



Financial Transactions and
Reports Analysis Centre
of Canada

Centre d'analyse des opérations
et déclarations financières
du Canada

Guideline 8C: Submitting Non-SWIFT Electronic Funds Transfer Reports to FINTRAC by Paper

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This replaces the previous version of *Guideline 8C: Submitting Electronic Funds Transfer Reports to FINTRAC by Paper* issued in September 2008. The changes made to this version are indicated by a side bar to the right of the modified text.

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1 General

The objective of the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* (the Act) is to help detect and deter money laundering and the financing of terrorist activities. It is also to facilitate investigations and prosecutions of money laundering and terrorist activity financing offences. This includes reporting, record keeping, client identification and compliance regime requirements for individuals and entities described in section 2.

If you are such an individual or entity, this guideline has been prepared to help you submit electronic funds transfer (EFT) reports by paper, if you do not have the technical capability to do so electronically (see subsection 3.7). It explains reporting timelines, how reports have to be sent to the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC), and what information has to be included in these reports.

This guideline uses plain language to explain the most common reporting situations under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* as well as the related regulations. It is provided as general information only. It is not legal advice, and is not intended to replace the Act and Regulations. For more information about money laundering, terrorist financing or other requirements under the Act and Regulations, see the guidelines in this series:

- *Guideline 1: Background* explains money laundering and terrorist financing and their international nature. It also provides an outline of the legislative requirements as well as an overview of FINTRAC's mandate and responsibilities.
- *Guideline 2: Suspicious Transactions* explains how to report a suspicious transaction. It also provides guidance on how to identify a suspicious transaction, including general and industry-specific indicators that may help when conducting or evaluating transactions.
- *Guideline 3: Submitting Suspicious Transaction Reports to FINTRAC* explains to reporting entities when and how to submit suspicious transaction reports. There are two different versions of Guideline 3, by reporting method.
- *Guideline 4: Implementation of a Compliance Regime* explains the requirement for reporting entities to implement a regime to ensure compliance with their obligations under the Act and associated regulations.
- *Guideline 5: Submitting Terrorist Property Reports to FINTRAC* explains to reporting entities when and how to submit a terrorist property report.
- *Guideline 6: Record Keeping and Client Identification* explains the requirement for reporting entities to identify their clients and keep records. There are several different versions of Guideline 6, with each one applicable to a particular sector.

- *Guideline 7: Submitting Large Cash Transaction Reports to FINTRAC* explains when and how to submit large cash transaction reports. There are two different versions of Guideline 7, by reporting method.
- *Guideline 8: Submitting Electronic Funds Transfer Reports to FINTRAC* explains when and how to submit electronic funds transfer reports. There are three different versions of Guideline 8, by type of electronic funds transfer and reporting method.
- *Guideline 9: Submitting Alternative to Large Cash Transaction Reports to FINTRAC* explains when and how financial entities can choose the alternative to large cash transaction reports. This is only applicable to financial entities.
- *Guideline 10: Submitting Casino Disbursement Reports to FINTRAC* explains when and how to submit casino disbursement reports. There are two different versions of Guideline 10, by reporting method.

If you need more help after you read this or other guidelines, call FINTRAC's national toll-free enquiries line at 1-866-346-8722.

Throughout this guideline, several references are provided to additional information that may be available on external Web sites. FINTRAC is not responsible for the accuracy or reliability of the information contained on those external Web sites. The links provided are based on information available at the time of publishing of this guideline.

Throughout this guideline, any references to dollar amounts (such as \$10,000) refer to the amount in Canadian dollars or its equivalent in foreign currency.

2 Who Has to Send an Electronic Funds Transfer Report to FINTRAC?

If you are one of the following individuals or entities (called reporting entities), you must report EFTs to FINTRAC.

2.1 Financial entities

Financial entities are banks (that is, those listed in Schedule I or II of the *Bank Act*) or authorized foreign banks with respect to their operations in Canada, credit unions, caisses populaires, financial services cooperatives, credit union centrals (when they offer financial services to anyone other than a member entity of the credit union central), trust companies, loan companies and agents of the Crown that accept deposit liabilities.

If you are a financial entity and you have foreign subsidiaries or foreign branches, the EFT reporting requirement does not apply to their operations outside Canada.

2.2 Money services businesses

A money services business means an individual or entity engaged in the business of any of the following activities:

- foreign exchange dealing;
- remitting or transmitting funds by any means or through any individual, entity or electronic funds transfer network; or
- issuing or redeeming money orders, traveller's cheques or other similar negotiable instruments. This does not include redeeming cheques payable to a named individual or entity. In other words, cashing cheques made out to a particular individual or entity is not included.

Money services businesses include alternative money remittance systems, such as Hawala, Hundi, Chitti, etc.

For more information about who is engaged in the money services business, see the FINTRAC Interpretation Notice No. 1, available under "General publications" on the Publications page of FINTRAC's Web site (<http://www.fintrac-canafe.gc.ca>).

2.3 Casinos

Casinos are those authorized by a Canadian provincial, territorial or federal government to do business and that conduct their business in a permanent establishment. It only includes those where roulette or card games are played in the establishment, or where there is a slot machine. For these purposes, a slot machine does not include a video lottery terminal.

Registered charities may be authorized to carry on business temporarily as a casino for charitable purposes. If this type of business is carried out in the establishment of a casino for no more than two consecutive days at a time under the supervision of the casino, the activities are considered to be the supervising casino's. In this case, the supervising casino is responsible for the reporting requirements and other obligations related to the charity casino.

3 Electronic Funds Transfer Reporting Requirements

3.1 When do you have to report electronic funds transfers?

If you are a reporting entity as described in section 2, you have to report incoming and outgoing international electronic funds transfers (EFTs) of \$10,000 or more to FINTRAC no later than five working days after the day of the transmission of the instructions (see subsection 3.6).

