Reporting Format for Virtual Asset Service Provider-Introduction

FINnet 2.0: Reporting Format for Virtual Asset Provider – Introduction

Date: 13-June-2023

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1 Overview

This section provides an overview of the FINnet 2.0 system being designed and implemented by Financial Intelligence Unit, Government of India (FIU-IND). It also provides an overview of the new reporting formats for reporting entity types Virtual Asset Service Provider (VASP). being planned by FIU-IND.

1.1 Introduction to FINnet 2.0

Project FINnet 2.0 envisions to streamline and redefine the process of collection, processing, and dissemination of data for the purpose of effectively generating meaningful intelligence to curb money laundering and terrorist financing activities and enforce the provisions of PMLA in India. This is a project of national importance and aims to strengthen the financial security architecture of India. The mission statement of FINnet 2.0 is to provide quality financial intelligence for safeguarding the financial system from the abuses of money laundering, terrorism financing, and other economic offenses.

FINnet 2.0 comprises of a set of three systems to ensure that the data ingested and processed by the three is isolated and immune to security threats as much as possible and all data is secure. The systems are listed below —

- 1. FINGate Collection and pre-processing system
- 2. FINCore Processing and analysis system
- 3. FINex Dissemination system

This document provides an overview of the new reporting formats for FINGate 2.0 for reporting entity types Virtual Asset Service Provider (VASP). Other areas shall be covered in the detailed user manual to be circulated to reporting entities (REs).

1.2 Introduction to the new reporting mechanisms

There are three reporting mechanisms planned in FINnet 2.0. These mechanisms have been launched as part of the FINGate 2.0 portal. The detailed features and functionalities are documented separately in their respective user manuals. Their broad overview has been provided below for reference.

Mechanism 1: Interactive web-based reporting

- This mechanism is recommended for Reporting Entities that have low volume reporting.
- This mechanism would consist of user friendly, context sensitive web-based forms.
- The forms would have built-in form and field level validations, including metadata and logical consistency validations.

Mechanism 2: Bulk report preparation app

 A completely revamped application given to reporting entities to help them in preparing, validating, and submitting reports. This would be a replacement to the



- existing report generation and validation utility. This utility is currently not available for VASP and will be deployed in future.
- The application would be modular that would allow for certain modules to be offline and not Internet facing. If the RE so wishes, modules where their customer data is being loaded can be stored in an offline mode.
- The application would have the ability to debug and validate reports at the form and field levels, including metadata and logical consistency validations.
- The RE would have the ability to encrypt and digitally sign (using DSC or Aadhaar e-Sign) the report through the application itself.
- There would be an interactive interface to help correct / resubmit rejected transactions.
- RE system would generate multiple files (in CSV/JSON as per a predefined format) covering KYC, Transactions and GoS. The same will be uploaded in the RE app to generate and submit all necessary reports.
- The system will allow additional manual data entry/editing by the RE user.

Mechanism 3: API based reporting

- Those reporting entities that would prefer to use their own systems for reporting may use the API based reporting mechanism.
- In this mechanism, the reports would be transmitted to the FIU in near real-time and automated mode with minimal manual intervention. This channel is currently not available for VASP and will be deployed in future.
- The APIs would be exposed by FINGate and would be configured in the Reporting Entity's systems.
- The form and field level validations are expected to be done by the RE's systems as these cannot be checked in real time in an API mode.
- All rules, including logical, business rules along with form and field level validations would be run at one go and the consolidated error report would be made available for the RE.

1.3 Objectives of the New Reporting Formats

Learning from the experience of stakeholders of FINnet 1.0 and the various interactions with Reporting Entities over the past many years, the following are the objectives that are identified to be achieved in FINnet 2.0.

Ease of reporting – Report Data has been segregated into Master data and Transaction data. Branch and ATM details are considered as master data and will be ingested in bulk or incremental mode prior to report submission. The format will also have an intuitive language-based interface instead of complicated codes.

The new format is in three parts – The new consolidated format will have three parts: (a) KYC profile (b) Transaction details and (c) Ground of suspicion. The 'Ground of Suspicion' is applicable only for STRs. The KYC profile will be different for customer-based reports and non-customer-based reports.



In order to facilitate the filling up of forms, REs will be able to extract their data in pre-defined bulk files (CSV, XLS or JSON formats). These pre-defined formats shall be designed to facilitate ease of data extraction, ease of filing and ease of information correction at a future date by REs.

