FINANCIAL
INTELLIGENCE UNIT
REPUBLIC OF MAURITIUS

FINANCIAL INTELLIGENCE UNIT

Suspicious Transaction Reporting Guidance Note 4.1 –

Supplementary Guidance on the STR Reporting Process

August 2026

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1. INTRODUCTION

The Financial Intelligence Unit ("FIU") is established under the Financial Intelligence and Anti-Money Laundering Act 2002 ("FIAMLA") as the central agency responsible for receiving, requesting, analysing and disseminating financial intelligence relating to suspected money laundering, terrorist financing, proliferation financing and associated offences.

Suspicious Transaction Reports ("STRs") submitted by Reporting Persons constitute one of the principal sources of financial intelligence available to the FIU. The timely and accurate reporting of suspicious transactions and activities enables the FIU to identify emerging threats, develop financial intelligence and support competent authorities in preventing and combating financial crime.

The effectiveness of the suspicious transaction reporting framework depends on the ability of Reporting Persons to establish appropriate internal systems and controls for the identification, escalation, assessment and reporting of suspicious matters. A strong STR framework requires not only the submission of reports where suspicion exists, but also the implementation of clear internal procedures ensuring that suspicious matters are reviewed and reported without undue delay.

The FIU recognises that certain aspects of the suspicious transaction reporting obligations under Section 14 of FIAMLA, particularly with respect to the meaning of the requirement to report "promptly", the commencement of the statutory reporting period of five (5) working days, and the responsibilities of the Money Laundering Reporting Officer/Deputy Money Laundering Officer ("MLRO/DMLRO") following receipt of an internal suspicious transaction report may be susceptible to differing interpretations.

This Supplementary Guidance Note 4.1 has therefore been issued to provide additional guidance and clarification on the suspicious transaction reporting process and the applicable timelines from suspicion to the submission of a STR. In particular, this Guidance Note explains the reporting process, from the identification of unusual activity through to the submission of a STR to the FIU. It also clarifies the FIU's interpretation of the statutory requirement to report suspicious transactions promptly and the circumstances in which the five (5) working days reporting period commences.

This Guidance Note 4.1 shall be read together with STR Guidance Note 4 previously issued by the FIU and does not replace, revoke or otherwise amend the provisions contained therein. The principles, expectations and requirements set out in STR Guidance Note 4 remain applicable unless expressly supplemented by this Guidance Note.

It should further be read together with FIAMLA, the Financial Intelligence and Anti-Money Laundering Regulations 2018 ("FIAML Regulations"), applicable Guidance Notes issued by competent authorities and any other relevant legal or regulatory requirements.

This Guidance Note does not create new legal obligations. It is intended to assist Reporting Persons in understanding and complying with their existing obligations under FIAMLA and the FIAML Regulations. In the event of any inconsistency between this Guidance Note and the applicable legislation, the provisions of FIAMLA and the Regulations shall prevail.

Authority

This Guidance Note is issued under the authority of Section 10(2)(c)(i) of the FIAMLA.

Purpose and Scope of Application

The purpose of this Guidance Note is to promote a consistent understanding of the statutory obligation to report suspicious transactions and to encourage timely, complete and high-quality reporting by Reporting Persons.

In particular, this Guidance Note seeks to:

- Explain the legal framework governing the reporting of suspicious transactions;
- Clarify the threshold for forming a suspicion;
- Describe the respective responsibilities of employees, business units and the MLRO/DMLRO during the internal reporting process;
- Explain the FIU's interpretation of the requirement to report suspicious transactions "promptly" under Section 14 of FIAMLA;
- Clarify when the statutory reporting period of five (5) working days commences;
- Provide guidance on the establishment of internal procedures and assessment timeframes to facilitate timely reporting; and
- Encourage a risk-based approach to the escalation and reporting of higher-risk matters, including suspected terrorist financing and proliferation financing.

This Guidance Note applies to all persons designated as Reporting Persons as defined under Section 2 of the FIAMLA.

