

WESTERN UNION

AGENT ANTI-MONEY LAUNDERING

COMPLIANCE MANUAL



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### Document Publication History

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***Dear Valued Agent:***

Western Union\* is a money transmitter, and subject to laws and regulations in relation to anti-money laundering and combating terrorism financing in the jurisdictions in which it does business. Western Union is required, among other things, to develop and implement a risk-based anti-money laundering compliance program; maintain transaction records; and report suspicious activities.

Western Union is providing this Agent Anti-Money Laundering Compliance Manual ("Manual") to all of our valued Agent locations to ensure that you provide Western Union services in a manner that enables you and us to comply with your and our obligations under the various laws to which we are subject. Each Agent location is required to adhere to the policies and procedures in the Manual.

The Manual includes the following:

- A description of the responsibilities and duties of the person designated for overseeing adherence to the policies, procedures and requirements given in the Manual for the Agent location.
- A description of the policies, procedures and internal controls designed to ensure compliance with applicable laws and regulations, including suspicious activity reports, employee training, location oversight and record keeping.
- An Anti Money Laundering ("AML") training section.
- Forms that are required as part of the AML program.

We have designed the Manual to assist you in understanding and adhering to Western Union policies, procedures and requirements and AML legislation in connection with providing money transfer services, and to train your staff to understand the requirements and their role in complying with them.

If you have questions about this Manual or your AML compliance obligations, please contact your Western Union representative.

Sincerely,

Western Union  
Consumer Protection Compliance and Ethics Department

*\* Western Union Payment Services Ireland Limited ("WUPSIL") is an authorized payment institution incorporated in Ireland and regulated by the Central Bank of Ireland. Western Union Payment Services UK Limited ("WUPSUK") is an authorized payment institution incorporated in England and regulated by the Financial Services Authority in the UK. WUPSIL and WUPSUK are wholly-owned by the Western Union Group. The Agent has been appointed as a tied agent of either WUPSIL or WUPSUK.*

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# INTRODUCTION

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Overview of Policies, Procedures and Requirements

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AML Compliance Training

This Agent Anti-Money Laundering Compliance Manual ("Manual") is issued on behalf of Western Union. The Manual describes the Anti-Money Laundering ('AML') compliance requirements applicable to Agent locations working under Western Union's License. Western Union Agents and their employees are subject to all relevant laws within their respective countries, any relevant EU laws and regulations, as well as policies and procedures, including those designed to combat money laundering and terrorist financing activities.

The Manual also includes quick reference pages with a summary of the Western Union identification, record keeping and reporting requirements for money transfers specific to your country. Quick reference pages are included and intended to be guides that are kept in a safe, convenient place for easy reference. The Manual is organized into four sections that you need to be aware of as an Agent. The sections are as follows:

#### Compliance Delegate Responsibilities

Each Agent must designate a person responsible for overseeing the implementation of the Western Union policies, procedures and requirements given in this Manual. This person is referred to as the Compliance Delegate and is usually the manager or is someone assigned by the manager and is responsible for initiating and overseeing adherence to these policies, procedures and requirements.

#### Policies and Procedures

Policies are general statements of broad intent and direction, whereas procedures are more detailed instructions for day-to-day activities. Western Union may update the policies and procedures from time to time as the result of changes in laws, regulations, business operations, or Western Union policy.

#### Training

The Compliance Delegate must ensure that all employees who handle Western Union transactions are trained on AML and Western Union policies and procedures included in this Manual. The training section has been designed to help you provide the required training to your employees.

#### Forms

This section includes Suspicious Activity Report forms, a training record, the Large Principle Money Transfer (LPMT) form (or the form that is applicable in your country) and the quick reference pages. These forms can be copied by the Agent as needed. If additional copies of these forms are required, they can be obtained by contacting your local Western Union Compliance Department.

This Manual outlines Western Union requirements. Agents may choose to implement additional internal requirements in keeping with the best practices of your business, so long as such requirements are not inconsistent with those given in this Manual and by the law.

The Compliance Delegate is the person responsible for compliance in your business. This person is responsible for overseeing and monitoring adherence by your Agency to the Western Union policies, procedures and requirements given in this Manual.

The duties and responsibilities of the Compliance Delegate are outlined below and may be in addition to the other duties and responsibilities of the appointed person.

The Compliance Delegate will work in collaboration with the Western Union AML Compliance department and has the following specific responsibilities:

## Training



1. Ensures that new employees complete Western Union AML Compliance training.
2. Ensures that all employees receive, at minimum, annual refresher training on AML Compliance, including Suspicious Activity Reports and identification requirements.
3. Ensures that all employees review compliance training and educational materials provided periodically by Western Union.
4. Provides supplemental training to employees as needed to address compliance deficiencies with the Western Union policies and procedures that are noted through monitoring, regulatory audits or program adherence reviews.
5. Ensures that initial and ongoing training efforts are documented and maintained for each employee.
6. Ensure that evidence of training (both initial and ongoing) has been documented and retained in accordance with local record keeping requirements.

## Monitoring



1. Ensures that employees identify and refer suspicious activity to Western Union or the local regulator using the Suspicious Activity Report form or as indicated within the Quick Reference Pages for both completed and attempted suspicious transactions.
2. Reviews all Suspicious Activity Report forms and Large Principal Money Transfer forms or the respective forms applicable for your country for accuracy, completeness and timely submission to Western Union.
3. Develops and implements appropriate corrective action for any deficiencies identified during the monitoring process.
4. Ensures that employees follow fixed AML Compliance processes and practices at all times when engaging in Western Union transactions.
5. Monitors transaction activity using daily reports, send/receive forms and/or receipts and data integrity issues and/or investigates any significant deviations from normal trends, where applicable.

## Record Keeping



1. Ensures that the Manual is maintained in an accessible place and that any updates received from Western Union are incorporated into the Manual.
2. Maintains the AML-related monitoring and training records.
3. Ensures that all required report forms and supporting documents are transmitted to Western Union or your local regulator in a timely fashion.
4. Ensures that all documents relating to consumer transactions are retained in a safe and secure place in compliance with local regulations (please refer to the Quick Reference Pages within this Manual for more information).

## Other



1. Serves as the primary contact with Western Union AML Compliance Department. In addition, when needed, serves as a contact during regulatory audits by Country authorities, liaising with the Western Union AML Regional Manager during these audits.
2. Serves as the primary contact for Agent Compliance reviews conducted by Western Union and is responsible for responding to review findings and implementing corrective action.
3. Coordinates the process for identifying suspicious activity, completing and submitting Suspicious Activity Reports or the respective reports applicable for your country for completed or attempted transactions.



# Western Union AML Compliance Policies

## COMPLIANCE POLICIES

Agents and their employees must comply with Western Union AML policies and procedures, which may be updated by Western Union from time to time.

- All employees conducting Western Union transactions must know and comply with the policies, procedures and requirements set forth in this Manual, as updated.
- All employees conducting Western Union transactions must have and use their own separate user ID and password for the money transfer system. Employees may not share user IDs or passwords or conduct Western Union transactions using another employee's user ID.
- Records of completed employee training and compliance monitoring must be documented and retained in compliance with local regulations.
- Suspicious activity identified during interactions with a consumer must be reported. The form for reporting and the address it should be sent to are contained in the form section of this manual. Western Union will also file any reports with the appropriate regulatory agency relating to suspicious activity as Western Union deems necessary or appropriate. Agents are required to keep copies of reports and any supporting documentation in compliance with local regulations. Evidence of submission to Western Union must also be documented and retained in compliance with local regulations.
- From time to time Western Union receives requests from Law Enforcement Agencies. If an employee of your company or at your location receives such a request, they must forward the request to their Compliance Delegate or directly to the Western Union Compliance Department.
- Large principal money transfers must be referred to Western Union following the policies and procedures described herein. Western Union will report to the local authorities when it deems it necessary or appropriate. Agents are required to keep copies of report forms and all customer transaction supporting documentation in compliance with local regulations. These documents are to be kept in a safe and secure place.

