

Explanatory guidelines on reporting to the Financial Intelligence Unit

1 GENERAL PROVISIONS

1. Regulation No. 42 of the Minister of Finance of 20 November 2020 on the “Content and form of reports to be submitted to the Financial Intelligence Unit and guidelines for submitting a report” lays down the requirements for the form of a report submitted to the Financial Intelligence Unit, and the guidelines for the submission of the report, by the persons specified in § 2 of the Money Laundering and Terrorist Financing Prevention Act and § 20 (1), § 24 (1) and § 25 (1) of the International Sanctions Act.
2. These guidelines largely repeat the guidelines set out in the Regulation but provide further explanatory instructions and specifications on the guidelines for submitting a report as established by the Minister of Finance, to be used as guidance when submitting a report to the Financial Intelligence Unit (hereinafter: the FIU).
3. Any natural and legal person who has doubts as to whether, or knows, that a person who has a business relationship with them or is carrying out a transaction or act, or a person who intends to establish a business relationship with them or to carry out a transaction or act, is a subject of international financial sanctions, shall immediately notify the FIU thereof, and of the measures taken.
4. If a person having specific obligations listed in § 20 of the International Sanctions Act or a person authorised by such person (hereinafter: obligated person) has doubts as to whether a person who has a business relationship with them or is carrying out a transaction or act, or a person who intends to establish a business relationship or to carry out a transaction or act, is a subject of international financial sanctions, shall obtain additional information from that person to establish the fact.
5. If the person referred to in clause 4 of these guidelines refuses to provide additional information or the information does not allow determining whether the person is a subject of international financial sanctions, the obligated person refuses to carry out the transaction or act, implements the measures provided for in the legislation imposing or implementing international financial sanctions, and immediately reports the doubts and the application of any measures to the FIU.
6. Where a directly applicable European Union Regulation provides for a financial sanction that is not related to persons but to a territory, entity or goods¹ –, the implementation of or the possible need to implement such sanction must also be immediately reported to the FIU.

¹ In the case of a prohibition or restriction on the carriage of goods, the competent authority under § 11 (3) 4) of the International Sanctions Act shall be the Ministry of Finance. Where a prohibition or restriction is imposed on the carriage of goods, the FIU should only be notified if the restrictions on the goods fall under the definition of financial sanctions (e.g. a prohibition on the financing of such a transaction).

7. In the event of a suspicion of money laundering or terrorist financing, upon the identification of unusual transactions and a subject of international financial sanctions or doubts as to whether a person is a subject of international sanctions, the obligated persons shall be guided by the FIU's guidelines on the characteristics of suspicious transactions and the guidelines on the application of international financial sanctions. The guidelines are published on the website of the FIU.

2 PREPARATION AND SUBMISSION OF NOTIFICATIONS

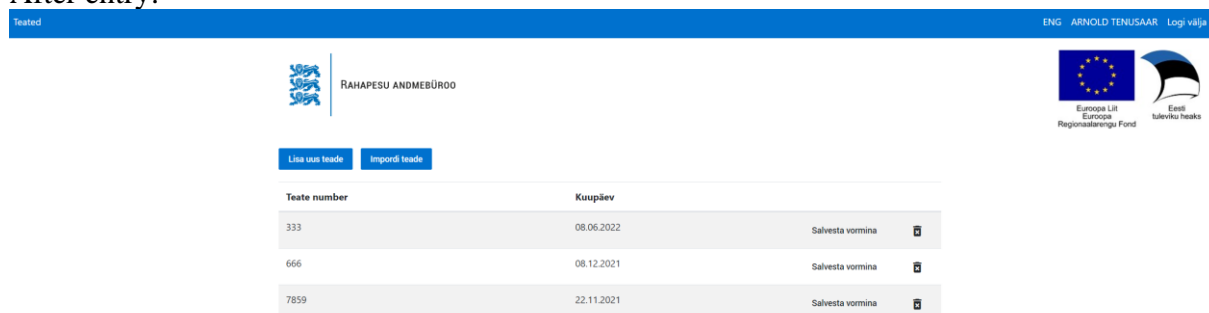
8. A notification is submitted to the FIU digitally using a form ("Notify us") on the FIU's website or a format agreed with the FIU (XML format). A notification submitted in the format agreed with the FIU is submitted through the X-Road system. When submitting a notification through the website, we recommend using the Google Chrome browser.
9. In exceptional cases where the notification cannot be submitted as described in clause 8 of the guidelines, the notification may be sent, with the FIU's consent, to the e-mail address info@fiu.ee. To obtain the consent, a reasoned request must be sent to the FIU to the same e-mail address.
10. **A notification submitted by e-mail** shall contain at least the following information:
 - 1) the personal information and contact information of the bearer;
 - 2) the type and number of the report;
 - 3) the main cause of the notification, and additional cause(s), if any;
 - 4) identification data of all parties to the transaction, their roles in the transaction and addresses of the place of residence/location;
 - 5) information on the object and cost/amount of the transaction;
 - 6) a description of the transaction, as clearly as possible, describing the parties to the transaction, their roles in the transaction, the object of the transaction and other characteristics of the transaction.