Reporting Persons should ensure that the principles and expectations contained in this Guidance Note are reflected in their internal policies, procedures and controls, taking into consideration the nature, size, complexity and risk profile of their business.

Effective Date

This Guidance Note shall come into effect as from 19 August 2026.

2. WHAT IS A SUSPICIOUS TRANSACTION?

Under Section 2 of the FIAMLA, a suspicious transaction is any transaction — whether completed, proposed or attempted — that gives rise to a reasonable suspicion that it may be connected to money laundering, terrorist financing, proliferation financing or any other predicate offence. There is no minimum value threshold, that is, a transaction of any amount must be reported if it is suspicious.

Suspicion does not require certainty or proof. The reporting obligation arises where a Reporting Person has reasonable grounds to suspect that a transaction may involve proceeds of crime, terrorist financing or proliferation financing.

2.1 Reporting based on suspicion

Suspicion is formed through the assessment of available information, including customer information, transaction patterns, behaviour, source of funds, source of wealth, geographical factors, business rationale and other relevant circumstances.

The definition does not require a Reporting Person to establish that a money laundering offence, terrorist financing offence or proliferation financing offence has actually occurred. The obligation to report arises where the available information gives rise to reasonable grounds for suspicion.

Where a Reporting Person has reasonable grounds to suspect money laundering ("ML"), terrorist financing ("TF") or proliferation financing ("PF"), the Reporting Person should recognise that the nature of these offences may require different reporting responses. In particular, suspected TF and PF activities may involve an immediate threat to national security, public safety or international obligations. Accordingly, where a Reporting Person or MLRO/DMLRO forms reasonable grounds to suspect TF or PF, the STR should be submitted to the FIU immediately[1] upon the suspicion being established and should not be delayed pending the collection of additional information that is not necessary to support the reporting decision.

The assessment of suspicion should be based on objective facts, circumstances and professional judgement. A suspicion may arise from a combination of factors which, when considered together, appear unusual, inconsistent or cannot reasonably be explained.

A Reporting Person is therefore not expected to possess evidence equivalent to that required for criminal prosecution before submitting a STR. The purpose of the STR regime is to allow the FIU to receive and analyse information that may assist competent authorities in identifying potential financial crime.

The role of the MLRO/DMLRO is to assess unusual or concerning circumstances reported through internal reporting channels, evaluate the available information and determine whether the circumstances give rise

[1] "Immediately" has the same definition as assigned to it under Section 2 of the United Nations (Financial Prohibitions, Arms Embargo and Travel Ban) Sanctions Act 2019

to a reasonable basis for suspicion. The decision to report should be based on an objective assessment of the relevant facts and circumstances rather than on speculation or unsupported assumptions.

2.2 Common indicators of suspicious transactions

Suspicious transactions may present themselves through a combination of different factors. The indicators below provide examples of common red flags that Reporting Persons should consider when identifying potentially suspicious activity. These indicators should not be considered exhaustive and should be assessed in the context of the overall customer relationship and available information.

Customer Behaviour	Transaction Patterns	Other Indicators
● Customer is reluctant to provide identification or CDD information, which when considered together with other relevant factors, give rise to concern ● Customer appears nervous or evasive when asked questions about the purpose of the transaction ● Third party appears to be directing or controlling the transaction on behalf of the customer	● Transaction is inconsistent with the customer's known business or financial profile ● Unusually large cash deposits or withdrawals without clear business rationale ● Frequent transfers to or from high-risk jurisdictions with no apparent business purpose ● Structuring of transactions to avoid reporting thresholds	● Source of funds or wealth cannot be adequately explained or verified ● Transaction involves complex or unusual ownership structures with no apparent legitimate purpose

