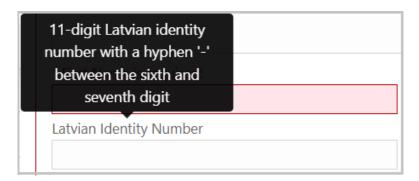
Empty mandatory fields are highlighted red. Validation errors in red letters are shown in place of the field name:



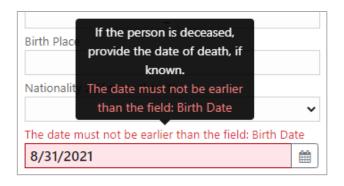
Filled in mandatory fields are marked by a red asterisk next to the field name:



Hovering the mouse pointer over the field name provides a tooltip for the field:



Tooltips also show the complete validation error messages:



Some fields are mandatory and mutually exclusive. By using radio button, select one of them:



Date format depends on what language is selected at the top right of the application (Latvian or English). For convenience, a date picker allows choosing a date from the calendar:



For some fields, there is an option to generate numbers by pressing the gear icon:



2.2.3 Actions with data objects

In the forms, there are clickable icons that perform actions associated with data objects.

Table 3. Actions with data objects.

+	Add Object Adds an object or a sub-form. Once the maximum number of objects have been added the button is greyed out.
Ü	Delete Object/Remove Sub-Form Removes a previously added object or sub-form.
>	Open Dataset The arrow next to the name or icon in this position means that the dataset is collapsed. Press the icon to expand the dataset.
~	Collapse Dataset The arrow next to the name or icon in this position means that the data set is expanded. Press the icon to collapse the dataset.

	Reuse Object
0	If the user has entered data of an object, such as natural person, entity, account or address once, the object can be reused to prevent having to repeat filling out the data multiple times. The action opens a dialog with a list of objects. Select a row for the object you wish to re-use. Once the object is selected, the data from the object will be copied into the form. Now, by modifying the object at one instance it gets modified at all linked instances. By linking objects in this way, there is no need to repeat modifications everywhere the object appears. Linked objects (with the number of objects) are
	indicated by the chain icon:
	In the Navigation Panel, a similar icon is used:
	(!) Reuse of objects is not suitable for copying. It should not be used to speed up data entry of similar objects. The object should be re-used only when you need to enter exactly the same object (account, person, address) multiple times.
	Link Accounts
Q	If the same account appears multiple times in one report, for example after uploading transactions in XML format, it is treated in each instance separately. It means, changes in one instance are not reflected in others. However, such accounts can be linked if they have the same account number + the SWIFT BIC (or the institution's registration number). After linking, changes in account data at one instance will be reflected at all linked instances automatically within the same report.
	Download
*	Download transaction list or attached files. The user can download all the transactions in the report in XML format. Any transaction can be downloaded, it is not necessary for a transaction to be valid or complete. In this way, files that are downloaded can be used for uploading as templates for new transactions.
	Upload
1	The user can add transactions to a report by uploading them in XML format. This allows to add a single transaction or a list of transactions.

2.3 Report Main Page

The Report Tab 'Report Headers' in the Navigation Panel opens the main page of the Report Form. For a new report, it is the initial form.

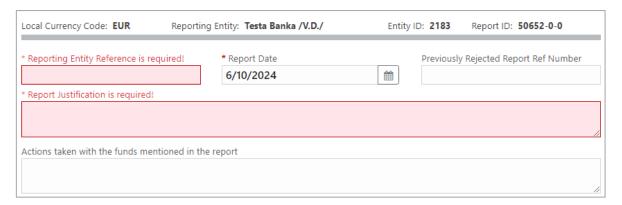


Figure 4. The Report Main Page form. The header shows the local currency, the name and identifier of the reporting entity, and the identifier of the report.

2.3.1 Report Main Page Form

Table 4. Report Main Page form fields.

Label	Explanation
* Reporting Entity Reference	The report reference assigned by the reporting entity.
* Report Date	The date of submission of the report.
Previously Rejected Report Ref Number	If the report was rejected and is submitted again with corrections. The system automatically fills this field with the initial report number. For example, with 48961-0-0.
Reference to FIU document	FIU document number (reference to FIU request or other type of document). This field is used only when submitting a DRF or TAI report.
Report Justification	Justification describing why the report was submitted. The description shall include a summary of the facts at the disposal of the reporting entity allowing the presumption of a potential criminal offence to be established. The field is mandatory when reporting suspicious transactions (STR) or activities (SAR).

Actions taken with the funds mentioned in the report

Description of actions that were taken regarding the financial means mentioned in the report. The field should only be filled in if the reporting entity wishes to emphasize the status of the funds mentioned in the report. For example, to inform about temporary blocking of funds, which does not constitute refraining from carrying out a transaction in accordance with Article 32 of the Law, or to provide additional information on funds, including securities, when submitting a refraining report (STRA).

2.4 Attachments

Attachments

Figure 5. As the section "Attachments" is optional, the tab's status bar is not highlighted red.

Selecting the Attachments Tab in the Navigation Panel will show the Attachments upload form. To add one or more files, press

The user can add files by dragging and dropping them on the "drop files here to upload" area, or by selecting them from the file catalogue.

The maximum file size is **85 MB**. In filenames, it is encouraged to use "snake_case" – only Latin letters, numbers, and to separate words use the underscore '_' character instead of space. The name should be no longer than 40 characters. Example: good_filename_01.docx.

The maximum number of attachments per report is 10.

Allowed file extensions: doc, docx, xls, xlsx, pdf, rtf, zip, edoc, asice,. png,. jpg,. Xml, but FIU Latvia reserves the right to correct or extend file extensions.

When adding file attachments, it is recommended to fill in the fields 'Category' (classifier value), 'Identification' and 'Description'. This information is useful in the process of analyzing reports and searching for information.



Figure 6. The Attachments upload form with one attached file and the action buttons "Delete" and "Download".



Figure 7. After adding some files, the status bar of the Attachments Tab is highlighted green. The total number of attachments uploaded is shown in a badge.

2.5 Indicators

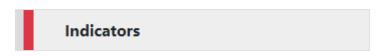


Figure 8. As the indicators are required for any type of report, the tab initially will always have a red status bar.

The indicators provide the justification of the report and offer additional classification of content. The indicators help the FIU to organize the reports and handle them more efficiently. Therefore, it is important to choose them carefully and select the appropriate ones. Correctly selected indicators speed up report processing. For more on the indicators, see <u>5.1 Report Indicators and Their Meaning</u>.

Selecting the Indicators Tab in the Navigation Panel will show the indicators selection form.