# Western Union AML Compliance Policies

Agents and their employees must comply with Western Union AML policies and procedures, which may be updated by Western Union from time to time.

Agents and their employees must take reasonable steps to identify suspicious activity and submit Suspicious Activity Reports to Western Union or to the local Regulator if required by local law as appropriate. The Agent should attempt to get as much information as possible about the consumer(s); however, the Agent shall not inform a consumer that a Suspicious Activity Report form is being completed. If you think that asking for additional information will tip off a consumer that a report will be made, do not ask for further information. This requirement applies to both Money Transfer transactions that are completed and to those that are only attempted.

## ***Suspicious Activity Report Procedure***

### **STEP 1**

A Suspicious Activity Report must be submitted to Western Union (or to the local Regulator if required by local law) for any activity where the Agent knows, suspects or has reasonable grounds to suspect that the transaction or attempted transaction is related to a money laundering or terrorist financing offense. A copy of the Suspicious Activity Report form can be found in the Appendix section of this Manual.

### **STEP 2**

Suspicious activity includes possible attempts to launder money, structure transactions to avoid reporting or record keeping requirements, and/or terrorist financing activities.

### **STEP 3**

Employees must take reasonable measures to obtain as much information as possible for completion of the Suspicious Activity Report, keeping in mind that you do not want to alert the consumer that a report is being completed. If you think that the consumer is aware of your suspicions, do not ask additional questions.

### **STEP 4**

Suspicious Activity Reports are to be reviewed for completeness and accuracy prior to submission to Western Union or the Regulator if required by local law. The form may be amended from time to time by Western Union or the local Regulator as it deems necessary to meet its regulatory and legal obligations.

### **STEP 5**

The Compliance Officer/Delegate should fax the completed Suspicious Activity Report to Western Union or the Regulator if required by local law at the number provided on the form located within the Appendix that is specific to your country. The Compliance Delegate should fax the completed Suspicious Activity Report to Western Union or the local Regulator as soon as possible after detecting the suspicious activity.

### **STEP 6**

Copies of Suspicious Activity Reports and evidence of submission to Western Union or the local Regulator, along with all supporting information, must be retained in compliance with local regulations.

Under no circumstances may an employee inform a consumer that a Suspicious Activity Report is being submitted.

# COMPLIANCE POLICIES

### Examples Of Suspicious Activity



The consumer displays unusual behavior or provides potentially improper documentation. For example, a consumer may be considered suspicious if he/she:

- Is nervous, rushed or aggressive
- Is reluctant to show identification
- Provides identification that seems unusual, false or altered
- Presents a different address each time they complete a money transfer
- Spells their name differently or uses a different name each time they complete a money transfer

### Transactions that Do Not Make Economic Sense

- A sender regularly sends money home once a month and suddenly begins sending larger amounts every week to other people.
- A sender comes in more than once during the same day or over several days and sends amounts just under the identification threshold to different people who are in the same geographic area.
- Large and regular transactions that cannot be identified as legitimate, especially if sent to countries associated with the production or processing of narcotics or other illegal drugs.
- A consumer who receives a number of small transactions on the same day, or within several days, and subsequently sends one or more transactions of about the same total amount to another person.

### Refusing Transactions

- If you are uncomfortable about a transaction, ask for help from a more experienced associate, your manager or Compliance Delegate. You have the right to refuse a transaction. Whether a transaction is completed or attempted, you should report your concerns/suspensions using the Suspicious Activity Report form.



# Western Union AML Compliance Policies

All Agent employees who conduct Western Union money transfer transactions must receive training on AML and Western Union AML Compliance policies and procedures, before being allowed to operate the money transfer system.

## ***Employee Training Program***

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- Western Union provides compliance training materials for Agents and their employees on:
  - Money laundering, terrorist financing and laws and regulations designed to combat them
  - Applicable laws and regulations on money laundering and terrorist financing
  - Suspicious activity identification and the Suspicious Activity Report process
  - Identification, record keeping and reporting requirements
  - Western Union policies and procedures
  - Large Principal Money Transfer process
- Initial Western Union compliance training for current employees must occur promptly upon you becoming a Western Union Agent location and prior to employees conducting Western Union transactions.
- At least annually, all employees who conduct Western Union money transfer transactions must receive Western Union refresher AML Compliance training.
- Ongoing additional Western Union AML Compliance training should occur as new information or requirements become available or if compliance issues are identified. In addition, Western Union may periodically provide educational materials, such as newsletters and bulletins that discuss Western Union compliance requirements or AML issues. These materials should be used for continuing education to ensure that current topics and trends are part of the AML Compliance training program.
- Evidence of completed Western Union initial and refresher compliance training must be documented, and such documentation must be retained in compliance with local regulations. A training record is included in the Appendix section of this manual for documenting training.



# COMPLIANCE POLICIES

The Compliance Delegate must periodically monitor compliance with the policies, procedures and requirements set forth in this Manual.

### ***Compliance Monitoring Procedure***

**1**

The Compliance Delegate must monitor Western Union activity conducted at their location. The monitoring must be documented to verify that:

- All Suspicious Activity Reports are completed correctly and submitted to Western Union or the local Regulator as soon as possible after the transaction's occurrence, and that copies of the Reports and any supporting documentation are retained at the Agent location.
- Information and identification requirements are met and identification policies are followed.
- Send and Recieve Forms are completed correctly and information on the forms matched the printed money transfer receipts.
- Where applicable, any LPMT forms are completed correctly and submitted to Western Union the same day the transaction occurred the transaction was held until the information was received, and that copies of the forms along with any supporting documentation are retained at the Agent location.
- All record keeping requirements comply with local regulations
- Existing employees received Western Union AML Compliance refresher training and new employees successfully completed Western Union AML Compliance training.
- All employees have and are properly using separate user IDs and passwords for conducting Western Union money transfer transactions.

**2**

If monitoring discloses potential compliance issues, the Compliance Delegate will identify the cause of the potential issue and determine the appropriate corrective measures, such as additional training or clarifying procedures. If the Compliance Delegate is unsure of the appropriate action, they should contact the Western Union AML Compliance department for guidance.





# Western Union AML Compliance Policies

LPMT refers to any transaction with a principal amount at or above the threshold set by Western Union policy. This LPMT policy is designed to limit the risk to all parties, the Agents and Western Union. The LPMT procedure helps Western Union to monitor and document transactions and to identify and prevent transactions that might be associated with money laundering or other illegal activities.

## ***Large Principal Money Transfer Procedure***

**1**

To ensure a prompt response to any LPMT request, it is important to get all the facts about the transaction, obtain supporting documentation and accurately complete the LPMT form before contacting Western Union. The LPMT form is found in the Appendix section of this manual.

**2**

Employees must take reasonable measures to obtain as much information as possible for completion of the LPMT form.

- The first step: determine the purpose of the transaction. If you are uncertain about the purpose of the transaction, ask the consumer open-ended questions. The questions should focus on: purpose of the transaction, source and origin of the funds, identification of the sender, relationship to the receiver, sender's previous dealings with the receiver, and full name of receiver.
- Step two: obtain supporting documentation to justify the purpose of the transaction and the origin of the funds.
- Next: Ensure that the consumer completes the LPMT form and "To Send Money" forms at the sending location within view of a Western Union Operator.
- Finally: the LPMT forms are reviewed for completeness and accuracy prior to submission.