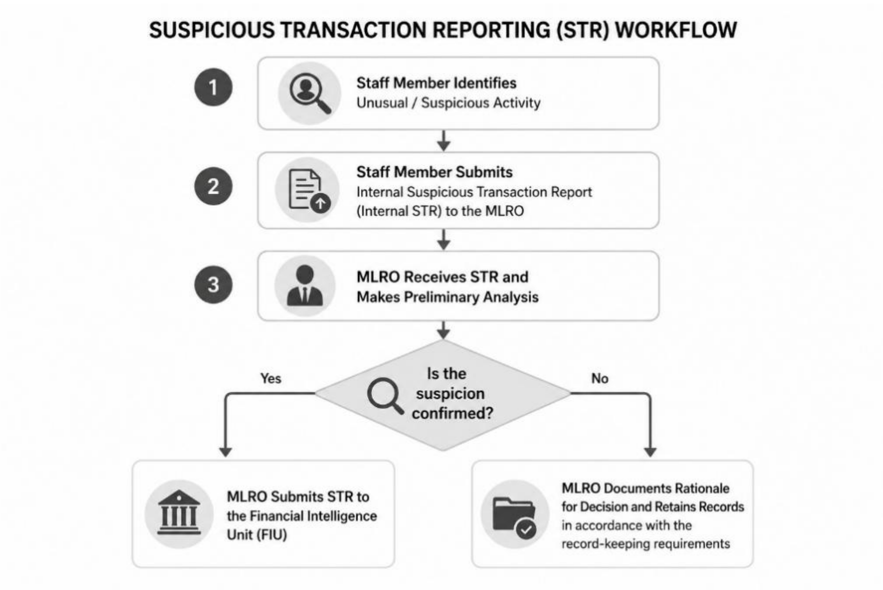
The common indicators of suspicious transactions listed above are not intended to be exhaustive and should not, in isolation, be regarded as sufficient to establish suspicion. Rather, Reporting Persons should consider such indicators collectively, together with other relevant information, including customer profile, nature of business relationship, transaction history and available supporting information, when determining whether reasonable grounds for suspicion exist.

3. THE REPORTING PROCESS: FROM SUSPICION TO STR

The STR reporting process involves two stages: an internal stage, where suspicion is identified and escalated to the MLRO/DMLRO, and an external stage, where the MLRO/DMLRO files the STR with the FIU.

3.1 Illustrative STR Reporting Workflow

The workflow below provides an illustrative overview that Reporting Persons should follow from the identification of unusual activity to submission of a STR to the FIU. While internal procedures may vary depending on the size and nature of the Reporting Person, the responsibilities of staff members and the MLRO/DMLRO should be clearly defined to ensure that suspicious activities are identified, assessed, documented and, where appropriate, reported to the FIU promptly but not later than five (5) working days after the suspicion arose.



3.2 Roles and Responsibilities in the STR Reporting Process

Reporting Persons should clearly define the respective roles and responsibilities of employees and the MLRO/DMLRO in the STR reporting process. Clear allocation of responsibilities promotes the timely identification, escalation, assessment and reporting of suspicious activities.

The table below summarises the key responsibilities of staff members and the MLRO/DMLRO in the STR reporting process.