Account Details – Along with a common KYC profile, there would also be Account Details that would capture details of different accounts held by the customer. This Account Details would differ based on the RE type. As an example, a banking Account Details would be different from an insurance policy account. VASP RE should provide the details of the account maintained by clients with them.

Configurable mandatory and non-mandatory fields for reporting: The new reporting paradigm will allow FIU to configure which form fields are mandatory or non-mandatory to be filled by a RE. This can be configured, on the basis of the report quality history of a particular RE or a category of REs. Further, non-mandatory fields can be made mandatory in future, basis the quality of data reported by REs.

Threshold Based as non-mandatory up to a threshold. This threshold will be configured by FIU. Once the number of reports without data in these fields exceed the threshold, FIU will reject subsequent reports.

Restructured 'Ground of Suspicion' format — FINnet 2.0 will have a standardised format to report Ground of Suspicion. Similar to the KYC profile, the GoS format too will be standardised across all RE categories. The GoS is mandatory only for STRs. The GoS will comprise four parts:

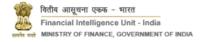
- 1. GoS Tags A standardized Mandatory Fields: Some of the form fields as defined as Threshold Based Mandatory. RE will be able to submit reports with such fields dictionary of tags would be provided that would be available for selection by the RE user. Selecting at least one tag is mandatory. The REs would also be provided an option to add their own tags.
- 2. Short Query(ies) Based on the tags selected, there may be a few short queries that the RE would have to answer to help the FIU process the report more efficiently.
- 3. Narration The most important part of the GoS is the free text narration that would be filled by the PO to describe the entire case. The new format will increase the text limit of the narration to 20,000 characters to help the REs narrate the case better.
- 4. Attachments The RE would have the ability to include relevant attachments that would help the FIU process the case better.
- 5. Summary The GoS page would display a consolidated profile history of the entity being reported including their KYC details, the details of the transaction being reported, and their historical transaction trends

1.4 How to use the New Reporting Formats

This section provides an overview of the steps to identify the relevant reporting format for filing a report by a RE under each scenario.

Step 1: Selection of report to be filed

- The system would then prompt the RE to select the report to be filed.
- In case of threshold-based reports, RE should select the month and year of the report.



- In case of RE with multiple lines of business, RE should select the line of business applicable for the report.
- The reports applicable for a customer or non-customer depends on the RE Type

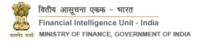
Step 2: Selection of customer or non-customer

- The system would allow the RE to select whether the report is being filed for a customer and / or a non-customer. RE will enter KYC details of Individuals / Non-Individuals for customers and Simplified KYC details of Individuals / Non-Individuals for non-customers. RE will enter account details and the relationship between accounts and persons.

Step 3: Selection of transaction types and transaction formats

- The system would allow for multiple formats to be chosen to allow the RE to file transactions relevant to the report. Currently, FIU has configured TS14 - Virtual Digital Assets Service Provider Transaction for VASP.

Note: Multiple reports (of the same report type) can be filed in bulk in the reporting application (Reporting mechanism 2 described above) when loaded through a bulk (csv or JSON) file. Through this mechanism, all customers would be loaded through a set of bulk customer csv / json / xls, all transactions through bulk transaction files and all GoS (that would contain GoS details) through another bulk STR-GoS file. This would be covered in detail in the respective systems' user manuals.



2 Guide to the new Reporting Formats

This section of the document provides an overview of the reporting formats for different types of reporting entities under different scenarios.

2.1 Navigating the new reporting formats

The table below represents a navigation guide for all REs to identify the relevant reporting formats for their needs and scenario. The representation depicts which reports are expected to be filed by which type of RE, for different type of transactions in case of customer / non-customers.

Table 1:Report Codification

RE Category	Type of report	Transactions	Format Code
	All Reports	KYC profile (Individual Customers)	KC7
		KYC profile (Non-Individual Customers)	KC8
		Simplified KYC profile (non-mandatory) — Individuals Non-Customers	KCS1
Virtual Digital Assets Service Provider		Simplified KYC profile (non-mandatory) - Non- Individuals Non-Customers	KCS2
	NTR ¹	Virtual Digital Assets Service Provider Transaction	TS14
	STR	Virtual Digital Assets Service Provider Transaction	TS14
		GoS profile	GS1

2.2 Reporting Formats for Virtual Digital Assets Service Provider

This section covers the reporting formats for Virtual Digital Assets Service Provider.

