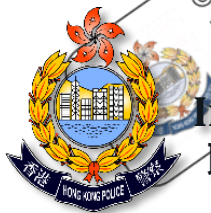


# Suspicious Transaction Reporting (STR)

**Mr. WONG Hoi-riu**  
**Senior Inspector of Police**

**Joint Financial Intelligence Unit (JFIU)**



**Joint Financial  
Intelligence Unit**  
**聯合財富情報組**



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## 重要告示

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# Suspicious Transaction Reporting Agenda



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Key Legislation



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Reporting Requirement



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STR Reporting



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STR Statistics



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# ABOUT JFIU

## Bureaux / Departments



Financial Services and  
the Treasury Bureau



Security Bureau



Department of Justice



Companies Registry



稅務署  
Inland Revenue  
Department

Inland Revenue  
Department

## Regulators



Hong Kong Monetary  
Authority



SFC  
證監會

Securities and Futures  
Commission



保險業監管局  
Insurance Authority

Insurance Authority

## Law Enforcement Agencies



Hong Kong Police Force

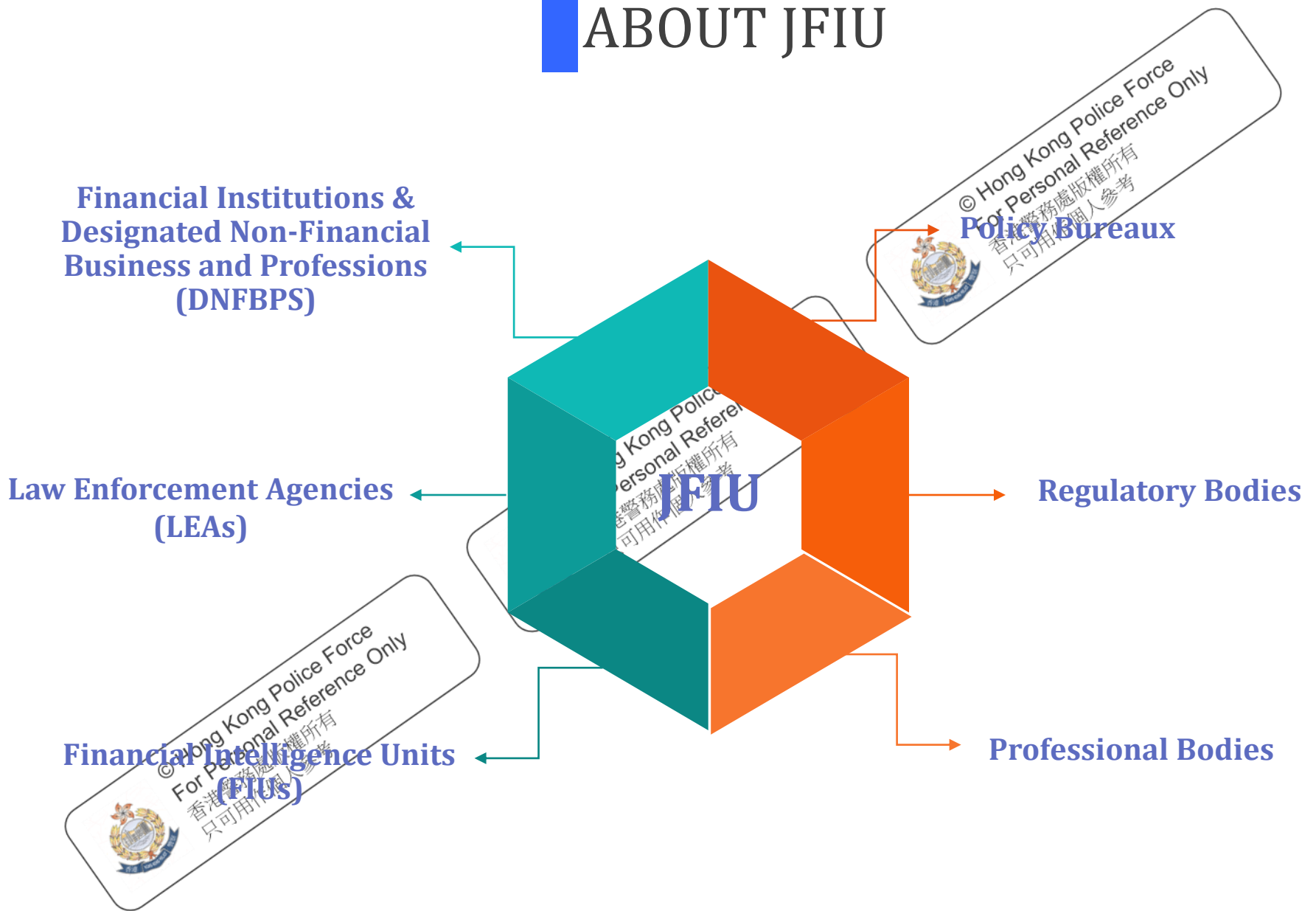


Customs and Excise  
Department



ICAC  
Independent  
Commission Against  
Corruption

# ABOUT JFIU



# ABOUT JFIU

## ← Public-Private Partnerships →

### Reporting Entities

#### Financial Institutions & DNFBPs

- CDD + KYC
- Record Keeping
- Internal Controls
- STR Filing

### Financial Intelligence Unit

#### JFIU

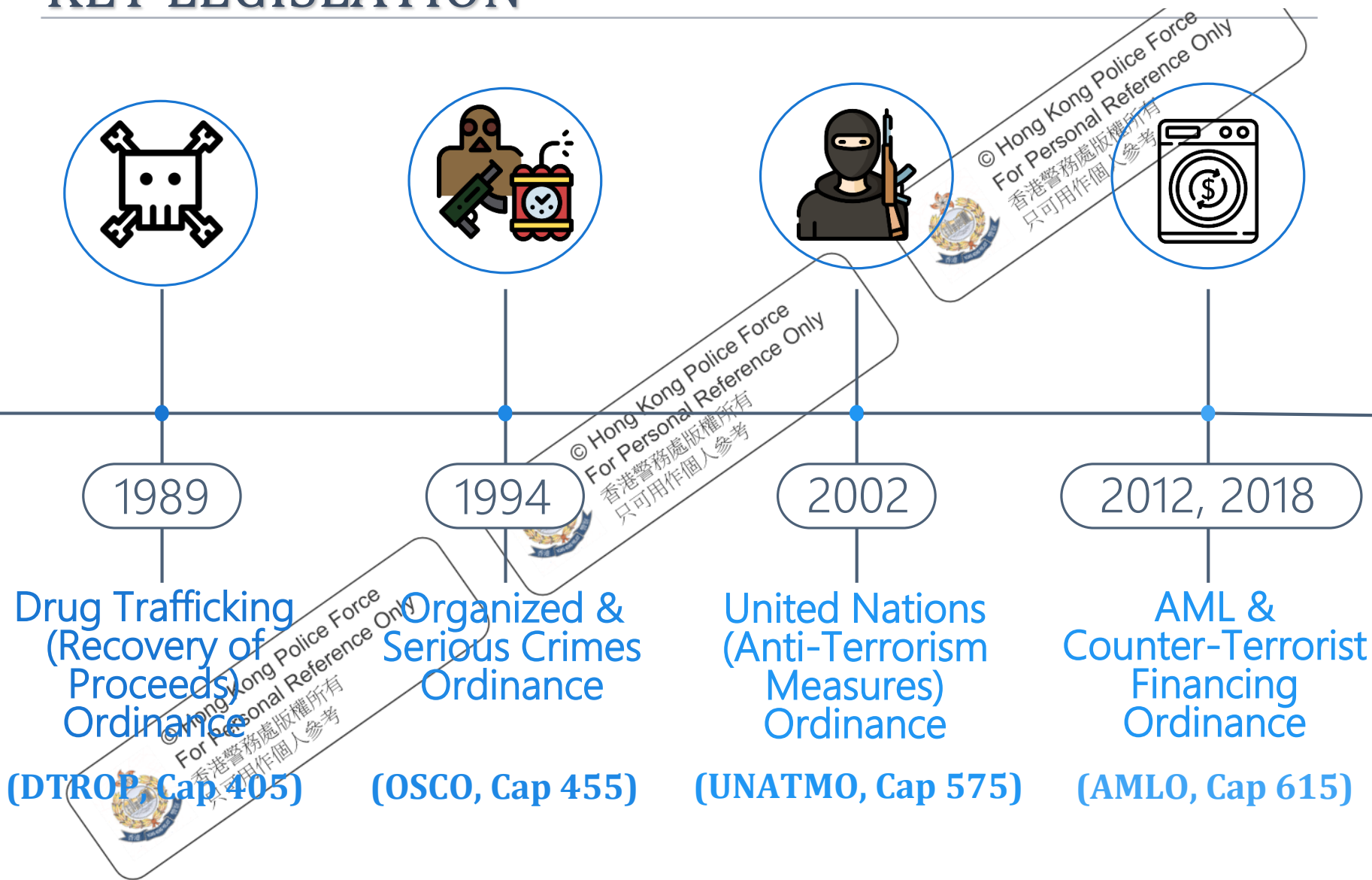
- STR Regime
- Intelligence Exchange
- International Cooperation
- Training & Outreach