Step	Who	What
1	**Staff member, including those responsible for reviewing monitoring alerts**	Identifies unusual or potentially suspicious activity during the course of their work — through transaction monitoring, a customer interaction, CDD review or any other means. Applies judgement: does this give rise to a reasonable suspicion? Further guidance on reporting based on suspicion is set out under Section 2 of this Guidance Note.
2	**Staff member, including those responsible for reviewing monitoring alerts**	Raises an internal suspicious transaction report (internal STR / escalation) directly and immediately to the MLRO/DMLRO. Internal procedures should not require the internal STR to pass through multiple levels of hierarchy, supervisory review or management approval before reaching the MLRO/DMLRO, as such process may result in unnecessary delay. The internal report must be raised immediately to the MLRO/DMLRO — do not delay escalation to investigate further. The internal report should include: ● the identity of the customer and any related parties; ● the nature, value and timing of the activity; ● the reason(s) for suspicion; and ● any supporting documents or transaction records. The above list is not exhaustive, and any additional information or documentation considered relevant should be provided to the MLRO. Further guidance on internal escalation procedures and timeliness of internal reporting is set out under Sections 6.1 and 6.2 of this Guidance Note.
3	**MLRO/DMLRO**	Receives the internal STR and immediately records receipt of the report. The MLRO/DMLRO ensures that the receipt of the internal STR, including the date and time of receipt and other relevant details are appropriately documented in accordance with the Reporting Person's record-keeping procedures. Further guidance on the role and records to be maintained by the MLRO/DMLRO in the context of STR reporting is provided under Section 5 and Section 7.6 of this Guidance Note respectively.
4	**MLRO/DMLRO**	Reviews the information available in relation to the internal STR, including CDD/EDD records, transaction history, customer profile, source of funds or wealth information and any other relevant information available to determine whether reasonable grounds for suspicion exist.
5	**MLRO/DMLRO**	Requests additional information or clarification where necessary. Where the information available is insufficient to support the assessment, the MLRO/DMLRO may request further information or clarification from relevant employees, business units or functions across the three Lines of Defence, in accordance with their respective roles and responsibilities. Such requests should be managed in a manner that does not result in unnecessary delays in determining whether a STR should be submitted. Further guidance on the reasonableness of the MLRO/DMLRO's assessment period is provided under Section 7.4 of this Guidance Note below.

6	**MLRO/DMLRO**	Makes an assessment and determines whether there are reasonable grounds to suspect money laundering, terrorist financing, proliferation financing or another predicate offence. Further guidance on the reasonableness of the MLRO/DMLRO's assessment period is provided under Section 7.4 below.
7	**MLRO/DMLRO**	**MLRO/DMLRO determines that reasonable grounds for suspicion exist** → The MLRO/DMLRO documents the decision, the reasons supporting the determination and the date on which reasonable grounds for suspicion were confirmed. The MLRO/DMLRO then proceeds with Steps 8 and 9 below. **MLRO/DMLRO determines that reasonable grounds for suspicion do not exist** → The MLRO/DMLRO documents the decision, the reasons why reasonable grounds for suspicion were not established and the date on which the assessment was concluded. The internal STR and supporting documentation are retained in accordance with applicable record-keeping requirements. Further guidance on the role and records to be maintained by the MLRO/DMLRO in the context of STR reporting is provided under Section 5 and Section 7.6 of this Guidance Note respectively.
8	**MLRO/DMLRO**	Files the STR electronically with the FIU via the goAML platform promptly and, not later than five working days after the suspicion arises and is duly established by the MLRO/DMLRO, as indicated in Section 7 of this Guidance Note. In exceptional circumstances where goAML is unavailable, a manual STR may be filed using the prescribed form (contact the goAML Helpdesk for assistance). Reporting Persons are encouraged to submit the STR promptly as soon as the suspicion is confirmed by the MLRO/DMLRO.
9	**MLRO/DMLRO**	Receives confirmation of submission from the goAML platform. Retains records of the STR and all supporting documentation for a minimum of seven years from the date of the report.

3.3 Application to Auditors

The statutory suspicious transaction reporting obligation under Section 14 of FIAMLA applies to both Reporting Persons and auditors.

The internal reporting and MLRO/DMLRO processes described in Sections 3 to 7 of this Guidance Note are principally applicable to Reporting Persons that are required to operate an internal suspicious transaction reporting framework and appoint a MLRO/DMLRO under the FIAML Regulations.

Where an auditor identifies a transaction or activity in the course of an audit which gives rise to reasonable grounds for suspicion, the auditor should assess the available information and, where appropriate, make the required report directly to the FIU in accordance with Section 14 of FIAMLA and the FIU's applicable reporting procedures.

An auditor is not required to follow the internal STR escalation process applicable to a Reporting Person unless the auditor is also acting in a capacity for which such internal procedures apply.

The auditor should nevertheless maintain appropriate records of the circumstances giving rise to the suspicion, the information considered, the basis for the reporting decision and the date on which the report was submitted.