KYC Formats 2.2.1

This section covers the KYC formats, for both customers and non-customers, to be reported by Virtual Digital Assets Service Provider.

2.2.1.1 KYC Profile – Individuals (KC7)

This table provides the format for reporting the KYC profile of individual customers.

Table 2: KYC Profile – Individuals (KC7)

#	Column Name	Description	Mandatory
1.	Unique ID	Unique Customer Identification Code maintained by RE to uniquely identify customer / client or beneficial owner,	Yes
2.	First name	First name of the client / beneficial owner	Yes
3.	Middle name	Middle name of the client / beneficial owner	No

¹ NTR is not currently available for VASP and will be implemented in future



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#	Column Name	Description	Mandatory
4.	Last name	Last name of the client / beneficial owner	No, with declaration stating Last name does not exist
5.	Declaration (If Last name is not available)	Declaration to be provided by RE if Last Name of the client / beneficial owner is not available	Yes, if Last name is not available
6.	Gender	Gender of the client / beneficial owner	No
7.	Nationality	Nationality of the client / beneficial owner	Yes
8.	Name of Father	Client / beneficial owner's Father's Name	No
9.	Name of Mother	Client / beneficial owner's Mother's Name	No
10.	Spouse/Partner Name	Client / beneficial owner's Spouse's/Partner's Name	No
11.	Mobile Number	Mobile number of the client / beneficial owner	Yes (Threshold)
12.	Telephone Number	Landline Phone Number of the client / beneficial owner	No
13.	Email ID	E-Mail ID of the client / beneficial owner	No
14.	Date of Birth	Date of Birth of the client / beneficial owner	Yes
15.	Address 1	Address Line 1 as part of address.	Yes
16.	Locality	Locality as part of address	Yes
17.	Country	Country as part of address	Yes
18.	Pin Code	Pin Code as part of address.	Yes
19.	State	State as part of address.	Yes
20.	District	District as part of address.	Yes
21.	City / Village / Town	City / Village / Town as part of address.	Yes
22.	PAN	PAN of the account holder	Yes (Threshold)
23.	Declaration (If PAN is not available)	Declaration to be provided by RE if PAN of the account Holder is not available	Yes, If PAN is not available
24.	Other Identifier Type	One out of the following should be provided: 1. CKCYC 2. Passport 3. Voter's Identity Card 4. Driving License 5. Identity Card Issue by Employer 6. Letter from Authorised Person	Yes, If PAN is not available
25.	Customer Risk Level	Risk level assigned to the individual as per last risk assessment (Low / Medium/ High)	Yes

To be filled for every account held by the reported customer within the RE. $\,$

Account Details This will be the account maintained with the RE by the client / beneficial owner

26.	Account Type	The type of the account needs to be selected	Yes
27.	Account Number	Account numbers of the account held by the client / beneficial owner.	Yes
28.	Account Status	Status of the account (Active/ Dormant/ Closed/Inactive/Blocked/Frozen)	Yes
29.	Reason for Account Freeze	Specify the reason of Account Freeze	Yes, if Account Status=Frozen



#	Column Name	Description	Mandatory
30.	Date of Account Opening	Date of the opening of the account	Yes
31.	Date of Account Closing	Date of closing of the account	Yes, In case of Closed accounts
32.	Branch Code of Account	ID of the RE branch on which the account was opened. RE should ensure that all the branch details are updated in RE profile. If there are no branches, at least one entry should be updated for the headquarters of the RE in branch profile.	Yes
33.	No Of Debits (In last 12 months)	Number of Debit transactions in the 12 months preceding the first reported transaction.	Yes
34.	Total Debit Amount (In last 12 months)	Total amount of debit transactions in the 12 months preceding the first reported transaction. RE should report the INR value of transactions that have happened in the account.	Yes
35.	No Of Credits (In last 12 months)	Number of credit transactions in the 12 months preceding the first reported transaction	Yes
36.	Total Credit Amount (In last 12 months)	Total amount of credit transactions in the 12 months preceding the first reported transaction. RE should report the INR value of transactions that have happened in the account.	Yes
37.	No Of Cash Transaction (In last 12 months)	Number of cash transactions in the 12 months preceding the first reported transaction	Yes
38.	Total Cash Deposit (In last 12 months)	Total credit amount in the 12 months preceding the first reported transaction. RE should report the INR value of transactions that have happened in the account.	Yes
39.	Total Cash Withdrawal (In last 12 months)	Total debit amount in cash in the 12 months preceding the first reported transaction. RE should report the INR value of transactions that have happened in the account.	Yes
40.	Reason for Account Freeze	Reason to entered if Account Status is 'Frozen'	Yes, If Account Status = Frozen