Read subsection 3.2 to find out more about SWIFT EFTs. Subsection 3.3 and the rest of this guideline contain information about any other type of reportable EFT (that is, non-SWIFT).

3.2 SWIFT electronic funds transfers

The incoming and outgoing SWIFT EFT reporting requirement is only applicable to you if you are a financial entity or a money services business. Furthermore, it only applies if you send or receive EFTs by transmission of a **SWIFT MT 103 message**, as a SWIFT member, through the SWIFT network. SWIFT means the Society for Worldwide Interbank Financial Telecommunication. It is a co-operative owned by the international banking community that operates a global data processing system for the transmission of financial messages.

These reports cannot be made on paper. They can only be made electronically. If you are a financial entity or a money services business and you send this type of EFT, read *Guideline 8B: Submitting SWIFT Electronic Funds Transfer Reports to FINTRAC*.

Your reporting obligations regarding EFTs also include sending or receiving EFTs by any other means, as explained below.

3.3 All other reportable electronic funds transfers (non-SWIFT)

The rest of this guideline provides information about the reporting requirement for international “non-SWIFT” EFTs. This applies to you if you are a financial entity, a money services business or a casino.

An EFT is the transmission of instructions for a transfer of funds made at the request of a client through any electronic, magnetic or optical device, telephone instrument or computer. In this context, SWIFT EFT messages are excluded, as explained in subsection 3.2.

You have to send a non-SWIFT EFT report to FINTRAC for the following transactions.

Outgoing EFTs

These are instructions sent electronically for the transfer of \$10,000 or more outside Canada at the request of a client in the following manner:

- in a single transaction; or

- in two or more transfers of less than \$10,000 each (that total \$10,000 or more) in the following 24-hour rule situations:
 - if you are an entity, your employee or senior officer knows the transfers were made within 24 consecutive hours of each other by or on behalf of the same individual or entity; or
 - if you are an individual, you know the transfers were made within 24 consecutive hours of each other by or on behalf of the same individual or entity.

This type of EFT requires that you send an Outgoing International Non-SWIFT EFT Report (EFTO) to FINTRAC.

It can happen that a client requests a transfer of funds and, instead of sending the EFT yourself, you order someone else that is a financial entity, a money services business or a casino in Canada to send it. In this case, you have to make the related EFT report (EFTO) to FINTRAC **unless** you provide them with the client's name and address. In other words, if you give them your client's name and address, you do not have to report the EFT. See Appendix 1 for example scenarios of this type of situation.

If you send an EFT to an individual or entity in Canada, you do not have to report it, even if the final recipient of the funds is outside Canada.

Incoming EFTs

These are instructions sent electronically for the transfer of \$10,000 or more from outside Canada at the request of a client in the following manner:

- in a single transaction; or
- in two or more transfers of less than \$10,000 each (that total \$10,000 or more) in the following 24-hour rule situations:
 - if you are an entity, your employee or senior officer knows the transfers were made within 24 consecutive hours of each other by or on behalf of the same individual or entity; or
 - if you are an individual, you know the transfers were made within 24 consecutive hours of each other by or on behalf of the same individual or entity.

This type of EFT requires that you send an Incoming International Non-SWIFT EFT Report (EFTI) to FINTRAC.

If you are a financial entity, a money services business or a casino and you received instructions for a transfer of funds from outside Canada, you have to make the related EFT report (EFTI) to FINTRAC, even if you have to forward the same instructions to another financial entity, money service business or casino in Canada. However, if you receive instructions for a transfer of funds from outside Canada from another financial entity, money services business or casino in

Canada, you do not have to make an incoming EFT report, as long as the EFT contained the name and address of the beneficiary. If the EFT did **not** contain the name and address of the beneficiary and the original sender was outside Canada, you also have to make an incoming EFT report. This is true even if you do not get a copy of the instructions received by the other financial entity, money services business or casino.

See Appendix 1 for example scenarios of these types of situation.

Exception to the 24-hour rule for EFTs

The following exception applies if you send or receive a bundled EFT, that is, an EFT with more than one beneficiary. The 24-hour-rule will not apply for any of the amounts under \$10,000 included in a bundled EFT if it was sent at the request of a public body, a very large corporation, or the administrator of a federally or provincially regulated pension fund.

In this context, a public body means any of the following or their agent:

- a Canadian provincial or federal department or Crown agency;
- an incorporated Canadian municipal body (including an incorporated city, town, village, metropolitan authority, district, county, etc.); or
- a hospital authority. A hospital authority means an organization that operates a public hospital and that is designated to be a hospital authority for GST/HST purposes. For more information on the designation of hospital authorities, refer to GST/HST Memoranda Series, Chapter 25.2, *Designation of Hospital Authorities* available in the Forms and Publications section of the Canada Revenue Agency's Web site (<http://www.cra-arc.gc.ca>).

Also in this context, a very large corporation is one that has minimum net assets of \$75 million on its last audited balance sheet. The corporation's shares have to be traded on a Canadian stock exchange or on a stock exchange outside Canada that is designated by the Minister of Finance. The corporation also has to operate in a country that is a member of the Financial Action Task Force (FATF). For more information about stock exchanges outside Canada that are designated by the Minister of Finance, refer to the July 2, 2008 news release available in the News area of the Department of Finance's Web site (<http://www.fin.gc.ca>).

To find out which countries are members of the FATF, refer to its Web site (<http://www.fatf-gafi.org>).

3.4 Electronic funds transfers in foreign currency

If you send or receive an EFT in a foreign currency, you will need to check whether it is the equivalent of 10,000 Canadian dollars or more to determine whether or not it is reportable to FINTRAC. **For this purpose only**, use the last

noon rate provided by the Bank of Canada available at the time of the transaction, instead of the actual exchange rate used to process the transaction. This calculation is only to check whether the \$10,000 threshold is met for the transaction to be reportable as an EFT transaction.