If necessary, copies of the relevant documents shall be added to the report.

INFORMATION BLOCK 3: "ENTER": <https://rabis-web.politsei.ee/#/>



After entry:



PLEASE NOTE! An inactive session is open for 30 minutes

11. If the notification is submitted using the FIU’s website, the language EST/ENG must be selected first, and then either “Sisene” or “Enter”. Then, the person preparing the notification identifies themselves either with an ID card, Smart-ID account or Mobile-ID. If the notification form has been previously stored on the computer, the “Import” button should be clicked, and if the notifier has any previous incomplete notifications, they can select the relevant notification number from the table to proceed. The option “Add new notification” must be clicked to prepare a new notification. The personal data of the notifier and the bearer, which were entered in the previous session, are displayed in the opened form.
12. All fields marked with an asterisk (*) must be completed; the remaining fields must be filled in if the information is available. It is not possible to navigate between the information blocks of the notification if the fields marked with an asterisk are not filled in. The “Next” button is activated after all fields marked with an asterisk have been filled in. If the inactive “Next” is clicked, the system will display the required blank fields in red.
13. Clicking on the letter “i” in the black circle in the header of the information block will display additional information to help fill in the relevant part of the form.
14. An incomplete notification can be saved by clicking on “Save”. Incomplete notifications will be displayed in a table showing the notification number and the date of entry. The

entry of the notification can be continued later (by clicking on the notification number), or the notification can be deleted (by clicking on the recycle bin symbol with a cross).

- Information blocks can be navigated using the “Next” and “Back” buttons at the bottom right of the page or by clicking on the headings of the information blocks at the top of the notification.

INFORMATION BLOCK 4: “NOTIFIER”

1 Teate koostaja 2 Teade 3 Osapooled 4 Tehing 5 Dokumendid 6 Esitamine

Teate koostaja

Eesnimi _____ Perekonnanimi _____ Isikukood _____

Sidevahendid [Lisa](#)

Telefon * _____ E-post * _____ Koduleht _____

Teataja

Isiku tüüp *
Juriidiline isik (resident) ▼

Asutuse nimi * _____ Registrikood * _____

Seaduse kohustatud subjekt * _____

Põhitegevusala * _____ Teatega seotud tegevusala * ▼

Adressid [Lisa](#)

Riik
Eesti ▼ Sisesta aadress _____ Sihtnumber _____

Teate esitaja on tehingu üks osapooltest

- When the notifier is identified, the system automatically displays the first and last name and the personal identification code. The contact information of the notifier and the bearer must be entered in the fields “Phone”, “E-mail” and “Homepage” under the section “Communication devices”. At least one telephone number and one e-mail address must be entered. By clicking on “Add more”, other means of communication can be added by selecting the communication device from the drop-down menu and entering the contact information in the “Contact” field. To add more information, click on “Add more” next to the “Communication device type” and “Contact” rows. Several additional means of communication can be added by clicking on the “Add more” button each time.

- In the section under “Bearer”, choose the person type – legal or natural person, non-resident or resident (in case of a legal person, also a person with a non-resident shareholder) or e-resident (hereinafter: person type), from the drop-down menu.

- For the person type selected, enter the personal data in the fields displayed (name(s) of the person, registry code / personal identification code, place of business in case of a

non-resident, country of origin, tax residency (country) or, in case of a resident with a non-resident shareholder, information of the owner company).

19. The obligated subject must be selected from the drop-down menu according to the name of the legally obligated subject group, after which a web-based form to select the main business area will be activated, and the last to activate is the notification business area field.
20. To add an address, select the country from the drop-down menu in the subsection “Addresses” and enter address in the “Enter address” line (the address must be as accurate as possible). When adding an Estonian address, choose the correct one from the choices offered by the Estonian Land Board information system. Add additional addresses by clicking on “Add more” behind “Addresses”.
21. If the notifier is a party to the transaction, the field “Notifier is a party to the transaction” must be ticked.
22. To move forward from the “Notifier” information block, click on “Save” and then “Next” after successful saving.