**3**

The Western Union Operator should send the completed LPMT form, "To Send Money" form and all supporting documentation directly to Western Union. For your country's contact details, please refer to the LPMT form found in the Appendix section of this Manual.

# COMPLIANCE POLICIES

## Large Principal Money Transfer Policy (continued)



**4**

Western Union processes the request and obtains all necessary approvals for the transaction to proceed.

**5**

Copies of the LPMT forms, "To Send Money" forms and all supporting documents must be retained in compliance with local regulations.

### Examples of When a LPMT Might be Accepted

The consumer must provide supportive documentation in order for a transaction to be accepted.

#### ACCEPTED

- Payment for urgent surgery
- Payment for funeral expenses
- Family support
- Legal Fees
- Tuition Fees

#### REFUSED

- Payment for personal business, where sender is unable to provide supporting documents
- Real estate project, where sender is able to present supportive documents BUT refuses to proceed with transaction if reported to Financial Authorities
- Gambling
- Investment Purposes
- To purchase stocks, bonds, gold, silver, minerals

# Western Union AML Compliance Policies

International and European Law requires all money transfer service providers to screen all transactions against a list of names provided by certain government and organizations, including the United Nations, the European Commission, the U.S. Treasury Department's Office of Foreign Assets Control (OFAC), and others. The Western Union system screens transactions against a list of people and entities with whom we are prohibited from doing business, or who we believe are involved in illicit activity.



## ***Government Sanction and Interdiction Program Procedures***

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- If a match is identified, Western Union must research the transaction in more detail. In many cases, consumers are required to provide additional identification or information about the transaction. The required research may delay the release of the transaction for payment.
- If an Operator or a consumer has questions about this topic, please contact the helpline provided with the Appendix section.

## ***Law Enforcement Requests***

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- From time to time Western Union receives requests from Law Enforcement Agencies. If an Agent's employees receive such a request, they must forward it to their Head Office or directly to the Western Union Compliance Department.



# COMPLIANCE POLICIES

This splitting policy provides guidance regarding the handling of two or more transactions that, whether intentionally or unintentionally, avoid record keeping requirements or identification thresholds.

The term “split” is defined as:

- A transaction that is broken apart for the purpose of decreasing the amount of each single transaction.

The activity of splitting/separating one transaction into two or more transactions can be done for legitimate reasons or it can be done for illegitimate reasons.

### Example of Splitting Transactions for Illegitimate Reasons



Joe, the sender, wishes to send €1,500 to a criminal associate in Europe; however Joe is nervous and sends three transactions of €500 euro each to try to avoid being reported.

As a Western Union Agent, you can witness the consumer's actions and are in a position to make a decision as to whether the splitting is for a legitimate reason or not. If your employees believe that the activity is suspicious, they must follow the procedures for handling suspicious activity, as outlined in this manual.



# Requirements

## REQUIREMENTS

Agents and their employees must obtain and record all consumer information required by Western Union identification and record keeping policies and procedures and local regulations. All such information obtained by the Agent must be retained by the Agent. This includes all forms, receipts, reports and any supporting documentation.

Employees conducting money transfer transactions must obtain and record all information required by identification and record keeping policies and procedures. Employees must ensure that all required information is contained on the appropriate money transfer transaction form ("To Send Money," "To Receive Money" or "Quick Pay") and entered into the Western Union money transfer system.

All such information obtained by the Agent must be retained by the Agent. Unless otherwise specified, money transfer transaction forms ("To Send Money", "To Receive Money" and "Quick Pay" are to be retained in compliance with local regulations and held in a safe and secure place



### Acceptable forms of Identification



When you are required to verify a consumer's identity by reviewing an identification document, Western Union policy requires that the identification document:

- Is government issued.
- Includes a photo of the consumer.
- Is current (not expired).

### ***Identification and Record Keeping Requirements***

Employees conducting Western Union Money Transfer transactions must obtain and record all information required by Western Union identification and record keeping policies and procedures. Employees must ensure that all required information is contained on the appropriate money transfer transaction form.

Record keeping and identification information specific to your jurisdiction can be found within the Quick Reference Pages.

# Overview of Training Responsibilities

Training is a critical component of the Western Union Anti-Money Laundering (AML) Compliance program. The following questions and answers will help you understand the training requirements.

## Who should take AML Compliance training?

Every employee who conducts Western Union services or has access to the Western Union system should take AML Compliance training. Before conducting any Western Union services, each employee should read the AML Training modules included in this binder.

## How often should employees be trained?

Refresher training must be completed at least annually.

## How do I document employee training?

The Agent Training Record should be used to document all employee AML Compliance training. This includes any ongoing training, such as reading AML compliance articles in newsletters and other publications.

## How long do I have to keep employee training records?

Training materials must be kept with your AML Compliance records in compliance with local regulations.

# Introduction

## MODULES

This training is an important part of Western Union’s AML Compliance Program. We provide the training to assist you in adhering to the requirements of our AML Compliance Program and to help you and your employees better understand how to protect your business operations from being used for illicit purposes. In addition to periodic training, the AML Compliance Program requires you to follow Western Union policies and procedures and to designate a Compliance Delegate who is responsible for overseeing AML Compliance at your Agent location.

### Training Modules

This packet contains Four separate training lessons to assist you in training employees. The format allows training to be conducted in a group or individually.

Each lesson presents a different aspect of AML Compliance:

LESSON 1	LESSON 2	LESSON 3	LESSON 4
Overview of Money Laundering and Terrorist Financing	AML Laws and Regulations	Record Keeping Requirements	Reporting Requirements

### AML Compliance Agent Training Record

This record will help you track and record your training. The record should be kept current and on file at your location. Be sure each employee initials the training record after completing the training. A blank copy of this form can be found within the Appendix section of this document. This record must be made available to Western Union on request.

# LESSON 01

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## Overview of Money Laundering and Terrorist Financing

What is Money Laundering?

What is Terrorist Financing?

Key Points



# Money Laundering

RISKS

Money laundering is the process of disguising the source of money that was obtained illegally in order to make it appear legitimate. Many types of criminal activity, such as drug trafficking, generate money for criminals and their organizations. In order to use that money without being detected, the criminals must disguise its origins and make it appear legitimate. Money laundering is the process by which the criminal does this. If successful, the criminal is able to use the criminal proceeds freely.

## The Risks of Money Laundering



- It hurts our communities and our country.
- It damages our business reputation.
- It allows criminals and terrorists to use our financial system for illegal purposes.

## The Three Basic Stages of Money Laundering

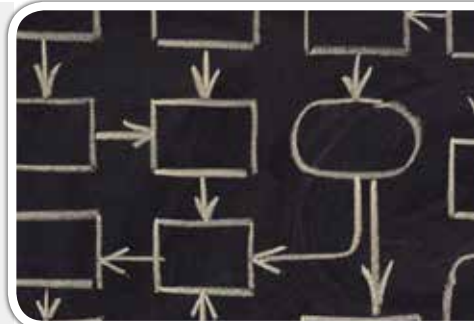
**PLACEMENT** is the attempt to place illegally obtained funds in the financial system without attracting attention.

*A send transaction could be the placement of cash with an Agent (e.g. Money from the sale of stolen goods/drug money). This is the initial stage and is very hard to establish. Western Union recommends that if you are suspicious of any activity at your location, you should report it. Details of reporting Suspicious Activity are covered later in this Manual.*



**LAYERING** is the second stage of the money laundering process where funds are moved around to hide them from their source. This "movement" often involves a complex series of transactions in order to create confusion and complicate the paper trail.