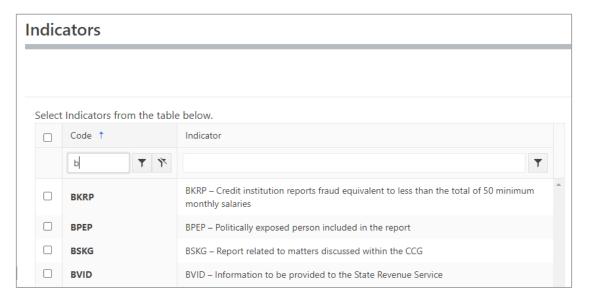


Figure 9. The Indicators search and select form. The list can be filtered by text (either Code or Indicator), e.g., after entering the letter "b" in the Code search field, all codes containing the letter "b" are shown. As you can see, one indicator is selected, and the blue arrow next to the column header "Code" shows that the list is sorted in ascending alphabetical order.

The indicator list is sorted alphabetically by the indicator code. The default order is ascending. By pressing the arrow next to the "Code" column header, the user can change the sorting direction. In addition, the user can enter one or more characters in the Code search field or the Indicator search field to narrow the list. In this way, only entries that contain the search text are shown.

The indicators are divided into five groups:

- Codes starting with "14" are justification indicators used in threshold declarations.
- Codes starting with an "A" are crime indicators used in suspicious transaction or activity reports.
- Codes starting with a "B" are supplementary indicators used in suspicious transaction or activity reports.
- Codes starting with a "C" are indicators used in information requests.
- Codes starting with a "T" are typology indicators used in suspicious transaction or activity reports.

To select the indicators, press the check box to the left of the indicator code.

You can remove indicators either by unselecting check boxes or by pressing "x" on the tag line:



Figure 10. Tags for selected indicators. By pressing "x", you can remove the indicator.



Figure 11. After adding at least one indicator, the status bar of the Indicators Tab will be highlighted green. The total number of selected indicators is shown in a badge. Note that the reports of type STR/SAR/STRA always have to contain at least 2 indicators – at least one of the "A" and one of the "T" group.

2.6 Transactions



Figure 12. The Transaction List Tab with the action icons: upload transactions, add Bi-party transaction, add one-party (Multi-party) transaction.

A transaction is any exchange of financial assets, goods or services (type of transaction funds) between transaction parties. There are three types of transaction parties: Account, Person (natural person) and Entity (legal entity). The 3rd part of the user guide "Transactions in goAML" helps to understand the principles of how to choose the appropriate type of transaction, funds, and parties for various real-life situations.

2.6.1 Transactions List

All transactions added to the report are shown in the Navigation Panel. The total number of transactions is shown in a badge and the total amount of all the values of the transactions are shown on the right of the tab. If the list is expanded, each transaction has its own tab and, if expanded, it shows details on the involved parties, goods and services.

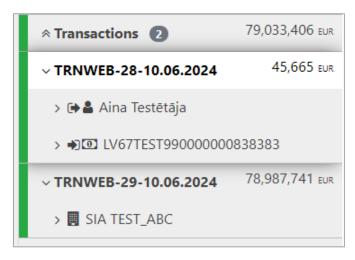
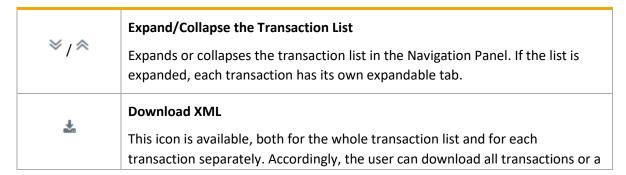


Figure 13. Expanded Transactions List Tab with two transactions — one Bi-party and one Multi-party transaction.

When the mouse pointer is hovered over the Transactions List Tab, additional clickable icons appear. All actions associated with the transaction list or a single transaction are:

Table 5. Available actions on the Transaction List Tab.



	single transaction in XML format.
<u> 1</u>	Upload XML This icon is available only on the Transaction List Tab. The operation allows the user to upload (add to the report) one or more transactions in XML format.
↔	Create a <i>Bi-Party</i> Transaction The <i>Bi-party</i> transactions is a transaction with exactly two parties. It is mandatory to provide details on both parties.
×	Create a <i>Multi-Party</i> Transaction The <i>Multi-party</i> transaction is a transaction with one or more parties. It is mandatory to provide details on at least one party.
ŵ	Delete Transaction The user can delete each transaction separately.
>,~	Expand/Collapse Data Object These actions are available for each transaction data object. By using them, the user can either expand or collapse the object details and, in this way, navigate to the sought object form more quickly.

When the whole data object tree is expanded, it is easy to navigate to any transaction party or its subordinate data object.

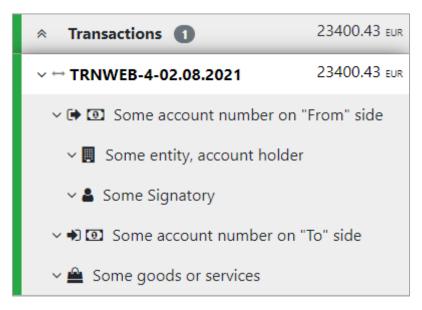


Figure 14. A Bi-party transaction object tree expanded. Each transaction party and their subordinate object types can be recognised by icons.

The type of transaction objects is identified by the following icons:

Table 6. Types of transaction data objects identified in the Navigation Panel.

\leftrightarrow	Bi-party transaction (two-party transaction)
×	Multi-party transaction (one-or-more-party transaction)
•	"From" party (originating party in a <i>Bi-party</i> transaction)
•	"To" party (beneficiary party in a <i>Bi-party</i> transaction)
0	Account (account number is shown as title)
	Entity (legal entity name is shown as title)
4	Person (natural persona name and surname are shown as title)
	Goods or services involved in the transaction (description is shown as title)

The transaction list can also be opened as a table. Selecting the Transactions List Tab will show the whole list of transactions in a grid containing the status, transaction number, date, amount and transaction type code for each transaction:

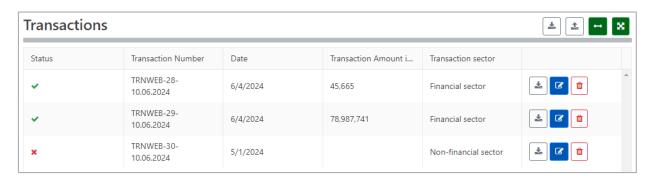


Figure 15. Transactions List as a table with the same action icons available in the Navigation Panel. The blue "Edit" button opens the Transaction Form. The Status column shows whether the required fields are filled in and valid.

2.6.2 Transaction Form

Once a transaction is created, for instance a *Bi-party* transaction, the following *Bi-party* transaction form will be shown:

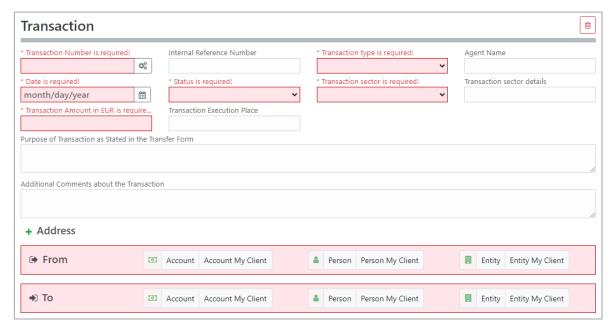


Figure 16. In the Bi-party transaction form, the lower part of the form contains two mandatory party objects – the "From" and "To" party.

