

How to Identify a Suspicious Transaction

Financial institutions in Fiji including covered legal practitioners, real estate agents and accountants are required to report to the Financial Intelligence Unit (FIU) any transaction (including attempted transactions) or information which it suspects or has reasonable grounds to suspect maybe related to the commission of:

- a) a money laundering (ML) offence;
- b) a terrorist financing (TF) offence;
- c) a serious offence (includes crimes such as tax evasion, drug related offences, human trafficking, corruption and bribery, identity fraud, immigration fraud, cyber related scams, etc.)

You can identify a suspicious transaction by following these **four steps**:



DETECT suspicious indicators

Detect indicators that a transaction(s) may involve funds that are derived from an illegal activity or that the transaction(s) is an attempt to disguise funds derived from an illegal activity, or lacks a business or apparent lawful purpose. These indicators are facts. The indicators act as “**red flags**” and alerts for you to pay more attention to a particular customer/client or transaction(s).



ASK appropriate questions

If one or more suspicious indicators are detected, you may ask the customer/client relevant and appropriate questions to determine whether there is a reasonable explanation for that observed indicator. When asking such questions, **do not “tip-off”** the customer/client.



REVIEW customer's records

Review your customer's/client's records. Consider all information that is already known to you about the customer/client, such as their **usual occupation, business or principal activity, transaction history, risk profile, income level, stated source of income, frequency of transactions, reason for the transaction, identity or location of any other person involved in the transaction.**



EVALUATE information collected

Evaluate the (i) **suspicious indicators**, (ii) **information solicited from the customer/client through questions asked**, and (iii) **known information about the customer/client** to determine if there is reasonable grounds to suspect that the transaction(s) is related to the commission of a money laundering, terrorist financing or any other serious offence.

Decision: Is there reasonable grounds to suspect that the transaction(s) or attempted transaction(s) is linked to a money laundering, terrorist financing or any other serious offence?

Any staff, officer or employee

Report this suspicion to your AML Compliance Officer internally. Clearly articulate the reasons for your suspicion based on this evaluation.



Do not report this to the AML Compliance Officer, continue monitoring the customer or the business relationship.



Designated AML Compliance Officer

Report this suspicion to the FIU by completing and submitting a suspicious transaction report to the FIU. Clearly articulate the reasons for your suspicion based on this evaluation.

Do not report this to the FIU, continue monitoring the customer or the business relationship.

For detailed requirements, refer to Enforceable Guideline 1 on Suspicious Transaction Reporting click [website link](#) or scan [QR code](#) provided.

Website



QR Code