*A consumer might go into several different Agent Locations and complete the same or similar transactions in the hope of not being detected. If you notice this behavior, you should bring it to the attention of your Compliance Delegate and Western Union by completing Suspicious Activity Report forms.*



**INTEGRATION** is the ultimate goal of the money laundering process. Once the illegal funds are placed into the financial system and are insulated through the layering stage, they are used to buy goods and services that appear as "legitimate" wealth.

*One or more consumers send several transactions to one receiver. This receiver collects the transactions and subsequently sends another transaction or tries to invest in a legitimate product.*





# Terrorist Financing

## DIFFERENCES

Combating terrorist financing has become an important part of anti-money laundering efforts. Terrorists, like criminals, try to conceal their activities (including their financing) to avoid detection. Terrorist financing is a little different than traditional money laundering because terrorists often finance their activities with money that was obtained legally. Terrorists know if they use illegally obtained money, they are more likely to be caught before they can use their money to fund their terrorist activity. What terrorists try to hide is the connection between themselves, their financing, and their terrorist activity.



## What is Terrorist Financing?

### Money Laundering vs. Terrorist Financing



#### **Example of Money Laundering**

Joe, by selling illegal drugs, generated a large sum of money. Now he must find a way to use the funds without attracting attention to his criminal activity.

Joe attempts to hide the unlawful funds by transferring small amounts of money to various individuals who deposit it in bank accounts that Joe controls.



#### **Example of Terrorist Financing**

A foreign organization on a government watch list needs to provide funds to its operatives for a terrorist act. The funders understand that sending large amounts of money, even legal money, will arouse suspicion.

Therefore, they divide a large sum into smaller amounts, which they transfer to associates claiming to be foreign students living abroad. These individuals posing as students then pass the money to the operatives.



#### **Penalties for Money Laundering**

It is a crime to engage in a financial transaction knowing that it involves the proceeds of drug trafficking, terrorist activities or other illegal activities. It may also be a crime to turn a blind eye to, or ignore, such transactions.

For example, ignoring "red flags" that indicate that funds could involve illegal activities can potentially expose a person or business to criminal penalties under the legal doctrine known as "willful blindness."

## LESSON 1 KEY POINTS

### ***Money Laundering***

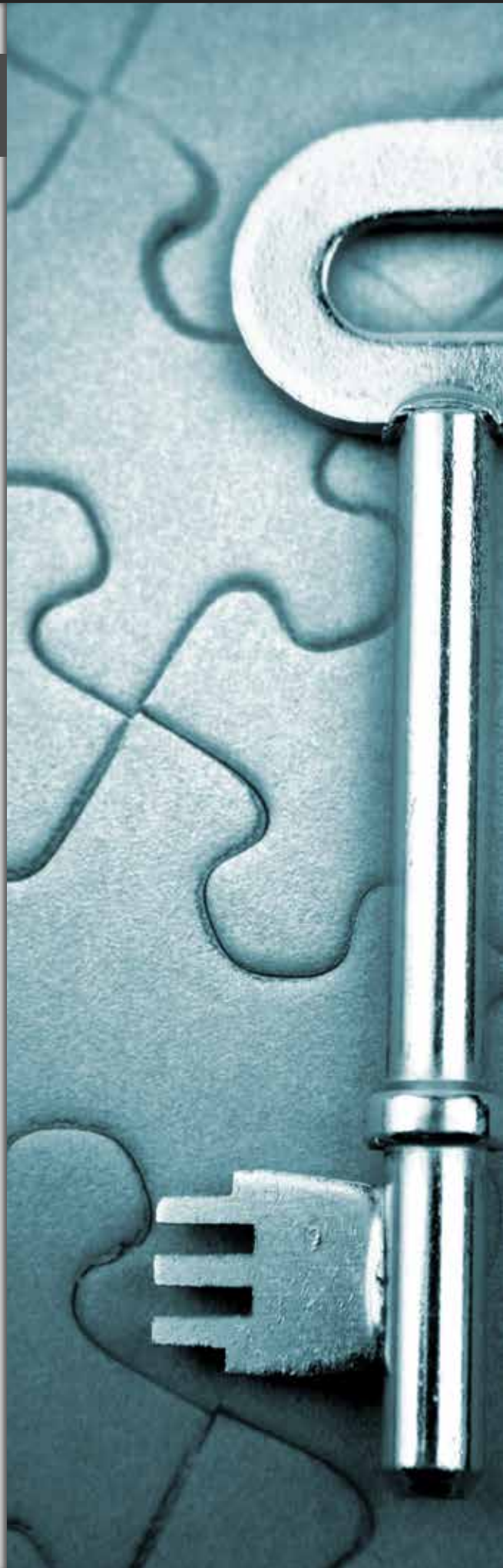
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- Begins with funds gained from crime
- Attempts to wash dirty money so that it cannot be easily traced
- Moves money through the financial system so it can later be used for legitimate purposes

### ***Terrorist Financing***

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- Often uses money acquired through legal means
- Attempts to hide the connection between the funders of terrorism, their money, and terrorist activity





# LESSON 02

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## Overview of Money Laundering and Terrorist Financing

Background and Objectives

General Requirements

Key Points

02

# Laws and Regulations

These laws and regulations tend to have three key objectives:

1. To detect and deter money laundering and the financing of terrorist activities and to facilitate investigations and prosecution of the related offences.
2. To respond to the threat posed by organized crime by providing law enforcement officials with the information they need to deprive criminals of the proceeds of their criminal activities.
3. To help fulfill a country's international commitments to fight multinational crime.

**Both money laundering and the financing of terrorist activities are criminal offences in most countries.**



## CRIMINAL OFFENCES

In general, these laws and regulations require financial institutions, including money transfer service providers, to:

- Establish and maintain an anti-money laundering compliance program.
- File certain reports with the government.
- Maintain records of certain transactions.
- Ascertain client identity in certain situations.

Compliance with these requirements is overseen in most cases by the local Financial Intelligence Unit (FIU). In addition, the FIU in most cases collects and analyzes reports from industry participants, and refers cases of possible money laundering and terrorist financing to law enforcement. Law enforcement uses the information to investigate and prosecute those who may have engaged in illegal activity.

### ***How These Requirements Apply to You***

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As a provider of money transfer services, Western Union is required to have an AML compliance program and to comply with the record keeping, reporting and client identification requirements of the various country laws and regulations. Western Union Agents must provide Western Union services in a manner that enables Western Union to meet its legal obligations. Specifically, each Agent location is required to follow Western Union operational and compliance policies and procedures which include:

- Obtaining and recording certain information when a consumer transfers money. Compliance with this requirement involves recording complete and accurate information according to prompts on the Western Union transaction screen for money transfers.
- Verifying the identity of consumers who are subject to the money transfer record keeping requirements listed on the ID summary pages provided to you.
- Submitting a Suspicious Activity Report to Western Union or to your local Regulator for completed or attempted transactions of any type that you believe are suspicious.