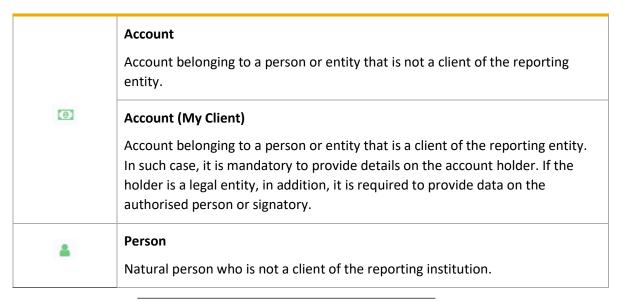
In the *Multi-party* transaction form, the party section is different:



Figure 17. In the Multi-party transaction form, there is only one mandatory party object.

In order to add a party, one of the six possible types of parties (participants) should be selected:

Table 7. Transaction party types.



Person (My Client)
Natural person who is a client of the reporting entity. In such case, it is mandatory to provide the date of birth of the person or the national identity number assigned in Latvia (it is encouraged to add both, if known).
Entity Legal entity that is not a client of the reporting entity.
Entity (My Client) Legal entity that is a client of the reporting entity. In such case, it is mandatory to provide the incorporation details and nature of business activities of the entity.

① The "Account" party should be added whenever the transaction involves an account. In goAML, the account holder or signatory is an object attached to the account party rather than a transaction party itself.

2.6.2.1 Transaction Details

Table 8. Transaction form fields.

Label	Explanation
* Number	Unique transaction number in the report. It can be generated automatically by pressing:
Internal Reference Number	Transaction registration number with the reporting entity.
* Transaction Type	Describes the way how the transaction was conducted. Select a value from a drop-down list. Enumeration "Transaction Type"
Agent Name	Indicates if transaction was executed through Agent.
* Date	The date of the transaction. A calendar picker is available.
* Transaction Status	Transaction Status must be picked form available options in the drop-down menu Status.
* Transaction Sector	Transaction Sector must be from drop-down menu – Financial Sector or Non-financial sector.
* Transaction sector details	Used in case of additional comments on Transaction sector.

* Transaction amount in EUR	The value of the transaction. If the transaction was carried out in another currency, the transaction amount should be converted to euros, using the exchange rate provided in the Transaction Party Involvement form (see Exchange Rate Against EUR).
Transaction Execution Place	Transaction Execution Place is mandatory for cash transactions. If cash transactions were made abroad, but if the address is not known then the country must be indicated. If the country is also unknown, then the information must be entered – Abroad
Purpose of Transaction as Stated in the Transfer Form	Mandatory field in CTR reports indicated with "1412 — Customer sends or receives a cross-border payment the amount of which is equivalent to EUR 500 000 or more".
Additional Comments about the Transaction	Can be used if there is an additional information on the transaction that is crucial and cannot be addresses through other field dropdown menu classifier values.
	For Transaction Type "401 – Summation of transactions between two parties" this field is used to indicate content of the transaction (credit debit, transfer) and period of the date from and to.

2.6.2.2 Transaction Party Involvement

Once a type of transaction party is selected, a form consisting of two parts will be shown. The top part (the header) contains fields that describe how the party is involved – the role and importance of the party, the country of origin or destination of the funds, and the type of funds this party used in the transaction.



Figure 18. The header of the Transaction Party form (approx. the area marked in light blue) contains fields that describe how the party is involved (in this example, the party type is Account).

Note concerning the re-use of objects

If transaction party data objects (accounts, persons, entities) are re-used, the headers are **not** copied across — they remain specific to the particular party instance, as they provide transaction specific details.

Table 9. Form fields describing involvement of a transaction party.

Label Explanation	
-------------------	--

Is Suspected	Used if it is known that the current Report Party is suspected
* Role in Transaction	Party's role in the transaction must be selected from a drop-down list. Enumeration "Party Role". This field is available only in <i>Multi-party</i> transactions.
* Funds Type	Specifies what type of funds this party used in the transaction. Select a value from a drop-down list. Enumeration "Funds Type".
Funds Comment	Description of the funds. Required field if "Funds Type" is selected as "Other".
* Country	Country in which the party was involved in the transaction.
Party Involvement Comments	Other information about party's involvement in the transaction. This field is available only in <i>Multi-party</i> transactions.

In addition, if a foreign (non-euro) currency was used, for instance in currency exchange, it is required to provide foreign currency details for the party that provided or received such currency.



Figure 19. This sub-form is required if the party provided or received funds in a non-euro currency.

Mandatory fields are marked with asterisk *.

Table 10. Foreign currency details form fields (fields become mandatory only when the form is added).

Label	Explanation
* Foreign Currency Code	Foreign currency the particular party used in the transaction. Select a value from a drop-down list. Enumeration "Currency".
* Amount in Foreign Currency	Transaction amount in foreign currency used by the particular transaction party.
* Exchange Rate Against EUR	Foreign currency exchange rate against euro rounded to two decimal places.

Below the form header, the main part of the Transaction Party Form contains fields particular to the party object type. They are used to describe the party itself. For the form details of:

• Account, see 2.8.1 Account Form

- Person, see <u>2.8.2 Natural Person Form</u>
- Entity, see 2.8.3 Entity Form

2.6.2.3 Adding Goods and Services

The last section of the Transaction Form is for additional information, if there is any, describing the goods or services involved in the transaction:

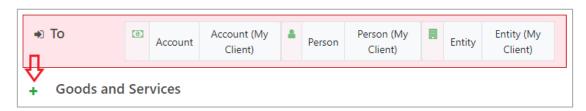


Figure 20. Sub-form for adding information about 'Goods and services'

For the description of Goods and Services Form, see the section of commonly used forms:

• 2.8.4 Goods and Services

2.6.3 How to download and upload transactions

The goAML Web Form provides the ability to upload and download, full and partial transactions as XML files. This allows users to create and re-use templates that can speed up the manual entry of reports. Two examples of application:

- 1. When submitting a threshold declaration (CTR), the user may include all the transactions having the same indicator in one report. If the reporting entity had such data, for instance, as an Excel file, it could be exported in an XML format.
- 2. Transactions in XML can be edited using dedicated software or a text editor that supports XML syntax. For example, if there were many very similar transactions to report, the user could create one transaction as a Web Report, download it as XML, and open it in the text editor. Then, by copying, pasting and replacing, new transactions could be generated much faster than by manual entry.

When the mouse pointer is hovered over the Transaction Tab in the Navigation Panel the action to download the transaction is displayed:



After opening the XML file with an editor that supports XML syntax, the user will see that the transactions are wrapped in the <reportdata> and <transactions> tags, and each single transaction is wrapped in the <transaction> tag.

In order to create new transactions, the user will have to copy and paste one transaction as many times as needed and ensure that the entire document has the following structure:

Once editing is finished, verify the validity of the XML document with the XML Report Validator tool. The tool is accessed via the main menu "New Reports" > "XML Report Validator". Open it, paste the XML into the text area and click "Validate".