INFORMATION BLOCK 5: “NOTIFICATION”

Teade

Teate liik: *

- Rahapesukahtlane tehing (STR)
- Ebaharilik tehing (UTR)
- Ebatavaline tegevus (UAR)
- Rahvusvahelise sanktsiooni seaduse subjekt (ISR)
- Summa üle piirsumma sularahas (CTR)
- Terrorismi rahastamise kahtlus (TFR)

Teate number
333

Põhjaend *

1.2. Kahtlus isiku poolt esitatud andmete tõele vastavuses

Lisaaajendid

Lisa

Kiire

Põhjus *

Tehing peatatud

Põhjuse lisaselgitus
dgh

Eelmise teate number Eelmise teate esitamise kuupäev

Tagasi Salvesta Edasi

23. In the information block “Notification”, the notification type must be selected first. It is mandatory to add a registration number of the notifier to the notification by entering it in the field “Notification number”. If the notification is not completed at once, it can be found later using the correct notification number.

23.1. The notification type STR “Suspicious Transaction Report” is selected in case of a suspicion of money laundering, when the suspicion has not been removed. In most of these cases, the transaction must not be carried out (must be postponed), or a customer relationship must not be established.

- 23.2. The notification type UTR “Unusual Transaction Report” must be selected when there is no suspicion of money laundering, but the transaction is unusual and does not follow the usual logic. There is no need to stop the transaction.
- 23.3. The notification type “Unusual Activity Report” must be selected in case of repeated or continuous unusual transactions or activities. When describing transactions, write the names of any known persons that provide the main resources for the transactions, in the “Main sources” field. If all suspicious transactions are made from one party to another and there are many of them, not all transactions need to be described individually. However, an account statement must be added and the total amount related to the notification must be corrected manually by balancing the transfers made back and forth. The customer relationship may be continued.
- 23.4. The notification type ISR “International Sanctions Report” must be selected in case of doubt as to whether, or knowledge, that the transaction violates international sanctions or the transaction relates to a **subject of international sanctions**, i.e. to a person included in the sanctions list. When choosing the cause, it must be specified whether the financial sanctions are imposed based on a suspicion or without a suspicion (causes 1 or 2). The indicator “Application of activity-based sanctions and suspicion of application of activity-based sanctions” (cause 3) includes activity-based sectoral sanctions, such as a prohibition on issuing a security or granting a loan. The persons located in Russia / Russian citizens are subject to a deposit limit of 100,000 euros and a restriction on cryptoassets. The indicator “Application of non-binding international sanctions” (cause 4) is selected for notifications if measures have been implemented due to the restrictions imposed by OFAC/OFSI, for instance. “Application of the restrictions specified in other type of sanction (other than financial sanction) or suspicion of the imposition of other type of sanction” (cause 5) provides an indication of the services or transactions involving goods, and “Circumvention of international sanctions” (cause 6) is the case when there are indications of intentional circumvention of sanctions.
- 23.5. Type CTR,² “Cash Transaction Report”, with causes 1 or 2 is selected where there is no suspicion of money laundering, but a **cash transaction** in one or more related transactions exceeds 32,000 euros. In case of a suspicion of money laundering, STR is selected. If there is no suspicion and the amount does not exceed the limit, UTR is selected, and the cause is reference to cash. **CTR with the causes 3–5 is used only by the Tax and Customs Board** in case of cash movements at the border of the European Union.
- 23.6. The report type TFR or “Terrorist Financing Report” is selected where the transaction or operation has a characteristic indicative of the risk or suspicion of terrorist financing. More specifically, **TFR-1 (Terrorist Financing Report / Unusual Transaction Report)** is selected where a party to the transaction (a natural person, a legal person or another association) is related to a high-risk country and, according to the guidelines on the characteristics of suspicious transactions, there is an indicator referring to unusual nature / the risk of terrorist financing. The

² for credit institutions in occasional transactions with a non-customer, and for other obligated persons in case of all transactions.

transaction or operation may be continued if enhanced due diligence measures are applied **TFR-2 (Terrorist Financing Report)**, which does not expect a link with a high-risk country, is selected where there is a suspicion according to the guidelines on the characteristics of suspicious transactions. The transaction must be suspended until further instructions from the competent authority, and the obligated person is prohibited from making any funds available to the customer. In the case of a TFR, it is important that the notifier would indicate all facts referring to the risk or the suspicion, as well as the contact information of the parties (telephone, e-mail address).