### Law Enforcement Agencies

#### Police, Customs, ICAC

- Financial Investigation
- Asset Tracing
- Restraint & Confiscation
- Mutual Legal Assistance

# KEY LEGISLATION



# REPORTING REQUIREMENT



**Drug  
Trafficking  
(Recovery of  
Proceeds)  
Ordinance**

S.25A of Cap 405 DTROP

**Organized &  
Serious Crimes  
Ordinance**

S.25A of Cap 455 OSCO

**United Nations  
(Anti-Terrorism  
Measures)  
Ordinance**

S.12 of Cap 575 UNATMO



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# STR REPORTING

## SAFE Approach

**Screen**

**subject entities' background & transactions**

**Ask**

**appropriate questions to clarify circumstances**

**Find**

**relevant records for review**

**Evaluate**

**whether suspicion is substantiated**

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# STR REPORTING

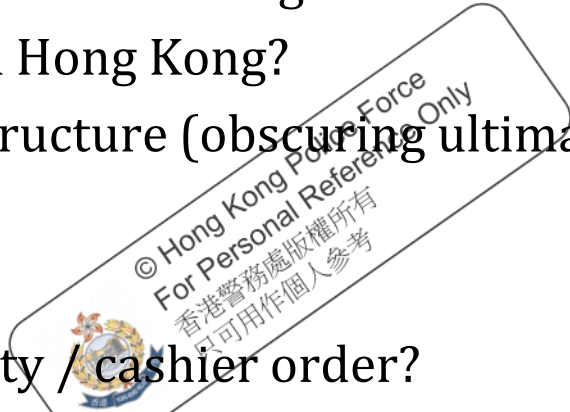
## Risk Indicators

### Client

- Politically Exposed Person?
- Non-resident / Corporate from high-risk country?
- No known nexus with Hong Kong?
- Complex corporate structure (obscuring ultimate beneficial ownership)?

### Transaction

- Payment from 3<sup>rd</sup> party / cashier order?
- Unusual high/ low payment for a property?
- Unexpected amount of transactions ?
- Transacted with unrelated parties / jurisdiction?



# STR REPORTING

## Risk Indicators

### Previous Records/ Further Enquiries

- Background check / open source (*adverse news*)
- Failing to disclose specific role / relationship / ownership of property
- Unwilling to response to questions or answers are not convincing
- Unwilling to provide supporting document

### Evaluation

- Information from client is incommensurate with your record in hand?
- Information from client could not be verified?
- The client appeared to be a stooge in the transaction?

**\*TF Risk**



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# STR REPORTING

## How to submit an STR?

Suspicious transaction reports can be made in one of the following ways:

- by e-reporting system, STREAMS
- by email to [jfiu@police.gov.hk](mailto:jfiu@police.gov.hk)

- by fax to : (852) 2529 4013

- by mail, addressed to Joint Financial Intelligence Unit, GPO Box 6555 Hong Kong

- by telephone (852) 2866 3366 (for urgent reports during office hours)

Suspicious Transaction  
Report And Management  
System (STREAMS)



The screenshot shows the login page for the Suspicious Transaction Report And Management System (STREAMS). It features the Hong Kong Police Force crest on the left. The title 'Suspicious Transaction Report And Management System (STREAMS)' is centered at the top. Below the title are input fields for 'Username', 'Password', and 'Database' (with a dropdown menu showing 'SBOX-ACCESS'). At the bottom are 'Login' and 'Reset' buttons. A watermark '© Hong Kong Police Force For Personal Reference Only' is visible across the page.