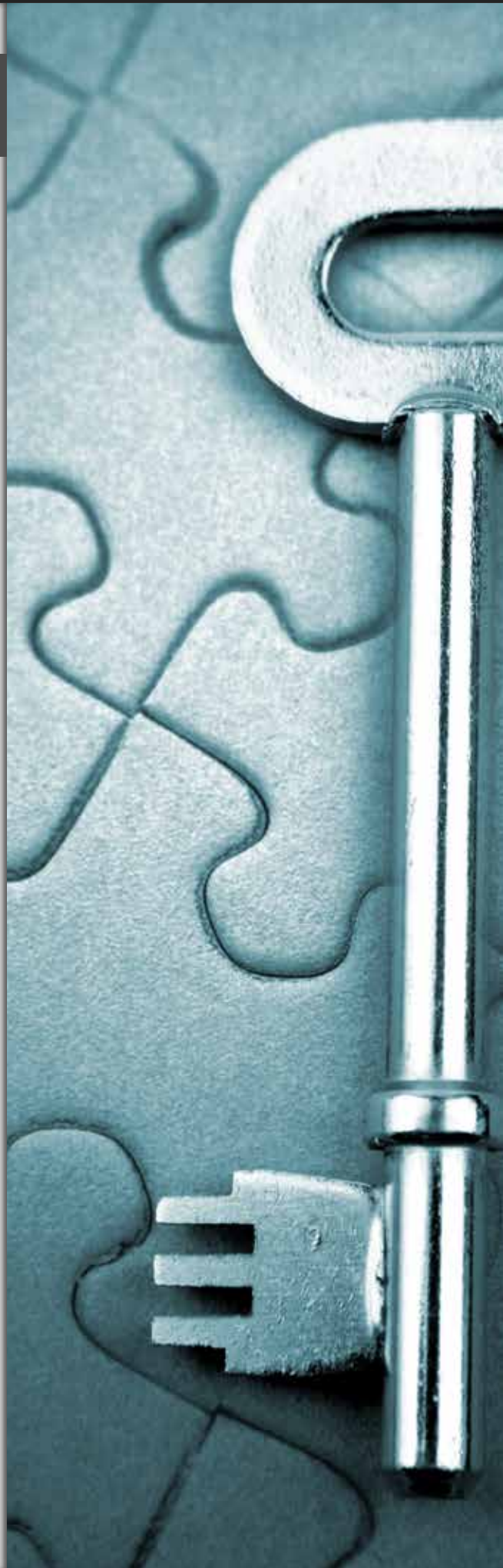
These requirements are discussed in more detail in the following training modules.

## LESSON 2 KEY POINTS

### ***Requirements***

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- Agents must follow Western Union policies and procedures so that we all comply with local AML laws and regulations.
- Agents are required to obtain and record certain information and review identification documents for money transfer transactions of certain amounts as indicated on the ID Summary pages of your country.
- Suspicious Transactions (completed or attempted) must be referred to Western Union or to your local Regulator using the Suspicious Activity Report.



# LESSON 03

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## Record Keeping Requirements

Record Keeping Requirements for Money Transfers

Acceptable Forms of Identification

Key Points



# Money Transfers

When you conduct a Western Union Money Transfer **SEND** or **RECEIVE transaction**, you need to obtain and record certain information and confirm the consumer's identity by reviewing a current, government-issued photo identification (ID) such as a national ID. Specifically, you need to see the ID and record the information listed in the ID section of the Appendix.

In most cases, you can meet these requirements by making sure that you obtain all of the information called for on the "To Send Money" or "To Receive Money" forms and by the Western Union money transfer system.

## ***Record Keeping Tips***

When obtaining information about a consumer's occupation, make sure you get a specific occupation. Answers such as "business," "self-employed," or "manual labor" are not acceptable. You should ask for more details, such as "owner of convenience store" or "self-employed plumber."

When obtaining a consumer's address, do not accept a P.O. Box. Instead you should obtain house/apartment number, street, town and/or city as applicable.

## **LARGE PRINCIPLE MONEY TRANSFERS (LPMT)**

Large principle money transfer or LPMT refers to any transaction with a principal amount at or above the threshold set by Western Union. This LPMT policy is designed to limit the risk to all parties, the Agents and Western Union. The LPMT procedure helps Western Union to monitor and document transactions and to identify and prevent transactions that might be associated with money laundering or other illegal activities.



## SEND OR RECEIVE TRANSACTIONS

### ***Acceptable Forms of Identification***

As stated previously, you must review an acceptable form of identification when making money transfers or transactions over certain amounts. Acceptable forms of identification are listed in the Appendix section of this Manual.

The identification document must be an original – a copy is not acceptable – and must contain a photograph of the individual. In addition, it must be currently valid. For example, an expired national ID would not be acceptable identification.

When you look at an ID, you should make sure the information is consistent with the information provided by the Sender or Receiver (i.e., name, address, age). You should also compare the photograph on the ID with the person in front of you. If the ID does not match or appears to be a forgery, you should not accept it.



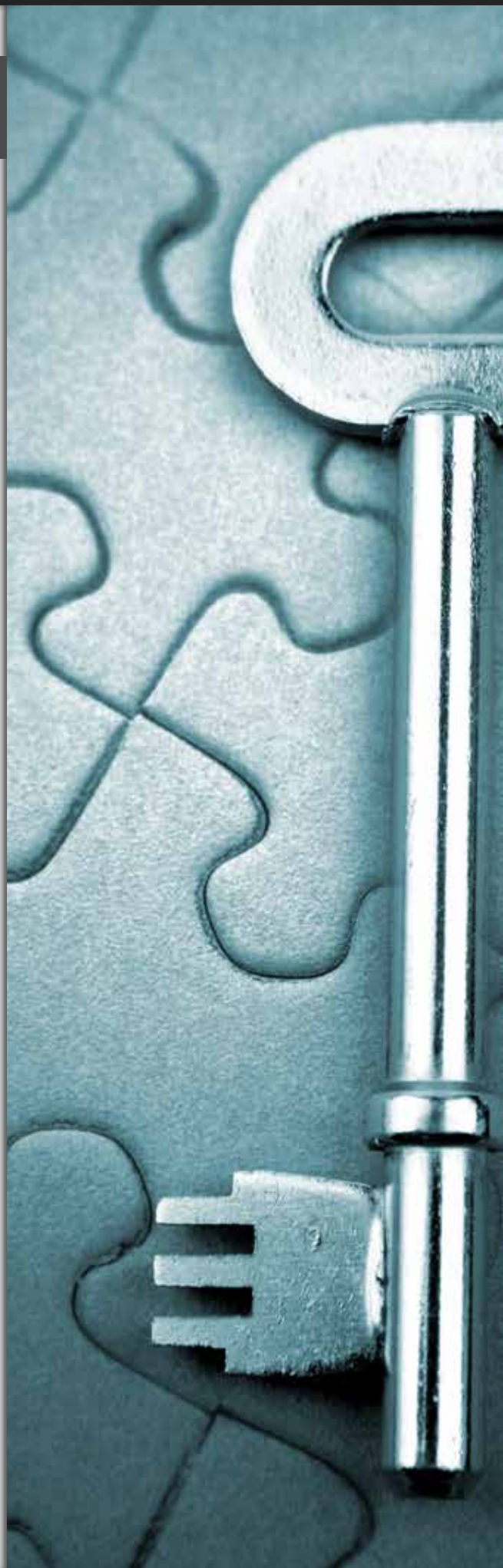


## LESSON 3 KEY POINTS

### ***Money Transfers***

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- The record keeping requirements for Money Transfers include obtaining and recording information about consumers sending or receiving money transfers above the amounts described on the ID Summary pages.
- Western Union conducts an interview for money transfer transactions above the LPMT threshold.
- Acceptable IDs must be original, currently valid government-issued identification documents with a photograph; for example, a passport.





# LESSON 04

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## Reporting Requirements

Suspicious Activity Reports (SARs)

Red Flags

Splitting Transactions

Completing a Suspicious Activity Report

Monitoring Responsibilities and Hints



# Suspicious Activity

One of the ways the international community combats money laundering and terrorist financing is by requiring financial institutions to take reasonable measures to detect and report suspicious activity.

