

## Part 08

# Suspicious Activity & Transaction Reports (SAR/STRs)

*What to consider*  
when submitting  
a SAR/STR



# When to file a SAR/STR?

It flags suspected money laundering or terrorism financing.

- A **formal notification** to the local Financial Intelligence Unit (FIU)
- A SAR/STR to the local Financial Intelligence Unit (FIU) is filed there is suspicion that
  - money could come from criminal activities (e.g. corruption, tax evasion), or
  - money is linked to criminal organizations or terrorism (financing), or
  - key information is not disclosed or is concealed (e.g. beneficial ownership / trust arrangements)
- Suspicious activity reports are not accusations, but indicators.



# Why do suspicious activity reports exist?

To combat money laundering and terrorism financing

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- ✓ **Protect the financial system**  
→ Prevent money or virtual assets from criminal sources from flowing further
- ✓ **Fight money laundering & terrorist financing**  
→ Make illegal money flows visible
- ✓ **Early warning system**  
→ Detect criminal activity early and support law enforcement
- ✓ **Information hub for authorities**  
→ Collect, analyze and connect information, and share it with investigators



# When is a SAR/STR filed?

When an unusual activity cannot be reasonably explained.

## Unusual activity/ transaction?

**Unusual behavior by customers or in money movements, e.g.:**

- no clear purpose  
many small amounts instead of one large one (“smurfing”)
- unusually high cash activity
- frequent conversion of money into crypto without a clear reason
- large one-off insurance payments & early surrender of life policies

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## Plausibility check?

**Can the unusual indication be plausibly explained, e.g. on the basis of information that is**

- temporally and/or
- economically

related to the transaction or the business relationship?

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## Report?

If not, a report must be filed immediately – **low reporting threshold**

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# What will cover the report?

Answering the 6-W questions.

## WHO?

- Relevant persons
- Relevant involved organizations

## WHEN?

- Date of the transaction
- Date of the unusual activity

## WHAT?

- Transaction type
- Subject of the transaction

## WHICH?

- Account / counterparty account
- Amount / transaction volume & account balance

## WHY?

- Why was the customer and/or transaction flagged?
- What offence is suspected?

## HOW?

- Current status (e.g. account closed)?
- Background on the customer relationship



# By whom and how is a report filed?

To the local FIU via goAML, by designated obligated entities.

## WHO?



- Banks & credit institutions
- Life insurance providers
- Financial service providers (e.g. investment firms)
- Crypto service providers
- Lawyers, tax advisors, auditors (in certain activities), notaries
- Real estate agents
- Certain non-financial businesses (e.g. dealers in goods/art, auction houses)
- Gambling providers

## HOW?



- Electronically via **goAML** to the local FIU
- Using a standardized reporting form
- With clear reasoning and **answers to the 6 W-questions**



# What changes under the new AMLR?\*



## STATUS QUO



## NEW

BASE	National laws in each EU Member state	EU AML Regulation applies directly across the EU (Art 69 et seq. AMLR)
WHO?	Designated obliged entities	Covers also new sectors (e.g. professional football clubs & agents)
WHEN?	Link to a criminal offence is required	Link to money laundering & terrorism financing is sufficient – <b>even lower reporting threshold</b>
	Dealers in high-value goods	Reporting required for <b>high-value goods above thresholds, even without suspicion</b>
HOW?	Response time to FIU requests: immediately (no deadline)	<b>Response time to FIU requests:</b> within 5 working days or <24h (urgent & justified cases)

\*Exemplary



# What can obligated entities do now?

Adapt processes, systems and thresholds early.



## All obliged entities participants

Expand reporting content, adjust processes and train staff/partners



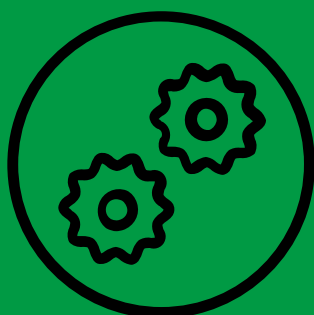
## High-value goods dealers

- Set up reporting processes when selling high-value goods to private individuals (non-business use) – even without suspicion
- Examples: luxury cars from EUR 250k, watches/jewelry from EUR 10k, vessels/aircrafts  $\geq$  EUR 7.5m