Account Person Relation

The customers and non-customers should be linked to the account

41.	Account Number	Will be dropdown of the already entered Account Number in the Account Details	Yes
42.	Relationship Type	How the customer / non-customer is related to the mentioned account number (Primary Account Holder, Secondary Account Holder, Authorised Signatory, Beneficiary, Nominee, Guarantor)	Yes
43.	Individual / Non- Individual	Specify if the KYC of the linked person is individual or non-individual	Yes



#	ŧ	Column Name	Description	Mandatory
4	14.	Unique Reference Number	Specify the UCIC/ Unique ID of the KYC of the linked person	Yes, if the linked person is a customer
4	! 5.	Name of non- customer	Specify the name of the non-customer, the details need to be provided as simplified KYC	Yes, if the linked person is a non-customer

2.2.1.2 KYC Profile – Non-Individual (KC8)

This table provides the format for reporting the KYC profile of non-individual customers.

Table 3:KYC Profile – Non-Individual (KC8)

#	Column Name	Description	Mandatory
1.	Unique ID	Unique Customer Identification Code	Yes
2.	Name	Name of the Non-Individual	Yes
3.	Place of business	Place of business of the Non-Individual	No
4.	Mobile Number	Mobile number of the Non-Individual	Yes (Threshold)
5.	Telephone Number	Landline Phone Number of the Non-Individual	No
6.	Fax Number	Fax Number of the Non-Individual	No
7.	Email ID	E-Mail ID of the client / beneficial owner	No
8.	Address 1	Address Line 1 as part of address.	Yes
9.	Address Locality	Locality as part of address	Yes
10.	Address Country	Country as part of address	Yes
11.	Address Pin Code	Pin Code as part of address.	Yes
12.	Address State	State as part of address.	Yes
13.	Address District	District as part of address.	Yes
14.	Address City / Village / Town	City / Village / Town as part of address.	Yes
15.	Valid Documents	Name of one of the valid documents should be provided: 1. Certificate of incorporation and memorandum & articles of association 2. Resolution of Board of Directors 3. Power of Attorney 4. PAN allotment letter 5. Telephone bill 6. Registration Certificate 7. Partnership Deed 8. Other Valid Document 9. Resolution of managing body	Yes
16.	Name of Other Valid Document	Name of Other Valid Document	Yes, if Valid Documents = 'Other Valid Document'
17.	Customer Risk Level	Risk level assigned to the individual as per last risk assessment (Low / Medium/ High)	Yes

#	Column Name	Description	Mandatory
18.	Company ID Type	Dropdown of the Company ID Type (CIN / FCRN /	Yes, If Company ID
	company to Type	LLPIN / FLLPIN)	Number is entered
19.	Company ID Number	Unique ID Number assigned to the customer (CIN / FCRN / LLPIN / FLLPIN)	One out of the 5 identifiers (Unique Identification number, GSTIN, PAN, TAN, No identifier available) is mandatory
20.	GSTIN	GST ID number of the entity	One out of the 5 identifiers (Unique Identification number, GSTIN, PAN, TAN, No identifier available) is mandatory
21.	PAN	PAN of the entity	One out of the 5 identifiers (Unique Identification number, GSTIN, PAN, TAN, No identifier available) is mandatory Declaration stating PAN does not exist
22	Declaration (If PAN	Declaration to be provided by RE if PAN of the	Yes, If PAN is not
22.	is not available)	entity is not available	available
23.	PEKRN	PEKRN of the entity	No
24.	TAN	TAN of the entity	One out of the 5 identifiers (Unique Identification number, GSTIN, PAN, TAN, No identifier available) is mandatory
25.	No identifier available	No identifier available Flag to be checked if No identifier is available for the Entity	One out of the 5 identifiers (Unique Identification number, GSTIN, PAN, TAN, No identifier available) is mandatory Threshold Based mandatory