In this lesson, you will learn what kind of transactions must be referred, what forms to use, and how you can effectively monitor daily transactions.

## ***3<sup>rd</sup>-Party Transactions***

- The economic beneficiary is the natural person who is the ultimate proprietor of, or who controls the source of funds.
- Western Union does not allow transactions to be sent on behalf of economic beneficiaries. In case of an economic beneficiary, the transaction must be refused.
- 3rd-party transactions are not permitted. The customer is only allowed to send his own personal funds.

## ***Transactions in the Name of the Operator***

- It is forbidden for the operator to use his own identity/ name to send transactions on behalf of the customer.



## REPORTING

Structured transactions or transactions that could involve fraud, money laundering, terrorist financing, or other illegal activity involving the use or movement of funds are considered suspicious activity. Western Union and other financial institutions must report suspicious activity. To help us meet this obligation, Agents are required to submit Suspicious Activity Reports for any activity the Agent considers suspicious.

The Suspicious Activity Report is a tool for identifying and reporting transactions that could be related to money laundering or terrorist financing. You need to refer any transactions you consider suspicious to Western Union by:

- Completing a Suspicious Activity Report for any transaction or pattern of transactions – completed or attempted – that is suspicious.
- Faxing the completed form to Western Union or to your local Regulator if required by law as soon as the suspicious activity is discovered.

**You may be wondering how you know if a transaction or attempted transaction is suspicious. Let's examine what might be suspicious activity.**

### What is Suspicious Activity?



Spotting suspicious activity is the first phase of the report process. In general, a transaction or attempted transaction is suspicious when you know, suspect or have reasonable grounds to suspect that it is being used to launder money, avoid reporting or record keeping requirements, or is part of other illegal activity.

We understand that you may not be certain if a consumer is making a transaction for a criminal purpose. You are only required to identify transactions that are "suspicious," that is, activity that could involve illegal or criminal activity. To help you identify these transactions, there are a number of signals – commonly referred to as "red flags" – that may indicate suspicious activity. Red flags generally consist of behavior or characteristics about a consumer and the transaction that could cause you to be concerned and suspicious.

It is the legal responsibility of every Agent to report any suspicious activity. You can do this by using the relevant Suspicious Activity Report (SAR) and submit it to Western Union by fax or email. You will find the SAR form and the relevant contact details in the appendix section of this Manual.

# Suspicious Transactions

When one or more factors signal that a transaction is unusual and possibly suspicious, it is called a “red flag.” Observing a red flag should trigger questions, such as:

- Is the amount of the transaction unusually large for the typical consumer?
- Does the consumer make the same or similar transactions more frequently than normal?
- Does the type of transaction seem unusual for the consumer?

**Other examples of red flags include:**

- Consumer uses a fake ID, or different IDs on different occasions (name, address, or identification number may be different).
- Two or more consumers use the same or similar ID (photo or name may be different).
- Consumer changes a transaction after learning that he or she must show ID.
- Consumer conducts transactions so that they fall just below amounts that require reporting or record keeping.
- Two or more consumers, trying to evade report or record keeping requirements, seem to be working together to break one transaction into two or more transactions.
- You know or have reason to suspect that the transaction involves funds from illegal activity.
- The transaction does not appear to have a lawful purpose.



## WHAT TO LOOK FOR

**Be aware of consumers who...**

- Are hurried, nervous or evasive
- Are aggressive or uncooperative
- Are reluctant to provide ID or information
- Appear at store opening, closing or peak times
- Try to impress you with substantial future business or wealth
- Offer you a tip, bribe or other inappropriate gift
- Provide inconsistent information when asked questions
- Come several times in one day to conduct transactions that are just below the amounts that require reporting
- Are not concerned about price or are too familiar with the reporting rules

**Be alert for transactions that...**

- Are just below the threshold amount for reporting or record keeping/identification
- Are changed frequently by the consumer at the desk
- Are conducted by familiar consumers who have a sudden change in pattern
- Have inconsistent or non-existent relationship between the sender and the receiver or payee
- Are conducted by multiple individuals who appear to know each other outside the premises, but ignore each other while they are inside the business

Keep in mind that a consumer who displays any of the red flag behaviors should not automatically be considered a money launderer or terrorist. However, one or more red flags should put you on alert to look for other clues that something could be wrong with the transaction. Also keep in mind that by submitting a Suspicious Activity Report, you are not accusing the consumer of being involved in criminal activity. You are only reporting activity that appears suspicious. Western Union or your local Regulator will decide whether the activity warrants the filing of a Suspicious Activity Report.

If you are suspicious about a transaction, ask the consumer about the reason for the transaction and their familiarity with the other party. If there are clear signs that the transaction is connected with illegal activity, refuse or do not complete the transaction. Whether the transaction is completed or refused, file a Suspicious Activity Report with the information available to you.

# Avoidance Techniques

## BASIC RULES

In order to avoid record keeping, reporting or ID requirements, a consumer may break up a large amount of money into a number of smaller transactions. For example, in order to avoid having to show an ID, a consumer may send multiple smaller transfers rather than a single money transfer. This is commonly referred to as “splitting.” This should be reported to Western Union or to your local Regulator using the Suspicious Activity Report.

### ***Basic Rules***

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Before looking at how to complete a Suspicious Activity Report, let’s review some basic rules.



#### **Rule #1**

Never tell a consumer that you are going to submit a Suspicious Activity Report to Western Union or to your local Regulator. In addition, be careful not to tip off the consumer that you are going to do so.



#### **Rule #2**

If you strongly suspect that a transaction involves illegal activity, do not complete the transaction. However, you may complete the transaction if you believe you or your employee would be in danger by refusing to do so.



#### **Rule #3**

A Suspicious Activity Report should be submitted even if you don’t complete a suspicious transaction – for example, you refuse to complete a transaction because the consumer has presented an obviously forged ID.

# Key Information

The best Suspicious Activity Reports are the ones with the most information. However it may not be possible to get all of the information requested on the form because the consumer may not be willing to provide it or the consumer may stop the transaction before the information can be obtained. Whatever is obtained and reported will be helpful on the Suspicious Activity Report.

Attempt to obtain the following information in order to complete the Suspicious Activity Report form:

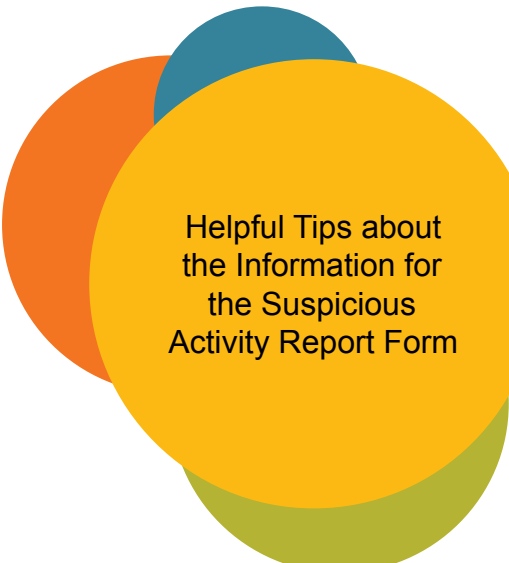
- Consumer's name, address, and telephone number
- Consumer's date of birth
- Consumer's identification information (e.g. passport) including issuing Country
- MTCN

However, if you feel that asking for additional information might alert the consumer to the fact that the transaction will be reported, you should not press for it. Again, under no circumstances should you tell the consumer that you are submitting a Suspicious Activity Report or that the transaction might be reported.