For example, for an EFT that happened at 9:00 am on Tuesday following a holiday Monday, you would use the Bank of Canada noon rate from the previous working day (in this case, Friday) to determine whether the transaction is reportable. You can find the noon rate on the Bank of Canada Web site at <http://www.bankofcanada.ca/rates/exchange/>.

If there is no Bank of Canada noon rate published for the currency of the transaction, use the actual exchange rate applied when you processed the transaction to determine whether it is reportable.

Once you have determined that an EFT in a foreign currency is reportable based on the Bank of Canada noon rate, you will have to send an EFT report to FINTRAC. On the EFT report in Part A, enter the amount of the transaction in the foreign currency. If you converted this amount to or from Canadian dollars when you processed the transaction (other than using the Bank of Canada noon rate to determine whether or not it was reportable), enter the actual exchange rate you used to process the EFT in Part A of the report.

3.5 Other requirements associated with electronic funds transfers

In addition to the reporting requirements explained in this guideline, consider the following relating to an EFT transaction:

Record keeping and client identification

EFTs have associated record keeping and client identification requirements. These are explained in *Guideline 6: Record Keeping and Client Identification*.

Originator information to include with transfers

If you **send** or **receive** an EFT of any amount, at the request of a client, there are obligations about **originator information** included with the transfer. For more details about this, see *Guideline 6: Record Keeping and Client Identification*.

Large cash transaction report

If an EFT transaction is initiated in cash, in the amount of \$10,000 or more, you will likely have to make a large cash transaction report to FINTRAC in addition to making the EFT report about the transaction as required. For more information about making large cash transaction reports, consult *Guideline 7: Submitting Large Cash Transaction Reports to FINTRAC*.

Suspicious transaction report

If anything about an EFT transaction gives you reasonable grounds to suspect that it could be related to a money laundering or a terrorist activity financing offence, you have to make a suspicious transaction report to FINTRAC about the same transaction. This would be in addition to making the EFT report about the transaction as required.

The suspicious transaction report has many fields that are different from those of an EFT report. For example, there is a field in the suspicious transaction report for you to explain your suspicion about the transaction. There is also a field in that report for you to describe what action, if any, was taken by you, as a result of the suspicious transaction. This would include stating that you have made an EFT report for the same transaction (if that is the case).

For more information about making suspicious transaction reports, consult the following guidelines:

- *Guideline 1: Backgrounder*
- *Guideline 2: Suspicious Transactions*
- *Guideline 3: Submitting Suspicious Transaction Reports to FINTRAC*

Transactions related to terrorist property

If you know that any proposed transaction is related to property owned or controlled by or on behalf of a terrorist or a terrorist group, you should not complete the transaction. This is because terrorist property must be frozen under the *Regulations Implementing the United Nations Resolutions on the Suppression of Terrorism* as well as the *Criminal Code*.

For more information about this and to find out what your obligations are regarding any terrorist property in your control or possession, consult the following guidelines:

- *Guideline 1: Backgrounder*
- *Guideline 5: Submitting Terrorist Property Reports to FINTRAC*

Casino disbursement report

If you are a casino sending an EFT that is part of a casino disbursement (in the amount of \$10,000 or more), you will likely have to make a casino disbursement report to FINTRAC in addition to making the EFT report about the transaction as required. For more information about making casino disbursement reports, consult *Guideline 10: Submitting Casino Disbursement Reports to FINTRAC*.

3.6 Reporting timeframes for electronic funds transfer reports

You have to send EFT reports to FINTRAC no later than five working days after the day of the transfer. The day of the transfer means:

- in the case of an incoming EFT, the day the instructions were transmitted to you; and
- in the case of an outgoing EFT, the day you transmit the instructions regarding the transfer of funds.

3.7 Means of reporting electronic funds transfers to FINTRAC

Electronic reporting

As a reporting entity, you have to submit all EFT reports to FINTRAC **electronically** if you have the technical capabilities to do so. The minimum technical capabilities are as follows:

- A personal computer with the following characteristics:
 - 32 MB memory
 - 640 x 480 VGA video display (800 x 600 or higher is preferable)
 - any operating system running the following Web browsers: Internet Explorer version 5.x (Windows® 98/Me/NT/2000); and
- An Internet connection.

Please refer to *Guideline 8A: Submitting Non-SWIFT Electronic Funds Transfer Reports to FINTRAC Electronically* for more information on submitting reports to FINTRAC electronically.

Paper reporting

If you do **not** have the technical capabilities to send reports electronically, you must submit reports on paper. See section 4 for more information on submitting paper non-SWIFT EFT reports to FINTRAC.

4 Paper Reporting

4.1 How to complete paper reports

If you do **not** have the technical capability to submit reports electronically (see subsection 3.7), you have to submit paper EFT reports to FINTRAC. In this case, forms will be available for paper filing as follows:

- A file is accessible from the reporting forms area of the publications section of FINTRAC's Web site (<http://www.fintrac-canafe.gc.ca>) to be printed at your local library or any other place with Internet access.
- Call 1-866-346-8722 for a copy to be faxed or mailed to you.

See section 5 for details of what each field must contain for the non-SWIFT EFT report.

If you have to submit SWIFT EFT reports, these cannot be made on paper. They can only be made electronically, as explained in *Guideline 8B: Submitting SWIFT Electronic Funds Transfer Reports to FINTRAC*.

4.2 How to send paper reports to FINTRAC

There are two ways to send a paper report to FINTRAC:

- Fax: 1-866-226-2346; or
- Mail to the following address:
Financial Transactions and Reports Analysis Centre of Canada
Section A
234 Laurier Avenue West, 24th floor
Ottawa ON K1P 1H7
Canada

4.3 Acknowledgement of receipt of a paper report

FINTRAC will not send you any acknowledgement when your paper EFT report has been received.