## Credit & financial institutions

Must also report transactions regarding high-value goods if they provide services related to the sale or transfer of ownership of these goods



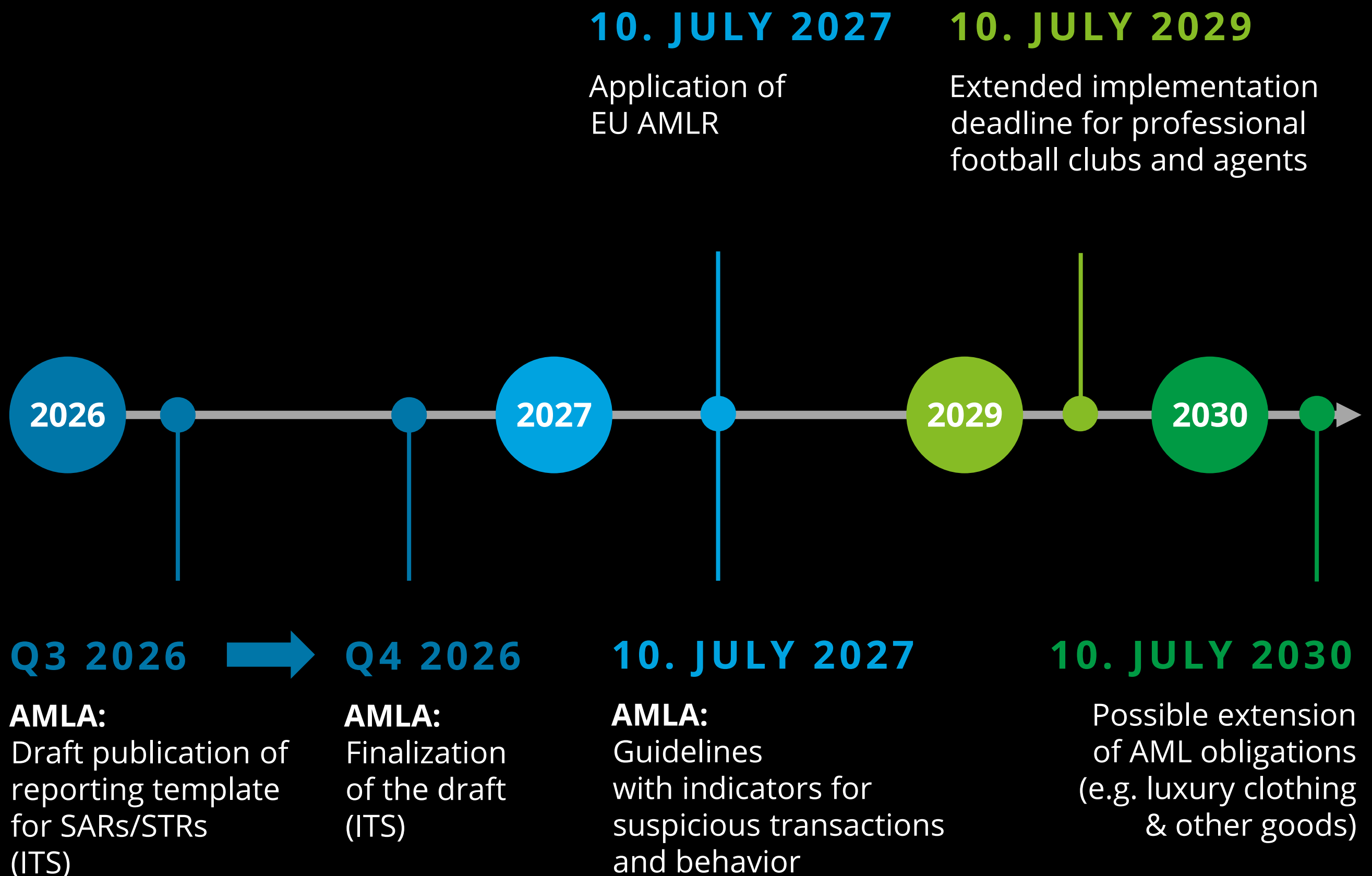
## Prepare for automation

Review and enhance monitoring systems



# What happens next?

## SARs/STRs under the AML-Package



# Deloitte.

Contacts:

We remain at your disposal.

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**Now is the time to position yourself strategically –  
well ahead of 2027.**



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