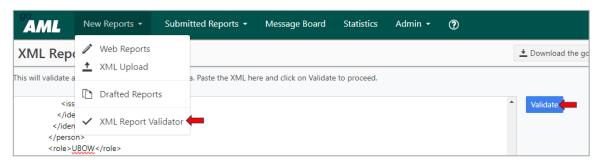


Figure 21. XML Report Validator.

There is also an option to "Download the goAML semi-automated report schema" containing only the part of the full schema needed for transactions XML. The user may make use of it for data export from Excel to XML.

More on the full report XML schema, see the goAML XSD documentation.

Once the file is validated and ready for upload, place the mouse over the Transactions Tab in the Navigation Panel so that the "Upload Transactions (XML)" button appears, click it to open the file upload dialog.



2.7 Activity

If the report type SAR is chosen to report suspicious activity (in cases when there is no information on the date and amount of the transaction), the Navigation Panel does not have the Transactions Tab. Instead, there is the Activity Tab.

For certain report types, such as STR (Suspicious Transaction Report), the field "Activity" is available as an additional information submission option, but it can only be used when submitting additional information on the transaction mentioned in the report.

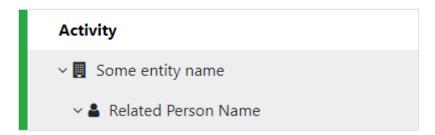


Figure 22. The Activity Tab. Unlike the Transaction Tab, there are no actions on the Activity Tab.

In the activity report SAR, **only activity** can be added. The activity cannot be downloaded or uploaded like transactions can. An activity can have **up to 100 participants** (report parties) – accounts, persons and entities. Otherwise, activity reports are filled out in the same way as transaction reports.

Selecting the Activity Tab will open the Activity Form.

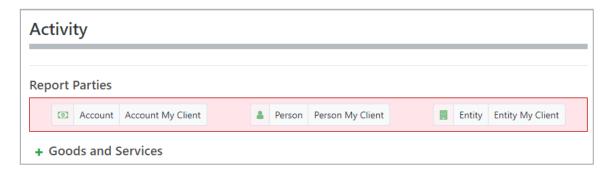


Figure 23. The Activity Form. At least one report party must be included. It is optional to add description of goods and services involved in the activity.

Once a type of report party is selected, a form consisting of two parts will be shown. The top part (the header) contains fields that justify why the party is included in the report.

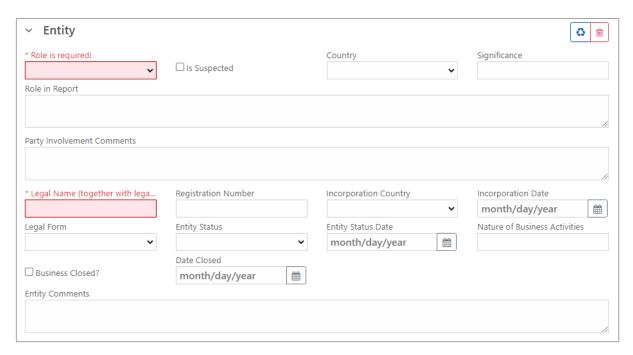


Figure 24. The header of the Report Party form (approx. the area marked in light blue) contains fields that describe how the party is involved in the particular activity (in this example, the party type is Entity).



Note concerning the re-use of objects

If report party data objects (accounts, persons, entities) are re-used, the headers are **not** copied across — they remain specific to the particular party instance, as they provide activity specific details.

Table 11. Form fields describing involvement of a report party.

Label	Explanation
*Role	Participant's role from classifier
Is Suspected	Used if it is known that the current Report Party is suspected.
Country	Indicates Country with whom report party is associated with.
Significance	The reporting person shall indicate the significance of the party in the report (scale from 1 to 10, where 10 is for the central party in the transaction).
Role in Report	Provide justification for reporting this party, if it adds important details to the justification of the whole report.
Party Involvement Comments	Other information about the party and its involvement in the activity.

Below the form header, the main part of the Report Party Form contains fields particular to the party object type. They are used to describe the report party itself. For the form details of:

- 1. Account, see 2.8.1 Account Form
- 2. Person, see <u>2.8.2 Natural Person Form</u>
- 3. Entity, see 2.8.3 Entity Form
- 4. Goods and services, see <u>2.8.4 Goods and Services</u>

2.8 Commonly Used Web Report Forms

There are sub-forms for several data objects that are repeatedly used in all main report forms. Such data objects are account, person, entity, goods or services, address, phone, e-mail, and identity document.

When providing information on the report party that is my client (My Client) there are more mandatory fields than reporting on report party that is not defined as "My client".

2.8.1 Account Form

Adding a party "Account" or "Account (My Client) to a transaction or activity will open the Account Form.

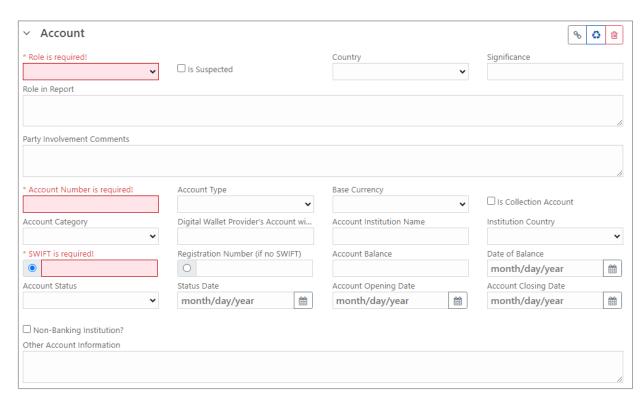


Figure 25. The Account Form. The blue coloured header refers to the account's involvement details in the particular transaction (includes information on funds and country) or activity (includes information on role and significance).

Table 12. Account Form fields.

Label	Explanation
* Account Number	Account number.
Account Type	Must choose one of the values provided in the drop-down menu. If reporting "My Client" it is mandatory to provide information on the account type.
Base Currency	Select a value from a drop-down list.
Is Collection Account	Used when indicating that account is used for collecting donations.
Account Category	Select a value from a drop-down list.
Digital Wallet Provider's Account with Credit Institution	Digital wallet provider's (e.g., a payment institution's) account with a credit institution. Provide only if the report contains a digital wallet.
Account Institution Name	The name of the bank or other institution where the account is opened.

Institution Country	Mandatory field for Account of "My Client". Select a value from a drop-down list – country in which the account is opened.
* SWIFT	SWIFT code identifying the institution where the account is opened. If a SWIFT code has not been assigned, it is mandatory to provide
* Registration Number (if no SWIFT)	If a SWIFT code has not been assigned, it is mandatory to provide institution's registration number in a public register.
Account Balance	The account balance at the end of the day in the base currency.
Date of Balance	The date the reported account balance was calculated. A calendar picker is available.
Account Status	Select a value from a drop-down list.
Status Date	The date when status is reported. A calendar picker is available.
Account Opening Date	Enter the date the account was opened. A calendar picker is available.
Account Closing Date	If the account is closed, enter the closing date. A calendar picker is available.
Non-Banking Institution?	To be checked if the account is not opened in a banking institution.
Other Account Information	Account notes field.