5 Instructions for Completing an International Electronic Funds Transfer Report

The contents of an EFT report depend on whether the report is about an outgoing or incoming transfer.

Fields in the report are either mandatory, mandatory where applicable, or require reasonable efforts to complete, as follows:

- **Mandatory:** All fields of a report marked with an asterisk (*) **have to be completed.**
- **Mandatory where applicable:** The fields that have both an asterisk and “where applicable” next to them have to be completed if they are applicable to you or the transaction being reported.
- **Reasonable efforts:** For all other fields that do not have an asterisk, you have to make reasonable efforts to get the information. “Reasonable efforts” means that you tried to get the information requested on the report. If the information is available to you, you must provide it in the report. If the information was not available at the time of the transaction, and it is not contained in your files or records, the field may be left blank.

In certain circumstances, only as directed in the instructions for certain fields, if you need to indicate that a required field in a report is not applicable, enter “N/A”

or “n/a”. Do not substitute any other abbreviations, special characters (e.g., “x”, “-” or “*”) or words (e.g., unknown).

The outgoing and incoming non-SWIFT EFT reports have the same mandatory, mandatory where applicable and reasonable efforts fields.

As explained in subsection 3.3, EFT reports can be about one of multiple EFTs of less than \$10,000 each conducted within 24 consecutive hours of each other that add up to \$10,000 or more. Because those individual EFTs were each under \$10,000, the information for some mandatory fields in the report may not be available in your records or from the time of the transaction. In this case, “reasonable efforts” applies to those otherwise mandatory fields.

You have to complete a separate EFT report for each transaction, even if you are reporting multiple EFTs of less than \$10,000.

The rest of this section will cover each part of the paper report called the *International Electronic Funds Transfer Report*. As explained earlier, these instructions are for reports concerning non-SWIFT EFTs only.

There are eight parts to the outgoing or incoming non-SWIFT EFT report, but some are only to be completed if applicable. To report an outgoing or an incoming EFT on paper, follow the following five steps:

- Step 1 — On page 1 of the form, indicate whether or not this report is a correction to one previously submitted. If you are submitting a new report, tick the “no” box, enter the date and time of this report, and complete the general information area. Check the appropriate box to show whether you are reporting an outgoing or incoming EFT in this report. Also indicate whether the 24-hour-rule applies to the EFT being reported.

If you are making a correction to a previously submitted report, tick the “yes” box, enter the date and time of the original report to the right, and follow the instructions immediately below that on the form.

Complete the rest of page 1, to provide the name of the reporting entity, the report reference number (if you use these) and the name and telephone number of the individual FINTRAC can contact about the report.

- Step 2 — Complete Part A to provide details about the transaction.

- Step 3 — Complete Part B to provide information about the client that ordered the EFT. If this individual or entity was acting on behalf of a third party, provide information about the third party in Part D.
- Step 4 — Provide information about who is sending and who is receiving the EFT. Complete Part C to provide information about the individual or entity sending the payment instructions and Part E to provide information about the individual or entity receiving the payment instructions.
- Step 5 — Complete Part F to provide information about the individual or entity to whose benefit the EFT is paid. If this beneficiary was acting on behalf of a third party, provide information about the third party in Part G.

The following covers each part of the EFT report.

General information

This part is for information about the reporting entity required to report the EFT. It is also for information about the type of EFT being reported.

Field 1 Reporting entity's full name

Enter the full legal name of the business or corporation that is the reporting entity. If you are a reporting entity that does not have a business name (for example, you are a reporting entity that is an individual), enter your full name.

Field 1A Reporting entity report reference number

If you use a reference number for your own internal purposes, you can enter it in your report to FINTRAC. This field can contain up to 20 alpha or numeric characters and must be unique for each of your reporting entity's reports.

If you do not wish to use such an internal reference number, leave this field empty.

Fields 2, 3 and 4 Contact name

Enter the name of the individual FINTRAC can contact for clarification about this report.

Fields 5 and 6 Contact telephone number

Enter the telephone number, including the area code, of the individual FINTRAC can contact for clarification. Include the extension, if applicable, in field 6.

Is this report about an incoming or outgoing EFT?

Check the appropriate box to show whether you are reporting an outgoing or incoming EFT in this report.

24-hour rule

Indicate **yes** if the 24-hour rule applies to the EFT being reported and **no** if it does not. Whether or not the 24-hour-rule applies, use a separate form for each EFT that you have to report.

Part A: Information about the transaction

This part is for information about when the EFT was sent. You have to complete a separate report for each EFT transaction.

Field A1 Time of transaction

In the case of an outgoing EFT, enter the time (hh:mm:ss) that you sent the EFT. In the case of an incoming EFT, enter the time (hh:mm:ss) that it was sent to you.

Field A2* Date of transaction

In the case of an outgoing EFT, enter the date (yyyy-mm-dd) that you sent the EFT. In the case of an incoming EFT, enter the date (yyyy-mm-dd) that it was sent to you.

Field A3* Amount of transaction

Enter the total amount of funds transferred (or to be transferred).

If this amount was not in Canadian funds, you do not have to convert it on the report, but you have to provide the currency information in field A4. You also have to provide the actual exchange rate applied at the time of the transaction in field A5.

Field A4* Transaction currency code

Enter the code for the type of currency for the transaction. Enter CAD if Canadian dollars, or USD for United States dollars. If the transaction was in another type of currency, see the list of currency codes in Appendix 1 in *Guideline 3B: Submitting Suspicious Transaction Reports to FINTRAC by Paper*.

