# XML DEVELOPMENTS

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Cellule de renseignement financier (CRF)

# Contents

# 1 Procedure

We recommend that any reporting entity likely to submit many transactions (e.g. transactions on a bank account or an electronic money wallet) implement IT developments allowing them to export transactions and all relevant details directly from their internal system in XML format compliant with goAML. This XML file constitutes the report.

If you decide to proceed with such IT developments, please contact us at: goaml_helpdesk@justice.etat.lu indicating your decision.

Once the developments are completed, reporting entities are asked to send representative test XML files in the training environment (https://goaml-training.b2g.etat.lu/) so that we may assess them in terms of data quality and content. Since this is your sandbox environment, please notify us by email at goaml_helpdesk@justice.etat.lu, indicating which report(s) should be reviewed. You will receive feedback on the quality of the reports submitted. If everything is correct, we will validate your developments and authorize you to send XML files in the production environment.

For data quality reasons, please do not upload XML files in production before receiving FIU approval. This also applies after major changes in your developments.

# 2 Report with transactions

If your reports or replies to FIU requests contain transactions, the report_code to use is either STR (suspicious transaction report), TFTR (terrorist financing transaction report) or RIRT (requested information transaction report).

## 2.1 XML « full report » and XML « transactions »

You may choose to develop:

- a complete XML
  - Containing general information and transactions. This file is submitted via « NEW REPORTS / XML UPLOAD »[1]
- an XML containing transactions only
  - the compliance officer manually creates a report via « NEW REPORTS / WEB REPORTS », fills in the general information and adds the attachments. Then uploads the XML file containing the transactions. It is even possible to upload invalid/incomplete XMLs, as they may be

[1] For more information regarding this menu, please refer to : https://crf.public.lu/en/comment/faq/declaration/telecharger-xml.html

corrected/completed before submission[2].

## 2.2 General information

The following general information must be provided :
- Reporting entity identification number (<rentity_id>)
- Reporting entity reference (<entity_reference>)
- FIU reference (if applicable, particularly for a RIRT) (<fiu_ref_number>)
- Motivation (<reason>) (if entered in goAML Web, limited to 8 000 characters)
- Indicators (<report_indicators>)

Attachments must be added either in a zip file together with the XML[3], or by the compliance officer directly in goAMLWeb.

If the XML file of a report or response to a request for information contains more than 500 transactions, please follow this procedure :
https://crf.public.lu/en/comment/faq/tech/faq/decl500.html/

## 2.3 Points to consider regarding transactions

### 2.3.1 My_client

The first decision is whether the account should be flagged as my_client (<t_from_my_client> or <t_from>). Selecting my_client means that the account is a client of the reporting entity **AND** a suspect or an involved person related to the report. If you omit my_client, this means that the account is not the reporting entity's client **OR** it is a reporting entity's client but is not related to the report (counterparty of the person involved by the report/response).

This distinction is crucial because it changes how the account must be reported.

If the account is my_client (hence suspect **AND** related to the report) you must include a <signatory> (technical constraint). In this case, persons and entities holding the account must be provided under specific tags. The entity account holder, if applicable, should be provided under <t_entity>. The persons account holders should be provided under <signatory> (<t_person>).

If the account is not my_client, please **do not fill in** these tags (<t_entity> et <signatory>), otherwise unrelated persons will exist in our database and watchlists. You should therefore only provide account data

[2] For more information regarding the upload, please refer to:
https://crf.public.lu/en/comment/faq/declaration/faire-declaration/transactions/transactions-up-down.html
[3] https://crf.public.lu/en/comment/faq/declaration/telecharger-xml.html

(<swift> **OR** <institution_code> depending on the case, <account>, <account_name> (account holder (presumed)), <iban> if applicable).

### 2.3.2 Transfer transaction type

The most frequent transaction type (<from_funds_code> & <to_funds_code>) is Transfer (code Q). In this case you must always provide, on both sides, the account object, therefore the tags <from_account> & <to_account>. More information here :
https://crf.public.lu/en/comment/faq/declaration-type/transactions/virement.html

### 2.3.3 Cash withdrawal transaction type

The Cash withdrawal transaction type (code H = Cash withdrawal at counter (branch) or I = Cash withdrawal at ATM) is to be provided as <from_account> to <to_person>. More information here :
https://crf.public.lu/en/comment/faq/declaration-type/transactions/prelevement.html

### 2.3.4 Cash deposit transaction type

The Cash deposit transaction type (code O = Cash deposit at counter (branch) or P = Cash deposit at ATM) is to be provided as <from_person> to <to_account>. More information here :
https://crf.public.lu/en/comment/faq/declaration-type/transactions/versement.html

### 2.3.5 Card payment transaction type

The Card payment transaction type (code G = Card payment (debit or credit)) is to be provided, either from est à renseigner, selon vos possibilités, soit de <from_account> (card data) to <to_account> (merchant payment account), or <from_account> (bank account data) to <to_account> (card data). More information here :
https://crf.public.lu/en/comment/faq/declaration-type/transactions/par-carte.html

### 2.3.6 Bank fees transaction type

Since they are not considered potentially suspicious transactions, do not provide : bank fees, interests, currency exchange commissions.