The Account may contain collection of two other types of objects. The first is the Entity (see <u>2.8.3 Entity Form</u>) as the account holder. The second is the Natural person (<u>2.8.2 Natural Person Form</u>) as the account holder, or signatory. If the account is of a client of the reporting entity, the party "Account (My Client)" should be chosen. In such a case, the information on account holder (person or entity) and the signatory (if the holder is an entity) is mandatory.

Other additional information can also be added to the account data — description of the Account's assets, if the account is a multi-currency account, add "Other related entities", "Related accounts", "Network devices" and indicate the connection of the account with the relevant sanctions lists through field "Sanctions".

2.8.2 Natural Person Form

The Natural Person Form is used in the Transaction Party Form, Report Party Form, Account Form, and Entity Form.

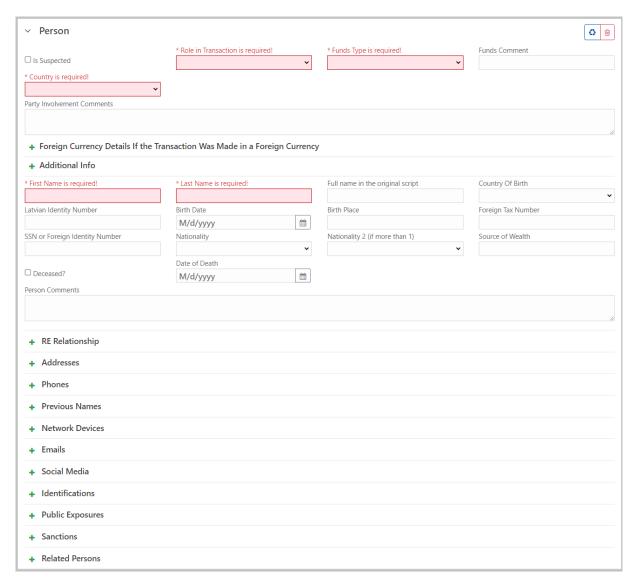


Figure 26. The Natural Person Form, when Person is a participant in multy-party transaction.

Table 13. Natural Person Form fields.

Label	Explanation
Is account holder?	The checkbox is available only if a person is added to an account. Tick if the person is the account holder.

* Role	Select a value from a drop-down list.
	The drop-down classifier values are used from "Entity Person role Type" if Person is related to Entity. If Person is related to Account, then drop-down values are from "Account Person Role Type" enumeration.
* First Name	First name or multiple names, including middle name, but excluding family names.
* Last Name	Last name or multiple family names.
Full name in the original script	Allows to report Personas First Name and Last Name in its original script. Example: Cyrillic, Phoenician letters etc.
Country Of Birth	Select a value from a drop-down list. Indicates Person country of birth.
/* Latvian Identity Number	Mandatory field if the person has an identity number issued in Latvia. The 11-digit identity number must be written with a hyphen '-' between the sixth and the seventh digit.
	If the person is a reporting entity's client, either the identity number or the date of birth must be provided. It is preferable to add both, if known.
/* Birth Date	Mandatory field if the person does not have an identity number issued in Latvia. If possible, please provide it in all cases. A calendar picker is available.
	If the person is a reporting entity's client, either the identity number or the date of birth must be provided. It is preferable to add both, if known.
Birth Place	The place of birth of the person.
SSN or Foreign Identity Number	Social security number or foreign identity number. Applies only to persons who do not have a Latvian identity number or in cases when, in addition to the Latvian identity number, the person has received another identity number or social security number in foreign countries.
Foreign Tax Number	The tax identifier for the person in a foreign country.
Nationality	The country of nationality of the person should be specified if neither an identification document nor a Latvian identity number is provided. From a drop-down list, select the country the person comes from.
Nationality 2 (if more than 1)	Provide the second country of nationality if the person has more than one.
Source of Wealth	The source of the person's wealth. A free text description.
Deceased?	Tick if the person is deceased.

Date of Death	If the person is deceased, provide the date of death, if known. A calendar picker is available.
Person Comments	Comments concerning the person.

In addition, when adding information on Person it is now possible to report Reporting Entities, Relationship with Person, address, phone, e-mail, previous names, person identification documents, social media accounts, relationships with politically exposed persons, sanction list information and relations to other physical persons.

This information should be added when such data is known and the person is "My client".

2.8.3 Entity Form

The Entity Form is used in the Transaction Party Form, Report Party Form, and Account form.

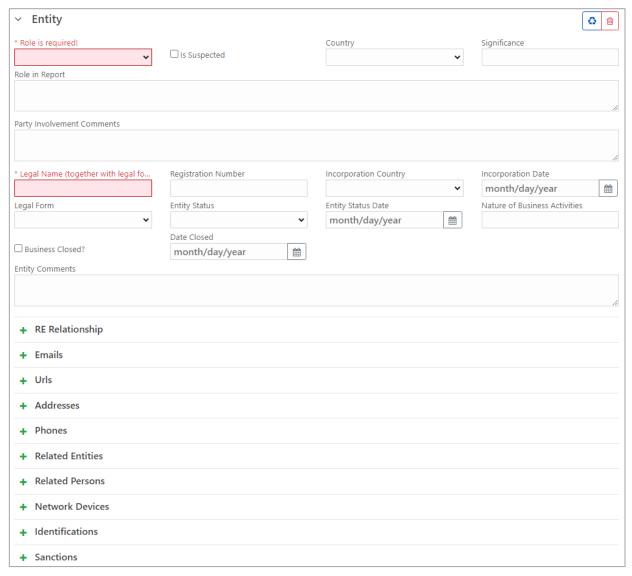


Figure 27. The Entity Form when added as a party to multi-party transaction.

Table 14. Entity Form fields.

Label	Explanation
* Legal Name (together with legal form)	The complete name of the entity as registered in a public register.
* Registration Number	The registration or incorporation number of the entity in a public register. Required if the entity is "my client".
Incorporation Country	The country of registration of the entity. Select a value from a drop-down list. Enumeration "Country". Required if a registration number is provided.
Incorporation Date	The date of registration of the entity in a public register. A calendar picker is available.
Legal Form	The legal form of the entity. Required if the entity is "my client". Select a value from a drop-down list. Enumeration "Legal Form". The list includes all current types of legal forms available for registration in Latvia, as well as common international and certain adjusted, or historical values, which are used by the FIU in data processing. If the list of foreign forms lacks the required value, select the most appropriate from the legal forms used in Latvia.
Entity Status	Select a value from a drop-down list. Contains most relevant values
Entity Status Date	A calendar picker is available. Indicates date of the Entity Status.
Nature of Business Activities	Enter a NACE rev.2 code or a list of semicolon-separated codes to describe the nature of company's business activities. Required if the entity is "my client". The list of expected codes is published at https://fid.gov.lv/nace Example: A01.1;C10.6
Tax Number Outside Latvia	Tax number provided by the incorporation country, if entity is registered outside Latvia and the tax number differs from the registration number of the entity.
Entity Comments	Comments concerning the entity.
Business Closed?	Select if the entity is dissolved or liquidated. If Entity Status is reports as "Liquidated" then this field mandatory.
Date Closed	Date of liquidation or dissolution if the company is removed from a public register. A calendar picker is available.