24. When the report type is selected, the “Main cause” option is activated and the appropriate characteristic of the suspicion or the cause for submitting the notification must be selected from the drop-down menu. **It is mandatory to select the main cause.** In case of an additional cause, it is added by clicking on “Add new” under the “Additional causes”. Additional cause is selected from the drop-down menu and in case of several additional causes, “Add new” can be clicked several times. The information provided in the document “Guidelines on the characteristics of suspicious transactions” helps select the notification type and cause. (See <https://fiu.ee/oigusaktid-ja-juhendid/juhendid#juhend-kahtlaste-teh>)
25. If necessary, the notification can be marked “Urgent” by ticking the relevant box. When ticking the box, a reason for the urgency must be selected from the drop-down menu that opens. If the reason for the “Urgent” is the fact that transactions with the assets involved in the suspicion could possibly be restricted, the value and description of such assets must be added to the reason comment field. If necessary, other additional causes for the reason can be entered. Any financial sanction report submitted under the International Sanctions Act with the causes 1–3 will be marked “Urgent” and the reason for the urgency should be “ISR suspicion”, selected from the drop-down menu.
26. The lower part of the information block “Notification” displays the number of the last notification submitted by the notifier, together with the date, which is of informative nature. This will help keep track. To move forward from the “Notification” information block, click on “Save” and then “Next” after successful saving.

INFORMATION BLOCK 6: “PARTIES” (for entering all persons related to the notification)

Teate koostaja Teade **3 Osapooled** 4 Tehing 5 Dokumendid 6 Esitamine

Osapooled +1 [Lisa osapool](#)

Isikukood/Registrikood	Nimi	Esindaja tehingus	Volitaja	Seotud isikud
466466	Tavid			Muuda Kustuta
14599147	System1 LLC			Muuda Kustuta

[Tagasi](#) [Edasi](#)

RAHAPESU ANDMEBÜROO

Teate koostaja Teade **3 Osapooled** 4 Tehing 5 Dokumendid 6 Esitamine

Osapooled +1 [Lisa osapool](#)

Isikukood/Registrikood	Nimi
466466	Tavid
14599147	System1 LLC

Osapool

[Vali seotud isikute hulgast](#) [Lisa uus isik](#)

[Katkesta](#) [Lisa](#)

[Tagasi](#) [Edasi](#)

Teate koostaja Teade

Osapooled +1 [Lisa osapool](#)

Isikukood/Registrikood	Nimi
466466	Tavid
14599147	System1

Isiku andmed +1

Isiku tüüp *
Juridiline isik (resident)

Nimi * Registrikood *

Asutamise aeg Lõpu aeg

Aadressid +1 [Lisa](#)

Riik Eesti Sisesta aadress Sihtnumber

Sidevahendid +1 [Lisa](#)

Telefon E-post Koduleht

Pangakontod +1 [Lisa konto](#)

Märkused

[Katkesta](#) [Lisa](#)

27. In the information block “Parties”, click on “Add party”. If the notifier is connected to the notification, the person can be chosen from the drop-down menu “Choose from connected persons”. If the notifier has a representative in the transaction, the field should be ticked. A representative related to the notification can be selected from the drop-down menu “Choose from connected persons”; otherwise, the representative must be added by clicking on the “Add new person” button. **All persons connected to the transaction(s), and persons who participate in the transaction(s) about whom documents are attached to the notification, must be registered as parties. Natural**

persons connected with a legal person must be connected with the legal persons in accordance with their role (member of management board, actual beneficiary, etc.).