## ***Submitting and Keeping Suspicious Activity Reports***

The Suspicious Activity Report should be completed after the consumer leaves your location. The form should be faxed to Western Union or your local Regulator if required by law as soon as possible after the suspicious activity was observed. Additional sheets of paper can be used if needed to explain the transaction or activity. The contact number for Western Union is on the form.

Agents must keep a copy of the Suspicious Activity Report form, along with any supporting documentation, for a minimum period of five years or longer if required by local law.



### Helpful Tips about the Information for the Suspicious Activity Report Form

Enter complete names, rather than initials.

Enter complete street addresses, including apartment numbers.

Passport ID must include the country of issuance.

If the activity involves money transfers, the description of activity section should include the destination city, province/state, country, and names of intended recipients.

Money Transfer Control Number (MTCN), if there is one, must be recorded.



# Transaction Monitoring

PROTECT YOUR BUSINESS

Now that you know the requirements for completing Suspicious Activity Reports, let's examine one more important process to help you comply with Western Union policies – transaction monitoring. Monitoring your transactions as well as your compliance with Western Union policies and procedures protects your business and is a critical step in spotting suspicious activity.

## ***Monitoring Responsibilities***

Compliance Delegates are responsible for the following:

- Monitoring daily activity and identifying and reporting suspicious activity on the Suspicious Activity Report form when applicable.
- Reviewing all Suspicious Activity Reports to make sure they are accurate and complete before faxing them to Western Union or to your local Regulator.
- Monitoring employees to make sure they are complying with Western Union policies and procedures, including the requirement that they use their own unique user IDs and passwords when conducting transactions.
- Identifying and taking any necessary corrective actions.

## ***Monitoring Hints***

Look for transaction patterns such as:

- The same Sender or Receiver names on Western Union records.
- Transactions that appear to be spread among two or more money transfers in order to avoid record keeping or reporting requirements.
- Consumers who make many similar transactions and/or split transactions without concern for the increased fee amounts.
  - In these cases, it is important to understand the circumstances surrounding the above mentioned activity. If an employee was or ought to be aware of a scenario that appears to be splitting, did that employee have a conversation with the sender to determine the purpose of the transaction(s)? Discussions like this with employees may identify a need for further training or perhaps additional information on the circumstances that eliminate our suspicion.
- Review employee activity to ensure they are following Western Union policies and procedures. Employees should be accurately capturing consumer data such as identification type, number, place of issuance, address particulars, occupation etc.
- Keep all supporting documents for Suspicious Activity Reports in one location in compliance with local regulations.





# APPENDIX

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Quick Reference Pages

Large Principal Money Transfer Form

Suspicious Activity Report (SAR) Form

Training Record

# WESTERN UNION MONEY TRANSFER® QUICK REFERENCE PAGES

## Identification, Record Keeping and Reporting Requirements (In Person Transactions)



### UNITED KINGDOM

Record Keeping Requirement	Requirement	Basis
Send/Receive Forms	Keep all copies on site for <b>5 years</b> as of the end of the calendar year.	WU Policy
Government Filings	All government related compliance filings including suspicious transaction reports, government sanctions etc. must be kept on site for 5 years as of the end of the calendar year.	UK Regulation
Training Log	Maintain records on AML Compliance training activities within the training log for 5 years.	WU Policy

NOTE: All consumer records must be kept in a reliable location that is not accessible to the public or other employees of your business.

Identification Requirement	Requirement	Basis
Identification threshold	<p><b>Send Transactions from 600 GBP</b> on a single or linked transaction – consumers have to be identified through an acceptable ID document for transactions of and above £600 either in one transactions or a series of linked transactions.</p> <p><b>Receive Transaction from 1 GBP</b> - Consumers have to be identified through an acceptable ID document</p>	UK Regulation
Data to be verified and recorded	<p><b><u>Send Transactions less than 600 GBP</u></b></p> <ul style="list-style-type: none"> <li>Record sender name and address (residential address – no post box)</li> </ul> <p><b><u>Send Transactions 600 GBP to 1999 GBP</u></b></p> <ul style="list-style-type: none"> <li>Identify Sender (obtain data and verify through acceptable Photo ID document). Record the name, date of birth, address (residential address - <b>no post office box</b>), place of birth, nationality, ID document type, ID number, expiration date and issuing authority.</li> </ul> <p><b><u>Receive Transactions less than 2000 GBP</u></b></p> <ul style="list-style-type: none"> <li>Identify Receiver (obtain data and verify through acceptable ID document). Record the name, date of birth, address (residential address - no post box), place of birth, nationality, ID document type, ID number, expiration date, issuing authority and receivers address</li> </ul> <p><b><u>All Send/Receive Transactions 2000 GBP or above</u></b></p> <ul style="list-style-type: none"> <li>Identify Sender (obtain data and verify through acceptable Photo and Address ID documents).</li> <li>Record the name, date of birth, address (residential address - <b>no post office box</b>), place of birth, nationality, ID document type, ID number, expiration date and issuing authority</li> </ul>	UK Regulation/WU Policy
Acceptable ID documents*	<p><b><u>Proof of Full name, place and date of birth</u></b></p> <ul style="list-style-type: none"> <li>Current signed passport</li> <li>Current full driving licence or provisional photo driving licence (UK only)</li> <li>National Identity Card (EU only with the exception of UK)</li> <li>Inland Revenue Card</li> <li>ID Card issued by the electoral office of Northern Ireland</li> </ul> <p><b><u>Proof of current/permanent residential address</u></b></p> <ul style="list-style-type: none"> <li>Utilities bill dated within the last three months</li> <li>Current UK full old style drivers license</li> <li>Bank, building society, or credit union statement dated within the last three months</li> </ul>	UK Regulation/WU Policy
<b><u>Not</u></b> acceptable ID documents*	<ul style="list-style-type: none"> <li>All <b><u>not</u></b> explicitly listed documents</li> </ul>	UK Regulation
3rd-party transactions	<ul style="list-style-type: none"> <li>All transactions on behalf of a 3rd party have to be rejected.</li> <li>Transactions must only concern 2 parties.</li> <li>If transaction is on behalf of a minor (under 17) then a parent or legal guardian can transact on their behalf</li> </ul>	WU Policy

\* For a full list of acceptable ID documents refer to your Agent AML Manual or Western Union Money Transfer Software

Large Principal Money Transfers (LPMT)	Requirement	Basis
Equivalent of USD 7500/5000 GBP - or more in a single transaction	<u>Send transactions</u> <ul style="list-style-type: none"> <li>In addition to the ID requirements listed above i.e. proof of photo and address ID, complete the Large Principal Money Transfer (LPMT) form as instructed. Western Union will then determine economical background, source of funds, relationship between sender and receiver and obtain a customer declaration regarding financial agent activity. Supportive documentation will be requested.</li> </ul>	WU Policy

Reporting Requirement	Requirement	Basis
Internal Suspicious Activity Report (SAR)	Use the Internal SAR form to file a report on observed suspicious activity. Please describe suspicious behavior and transactions as indicated on the form. Forward the report <b>immediately</b> to the Western Union AML Compliance department. The SAR is then logged and further reports can be made to the <b>National Crime Agency (NCA)</b>	UK Regulation
Contact data	<p>As a legal obligation under PoCA and contractual obligation, you must report all and any suspicious activity to the WURSGB Compliance department immediately by completing a Suspicious Activity Report (SAR) either:</p> <ul style="list-style-type: none"> <li><b>On-line through the agent portal</b></li> <li><b>By post with the paper-based form</b></li> <li><b>Fax : 02085636699 ; email : vrrsardesk@westernunion.com</b></li> </ul>	UK Regulation