The Entity Form may contain collection of the following types of objects: Address, Related

Person, Reporting Entities Relationship with Entity, e-mail, relationships with politically exposed persons and sanction list information.

This information should be added when such data is known and the entity is "My client".

2.8.4 Goods and Services Form

The Goods and Services Form is available in all report forms in order to provide information on goods or services involved in transactions and activities.

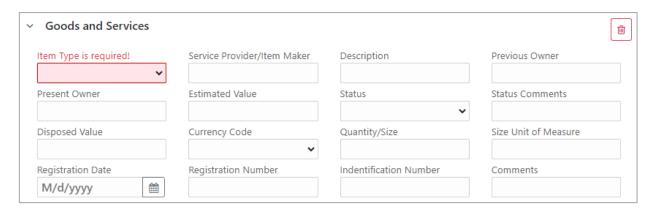


Figure 28. The Goods and Services Form.

Table 15. Goods and Services Form fields.

Label	Explanation
* Item Type	The type of goods or services. Select a value from a drop-down list. Enumeration "Transaction Item Type".
Service Provider/Item Maker	Information about the service provider or the product manufacturer.
Description	Description of the goods or services.
Previous Owner	Information on the previous owner of the goods.
Present Owner	Information on the present owner of the goods.
Estimated Value	The value of the goods or services in euros.
Status	The status of the goods or services. Select a value from the drop-down list. Enumeration "Property Status".
Status Comments	Description of the status. Required field if "Status" is selected as "Other".

Disposed Value	The value (in transaction currency) at which the goods were sold or disposed of.
Currency Code	The currency shall be provided if the goods or services were sold in foreign currency. Select a value from a drop-down list.
Quantity/Size	The quantity or size of the goods or services in a particular unit of measure (UOM). The UOM is specified in the next field.
Size Unit of Measure	Unit of measure for the provided goods or services size.
Registration Date	The official registration date for the goods or services. A calendar picker is available.
Registration Number	The registration number of the goods or services included in an official register.
Identification Number	The identification number of the goods or services.
Comments	Comments on the goods or services.

The Goods and Services form may contain one additional object for one address:



2.8.5 Address Form

The Address Form is available in the Person Form, Entity Form, and Goods and Services Form.



Figure 29. The Address Form.

Mandatory fields are marked with asterisk *.

Table 16. Address Form fields.

Label	Explanation
* Type	Select the appropriate address type from a drop-down list. Enumeration "Phone Address Type". Example: Legal
* Address	Information regarding the street, house, apartment, village, parish according to the address regulations. Examples of Latvian addresses: • Lielā iela 2A – 3 • "Ceriņi 2A", Armaņi, Andzeļu pag.
* City or County	Here you should enter either city or county. Examples: • Riga • Dobeles nov.
Postal Code	Example: LV-1010
* Country	Select the address country from a drop-down list. Enumeration "Country".
Comments	If you have important information about this address, which could not be entered in other form fields, you can type it freely in the comments field.
To add multiple addresses, press	+

To add multiple addresses, press



To remove an added form, press



2.8.6 Phone/Contact Form

The Contact Form is available in the Person Form and Entity form.



Figure 30. The Contact Form.

Mandatory fields are marked with asterisk *.

Table 17. Contact Form fields.

Label	Explanation
* Contact Type	Select the appropriate phone type from a drop-down list. Enumeration "Phone Address Type". Example: Work
* Comm. Type	Select the appropriate type of communication from a drop-down list. Example: <i>Phone</i>
Country Prefix	If it is not a Latvian phone number, the country calling code should be provided, prefixed with a plus sign "+". Examples: +372 +1
* Number	Number without country calling code. Should contain only numbers.
Comments	If you have important information about this communication channel, which could not be entered in other fields on the form, you can type it freely in the comments field.

To add multiple phone numbers, press +

To remove an attached form, press



2.8.7 Email Form

The Email Form is available in the Person Form and Entity Form.



Figure 31. The Email Form.

Mandatory fields are marked with asterisk *.

Table 18. Email Form fields.

Label	Explanation
* Email Address	Email address.

To add more than one e-mail address, pres +



2.8.8 Identification Document Form

The Identification Document Form is available only in the Person Form.

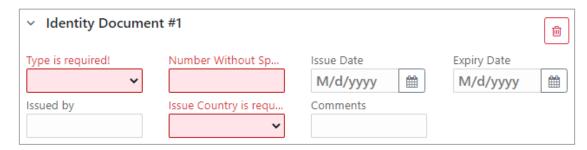


Figure 32. The Identification Document Form.

Mandatory fields are marked with asterisk *.

Table 19. Identification Document Form fields.

Label	Explanation
* Type	Select the type of the identification document from a drop-down list. Enumeration "Identification Type". Example: Passport
* Number Without Spaces	The document number without spaces.
Issue Date	The document issue date. A calendar picker is available.
Expiry Date	The document expiry date. A calendar picker is available.
Issued by	The name of the authority that issued the document.
* Issue Country	The country that issued the document. Select a value from a drop-down list. Enumeration "Country".
Comments	Comments on the identity document.

To add multiple documents, press +



To remove an attached form, press



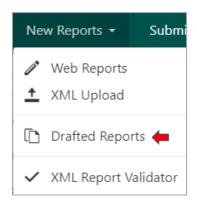
2.9 Saving Drafts and Submitting Reports

Remember to save reports frequently to minimize the chance of losing data.



① The report storage time is limited. See the terms published on the homepage of the Website while logged in.

Not submitted and saved reports are available to all representatives of the same reporting entity who have been granted permission to handle the Web Reports. They can be accessed from the main menu "New Reports" / "Drafted Reports".



Selecting opens a grid containing the list of not submitted reports:

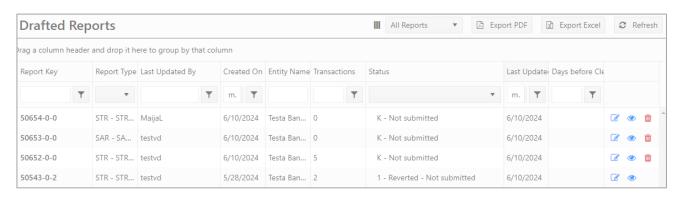
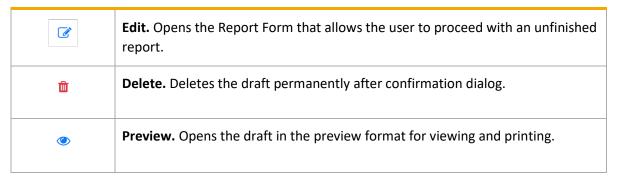


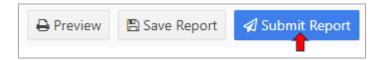
Figure 33.Drafted reports Form.