28. If a party has additional connected persons, click on “Add connected person”, select the role of the person from the drop-down menu and add the person from among the persons connected to the notification or by clicking on “Add new person”.
29. When clicking on “Add new person”, select the person type first, which will open the fields that characterise this person type. The rows opening after the selection of the person type must be filled in as accurately as possible with the information available. **For resident and e-resident customers, the registry code or personal identification code is required.** In the case of non-resident or e-resident persons, all information known to the notifier must be entered, including the information which needs to be retrieved from the documents available. In case of a TFR report, the contact information of the parties (telephone, e-mail address) is particularly important. The nationality of a natural person is not important, but citizenship is important.
30. **If a party is a person whose name and account number only are known**, legal person (residency for tax purposes not specified) or natural person (residency for tax purposes not specified) is selected as person type. The only required field is Name. Other information and account details are also entered if available.
31. In the “Bank accounts” section of the person details block, for all accounts/wallets involved in the transaction, the account number or wallet address, the bank/service provider and the country of location of the bank must be specified, and in the case of a foreign bank, the country of location must be started with. In the case of bank accounts with an Estonian IBAN number, the program checks the length of the bank code and the account number. To add a bank account statement (by clicking on “Add document”), fill in the metadata fields (statement date, statement period and description of the content if necessary), then click on “Add file” and drag and drop the file. The document is automatically associated with the person. **The field Comments under the account** is not for describing the transaction, but for commenting on the accounts. When all fields are filled in and the file has been attached, click on “Save”. In the case of a cryptocurrency wallet, the address of the wallet, the name of the service provider and the country must be added. **The address of the wallet is treated on the same basis as the bank account number.** If a cryptocurrency wallet registered as the payer’s or receiver’s account is selected when entering transactions, additional fields are displayed to describe the transaction made in cryptocurrency, where the transaction ID, the amount in cryptocurrency and the type of cryptocurrency can be entered. If the list of cryptocurrency types does not have the correct currency type, the option “Other currency” should be selected to enter the currency manually.

Arvelduskonto
 Virtuaalkonto
Virtuaalvääringu rahakott
 Väärtpaberikonto
 Hoiukonto

Rahakoti aadress	Teenusepakkuja	Teenusepakkuja asukoht Eesti
------------------	----------------	--

Isikut tõendavad dokumendid
[Lisa dokument](#)

Märkused

Katkesta
[Salvesta](#)

32. If the address of the account or wallet is known, but the owner is not known, the party to be added is Non-resident legal person, where the bank account number / wallet address is written in the NAME field and the account or wallet details are also entered in the account sub-section . Transactions are described using this person and account like others.

Nimi *
 11111f47a259ffffff77cd2zxaq\

Registrikood _____

Asutamise aeg

Lõpu aeg

Peamine tegevuskoht

Päritolu

Maksuresidentsus

Aadressid [Lisa](#)

Riik
 Teadmata

Sisesta aadress _____

Sidevahendid [Lisa](#)

Telefon

E-post

Koduleht

Pangakontod [Lisa konto](#)

Konto tüüp *
 Virtuaalvääringu rah...

Rahakoti aadress
 11111f47a259ffffff77cd2zxac

Teenusepakkuja

Isiku andmed ⓘ

Sidevahendid ☰ Lisa

Dokumendi lisamine ⓘ

Lisa fail

Faile saab lohistada siia

Dokumendi liik * ▼ Kuupäev 📅

Sisu

Katkesta Salvesta

33. For a natural person, identity document information can be added in the information block concerning the person, and for a legal person, the data of the documents related to the legal person, by selecting the type of document in the drop-down menu (see Annex 1 for options) and filling in the metadata fields. The document is automatically associated with the person. A copy of the document must only be attached if the required information is not available from the commercial register and the population register. To attach a copy of a document, click on “Add file” and drag and drop the respective file. Comments about the submitted documents can be written in the “Content” field.
34. Further explanations about the identity of a person must be entered in the “Comments” field. To move forward, click on “Save”. To register the saved person in the notification as a party, click on “Add”.
35. After a party has been saved, the data submitted about the person can be changed by clicking on “Change”, or the person can be removed by clicking on “Remove”.
36. To add additional parties to the notification, each new person should be added by clicking on “Add party”.
37. After adding all parties to the transaction and their representatives, click on “Next”.

INFORMATION BLOCK 7: “TRANSACTION”

Tehing Tehingut pole

Rahapesukahtlane tehing (STR)

Tehingu liik *

Summa ▼

Lisa tehing *Peab olema lisatud vähemalt üks tehing.

<input type="checkbox"/> Sularaha	Kuupäev 📅	Summa *	Valuuta EUR - Euro ▼
Kellelt ▼	Maksja konto ▼	Kellele ▼	Saaja konto ▼

SWIFT kirje koopia **Lisa dokument**

Kustuta

Teatega seotud kogusumma

Summa Valuuta

Tehingu kirjeldus *

Kas küsiti vara päritolu?

Tuli tagastusnõue?

Teate koostaja Teade Osapooled **4 Tehing** 5 Dokumendid 6 Esitamine

Tehing Tehingut pole

Rahapesukahtlane tehing (STR)

Tehingu liik *

Vara ▼ Tehingu alamliik ▼

Tehingu kirjeldus *

Ettevõte

Kinnisvara

Väärtpaberid/nõuded

Vallasvara

Majandusressurss

Kas küsiti vara päritolu?

Tuli tagastusnõue?