If you want to file STR via STREAMS, you have to complete **the application form** and return to JFIU by fax (2529 4013) or email ([jfiu@police.gov.hk](mailto:jfiu@police.gov.hk)). If you need any further information, please feel free to contact JFIU staff.

# STR REPORTING

## STR Content

### ■ Particulars

of the subject persons / organizations / beneficial owners  
(including details of ID document or company registration)

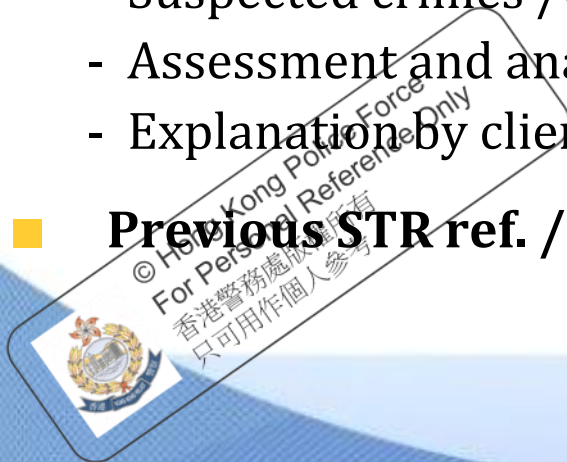
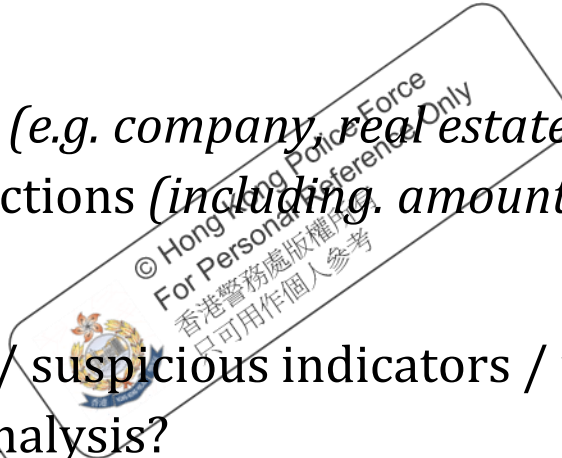
### ■ What Suspicious?

- Property involved (e.g. company, real estate, vessel, etc.)
- Accounts & transactions (including amount, currency, source of fund)

### ■ Why Suspicious?

- Suspected crimes / suspicious indicators / news
- Assessment and analysis?
- Explanation by clients, if any

### ■ Previous STR ref. / Police case ref., if any



# Recommended Structure of STR Narrative

- 1) Triggering Factors
- 2) Background of Subject(s)
- 3) Transactions
- 4) KYC/CDD Result & Open Source Information
- 5) Conclusion & Way Forward



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# Recommended Structure of STR Narrative

(STR Summary) (Reporting Body) (Subject) (Organization) (Phone) (Address) (Account) (Transaction)  
 (Suspected Crimes) (Suspicious Indicators) (Open Source Info.) (Entity Lists) **Check** **Save** **Print**

## Subject

Sequence No: 1

English Name:	Family Name:	Given Name:	Middle Name:
Chinese Name:	CCC:	HKID:	
Other ID	Type:	if Others:	
	ID No.:	Country:	
DOB:	Gender:	Occupation:	
Nature:			
Phone:			
Email:			
Address:			
Additional Information:			



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Force  
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(STR Summary) (Reporting Body) (Subject) (Organization) (Phone) (Address) (Account) (Transaction)  
 (Suspected Crimes) (Suspicious Indicators) (Open Source Info.) (Entity Lists) **Check** **Save** **Print**

## Account

Sequence No: 1

Account Institution:			
Account Number:	Account Type:	if Others:	
Opening Date:	Closing Date:		
Balance:	Currency: HKD	Amount:	Date:
Related Person:	Role:	if Others:	
Related Company:	Role:	if Others:	
Additional Information:			