Field A5 Exchange rate

Complete this field only if the currency code in field A4 is other than CAD. Use one of the boxes for this field to indicate the decimal point, where appropriate. Use as many places after the decimal as necessary to enter the exact exchange rate used (for example, 1.5537 or 0.002185).

For an outgoing EFT, enter the actual exchange rate you used when you sent the transfer to convert the amount sent **from** Canadian dollars to the amount and currency shown in fields A3 and A4 above. If there was no exchange rate applied to this transaction to convert the amount sent to

Canadian dollars (for example, the EFT was received in Canadian currency), leave this field blank.

For an incoming EFT, enter the actual exchange rate you used when you received the transfer to convert the amount and currency shown in fields A3 and A4 to Canadian dollars. If there was no exchange rate applied to this transaction to convert the amount sent to Canadian dollars (for example, the EFT was sent in Canadian currency), leave this field blank.

Part B: Information about the client ordering the EFT

In the case of an outgoing EFT, this part is for information about the individual or entity ordering you to send the EFT. In the case of an incoming EFT, this part is for information about the individual or entity that ordered the EFT to be sent to you.

If the individual or entity that ordered the EFT did so on someone else's behalf, you also have to complete Part D.

Fields B1*or B2*, B3* and B4 Full name of client ordering the EFT

Enter the full name of the client that ordered the EFT. If the client is an entity, enter the complete name of the entity in field B1. If it is an individual, enter the individual's surname, given name, and other name or initial (if known) in fields B2, B3 and B4.

If the transaction is reportable as one of multiple EFT transactions of less than \$10,000 each and, because of this, information for field B1 or fields B2 and B3 was not obtained at the time of the transaction (and is not available from your records), you can leave these fields blank.

Fields B5, B6, B7, B8 and B9 Full address of the client ordering the EFT

Enter the civic address, town or city, province or state, country and postal code of the individual or entity that ordered the EFT.

If the address does not follow this format, enter the information in each of fields B5 to B9 based on your understanding of the address information, and according to the number of characters available in each field.

Field B10 Telephone number

Enter the telephone number, including the area code, of the individual or entity that ordered the EFT.

If the number is one from Canada or the United States, enter the area code and local number. This should be in the following format: "999-999-9999".

If the number is from outside Canada or the United States, provide the country code, city code and local number components. As each of those components can vary in length, use a dash (-) to separate each one. For example, "99-999-9999-9999" would indicate a two-digit country code, a three-digit city code and an eight digit local number.

Field B11 Date of birth (if the client is an individual)

If the client that ordered the EFT was an individual, enter the date (yyyy-mm-dd) of birth of that individual. If the client was an entity, leave this field blank.

Field B12 Occupation (if the client is an individual)

If the client that ordered the EFT was an individual, enter the occupation of that individual. If the client was an entity, leave this field blank.

Field B13* Client's account number (if applicable)

Enter the account number (if any) that you have for the client ordering the EFT.

Field B14 Client's identifier (if the client is an individual)

If the client that ordered the EFT was an individual, check the appropriate box to show the document used to identify that individual.

In the case of an outgoing EFT, you can refer to the individual's provincial health card, provided there is no provincial or territorial legislation preventing you from using or requesting it. If the selections provided do not cover the identifier used, indicate "Other" and provide details in the appropriate field.

Please note that although a Social Insurance Number (SIN) card can be used for identification purposes for transactions in Canada such as the opening of an account, the SIN (i.e., the number) should not be provided on this form. If you used a SIN card and no other identifying document for the individual, indicate **SIN card** in the "Other" area of field B14, but do not provide the number in field B15.

If the client was an entity, leave this field blank.

Field B15 Identifier number (if the client is an individual)

Enter the number of the document described in field B14 that was used to identify the client ordering the EFT.

Remember that a health card number is not acceptable for this purpose in some provinces. Furthermore, as explained at field B14, a SIN should not be provided on this form. If the identifier document in field B14 (and B14A) is a SIN card, enter "N/A" in field B15 to indicate the number is not applicable.

Part C: Information about the individual or entity sending the payment instructions for the EFT

In the case of an outgoing EFT, this part is for information about you as the reporting entity sending the payment instructions. In the case of an incoming EFT, this part is for information about the individual or entity that sent you the payment instructions.

Fields C1*or C2*, C3* and C4 Full name of individual or entity sending the payment instructions

In the case of an outgoing EFT, enter your full name as the reporting entity sending the payment instructions. In the case of an incoming EFT, enter the full name of the individual or entity that sent you the payment instructions. If it is an entity, enter the complete name of the entity in field C1. If it is an individual, enter the individual's surname, given name, and other name or initial (if known) in fields C2, C3 and C4.

For an incoming EFT, if it is reportable as one of multiple EFT transactions of less than \$10,000 each and, because of this, information for field C1 or fields C2 and C3 was not obtained at the time of the transaction (and is not available from your records), you can leave these fields blank.

Fields C5*, C6*, C7*, C8* and C9* Full address of the individual or entity sending the payment instructions

Enter the civic address, town or city, province or state, country and postal code of the individual or entity sending the payment instructions.

If the address does not follow this format, enter the information in each of fields C5 to C9 based on your understanding of the address information, and according to the number of characters available in each field.

For an incoming EFT, if it is reportable as one of multiple EFT transactions of less than \$10,000 each and, because of this, information for fields C5 to C9 was not obtained at the time of the transaction (and is not available from your records), you can leave these fields blank.

Part D: Information about any third party related to the EFT order (if the client ordering the EFT is acting on behalf of a third party)

This part is for information about any third party on whose behalf the EFT was ordered. If there was no third party related to the EFT order, do not complete this part.

Fields D1 or D2, D3 and D4 Full name of the third party on whose behalf the EFT was ordered

Enter the full name of any third party on whose behalf the EFT was ordered. If the third party is an entity, enter the complete name of the entity in field D1. If it is an individual, enter the individual's surname, given name, and other name or initial (if known) in fields D2, D3 and D4.