Tagasi Salvesta **Lisa**

38. The content of the information block “Transaction” depends on the type and causes of the previously registered notification, as well as the transaction types Property or Amount. The fields displayed are somewhat different. The displayed form must be filled in as accurately as possible.

39. Transaction description should indicate the person(s) from among the parties who are the subjects of the suspicion or whose transactions/operations are sought to be identified as suspicious in the notification, and should describe the transactions and circumstances referring to the reasons for submitting the notification. (For example, position on the existence of goods/services, movement of goods, movement of money, economic

feasibility of a transaction, links between the parties, circumstances raising suspicion.) The description of the transaction must be a clear, well-structured and comprehensible overview of the suspicious activity. The content should be described based on a chronological or characteristic-based structure depending on the nature of the activity. The chronological structure means that the obligated person describes the activities in chronological order (when and which events took place). The characteristic-based structure means that the description is structured into different thematic blocks (suspicious transactions; background of the related parties; summary/conclusions; decision to continue/terminate the customer relationship).

40. Trend/typology in transaction description

39.1 If the money laundering trend or typology (such as commercial money laundering, use of money mules, loan transactions, etc.) can be identified through an analysis, it should certainly be registered.

39.2 Suspected predicate offence, if any.

39.3 Circumstances of the event (time, place, manner, reason, persons).

The following questions should be answered when analysing suspicious activity: Who? Where? When? Why? How?

39.4 The cause of the suspicion (what prompted the bank to apply enhanced due diligence measures).

39.5 The due diligence measures applied and the conclusions drawn from them (analysis).

39.6 Information about the continuation/termination of the customer relationship.

41. If there is no actual transaction in the notification, the transaction description should include a description of the event of submitting the notification, and the option “No transaction” in the upper right corner should be clicked. **Transaction description must not be left empty.** If the transaction was described and the option “No transaction” was clicked accidentally, the transaction description can be restored by clicking “Transaction took place” in the upper right corner.

42. In the case of a financial transaction, the transaction type is “Amount”. Transactions are described by filling in the fields that open. The total amounts of all transactions are automatically added to the field “Total amount related to notification”. If an amount of money is present in several transactions, the total amount must be corrected manually.

43. In practice, there are two possible options for cryptocurrency transactions.

42.1 A transaction between cryptocurrency wallets, showing the payer and the receiver, the addresses of the wallets, the transaction ID, the amount in cryptocurrency and type of virtual currency.

42.2 The transaction is a purchase and sale of the cryptocurrency, where two transactions must be described, i.e. the transfer of ordinary funds from the buyer to the seller and the transfer of the cryptocurrency from the seller's wallet to the buyer's wallet.

Rahapesukahtlane tehing (STR)

Tehingu liik *
Summa

Lisa tehing *Peab olema lisatud vähemalt üks tehing.

<input type="checkbox"/> Sularaha	Kuupäev 01.10.2022	Summa * 23 452	Valuuta EUR - Euro
Kellelt DEF	Maksja konto 22222bbbb11111cccc33333ffffdd	Kellele A B	Saaja konto 11111aaaa22222bbbb33333ccccff
Tehingu ID gagafasfrtrwrfwvfgvdsxgb		Summa virtuaalväärings * 0,33	Virtuaalvääringu liik * Bitcoin
SWIFT kirje koopia Lisa dokument			Kustuta

<input checked="" type="checkbox"/> Sularaha	Kuupäev 01.10.2022	Summa * 23 452	Valuuta EUR - Euro
Kellelt A B	Maksja konto	Kellele DEF	Saaja konto
Riigist Eesti	Riik Eesti		

44. To add information about the transaction, click “Add transaction” and fill in the rows that opened, as accurately as possible, by selecting the appropriate options from the drop-down menu. In case of more than one transaction, each transaction is added separately by clicking on “Add transaction”. If the transaction was carried out in cash, the field “Cash” is ticked and the appropriate options are selected from the drop-down menu country fields “From” and “To”. If bank accounts are used in the transaction, these must be priorly entered together with the respective parties to the transaction. The total transaction amount is entered separately for each currency under “Total amount related to notification”.
45. If the notifier asked or knows the origin of the assets, the field “Asked asset origin” is ticked, the description of the asset is added and, if available, documents to prove the origin of the assets are added by clicking “Add document”, filling in the metadata and dragging and dropping the file.
46. If a refund request was submitted after the transaction, the field “Has received refund request?” is ticked, and a copy of the SWIFT entry for the refund request, if available, **in case of an urgent notification**, is added by clicking on “Add document”.
47. In the case of a property transaction (movable and immovable property, securities/claims, company, economic resource), the transaction type and transaction object selected from the drop-down menu must be “Property”. For each option, there are fields describing the corresponding transaction, which must be filled in diligently.
48. For all of the options described above, the free text field “Transaction description” must also be filled in, to describe the parties to the transaction, their roles, the object of the

transaction and other characteristics of the transaction in such a way that the nature of the transaction is revealed.