This Section is without prejudice to any other obligations applicable to auditors under the Financial Reporting Act, applicable professional requirements or other relevant legislation.

4. KEY REPORTING REQUIREMENTS

Reporting Persons must comply with the statutory requirements governing the STR reporting process. The key rules set out below highlight important obligations that should be observed to ensure STRs are submitted in a timely, complete and compliant manner.

Rule	Detail
5 working days deadline (Section 14(1) FIAMLA)	Following the MLRO/DMLRO's determination that reasonable grounds for suspicion exist, the STR must be submitted to the FIU promptly and no later than five working days after the suspicion arises and is duly established pursuant to this Guidance. The statutory period of five working days represents the maximum time permitted by law and should not be treated as the expected reporting timeframe. MLRO/DMLROs should therefore submit STRs as soon as reasonably practicable after suspicion has been confirmed by him. The FIU's interpretation of the requirement to report "promptly" is set out under Section 7.1 of this Guidance Note.
Immediate reporting of TF/PF STRs	Although Section 14(1) of FIAMLA prescribes a maximum reporting period of five working days, Reporting Persons should treat suspected terrorist financing and proliferation financing as matters requiring immediate attention. Where reasonable grounds for suspicion of TF or PF have been established, the STR should be submitted to the FIU immediately.
No minimum threshold	There is no minimum transaction value for STR filing. Any transaction[2] — regardless of amount — must be reported if it is suspicious.
Completed and attempted transactions	Both completed and attempted or proposed transactions must be reported. If a customer attempts a transaction that you suspect is linked to financial crime but does not complete it, you are still obliged to file a STR.
Do not tip off (Section 16 FIAMLA)	You must not disclose to any person — including the customer — that a STR has been filed, is being considered or that related information has been requested by or submitted to the FIU. Tipping off is a criminal offence under Section 16 of the FIAMLA and on conviction carries a fine not exceeding 5 million rupees and imprisonment for up to 10 years.

[2] "Transaction" has the same definition as assigned to it under Section 2 of the FIAMLA

5. ROLE OF THE MLRO/DMLRO IN THE SUSPICIOUS TRANSACTION REPORTING PROCESS

The MLRO/DMLRO plays a central role in ensuring that the Reporting Person complies with its statutory obligations under the FIAMLA and the FIAML Regulations relating to suspicious transaction reporting.

In accordance with Regulation 26 of the FIAML Regulations, every Reporting Person shall appoint a MLRO/DMLRO who is responsible for receiving internal disclosures of suspicious transactions or activities, considering whether the information gives rise to reasonable grounds for suspicion, and, where appropriate, submitting a STR to the FIU in accordance with Section 14 of the FIAMLA.

In the context of the STR reporting process, the MLRO/DMLRO's core responsibilities include:

- receiving and maintaining records of internal suspicious transaction reports submitted by employees or relevant business units;
- conducting a timely and objective preliminary assessment of the information available to determine whether reasonable grounds for suspicion exist;
- obtaining additional information or clarification where reasonably necessary to support the reporting decision, provided that such enquiries do not result in unnecessary delay;
- determining whether a STR should be submitted to the FIU in accordance with Section 14 of the FIAMLA;
- ensuring that STRs are submitted promptly and, in any event, within the statutory timeframe prescribed under the FIAMLA;
- maintaining appropriate records of the assessment undertaken, the decision reached and the reasons supporting that decision; and
- acting as the principal point of contact with the FIU in relation to STRs and any requests for additional information relating to reports submitted.

The MLRO/DMLRO should have sufficient authority, independence, resources and full access to relevant information to enable the proper discharge of the above responsibilities. Internal procedures should ensure that the MLRO/DMLRO is able to perform the assessment independently and without undue influence or unnecessary internal approvals that may delay the submission of a STR.

6. INTERNAL REPORTING PROCEDURES

6.1 Timeliness of Internal Reporting

An employee who identifies a suspicious transaction or activity should submit an internal report to the MLRO/DMLRO without delay.