Fields D5, D6, D7, D8 and D9 Full address of the third party on whose behalf the EFT was ordered

Enter the civic address, town or city, province or state, country and postal code of any third party on whose behalf the EFT was ordered.

If the address does not follow this format, enter the information in each of fields D5 to D9 based on your understanding of the address information, and according to the number of characters available in each field.

Field D10 Date of birth (if the third party is an individual)

If the EFT was ordered on behalf of a third party that is an individual, enter the date (yyyy-mm-dd) of birth of that individual. If the third party was an entity, leave this field blank.

Field D11 Occupation (if the third party is an individual)

If the EFT was ordered on behalf of a third party that is an individual, enter the occupation of that individual. If the third party was an entity, leave this field blank.

Field D12 Third party's identifier (if the third party is an individual)

If the EFT was ordered on behalf of a third party that is an individual, check the appropriate box to show the document used to identify that individual.

In the case of an outgoing EFT, you can refer to an individual's provincial health card, provided there is no provincial or territorial legislation preventing you from using or requesting it. If the selections provided do not cover the identifier used, indicate "Other" and provide details in the appropriate field.

Please note that although a Social Insurance Number (SIN) card can be used for identification purposes for transactions in Canada such as the opening of an account, the SIN (i.e., the number) should not be provided

on this form. If you used a SIN card and no other identifying document for the individual, indicate **SIN card** in the “Other” area of field D12.

If the third party was an entity, leave this field blank.

Part E: Information about the individual or entity receiving the payment instructions for the EFT

In the case of an outgoing EFT, this part is for information about the individual or entity to which you are sending the payment instructions. In the case of an incoming EFT, this part is for information about you, the reporting entity receiving the payment instructions.

Fields E1* or E2*, E3* and E4 Full name of individual or entity receiving the payment instructions

In the case of an outgoing EFT, enter the full name of the individual or entity that will receive the payment instructions. In the case of an incoming EFT, enter your full name, as the reporting entity that received the payment instructions.

If an entity is receiving the payment instructions, enter the complete name of the entity in field E1. If it is an individual, enter the individual's surname, given name, and other name or initial (if known) in fields E2, E3 and E4.

For an outgoing EFT, if it is reportable as one of multiple EFT transactions of less than \$10,000 each and, because of this, information for field E1 or fields E2 and E3 was not obtained at the time of the transaction (and is not available from your records), you can leave these fields blank.

Fields E5*, E6*, E7*, E8* and E9* Full address of the individual or entity receiving the payment instructions

Enter the civic address, town or city, province or state, country and postal code of the individual or entity that received (or will receive) the payment instructions.

If the address does not follow this format, enter the information in each of fields E5 to E9 based on your understanding of the address information, and according to the number of characters available in each field.

For an outgoing EFT, if it is reportable as one of multiple EFT transactions of less than \$10,000 each and, because of this, information for fields E5 to E9 was not obtained at the time of the transaction (and is not available from your records), you can leave these fields blank.

Part F: Information about the client to whose benefit payment is made

This part is for information about the individual or entity to whose benefit the payment of the EFT was made (or will be made).

Fields F1*or F2*, F3* and F4 Full name of client to whose benefit payment is made

Enter the full name of the client to whose benefit payment is made. If the client is an entity, enter the complete name of the entity in field F1. If it is an individual, enter the individual's surname, given name, and other name or initial (if known) in fields F2, F3 and F4.

If the transaction is reportable as one of multiple EFT transactions of less than \$10,000 each and, because of this, information for field F1 or fields F2 and F3 was not obtained at the time of the transaction (and is not available from your records), you can leave these fields blank.

Fields F5, F6, F7, F8 and F9 Full address of the client to whose benefit payment is made

Enter the civic address, town or city, province or state, country and postal code of the individual or entity to whose benefit payment is made.

If the address does not follow this format, enter the information in each of fields F5 to F9 based on your understanding of the address information, and according to the number of characters available in each field.

Field F10 Client's telephone number

Enter the telephone number, including the area code, of the individual or entity to whose benefit payment is made.

If the number is one from Canada or the United States, enter the area code and local number. This should be in the following format: "999-999-9999".

If the number is from outside Canada or the United States, provide the country code, city code and local number components. As each of those components can vary in length, use a dash (-) to separate each one. For example, "99-999-9999-9999" would indicate a two-digit country code, a three-digit city code and an eight digit local number.

Field F11 Date of birth (if the client is an individual)

If the client to whose benefit payment is made is an individual, enter the date (yyyy-mm-dd) of birth of that individual. If the client is an entity, leave this field blank.

Field F12 Occupation (if the client is an individual)

If the client to whose benefit payment is made is an individual, enter the occupation of that individual. If the client is an entity, leave this field blank.

Field F13* Client's account number (if applicable)

Enter the account number (if any) that you have for the client to whose benefit payment will be made.

Field F14 Client's identifier (if the client is an individual)

If the client to whose benefit payment is made is an individual, check the appropriate box to show the document used to identify that individual.

In the case of an incoming EFT, you can refer to an individual's provincial health card, provided there is no provincial or territorial legislation preventing you from using or requesting it. If the selections provided do not cover the identifier used, indicate "Other" and provide details in the appropriate field.

Please note that although a Social Insurance Number (SIN) card can be used for identification purposes for transactions in Canada such as the opening of an account, the SIN (i.e., the number) should not be provided on this form. If you used a SIN card and no other identifying document for the individual, indicate **SIN card** in the "Other" area of field F14.

If the client is an entity, leave this field blank.

Part G: Information about any third party beneficiary of the EFT payment (if the client to whose benefit the payment is made is acting on behalf of a third party)

This part is for information about any third party on whose behalf the EFT payment is made. If there is no third party related to the EFT payment, do not complete this part.