49. For an ISR report type, there are additional fields in the transaction block. Select the legislative act governing the respective sanction, and the measures taken, from the drop-down menus “Regime” and “Taken measures”. In the “Sanctions subject” field, enter the person, object or territory included in the sanctions list. The field “Transaction description” must provide a comprehensive overview of the reasons for the notification. It should specify all information and details (parties, dates, amounts, measures and date of application thereof) relating to the transaction, followed by an analysis by the notifier explaining the link between the transaction and the subject of sanctions and/or explaining why the case is a transaction in violation of sanctions or is suspected of being so.

The screenshot shows a form titled "Sanktsioneeritava vara väärtus" (Sanctionable asset value). It contains the following fields:

Summa	Valuuta
Summa	
0,00	EUR

Tehingu kirjeldus *

Sanktsiooni subjekt

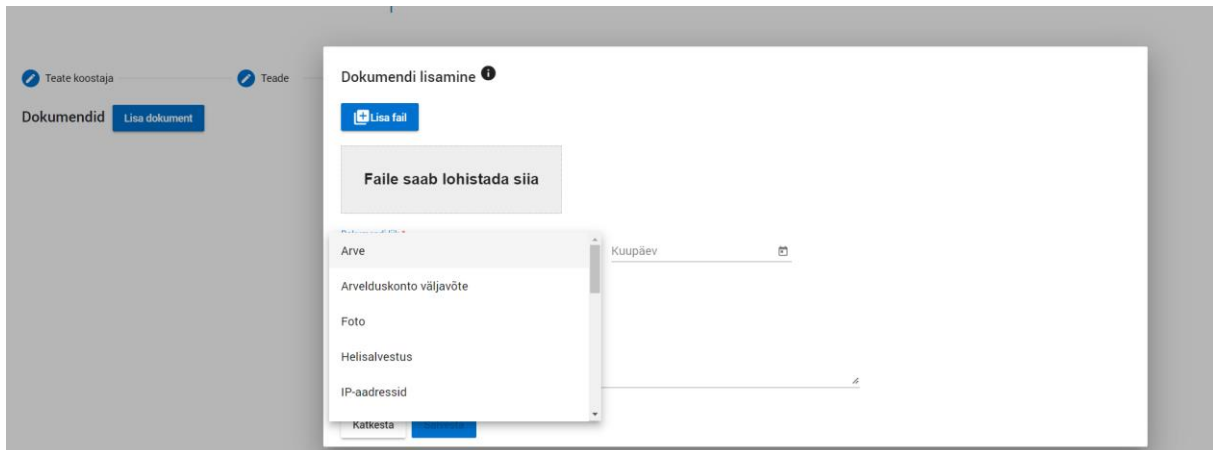
Režiim

Võetud meetmed

Meetmete võtmise aeg

50. The field “Transaction description” describes the procedure for the analysis which resulted in the conclusion that there is a need to apply international sanctions. The field “Sanctions subject” specifies the name of the person or company subject to sanctions, and in the drop-down menu “Regime”, the relevant EU legislation must be selected to describe the sanction applied. The relevant sanction type is selected in the drop-down menu “Taken measures”.

INFORMATION BLOCK 8: “DOCUMENTS”



51. Other documents are added to the notification in the information block “Documents” by clicking on “Add document”. **To add documents, select “Document type” from the drop-down menu** (see list in Annex 2), **and fill in the required metadata fields** (date of issue of the document, number, subject, period of validity if applicable, brief summary if necessary) Files can only be added in digital format by clicking on “Add file” and dragging the file(s) to the field “Drag & drop files here” or by double-clicking on the right file.
52. When requesting additional documents from the customer, obligated persons should request these files in PDF-format. **Only documents which are relevant for explaining the content of the notification or which substantially supplement the description of the transaction should be submitted to the FIU.** The persons whose role in the transactions is explained in the document submitted must be entered as parties beforehand. Then, they can be linked to documents via the drop-down menu.
53. **Each attached document or document package must be linked to at least one party** by clicking on the drop-down menu “Add party”. If the notifier wishes to provide further explanations on the content of the document, these should be added as comments in the “Content” line. Where possible, only documents of the same type (e.g. invoices, contracts, declarations, documents for goods, etc.) are grouped together in a single file for the same parties to the transaction.
54. Credit institutions will attach to the notification the documents explaining the accounts and the account statements for the period when the suspicious transactions took place or when the subject of international financial sanctions was a customer of the credit institution, if the obligated person / person having specific obligations considers such information to be related to the notification. The statement must also reflect the balance of the account immediately before the notification is made, so that the FIU would have a margin of discretion to impose a restriction.
55. If the data of the parties are not available from the Estonian commercial register and population register, copies of the following documents must be attached to the notification if available:
- 1) the personal information and photo page of the identity document of an identified non-resident natural person (added to the person);