Reporting Persons should avoid internal processes that result in unnecessary reviews by multiple levels of management before the matter reaches the MLRO/DMLRO. Excessive internal escalation may delay the assessment of suspicious matters and affect the ability of the Reporting Person to meet statutory reporting obligations.

Internal reporting arrangements should ensure that any employee, including those responsible for reviewing automated alerts, is able to raise an internal STR directly to the MLRO/DMLRO. Internal procedures should not require mandatory supervisory or management approvals before an internal STR reaches the MLRO/DMLRO.

Internal procedures should therefore ensure that suspicious matters are channelled efficiently and directly to the MLRO/DMLRO for assessment.

6.2 Requirements for Reporting Persons to Establish Internal Timeframes

Reporting Persons shall establish and maintain documented policies, procedures and controls governing the handling of internal STRs and the MLRO/DMLRO's preliminary assessment process. Such policies and procedures should be approved by senior management and should establish a reasonable timeframe within which the MLRO/DMLRO is expected to review and assess internal STRs received from employees or relevant business units.

The timeframe established by a Reporting Person should take into consideration:

- the nature, size and complexity of the Reporting Person's organisation;
- the volume and frequency of internal STRs received;
- the availability of relevant information;
- the complexity of the transactions or activities under review;
- the resources available to the MLRO/DMLRO function;
- the risk profile of the customer or activity concerned; and
- the potential consequences of delayed reporting.

The timeframe should be sufficiently short to ensure compliance with the statutory reporting obligation and should not create a process whereby suspicious matters remain pending for prolonged periods before the MLRO/DMLRO reaches a determination.

Reporting Persons should periodically review the effectiveness of their internal STR procedures to ensure that established timeframes remain appropriate. In doing so, they should have regard to changes in their business activities and risk profile, as well as relevant legislative and regulatory developments, guidance issued by competent authorities, emerging ML/TF/PF trends and typologies, findings from the National Risk Assessments and Sectoral Risk Assessments, and other relevant information that may affect the timely identification, assessment and reporting of suspicious transactions.

7. MLRO/DMLRO PRELIMINARY ASSESSMENT AND COMMENCEMENT OF FIVE WORKING DAYS REPORTING PERIOD

Upon receipt of an internal suspicious transaction report ("internal STR"), the MLRO/DMLRO shall conduct an appropriate preliminary assessment to determine whether the information available gives rise to reasonable grounds to suspect that a suspicious transaction or activity exists and that a STR should be submitted to the FIU.

7.1 Interpretation of "promptly" under Section 14(1) of FIAMLA

Section 14(1) of the FIAMLA requires a Reporting Person or auditor to report a suspicious transaction to the FIU "promptly but not later than five working days after the suspicion arose."

For the purposes of Section 14(1), "promptly" means that a Reporting Person or auditor should act without unnecessary or avoidable delay once reasonable grounds for suspicion have been established, that is, where the MLRO/DMLRO determines that reasonable grounds for suspicion exist, a STR should be submitted on the same day where reasonably practicable. This notwithstanding, the FIU recognises that in certain more complex cases, the compilation and submission of the STR within the same day when reasonable grounds to suspect has been confirmed by the MLRO/DMLRO, would prove challenging in view of the extensive volume and/or complexity of information /documentation that may need to be provided. In such instances, the MLRO/DMLRO shall ensure that the STR is submitted within the shortest time possible and in no case later than five (5) working days. Nonetheless, reporting of STRs is to be treated with utmost priority and undue delays in the submission of STRs occasioned by lack of human or IT resources are not considered acceptable.

As indicated under Section 2.1, where a Reporting Person or MLRO/DMLRO forms reasonable grounds to suspect TF or PF, the STR should be submitted to the FIU immediately.

7.2 MLRO/DMLRO Preliminary Assessment

The preliminary assessment represents an important stage in the suspicious transaction reporting process. It enables the MLRO/DMLRO to consider the circumstances giving rise to the concern, evaluate the available information and determine whether reasonable grounds for suspicion exist and a STR should be submitted to the FIU.