For more on the report list columns and associated actions, see $\underline{4.1}$ Report Lists. There are three available actions for report drafts:

Table 20. Actions associated with drafts.

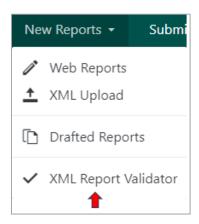


If the report drafting is finished and the Report Tabs status is "green", i.e., ready for submission, the "Submit Report" icon is enabled and the report can be submitted:



3 Submission of XML Reports

3.1 XML Report Validation

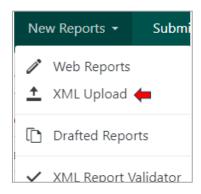


If you are planning of creating XML reports, the XML Report Validator is handy tool that tests the validity of XML against the current goAML XML schema.

The XML Report Validator allows the user to paste the prepared XML and validate it prior to upload. It is also useful to download the current full XML schema (XSD) as well as the semi-automated schema used just for transactions. For more about using the transaction XML, see 2.6.3 How to download and upload transactions.

Prior to creating XML reports, please read the documentation on the goAML XML Schema published at https://fid.gov.lv/en/goaml-2/reporting-system-goaml.

3.2 XML Report Upload



The user can access XML Upload dialog via the main menu "New Reports" > "XML Upload" while logged in.

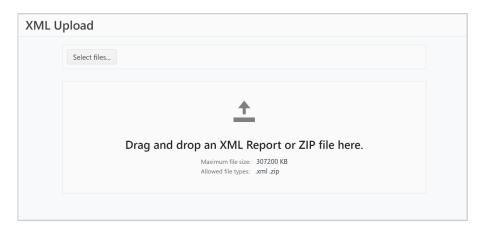


Figure 34. The XML Upload dialog.

If an XML file is selected, an attachments area is shown so that the user can select files to upload with the XML file as attachments. No files are uploaded until the "Upload Report File" button is pressed. A confirmation dialog box appears to confirm that the files have been uploaded.

3.2.1 Upload File Rules

The XML file should be **UTF-8** encoded.

Use ZIP file to group XML reports and attachments into a single file. The files inside the ZIP file must be structured in a specific way to be accepted by the goAML Web application:

- One XML report file with zero or more non-XML attachments
- Multiple XML report files with no attachments
- One or more single level folders, each containing:
 - o One XML report file with zero or more non-XML attachments.

3.2.2 Report Numbering

Each XML document and ZIP file that is uploaded to the Web Application is assigned a Report ID consisting of three parts: (1) the report sequence number, (2) the file number within a ZIP package after uploading, and (3) the report version number (the initial version number is 0). In the example "3753-5-0", the sequential number is 3753, the file number within a ZIP package is 5, and the report version number is 0.

4 Things to Know After Report Submission

Upon submission, the report is uploaded and processed. The report processing steps are:

- 1) Inspection of the document structure. If the report is not a well-formed XML document or ZIP file, the file is archived (not available for the user), later deleted.
- 2) Validation against the XSD. If the XML is not valid against the schema, the report is returned to the user, and the user is informed about the validation error.
- 3) Validations against business rules specified in the XSD schema (section Assertions).
- 4) Upload to the FIU system.
- 5) Automatic validation against the business rules in the FIU system.
- 6) Acceptance of the report in the FIU system by a FIU employee. The report may be accepted or rejected.

Web Reports

Moving through the processing steps, the report status changes. The user can monitor the report status in the report lists accessible from the main menu section "Submitted Reports".

The submitted XML Reports and Web Reports are displayed in separate lists "XML Reports" and "Web Reports".

4.1 Report Lists

All three report lists, namely "Not Submitted Web Reports", "XML Reports", and "Web Reports" are displayed in the same manner.



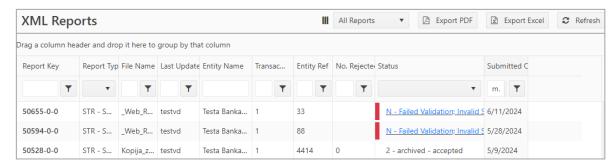


Figure 35. The Report Lists. The submitted and not submitted web report list has a distinct column for the report creation date, while the XML report list has a column for the submitted file name.

The user can filter the reports by a date range based on the entered Start Date and End Date (click) and export the results as a PDF or Excel document. The result table contains the following filterable columns:

Table 21. Columns in the report grid.

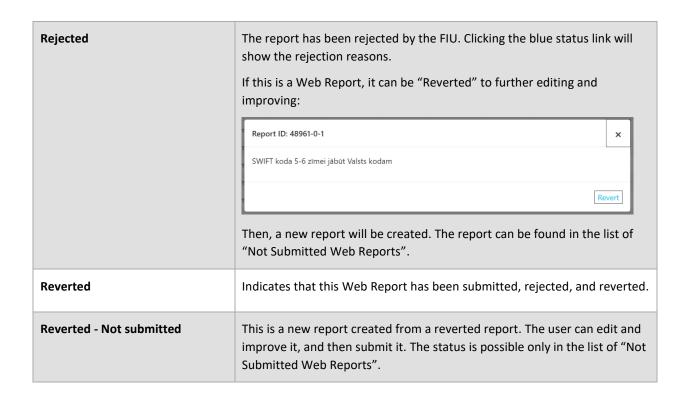
Column Name	Explanation
Report ID	The report identifier.
Report Type	The type of the report. Enumeration "Report Type".
File	The filename of the uploaded file.
Created By	The user who initially created the report.
Last Updated By	The user who last modified the report.
Created On	The date when the report was created.
Org Name	The name of the reporting entity in the name of which the report was created.
Submitting Org	Since the delegation functionality is not being used, the submitting entity is the reporting entity.

Transactions	The number of transactions included in the report.
No. Rejected	The number of rejected transactions.
Status	The status of the report. See <u>4.2 Report Statuses.</u>
Submitted On	The date of the report submission.
#	Column with optional actions (not all are always available): Edit Delete Preview/Print Download

4.2 Report Statuses

Table 22. More frequently occurring report statuses.

Report Status	Explanation
Not Submitted	The report is a draft. The status is possible only in the list of "Not Submitted Web Reports".
Uploaded	The report is uploaded.
Failed Validation; Invalid Structure	The report XML is not valid against the XSD or the ZIP file has an invalid structure. Clicking the blue status link will show the validation errors.
Validated; scheduled for loading	The report XML is valid and the report is scheduled to be uploaded to the FIU system.
Transferred From Web	The report is transferred to the FIU system and pending review by the FIU employees.
Processed	The report has been accepted by the FIU and processed.



5 Useful Information

5.1 Report Indicators and Their Meaning

5.1.1 Occasions when a threshold declaration (CTR) shall be submitted

The Paragraph 14 of the Cabinet Regulations No. 550 of 17 July 2021 lists cases when Obliged entities are required to submit a threshold declaration (type CTR report). The indicator codes that start with "14" correspond with the regulation clauses and must be used only in CTR reports.