Fields G1 or G2, G3 and G4 Full name of the third party on whose behalf the EFT was paid

Enter the full name of any third party on whose behalf the EFT was paid (or is to be paid). If the third party is an entity, enter the complete name of the entity in field G1. If it is an individual, enter the individual's surname, given name, and other name or initial (if known) in fields G2, G3 and G4.

Fields G5, G6, G7, G8 and G9 Full address of the third party on whose behalf the EFT was paid

Enter the civic address, town or city, province or state, country and postal code of any third party on whose behalf the EFT was paid (or is to be paid).

If the address does not follow this format, enter the information in each of fields G5 to G9 based on your understanding of the address information, and according to the number of characters available in each field.

Field G10 Date of birth (if the third party is an individual)

If the EFT was paid (or is to be paid) on behalf of a third party that is an individual, enter the date (yyyy-mm-dd) of birth of that individual. If the third party is an entity, leave this field blank.

Field G11 Occupation (if the third party is an individual)

If the EFT was paid (or is to be paid) on behalf of a third party that is an individual, enter the occupation of that individual. If the third party is an entity, leave this field blank.

Field G12 Third party's identifier (if the third party is an individual)

If the EFT was paid (or is to be paid) on behalf of a third party that is an individual, check the appropriate box to show the document used to identify that individual.

In the case of an incoming EFT, you can refer to an individual's provincial health card, provided there is no provincial or territorial legislation preventing you from using or requesting it. If the selections provided do not cover the identifier used, indicate "Other" and provide details in the appropriate field.

Please note that although a Social Insurance Number (SIN) card can be used for identification purposes for transactions in Canada such as the opening of an account, the SIN (i.e., the number) should not be provided on this form. If you used a SIN card and no other identifying document for the individual, indicate **SIN card** in the "Other" area of field G12.

If the third party was an entity, leave this field blank.

6 Comments?

These guidelines will be reviewed on a periodic basis. If you have any comments or suggestions to help improve them, please send your comments to the mailing address provided below, or by email to guidelines-lignesdirectrices@fintrac-canafe.gc.ca.

7 How to Contact FINTRAC

For further information on FINTRAC and its activities, reporting and other obligations, please go to FINTRAC's Web site at <http://www.fintrac-canafe.gc.ca> or contact FINTRAC:

Financial Transactions and Reports Analysis Centre of Canada
234 Laurier Avenue West, 24th floor
Ottawa ON K1P 1H7
Canada

Toll-free: 1-866-346-8722

Appendix 1: Scenarios for EFT reports involving another reporting entity

Appendix 1A:

Scenarios for outgoing EFT reports involving another reporting entity

Appendix 1B:

Scenarios for incoming EFT reports involving another reporting entity

Appendix 1A: Scenarios for outgoing EFT reports involving another reporting entity

It can happen that a client requests a transfer of funds and, instead of sending the EFT yourself, you order someone else that is a financial entity, a money services business or a casino in Canada to send it. In this case, you have to make the related outgoing EFT report to FINTRAC **unless** you provide them with the client's name and address. The following example provides two different scenarios to explain how the required reports are to be completed in such cases.

EXAMPLE

A client requests a money services business to send an international EFT of \$12,000 from Canada. The money services business does not send the EFT itself, but orders a financial entity in Canada to do so. For the purposes of this example, the financial entity does not send the EFT as a SWIFT member of the SWIFT network. Also for the purposes of this example, **neither** the client ordering the EFT from the money services business **nor** the beneficiary of the EFT is acting on behalf of a third party.

SCENARIO 1

The money services business provides the client's name and address to the financial entity. In this scenario, the money services business does not send an outgoing EFT report to FINTRAC. Only the financial entity must report the EFT to FINTRAC, as follows:

- Part A is for general information about the transaction.
- In Part B, the financial entity has to provide FINTRAC with the money services business' full name and full address, along with the rest of the information about the money services business, as the money services business is considered the client of the financial entity in this context.
- Part C is for information about the financial entity, as the reporting entity.
- Part D applies to this report because the money services business is ordering the EFT on a client's behalf. The financial entity will provide the information about the money services business' client, as provided by the money services business.
- Part E is for information about the individual or entity outside Canada who will be receiving the EFT instructions. It is about the bank or other type of financial service provider who will receive the EFT instructions to provide payment to the beneficiary.

- Part F is for information about the beneficiary to whose benefit the EFT is sent.
- Part G does not apply to this report because, in this example, the EFT's beneficiary is not acting on anyone else's behalf. In other words, there is no third party beneficiary.

SCENARIO 2

The money services business does **not** provide the client's name and address to the financial entity. In this scenario, the money services business and the financial entity must **both** report the EFT to FINTRAC. The following table shows the similarities and differences for the two reports.

	Money services business' outgoing EFT report	Financial entity's outgoing EFT report
Part A	General information about the transaction.	General information about the transaction.
Part B	The money services business has to provide FINTRAC with the client's full name and full address, along with the rest of the information about their client.	The financial entity has to provide FINTRAC with information about the money services business, as the money services business is considered the client ordering the EFT from the financial entity in this context.
Part C	Information about the money services business, as the reporting entity.	Information about the financial entity, as the reporting entity.
Part D	Does not apply to this report because the money services business' client is not ordering the EFT on anyone else's behalf. In other words, there is no third party related to the EFT order.	Does not apply to this report because the money services business is not providing information about their client to the financial entity and the money services business is required to provide that information in their own report to FINTRAC. In other words, there is no third party related to the EFT order.
Part E	Information about the individual or entity outside Canada who will be receiving the EFT instructions. This is not about the financial entity that is being ordered to send the EFT. It is about the bank or other type of financial service provider outside Canada who will receive the EFT instructions to provide payment to the beneficiary.	Information about the individual or entity outside Canada who will be receiving the EFT instructions. It is about the bank or other type of financial service provider outside Canada who will receive the EFT instructions to provide payment to the beneficiary.