#	Column Name	Description	Mandatory
	Account Details	To be filled for every account held by the reported This will be the account maintained with the RE by owner	customer within the RE.
26.	Account Type	The type of the account needs to be selected	Yes
27.	Account Number	Account numbers of the account held by the customer.	Yes
28.	Account Status	Status of the account (Active/ Dormant/ Closed/Inactive/Blocked/Frozen)	Yes
29.	Reason for Account Freeze	Specify the reason of Account Freeze	Yes, if Account Status=Frozen
30.	Date of Account Opening	Date of the opening of the account	Yes
31.	Date of Account Closing	Date of closing of the account	Yes, In case of Closed accounts
32.	Branch Code of Account	ID of the branch on which the account was opened	Yes
33.	No Of Debits (In last 12 months)	Number of Debit transactions in the 12 months preceding the first reported transaction	Yes
34.	Total Debit Amount (In last 12 months)	Total amount of debit transactions in the 12 months preceding the first reported transaction. RE should report the INR value of transactions that have happened in the account.	Yes
35.	No Of Credits (In last 12 months)	Number of credit transactions in the 12 months preceding the first reported transaction	Yes
36.	Total Credit Amount (In last 12 months)	Total amount of credit transactions in the 12 months preceding the first reported transaction. RE should report the INR value of transactions that have happened in the account.	Yes
37.	No Of Cash Transaction (In last 12 months)	Number of cash transactions in the 12 months preceding the first reported transaction	Yes
38.	Total Cash Deposit (In last 12 months)	Total credit amount in the 12 months preceding the first reported transaction. RE should report the INR value of transactions that have happened in the account.	Yes
39.	Total Cash Withdrawal (In last 12 months)	Total debit amount in cash in the 12 months preceding the first reported transaction. RE should report the INR value of transactions that have happened in the account.	Yes
40.	Reason for Account Freeze	Reason to entered if Account Status is 'Frozen'	Yes, If Account Status = Frozen
	Account Person Relation	The customers and non-customers should be	linked to the account
41.	Account Number	Will be dropdown of the already entered Account Number in the Account Details	Yes
42.	Relationship Type	How the customer / non-customer is related to the mentioned account number	Yes



#	Column Name	Description	Mandatory
		(Primary Account Holder, Secondary Account Holder, Authorised Signatory, Beneficiary, Nominee, Guarantor)	
43.	Individual / Non- Individual	Specify if the KYC of the linked person is individual or non-individual	Yes
44.	Unique Reference Number	Specify the UCIC/ Unique ID of the KYC of the linked person	Yes, if the linked person is a customer
45.	Name of non- customer	Specify the name of the non-customer, the details need to be provided as simplified KYC	Yes, if the linked person is a non-customer

2.2.1.3 KYC Profile – Individual Non-Customers (KCS1)

This table provides the format for reporting the KYC profile of individuals who are not the customers of the RE.

Table 4:KYC Profile - Individual Non-customers (KCS1)

#	Column Name	Description	Mandatory
1.	First Name	First name of the individual	Yes
2.	Middle Name	Middle name of the individual	No
3.	Last Name	Last name of the individual	No
4.	Declaration (If Last name is not available)	Declaration to be provided by RE if Last Name of the individual is not available	Yes, if Last name is not available
5.	Date of Birth	Date of Birth of the individual	No
6.	PAN	PAN of the account	No
7.	Declaration (If PAN is not available)	Declaration to be provided by RE if PAN of the individual is not available	Yes, If PAN is not available
8.	PEKRN	PAN Exempt Investor Category Number of the individual	No
9.	CKYC Number	CKYC Number of the Individual	No Declaration stating CKYC Number does not exist
10.	Declaration (If CKYC is not available)	Declaration to be provided by RE if CKYC Number of the individual is not available	Yes, If CKYC is not available
11.	Passport Number	Passport Number of the individual	No
12.	NREGA Card	NREGA Card number of the individual	No
13.	Voter ID	Voter ID number of the individual	No
14.	Drivers License Number	Driver's License ID of the individual	No
15.	NPR	National Population Registry of the individual	No
16.	Identity verified using Aadhaar ID	Identity verified using Aadhaar ID Flag	No