The preliminary assessment should be conducted in a manner that is proportionate to the circumstances of the case. The MLRO/DMLRO is not required to establish proof of ML, TF, PF or any other offence before submitting a STR. Similarly, the MLRO/DMLRO is not expected to conduct an investigation that would duplicate the role of competent authorities.

The purpose of the preliminary assessment is to determine whether reasonable grounds for suspicion exist based on the information available at that point in time. Further guidance on the timeframe for completing the preliminary assessment is provided in Section 7.4 of this Guidance Note.

In matters involving suspected TF or PF, the MLRO/DMLRO should recognise that the available information at the time the suspicion is formed may be limited due to the nature of such activities. Where reasonable grounds for suspicion already exist, the MLRO/DMLRO should not delay submission of the STR solely to obtain additional information or complete further internal enquiries.

A Reporting Person should ensure that a STR submitted to the FIU contains all relevant information reasonably available to it at the time of submission and should not defer reporting pending the collection of information that is not necessary to support the reporting decision. Where, following submission of a STR, the Reporting Person obtains additional relevant information that should be brought to the attention of the FIU, such information may be communicated through the goAML message board, with reference to the Report Key of the relevant STR.

Where a STR submitted through goAML is rejected by the FIU, the Reporting Person should review the notification and promptly take the necessary corrective action, including amending and resubmitting the STR through goAML.

The rejection of a STR by the FIU should not be interpreted as a determination that the underlying transaction or activity is not suspicious, nor does it relieve the Reporting Person of its obligations under Section 14 of FIAMLA. The Reporting Person should ensure that the required information is corrected, supplemented or clarified and that the STR is resubmitted without unnecessary delay.

Reporting Persons should maintain records of the original submission of the STR, the FIU notification or rejection, the corrective action taken and the date of the subsequent re-submission of the STR.

A Reporting Person should not treat the rejection of a STR as extending or resetting the statutory reporting period under Section 14 of FIAMLA.

Reporting Persons should follow the FIU's applicable goAML procedures and any instructions communicated by the FIU in relation to any rejected STR.

7.3 Commencement of the Five Working Days Reporting Period

In accordance with FIAMLA and the FIAML Regulations, where the MLRO/DMLRO has reasonable grounds to believe that a transaction or activity is suspicious, a STR shall be submitted to the FIU within the prescribed statutory timeframe.

For the avoidance of doubt, the five (5) working days period for submission of a STR to the FIU shall commence when the MLRO/DMLRO determines, following a reasonable preliminary assessment, that reasonable grounds for suspicion exist.

The date on which the internal STR is received by the MLRO/DMLRO does not, by itself, constitute the commencement date of the five (5) working days reporting period. The statutory reporting period begins once the MLRO/DMLRO has completed the necessary preliminary assessment and reached the conclusion that reasonable grounds for suspicion exist.

However, this principle shall not be interpreted as allowing Reporting Persons or MLRO/DMLROs to delay the commencement of the statutory reporting period by undertaking unnecessarily lengthy assessments or reviews. The preliminary assessment must be completed within a reasonable timeframe having regard to the circumstances of each case.

The MLRO/DMLRO should therefore ensure that the assessment process is sufficiently thorough to support a reporting decision while also ensuring that the statutory obligation to report is not obstructed by avoidable delays.

The foregoing should not be interpreted as preventing earlier reporting. In particular, where reasonable grounds exist to suspect terrorist financing or proliferation financing, Reporting Persons are expected to submit the STR immediately upon completion of the preliminary assessment, notwithstanding that the statutory period permits reporting within five (5) working days.

7.5 Risk-Based Approach to Assessment Prioritisation

Reporting Persons should recognise that not all suspicious matters present the same level of urgency or potential harm.

Where a matter involves heightened risks, the MLRO/DMLRO should conduct the preliminary assessment within a shorter timeframe than would ordinarily apply to standard cases.