### 2.3.7 Transaction type

Regarding the transaction type (<from_funds_code> & <to_funds_code>), the same code is to be provided on both sides of a transaction.

### 2.3.8 My_client account balance

For the my_client account balance (<balance>), please provide the same balance for each occurrence of the account in the chosen currency of the account (<currency_code>) and preferably for the date when the XML file has been generated (to be provided in <date_balance>).
This means that it is not needed to provide a different balance for each transaction.

### 2.3.9 Foreign currency

If the transaction is not in EUR, you must include, on the relevant side of the transaction (<t_from> and/or <t_to>), the tag <t_foreign_currency>. More information here :
https://crf.public.lu/en/comment/faq/declaration/faire-declaration/transactions/devise.html

### 2.3.10 Objects : person, account, entity

For information on how to enter account objects, persons and entities, please refer to the relevant pages in our FAQ :

*2.3.10.1 Account :*
https://crf.public.lu/en/comment/faq/declaration/faire-declaration/renseigner.html

*2.3.10.2 Person :*
https://crf.public.lu/en/comment/faq/declaration/faire-declaration/renseigner-compte/informations-generales.html

*2.3.10.3 Entity :*
https://crf.public.lu/en/comment/faq/declaration/faire-declaration/renseigner-personne-morale.html

De plus, nous vous prions de tenir en compte les informations contenues dans cet article : https://crf.public.lu/en/comment/faq/manuel/qageneral/essent.html

## 3 Report without transactions

If your reports or responses to FIU requests for information contain no transactions, the report_code to use is either SAR (Suspicious activity report), TFAR (Terrorist financing report (without transactions) or RIRA (Requested information activity report (without transactions)).

For these report types, only a complete XML (general information and data for the different objects (person, account, entity)) may be developed for these.

The structure differs from transaction-based reports :

**SAR**

```
<report>
    ...
    <activity>
        <report_parties>
            <report_party>
                <person>
                </person>
            </report_party>
            <report_party>
                <account>
                </account>
            </report_party>
            <report_party>
                <entity>
                </entity>
            </report_party>
        </report_parties>
    </activity>
    ...
</report>
```

**STR**

Example of a Transfer transaction type (account to account)

```
<report>
    ...
    <transaction>
        ...
        <t_from>
            ...
            <from_account>
            </from_account>
        </t_from>
        <t_to>
            ...
            <to_account>
            </to_account>
        </t_to>
    </transaction>
    ...
</report>
```

The XSD schema supports both and can therefore be used for any report type.

## 4 Points to consider and How-Tos :

### 4.1 Where to start ?

A good starting point for your compliance officer would be to manually enter a fully populated test report with fictitious transactions, according to your use case, in the training environment. Once the report submitted and has the status “Processed”, it is possible to download the corresponding XML file via the goAML Web menu ( SUBMITTED REPORTS / WEB REPORTS) and check if all information has been integrated. The XML thus produced is always valid against the XSD.

## 4.2 XML validation

Before sumitting your report in the training environment, a last check that you could make is to validate the generated XML file against the XSD schema. It is possible to do this directly in goAML Web, under : NEW REPORTS, THEN XML REPORT VALIDATOR.

You must therefore have an account in the goAML training environment.

We recommend adding an XSD validation step to your XML generation developments.

## 4.3 Reporting entity identifier

*Attention :* The training environment is completely separated from the production environment, therefore your entity ID will usually differ. Your entity ID is present in the XML file (<rentity_id>).

If during the XML upload you receive the following error message : "*Reporting Entity does not match user : 'user' is not allowed to submit reports for the REID in the report '1234'*", please check if in the XML file you have provided the correct ID corresponding to the training environment.

## 4.4 XSD documentation and used enumeration codes utilisés

Bothe XSD schémas (full report and transactions) are available at:
https://crf.public.lu/en/comment/faq/tech/sujets-it.html

The used code enumerations are also available here in order to help you map the codes used at your institution to those in the goAML XML.

## 4.5 Indicators

Every report that is not a RIRA or RIRT (i.e. a response to an FIU request for information) must include at least one indicator. Because of the RIRA and RIRT exceptions, the XSD schema cannot enforce this restriction.

Similarly, other checks that cannot currently be performed via XSD are carried out after initial acceptance at the goAML Web level, were only XSD validity is verified. These semantic *business rules* may result in the rejection of a report, even if it is syntactically correct.

More information on this topic : https://crf.public.lu/en/comment/faq/manuel/qageneral/reglesbus.html