#	Column Name	Description	Mandatory
17.	DIN / DPIN	Director ID number in case the	
	DIN / DI IN	individual is a director	No
18.	Address Line1	Address Line1 as part of Individual's Address	No
19.	Locality	Locality as part of Individual's Address	No
20.	Country	Country as part of Individual's Address	No
21.	Pin Code	Pin Code as part of Individual's Address Please Note: Portal: Indian Addresses: The Pin-code will be validated against metadata maintained by FIU and will be available as dropdown. Non-Indian Addresses: The Pin-code will be a free text field. Bulk files: Separate fields are provisioned for Indian and Non-Indian addresses.	No
22.	State	Please Note: Portal: Indian Addresses: The State will be validated against metadata maintained by FIU and will be available as dropdown. Non-Indian Addresses: The State will be a free text field and mandatory field will become non-mandatory. Bulk files: Separate fields are provisioned for Indian and Non-Indian addresses.	No
23.	District	District as part of Individual's Address Please Note: Portal: Indian Addresses: The District will be validated against metadata maintained by FIU and will be available as dropdown.	No



#	Column Name	Description	Mandatory
		Non-Indian Addresses: The District will be a free text field and mandatory field will become non-mandatory.	
		Bulk files:	
		Separate fields are provisioned for Indian and Non-Indian addresses.	
24.	City / Village / Town	City / Village / Town as part of Individual's Address Please Note: Portal: Indian Addresses: The City / Village / Town will be validated against metadata maintained by FIU and will be available as dropdown. Non-Indian Addresses: The City / Village / Town will be a free text field and mandatory field will become nonmandatory. Bulk files: Separate fields are provisioned for Indian and Non-Indian addresses.	No
25.	Mobile Number	Mobile number of the individual	No

2.2.1.4 KYC Profile – Non-Individual Non-Customers (KCS2)

This table provides the format for reporting the KYC profile of non-individuals who are not the customers of the RE.

Table 5:KYC profile - Non-Individual Non-Customers (KCS2)

#	Column Name	Description	Mandatory
1.	Full Name	Full legal name of the Entity	Yes
2.	Company ID Type	Dropdown of Company ID Type (CIN/ FCRN/ LLPIN/ FLLPIN)	Yes, If Company ID Number is entered
3.	Company ID Number	Unique Company Identification number of the entity	No
4.	GSTIN	GSTIN of the entity	No
5.	PAN	PAN of the account holder	No
6.	Declaration (If PAN is not available)	Declaration to be provided by RE if PAN of the Entity is not available	Yes, If PAN is not available
7.	PEKRN	PAN Exempt Investor Category Number of the Entity	No
8.	Registered Address Line1	Address Line1 as part of Registered Address of Entity	No

#	Column Name	Description	Mandatory
	Columnitatiic	Description	ivialidatory
9.	Locality	Locality as part of Registered Address of Entity	No
10.	Country	Country as part of Registered Address of Entity	No
11.	Pin Code	Pin Code as part of Registered Address of Entity Please Note: Portal: Indian Addresses: The Pin-code will be validated against metadata maintained by FIU and will be available as dropdown. Non-Indian Addresses: The Pin-code will be a free text field. Bulk files: Separate fields are provisioned for	No
12.	State	Indian and Non-Indian addresses. State as part of Registered Address of Entity Please Note: Portal: Indian Addresses: The State will be validated against metadata maintained by FIU and will be available as dropdown. Non-Indian Addresses: The State will be a free text field. Bulk files: Separate fields are provisioned for Indian and Non-Indian addresses.	No
13.	District	District as part of Registered Address of Entity Please Note: Portal: Indian Addresses: The District will be validated against metadata maintained by FIU and will be available as dropdown. Non-Indian Addresses: The District will be a free text field.	No



#	Column Name	Description	Mandatory
		Bulk files: Separate fields are provisioned for Indian and Non-Indian addresses.	
14.	City / Village / Town	City / Village / Town as part of Individual's Address Please Note: Portal: Indian Addresses: The City / Village / Town will be validated against metadata maintained by FIU and will be available as dropdown. Non-Indian Addresses: The City / Village / Town will be a free text field Bulk files: Separate fields are provisioned for Indian and Non-Indian addresses.	No
15.	Secondary Address Line1	Address Line1 as part of Secondary Address of Entity	No
16.	Locality	Locality as part of Secondary Address of Entity	No
17.	Country	Country as part of Secondary Address of Entity	No
18.	Pin Code	Pin Code as part of Secondary Address of Entity Please Note: Portal: Indian Addresses: The Pin-code will be validated against metadata maintained by FIU and will be available as dropdown. Non-Indian Addresses: The Pin-code will be a free text field. Bulk files: Separate fields are provisioned for Indian and Non-Indian addresses.	No
19.	State	State as part of Secondary Address of Entity Please Note: Portal:	No