Code	Description
1411	Customer makes a cash transaction in an amount equivalent to EUR 7000 or more, except the transaction is made within a cash collection service from the customer's account of the service provider in a credit institution or financial institution
1412	Customer sends or receives a cross-border payment the amount of which is equivalent to EUR 500 000 or more
1420	In relation to insurance distributors, when providing life insurance or other insurance services related to the accumulation of funds – the amount of insurance indemnities disbursed or the surrender value is equivalent to EUR 100 000 or more
1430	In relation to private pension funds - the amount of supplementary pension capital disbursed is equivalent to EUR 100 000 or more

1440	In relation to capital companies and credit institutions engaged in the purchase and selling of cash in foreign currency - a transaction in which a customer buys or sells foreign currency in cash for an amount equivalent to EUR 5000 or more
1450	In relation to organisers of lotteries and gambling - a transaction the amount of which is equivalent to EUR 2000 or more
1460	In relation to persons engaged in handling of art and antique articles - the amount of the transaction is equivalent to EUR 50 000 or more
1470	In relation to sworn notaries - an heir has indicated non-registerable movable property (including cash), the evaluation of which exceeds EUR 15 000

5.1.2 Crime indicators of suspicious transaction or activity ("A" group)

At least one crime indicator must be added when submitting the following reports:

- SAR Suspicious Activity Report
- STR Report on suspicious transactions or transactions
- STRA Suspicious Transaction Report with Refraining
- ATL Additional Transaction List

Code	Description
ANIL	Stand-alone (autonomous) ML (predicate crime not identified)
APRO	Professional ML
AMAN	Property crimes (including theft, robbery, fraud, misappropriation, etc.)
ANOD	Tax crimes
AVAL	Crimes against public administration, including corruption
ATAU	Other economic crimes (including illegal movement and smuggling of excise goods, counterfeiting of currency, illegal handling of financial instruments, etc.)
ATPF	TF, PF
ACIL	Human trafficking, crime against sexual inviolability, illegal immigration, illegal residence permits
ANES	Failure to provide information and provision of false information regarding ownership of funds and the ultimate beneficial owner
ADEK	Avoidance of cash declaration

AKAR	Offences against general safety and public order (including illicit trafficking and smuggling of drugs, firearms, cultural monuments, etc.)
ACIT	Other crimes
ASAN	Circumvention/violation of sanctions

5.1.3 Additional indicators for suspicious transaction or activity (group "B")

These are additional indicators which either complement or replace the indicators of the "A" group.

In the "DRF – Response File to FIU Request" report it is required to include the "BATB – Providing the information and documents to the FIU" indicator, but to avoid any indicator of the "A" group.

If the report is related to taxation, the indicator "BVID – Information to be provided to the State Revenue Service" has to be provided (only applicable to Obliged entities).

If STR, SAR, STRA, or ATL type reports contain information on a politically exposed person, the "BPEP – Politically exposed person included in the report" indicator should be provided.

Code	Description
BVID	Information to be provided to the State Revenue Service
ВРЕР	Politically exposed person included in the report
ВАТВ	Providing the information and documents to the FIU
BSKG	Report related to matters discussed within the CCG
BKRP	Credit institution reports fraud equivalent to less than the total of 50 minimum monthly salaries

5.1.4 Information request indicators (group "C")

These are indicators that are used by the law enforcement authorities and other authorities when submitting information requests to the FIU.

The indicators CFIU, CINT, CALL, CURG, CADD shall be used in TAI-type reports with which the law enforcement authorities request information in accordance with Article 56 (1) of the Law.

The indicator COTH shall be used in IRD-type reports which are used by the authorities entitled to request information from the FIU in accordance with Article 56 (1.1), (2), (3), (6) of the Law.

Code	Description
CFIU	Request only for information held by the FIU
CINT	Request only within the FIU's international cooperation framework (after the agency's international cooperation capabilities are exhausted)
CALL	Request for both the information held by the FIU and within the FIU's international cooperation framework (after the agency's international cooperation capabilities are exhausted)
CURG	The request is urgent, the request contains sufficient grounds for urgency
CADD	Additional request to the FIU (reference to the information received from the FIU is mandatory)
сотн	Request for other information held by the FIU in accordance with Article 56 (1.1) – (6) of Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing

5.1.5 Typology indicators for suspicious transaction or activity (group "T")

At least one typology indicator must be selected when submitting the following reports:

- SAR Suspicious Activity Report
- STR Suspicious Transaction Report
- STRA Suspicious Transaction Report with Refraining
- ATL Additional Transaction List

Code	Description
T01	Payments are of a transit nature – funds are transferred from accounts shortly after they have been debited
Т02	Abnormal accumulation and further transfer of funds for companies operating in the sector concerned
Т03	Customer's account turnover and/or other indicators indicate imitation of economic transactions (fictitious transactions) and/or atypical transactions in the sector concerned
Т05	Volume of cash transactions is not typical to the customer's profile and/or type of business
T06	Purchase/sale price of goods, property or capital shares is significantly above or below the estimated purchase/market value
Т07	Payments are routed in a circle

The route of delivery of the goods and/or the flow of transactions is complex, atypical, or close to jurisdictions subject to sanctions regimes Transactions performed in NGO accounts do not meet the objectives set out in their articles of association and have no rationale Unusual transfers abroad to accounts of companies registered in Latvia T11 Knowledge, experience or available resources of a customer are not commensurate with the transactions performed or planned and have no rationale T12 Acquisition of property or goods is credited by a third party, which is not involved in activities related to provision of credit services T13 Documents submitted by customer show signs of forgery/handwritten corrections T14 Origin of funds and/or the economic rationale of the transactions is not clear as customer does not provide an explanation or provides a hard-to-verify explanation T15 Customer makes suspicious transactions with virtual currencies T16 Customer conducts transactions with shell arrangements T17 Suspected issuance or repayment of a fictitious loan T18 Customer makes suspicious transactions involving financial instruments T19 Customer or other person reports a possible criminal offence T20 Customer performs structuring of transactions and there is a suspicion that the aim is to avoid in-depth investigation T21 Customer's account is controlled by a third party and there are suspicions that actions have been taken to conceal or disguise the true ownership of the funds T22 Customer comes accompanied by third parties and/or consults them in answering questions, and it has no clear rationale T23 Transactions of the customer (natural person) are not commensurate with his or her declared income and have no rationale T24 There is publicly available adverse information relating to the customer, its counterparty or authorised person, a request of a public authority has been received, which, in the context of transactions performed, raises suspicions of ML		
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T26 Other typology	T25	authority has been received, which, in the context of transactions performed, raises
	T26	Other typology

T27	The customer participates/receives funds in public procurement and carries out suspicious transactions
T28	Transfer of economic activity of a legal person in order to avoid debt or to avoid association with a subject of sanctions
T29	The goods/services purchased and sold by the customer (legal entity) are mutually incompatible or do not coincide with the customer's activity profile