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# STR Feedback

- Acknowledgement of receipt
- Consent/ No Consent/ N/A
- Quarterly STR Analyses
- Meetings with Stakeholders



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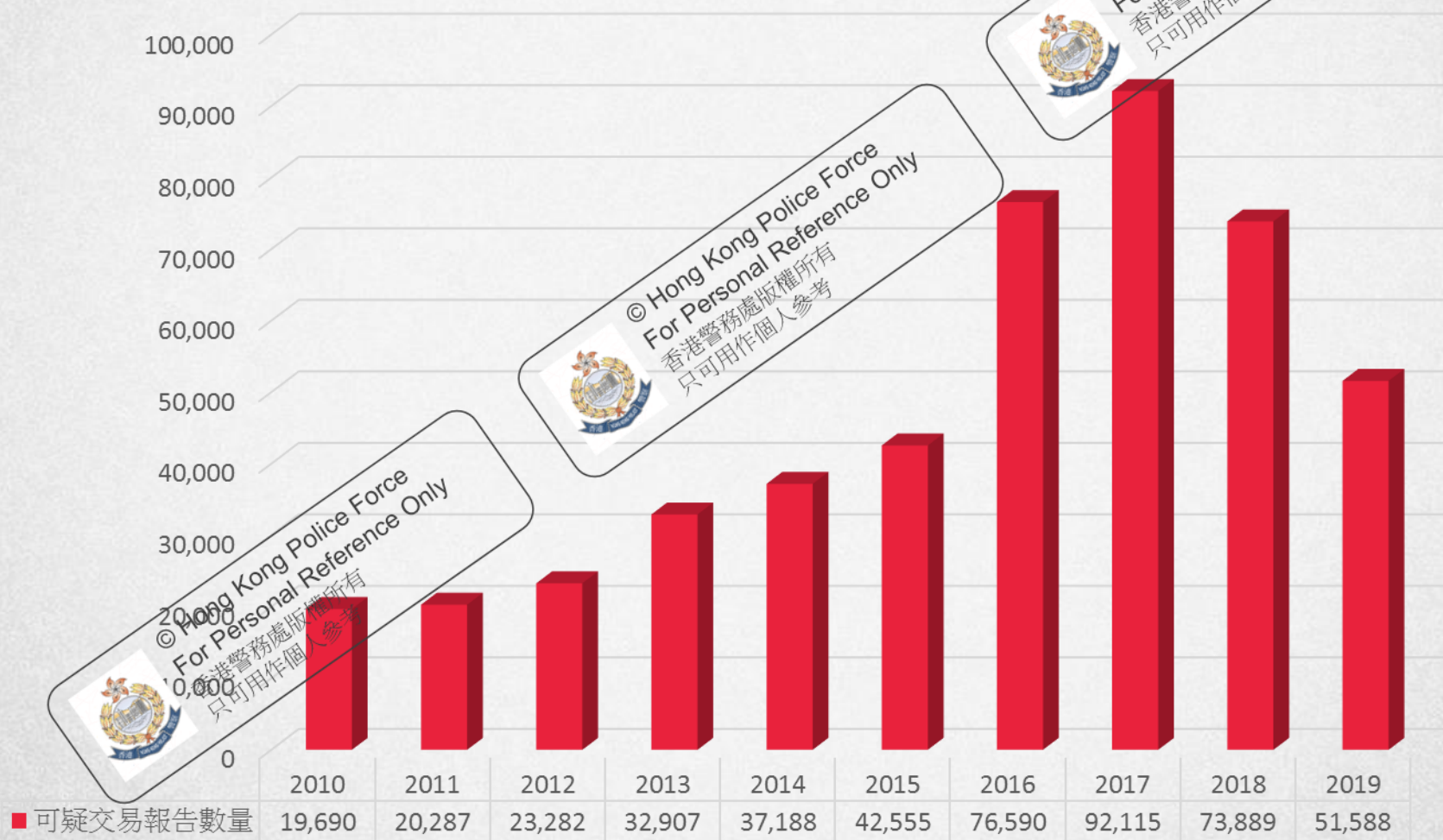