#	Column Name	Description	Mandatory
		Indian Addresses: The State will be validated against metadata maintained by FIU and will be available as dropdown. Non-Indian Addresses: The State will be a free text field.	
		Bulk files: Separate fields are provisioned for Indian and Non-Indian addresses. District as part of Secondary Address of	
20.	District	Please Note: Portal: Indian Addresses: The District will be validated against metadata maintained by FIU and will be available as dropdown. Non-Indian Addresses: The District will be a free text field. Bulk files: Separate fields are provisioned for Indian and Non-Indian addresses.	No
21.	City / Village / Town	City / Village / Town as part of Individual's Address Please Note: Portal: Indian Addresses: The City / Village / Town will be validated against metadata maintained by FIU and will be available as dropdown. Non-Indian Addresses: The City / Village / Town will be a free text field Bulk files: Separate fields are provisioned for Indian and Non-Indian addresses.	No
22.	Mobile Number	Mobile number of the account holder (Option available to add multiple values)	No

2.2.2 Transaction Formats

2.2.2.1 Suspicious Virtual Digital Assets Service Provider Transaction (TS14)



This table provides the format for reporting the suspicious transaction.

Table 6: Suspicious Virtual Digital Assets Service Provider Transaction (TS14)

#	Column Name	Description	Mandatory
1.	Relationship Flag	Sender/Receiver The relationship of the client to the transaction should be provided. If fund flows from client to another person, select 'sender'. If fund flows from another person to client, select 'receiver'.	Yes
2.	Date	Date of the transaction	Yes
3.	Time	Time of the transaction	No
4.	Transaction ID	Unique Transaction ID	Yes
5.	Transaction Amount (INR)	Amount of the transaction, INR value should be provided	Yes
6.	Transaction Type	Type of the transaction Exchange with fiat currency – purchase Exchange with fiat currency – sale Exchange between Virtual Asset Transfer of asset Safekeeping of asset Participation / Provision of services	Yes
7.	Digital Asset Name	Type of the Digital Asset	Yes
8.	Digital Asset Quantity	Quantity of the Digital Asset	Yes
9.	Digital Asset Transaction Rate in Fiat Currency	Transaction Rate of Digital Asset in Fiat Currency	Yes
10.	Fiat Currency	Type of the Fiat Currency	Yes
11.	Transaction value in Fiat Currency	Transaction value in Fiat Currency	Yes, if Transaction Type is Exchange with fiat currency — purchase Exchange with fiat currency — sale Yes, if Transaction Type is Transfer of asset Safekeeping of asset Participation / Provision of services

#	Column Name	Description	Mandatory
12.	Counterparty Exchange Name	Counterparty Exchange Name	Yes, if Transaction Type is Exchange between Virtual Asset
13.	Counterparty Name	Name of the Counterparty	Yes, if Transaction Type is Exchange between Virtual Asset Transfer of asset
14.	Counterparty Virtual Asset Quantity	Counterparty Virtual Asset Quantity	Yes, if Transaction Type is Exchange between Virtual Asset Transfer of asset
15.	Counterparty Virtual Asset Type/Name	Type of the Digital Asset	Yes, if Transaction Type is Exchange between Virtual Asset Transfer of asset
16.	Customer Name	Customer Name	Yes
17.	Customer Wallet Address	Customer Public Wallet Address, to be provided if the fund inflow / outflow is routed through customer wallet.	No
18.	Counterparty Public Wallet Address	Counterparty Public Wallet Address, to be provided if the fund inflow / outflow is routed through wallet.	No



#	Column Name	Description	Mandatory
19.	Related Bank Account Number	Related Bank Account Number associated with the transaction, to be provided if the fund inflow	No
	Account Number	/ outflow is routed bank account.	
20.	Related Bank Account IFSC Code	Related Bank Account IFSC associated with the	Yes, if the Related Bank
		transaction, to be provided if the fund inflow /	Account Number is
		outflow is routed bank account.	provided

2.2.3 Grounds of Suspicion (GS1)

Initial Display will show the KYC Profile. All but the last field will be Auto Populated by the system and will be non-editable in the GoS format.