- 2) the registration certificate or equivalent document of an identified non-resident legal person (added to the person);
 - 3) a document in the prescribed format certifying the right of representation of the authorised person involved in the transaction;
 - 4) a written agreement or arrangement on which the transaction is based, and any annexes thereto;
 - 5) where appropriate, other documents describing the transaction.
56. When submitting a notification online, it should be kept in mind that the **total size of the notification and the additional documents must not exceed 20 MB** and that the size of one file must not exceed 15 MB. It is recommended to use the Chrome or Firefox browser, but not a version that is older than 3 years. To share larger files with the FIU, a cloud-based file sharing service should be used: <https://pilv.fiu.ee> by notifying the FIU’s document administrators thereof beforehand at info@fiu.ee.
57. The documents to be attached to the notification may not include any encrypted documents. The notification together with the attachments is automatically encrypted by the system.

INFORMATION BLOCK 9: “SUBMISSION”

Teate koostaja Teade Osapooled Tehing Dokumendid **6** Esitamine

Teate esitamine

Kui teade koos lisatud failidega on ette valmistatud, vajutage nuppu "Esita teade". Süsteem krüpteerib teate koos lisadega ja saadab RAB serverisse. Eduka saatmise puhul kuvatakse sellekohane teade ekraanile ning saadetud teadet pole võimalik rohkem avada. Saadetava teate salvestamiseks on võimalik laadida alla eelvaade.

Esitamisel lae alla teate eelvaade.

58. Before submitting a document, a PDF-format preview can be downloaded in the information block “Submission” by clicking on “Download preview”. To change the notification, click on “Back”. To submit the notification, click on “Submit notification”, after which the notification will be encrypted, sent to the Financial Intelligence Unit and entered into the Financial Intelligence Unit's information system RABIS for further processing. **When the notification is submitted, the system automatically downloads a PDF-format preview to the notifier’s computer.** To cancel the preview, untick the box “Download preview when submitting”.
59. By using the XML-format agreed with the Financial Intelligence Unit and linked to the information system used by the company to submit a notification, the obligated person ensures, by means of its own information system, that mandatory fields are filled in.
60. Any questions can be addressed to the Financial Intelligence Unit’s general e-mail address info@fiu.ee . In case of any deficiencies in the notification, the person preparing the notification will be informed by e-mail or telephone.

Annex 1. Identity documents of the parties

ID-card
Driving licence
Other identity document
Passport

Annex 2. Types of documents to be attached

Invoice
Bank account statement
Photo
Sound recording
IP addresses (with dates and times)
Cash release ticket
Correspondence with the customer – e-mail correspondence between the notifier and the customer.
Documents explaining the account / customer relationship
Contract
Payment card
Payment order
Other
Other account statement
Other accounting document
Notarial deed
Explanation of the origin of property – a written explanation by the person or a completed form.
If the person has submitted other documents – contract, invoices, account statement, these must be entered as separate document types.
Video recording
Authorisation

Annex 3. Typical mistakes to avoid when preparing a notification

- A field marked with an asterisk is empty (cannot proceed to the next block).
- It is mandatory to always fill in the transaction description field. If there is no transaction, the reason for submitting the notification must be entered.
- There is no transaction amount. If there is no actual transaction, click on “No transaction” in the upper right corner and enter the reason for submitting the notification in the field “Transaction description”
- The address does not include a town/settlement name even though it is known
- A significant person named in the transaction description or document has not been entered as a party
- A document is not associated with a person (see p. 27 and p. 53 of the guidelines)
- The notifier has the person’s identity document, but has not entered the person’s date of birth

- The total size of the notification and the attachments exceeds 20 MB; cloud service must be used for large files (see p 56)
- The file to be attached is larger than 15 MB
- The ISR report does not specify the sanction regime, the measure taken and the date of application of the measure.