	Money services business' outgoing EFT report	Financial entity's outgoing EFT report
Part F	Information about the beneficiary to whose benefit the EFT is sent.	Information about the beneficiary to whose benefit the EFT is sent.
Part G	Does not apply to this report because the beneficiary is not acting on anyone else's behalf. In other words, there is no third party beneficiary.	Does not apply to this report because the EFT's beneficiary is not acting on anyone else's behalf. In other words, there is no third party beneficiary.

Note: For information about the contents of the financial entity's report if the EFT were sent as a SWIFT message, refer to the scenarios explained in *Guideline 8B: Submitting SWIFT Electronic Funds Transfer Reports to FINTRAC*.

Appendix 1B: Scenarios for incoming EFT reports involving another reporting entity

If you receive an electronic funds transfer from outside Canada, some of the information required in your report to FINTRAC is provided by the individual or entity sending you the instructions. The following example provides two different scenarios to explain how the required reports are to be completed in such cases.

EXAMPLE

A European funds transfer business, at the request of an individual client in Europe, sends an EFT of \$12,000 to be paid to an individual in Canada through a particular financial entity (to be referred to in this example as Bank 1). The European business does not have a relationship with Bank 1, but does with another financial entity in Canada (to be referred to in this example as Bank 2). The EFT is therefore sent from the European business to Bank 2, for payment to a client of Bank 1.

For the purposes of this example, the EFT is not sent through the SWIFT network. Also for the purposes of this example, **neither** the client ordering the EFT in Europe **nor** the beneficiary of the EFT in Canada is acting on behalf of a third party.

Even if the ultimate beneficiary is a client of Bank 1, Bank 2 must report to FINTRAC, as it is the first to receive the EFT in Canada. Depending on whether or not the name and address of the beneficiary was included in the EFT, Bank 1 may also have to report to FINTRAC, as explained in the following scenarios.

SCENARIO 1

The EFT contains the name and address of Bank 1's client. In this scenario, Bank 1 does not report to FINTRAC. Bank 2 reports the incoming EFT to FINTRAC, as follows:

- Part A is for general information about the transaction.
- In Part B, Bank 2 must provide FINTRAC with the European business' client's full name and, if applicable, the client's account number. In addition, if the information is available at the time of the transaction or in Bank 2's records, Bank 2 has to provide the European business' client's full address, telephone number, date of birth, occupation, identifier and identifier number.
- Part C is for information about the European business sending the EFT.
- Part D does not apply to this report because, in this example, the European business' ordering client is not acting on anyone else's behalf. In other words, there is no third party related to the EFT order.

- Part E is for information about Bank 2, as the reporting entity.
- Part F is for information about the beneficiary to whose benefit the EFT is sent. In this scenario, Bank 2 must provide Bank 1's client's full name, full address, and, if applicable, the client's account number. In addition, Bank 2 has to provide the client's telephone number, date of birth, occupation and identifier if any of that information is available at the time of the transaction or in Bank 2's records.
- Part G does not apply to this report because, in this example, the EFT's beneficiary is not acting on anyone else's behalf. In other words, there is no third party beneficiary.

SCENARIO 2

The EFT does **not** contain the name and address of Bank 1's client. In this scenario, both Bank 1 and Bank 2 report the incoming EFT (EFTI) to FINTRAC, as follows:

The following table shows the similarities and differences for the two reports.

	Bank 2 EFTI report	Bank 1 EFTI report
Part A	General information about the transaction.	General information about the transaction.
Part B	Bank 2 has to provide FINTRAC with the European business' client's full name and, if applicable, the client's account number. In addition, if the information is available at the time of the transaction or in Bank 2's records, Bank 2 has to provide the European business' client's full address, telephone number, date of birth, occupation, identifier and identifier number.	Bank 1 has to provide FINTRAC with the European business' client's full name and, if applicable, the client's account number. In addition, if the information is available at the time of the transaction or in Bank 1's records, Bank 1 has to provide the European business' client's full address, telephone number, date of birth, occupation, identifier and identifier number.
Part C	Part C is for information about the European business sending the EFT.	Part C is for information about the European business sending the EFT.
Part D	Does not apply to this report because the European business' ordering client is not acting on anyone else's behalf. In other words, there is no third party related to the EFT order.	Does not apply to this report because the European business' ordering client is not acting on anyone else's behalf. In other words, there is no third party related to the EFT order.

	Bank 2 EFTI report	Bank 1 EFTI report
Part E	Information about Bank 2, as the reporting entity.	Information about Bank 1, as the reporting entity.
Part F	Part F is for information about the beneficiary to whose benefit the EFT is sent. In this scenario, Bank 2 must provide Bank 1's full name, and, if applicable, Bank 1's account number. In addition, Bank 2 has to provide Bank 1's full address and telephone number if any of that information is available at the time of the transaction or in Bank 2's records.	Information about the beneficiary to whose benefit the EFT is sent. In this scenario, Bank 2 must provide its client's full name and, if applicable, the client's account number. In addition, Bank 1 has to provide its client's full address and telephone number if any of that information is available at the time of the transaction or in Bank 1's records.
Part G	Does not apply to this report because the beneficiary is not acting on anyone else's behalf. In other words, there is no third party beneficiary.	Does not apply to this report because the EFT's beneficiary is not acting on anyone else's behalf. In other words, there is no third party beneficiary.

Note: Bank 2 in the above scenarios would have to take reasonable measures to ensure that the EFT includes originator information. For more information about this requirement for both incoming and outgoing EFTs, see *Guideline 6: Record Keeping and Client Identification*.