Table 7 : Grounds of Suspicion - KYC (GS1)

#	Column Name	Description	Mandatory
1.	Name	Name of the entity to be reported	Auto Populated
2.	Address		Auto Populated
3.	PAN (mandatory) PAN to be provided or bank to attest 'not available'	PAN of the entity to be reported.	Auto Populated
4.	Unique ID (CKYC/GSTN/CIN)		Auto Populated
5.	Risk		Auto Populated
6.	Profession/ LOB		Auto Populated
7.	Income (per year)		Auto Populated
8.	Role (Main / associate)	If there are multiple entities mentioned in the STR the PO would identify the main person and the associated persons	To be filled by PO

The second part will display the transactions which were reported. These transactions will be Auto Populated by the system and will be non-editable in the GoS format.

Table 8: Grounds of Suspicion - Transactions (GS1)

Type of Transaction	Total Debit	Total Credit	Transaction Count	Amount (in INR)
Suspicious Transaction				

The third part will display the Account Details of all reported accounts in the following format. These fields will be Auto Populated by the system based on the details entered in Account Details and will be non-editable in the GoS format.



Table 9 : Grounds of Suspicion - Account Details (GS1)

Field		Description	Mandatory
Account number		Reported account Number	Auto Populated
Total debit	Number of transactions	Number of Debit transactions in the 12 months preceding the first reported transaction	Auto Populated
in last 12 months	Amount (in INR)	Total amount of debit transactions in the 12 months preceding the first reported transaction	Auto Populated
Total credit	Number of transactions	Number of credit transactions in the 12 months preceding the first reported transaction	Auto Populated
months	Amount (in INR)	Total amount of credit transactions in the 12 months preceding the first reported transaction	Auto Populated
Total anah	Number of transactions	Number of cash transactions in the 12 months preceding the first reported transaction	Auto Populated
Total cash transactions in last 12 months	Deposit Amount (in INR)	Total credit amount in the 12 months preceding the first reported transaction	Auto Populated
HIOHHIS	Withdrawal Amount (in INR)	Total debit amount in cash in the 12 months preceding the first reported transaction	Auto Populated

RE will be required to mention the below details of the fund flow on the reported transactions

Table 10: Grounds of Suspicion - Fund Flow (GS1)

Field	Description	Mandatory	
Source of Funds	Free text field detailing from whom did the concerned	Yes	
Source of Fullus	entity receive the funds which were reported	165	
Destination of funds	Free text field detailing to whom did the concerned	Vos	
Destination of funds	entity send the funds which were reported	Yes	

RE will then be required to add tags to the report depending on suspicions

Table 11: Grounds of Suspicion - Tagging (GS1)

Field	Description	Mandatory
Suspicion due to	A choice will need to be made out of the 4 main sources of suspicion - Proceeds of crime - Unusual or complex transactions - No economic rationale or bonafide purposes - (Suspicion of) financing of terrorism	Yes
Source of alert	A choice will need to be made out of the 10 main sources of STR trigger	Yes

Field	Description	Mandatory
	A choice will need to be made from a list which will be	
Red Flag Indicator	available as a drop down based on source selected	Yes
	above, as per applicable RE category	
	A choice will need to be made from a high-level	
Type of suspicion	dictionary which will be provided, with an option to add a	Yes
	new tag.	

RE will then respond to queries that would be system generated based on the alerts selected above. RE will also add the detailed narration and if available, attachments.

Table 12: Grounds of Suspicion: Queries, Attachment and Narration (GS1)

Field	Description	Mandatory
Queries (One or more)	Based on the tags submitted under "Type of suspicion" by the RE, the system would prompt a set of relevant queries for the RE to answer.	No
	These queries would help the FIU understand the case better and also support the respective LEA.	
Narration	RE will be required to enter a narration, explaining the RE's point of view, explaining the reasons leading to the suspicion on the entity. This free text will be limited to 20,000 characters and will be expected to have the details of the entity, his suspicious activities and any information which might be relevant to the report	Yes
Attachments	RE will have an option to attach any documents to the report which may help the FIU or the relevant LEA in processing the report. Up to 5 attachments will be allowed to be attached, size of each not exceeding 5MB	Yes