UK Regulations	Requirement	Basis
<p>The Money Laundering Regulations 2007 (MLR 2007)</p> <p>The Proceeds of Crime Act 2002 (PoCA)</p> <p>The Terrorism Act 2000 (TA00)</p>	<p>As a Money Service Business (MSB) the Western Union service is regulated in the UK by Her Majesty's Revenue and Customs (HMRC).</p> <p>There is 3 main articles of UK legislation that focus on the prevention of money laundering and combating terrorist financing.</p> <p><b>Please be aware that HMRC themselves may visit your location and check that you are following Western Union and local regulation and procedures correctly at any time.</b></p> <p><b>Punishment for non-compliance can be severe.</b></p> <p>The PoCA Legislation outlines the penalties for the various offences, which you could be liable for if you do not follow the procedures and advice of your Anti-Money Laundering training;</p> <ol style="list-style-type: none"> <li><b>Entering into Arrangements (section 328) – Punishment is 14 years imprisonment, a fine or both.</b></li> <li><b>Failure to Report (section 330) – Punishment is 5 years imprisonment, a fine or both.</b></li> <li><b>Tipping Off (section 333) – Punishment is 5 years imprisonment, a fine or both.</b></li> </ol>	UK Regulation

**LARGE PRINCIPAL MONEY TRANSFER FORM**  
FOR USE WITH MONEY TRANSFERS EQUAL OR EXCEEDING USD \$7,500 OR  
LOCAL CURRENCY EQUIVALENT

**TRANSACTION INFORMATION**

**Send Amount**

LOCAL CURRENCY: \_\_\_\_\_ USD: \_\_\_\_\_

Destination City & Country: \_\_\_\_\_ Expected Payout Date: \_\_\_\_\_

Source of funds: \_\_\_\_\_

Purpose of the transfer (Briefly explain purpose): \_\_\_\_\_

PRIVATE

Is there documentation attached to support the purpose of the transfer? \_\_\_\_\_ Yes \_\_\_\_\_ No

Is the sender aware of the charges & F/X rates; and agree to them? \_\_\_\_\_ Yes \_\_\_\_\_ No

Did you check the country restrictions on the F2 zoom? \_\_\_\_\_

What is the relationship between sender and receiver? \_\_\_\_\_

Has the send money form been attached? \_\_\_\_\_ Yes \_\_\_\_\_ No

**SENDER INFORMATION**

Sender Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

ID Type: \_\_\_\_\_ ID number: \_\_\_\_\_

Date of Birth: \_\_\_\_\_ Country of Birth: \_\_\_\_\_

Issue Date: \_\_\_\_\_ Expiration Date: \_\_\_\_\_

Occupation: \_\_\_\_\_

How many money transfers have you sent by Western Union in the past three months? \_\_\_\_\_

**RECEIVER INFORMATION**

Receiver Name: \_\_\_\_\_

Expected Payout City & Country: \_\_\_\_\_

Receiver Telephone number: \_\_\_\_\_

ID Type: \_\_\_\_\_ ID number: \_\_\_\_\_

Nationality: \_\_\_\_\_

### THIRD PARTY DETAILS

Is the transaction is being conducted on behalf of a third party? If Yes, complete information below.

First/Last/or Business Name: \_\_\_\_\_

Address: \_\_\_\_\_

Phone number: \_\_\_\_\_

ID Type: \_\_\_\_\_ ID Number: \_\_\_\_\_

Date of Birth: \_\_\_\_\_ Country of Birth: \_\_\_\_\_

Expiration Date: \_\_\_\_\_ Occupation: \_\_\_\_\_

### SENDING AGENT INFORMATION

Country: \_\_\_\_\_ Agent Name: \_\_\_\_\_

Terminal ID: \_\_\_\_\_ Operator ID: \_\_\_\_\_

E-mail address: \_\_\_\_\_ Phone number: \_\_\_\_\_

### MONEY TRANSFER CONTROL NUMBERS

For Western Union Head Office Use only

Principal: \_\_\_\_\_ Fee: \_\_\_\_\_ MTCN: \_\_\_\_\_

Principal: \_\_\_\_\_ Fee: \_\_\_\_\_ MTCN: \_\_\_\_\_

Principal: \_\_\_\_\_ Fee: \_\_\_\_\_ MTCN: \_\_\_\_\_

Principal: \_\_\_\_\_ Fee: \_\_\_\_\_ MTCN: \_\_\_\_\_

Total Principal: \_\_\_\_\_ Total Fee: \_\_\_\_\_ Total Principal & Fee: \_\_\_\_\_

### Western Union SPECIALIST

Approved by: \_\_\_\_\_ Title: \_\_\_\_\_ Date: \_\_\_\_\_

Declined by: \_\_\_\_\_ Title: \_\_\_\_\_ Date: \_\_\_\_\_

Forward all documentation to  
**international.lpmt@westernunion.com**

# Western Union Payment Services UK (WUPSUK) / Western Union Payment Services Ireland (WUPSIL)

## Suspicious Activity Report (SAR) Form

(Completed or Attempted Transaction(s))

PLEASE RETURN BY FAX TO 0208-563-6699 or email: [vrrsardesk@westernunion.com](mailto:vrrsardesk@westernunion.com)

### AGENT INFORMATION - Please Complete

TERMINAL ID

DATE SUBMITTED

OPERATOR NUMBER

OPERATOR NAME

### TRANSACTION DETAILS - Please Complete

MTCN<sup>1</sup>

REFUSED TRANSACTION

COMPLETED OR ATTEMPTED TRANSACTION DATE

### CUSTOMER DETAILS - Please Complete

FIRST NAME

LAST NAME

DATE OF BIRTH

ID TYPE and NUMBER

FULL POSTAL ADDRESS

### REASON FOR SUSPICION - Please Complete

Choose the indicator that best describes the situation – you can choose more than one; please give further information in the Notes section. If none of these apply, please use the Notes Section and write on the reverse of the form if you need more space.

- ☐ Customer sends money to multiple receivers
- ☐ Customer receives money from multiple senders
- ☐ Customer uses more than one valid ID document of the same type and nationality
- ☐ Customer uses multiple addresses
- ☐ Several customers using the same ID document
- ☐ Several customers using the same address
- ☐ Customer sends or receives large sums
- ☐ Customer receives money and immediately sends it on
- ☐ Customer produces seemingly false identification or identification that appears to be counterfeited, altered or inaccurate (please remember that you should REFUSE a transaction if you are unhappy with the ID presented)
- ☐ Customer's reason for transaction is doubtful, vague or inconsistent
- ☐ Customer avoids providing identification and/or questions internal systems and policies
- ☐ Customer sends or receives money on behalf, or in association with, a third party (including a business or charity)
- ☐ Customer uses different names
- ☐ Customer seems to be sending money under the influence of third party(ies)

Notes: Please provide more information about the reason for your suspicion.

<sup>1</sup> If there are any other MTCNs relevant to this customer please indicate them in addition to any other information in the "Notes" section



**Suspicious Activity Report (SAR) Form**  
(Completed or Attempted Transaction(s))

HEAD OFFICE USE ONLY

COMPLIANCE DECISION	SAR <input type="checkbox"/>	XSAR <input type="checkbox"/>	RECEIVED DATE STAMP
INVESTIGATION DATE			
NAME/NUMBER			
SIGNATURE			

**WESTERN UNION WU**  
moving money for better

Employee Initials: Next to the Employee Name, each employee is required to write his or her initials to signify that the indicated training has been received.

Business Name and Address: \_\_\_\_\_

[illegible]