A Reporting Person's internal procedures should therefore include arrangements for prioritising urgent or higher-risk matters. In such circumstances, the MLRO/DMLRO should not apply the same assessment timeframe used for ordinary cases. The level of urgency should correspond to the nature and severity of the identified risk. Reporting Persons should adopt a risk-based approach when prioritising internal STR assessments.

The application of a risk-based approach does not mean that lower-risk matters may be ignored or unnecessarily delayed. Rather, it ensures that resources are allocated appropriately and that matters presenting the greatest potential risk receive immediate attention.

The MLRO/DMLRO should consider factors including:

- the nature of the suspected offence, including whether the matter involves potential threats to national security, TF, PF or other serious financial crime risk;
- the vulnerability of the financial system to misuse;
- the identity and profile of the persons involved;
- the geographical exposure;
- the value and movement of funds;
- the likelihood that evidence or assets may be lost; and
- any other relevant risk factor.

The Reporting Person should be able to demonstrate that its internal procedures enable appropriate prioritisation of suspicious matters according to risk.

7.6 Documentation of the MLRO/DMLRO Assessment Process

Reporting Persons shall maintain appropriate records demonstrating the handling of internal STRs and the MLRO/DMLRO's decision-making process.

Records should include, as appropriate:

- the date the internal STR was received;
- the date on which the MLRO/DMLRO commenced the assessment;
- the information reviewed;
- any additional information obtained;
- the rationale for the MLRO/DMLRO's decision to file a STR or not, together with any supporting evidence or justification for that decision;
- the date on which the MLRO/DMLRO reached the decision to submit or not to submit a STR to the FIU;
- the date the STR was submitted to the FIU and, where applicable, the date on which any additional information was submitted; and
- details of any escalation or urgent treatment applied.

The above records should be retained in accordance with applicable record-keeping requirements.

8. CONSEQUENCES OF NON-COMPLIANCE

Non-compliance with STR reporting obligations constitutes an offence under the FIAMLA and FIAML (Administrative Penalties) Regulations 2025 and may result in enforcement action and penalties.

The table below summarises the key offences, relevant legislative provisions and penalties that may apply upon conviction.

Offence	Provision	Applicable Penalty
Failure to file a STR within 5 working days	Section 14(3) FIAMLA	Fine not exceeding MUR 1,000,000 and/or imprisonment up to 5 years
Tipping off — disclosing to any person that a STR has been or is being filed	Section 16(3)(A) FIAMLA	Fine not exceeding MUR 5,000,000 and/or imprisonment up to 10 years
Failure to comply with AML/CFT obligations (Administrative Sanctions)	Section 19H(1)(d)(iii) FIAMLA; FIAML (Administrative Penalties) Regulations 2025	Administrative penalties ranging from MUR 5,000 up to MUR 250,000 per breach depending on the gravity thereof under the FIAML (Administrative Penalties) Regulations 2025

9. CONCLUSION

The FIU recognises the essential role played by Reporting Persons in protecting the integrity of Mauritius' financial system and preventing its misuse for money laundering, terrorist financing, proliferation financing and other criminal purposes.

An effective suspicious transaction reporting framework requires timely identification of concerns, appropriate escalation, sound judgement by the MLRO/DMLRO, quality reporting and ongoing cooperation with the FIU.

Reporting Persons are expected to adopt a proportionate, risk-based and proactive approach to suspicious transaction reporting. The objective of the framework is not merely to ensure compliance with reporting obligations, but the creation of meaningful financial intelligence that supports national and international efforts to combat financial crime.

The FIU encourages Reporting Persons to continuously strengthen their internal arrangements, enhance the quality of STR submissions and maintain effective cooperation with the FIU and other competent authorities.

This Guidance Note is issued for information and compliance purposes. It should be read together with the Financial Intelligence and Anti-Money Laundering Act and the Financial Intelligence and Anti-Money Laundering Regulations 2018. In the event of any inconsistency between this Guidance Note and applicable legislation, the provisions of the legislation shall prevail.

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