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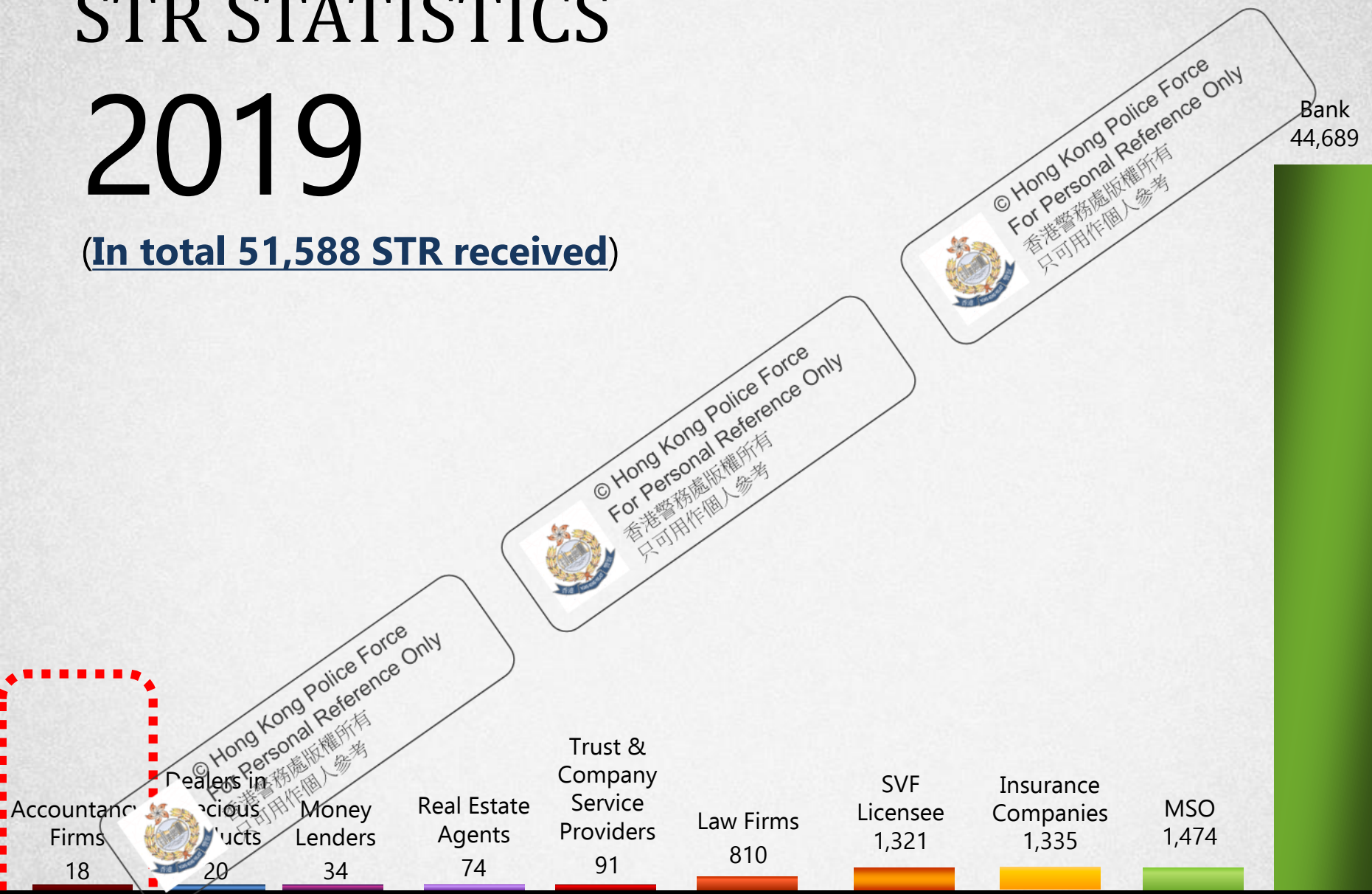
# STR STATISTICS

**Number of STRs received in the past 10 years**



# STR STATISTICS 2019

(In total 51,588 STR received)



THANK YOU



[www.jfui.gov.hk](http://www.jfui.gov.hk)

