



FIAU

Financial
Intelligence
Analysis Unit
Malta



goAML Rejection Rules

December 2025



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Tracking Changes Between Publication Versions

FIAU Revision	Date	Author	Explanation
1.0.0	April 2024	FIU Malta	The initial version of the guidance document covering all the rejection rules
1.1.0	September 2024	FIU Malta	We remove the call for rejection
1.2.0	October 2024	FIU Malta	<ol style="list-style-type: none">1. R1 rejection rule amended to reflect new changes in indicators2. Added three indicators within the TF indicators table in section R2

Introduction

The purpose of this guidance document is to provide an overview of the Rejection Rules ensuing the Web Report validation process. These Rejection Rules serve as an added automated filter prior to the acceptance stage. This is to ensure that submissions made include as much information as possible to assist with the prompt assessment and prioritisation of reports being received by the FIAU.





Validation of Reports

When submitting a report to the FIAU and the XML file is validated, the status changes to “Transferred from Web”. Following its approval based on XML validation and rejection rules by the FIAU’s screening officer, the status is changed to “Processed”. No action needs to be taken by reporting entities when the status of their submission is marked as “Processed”.

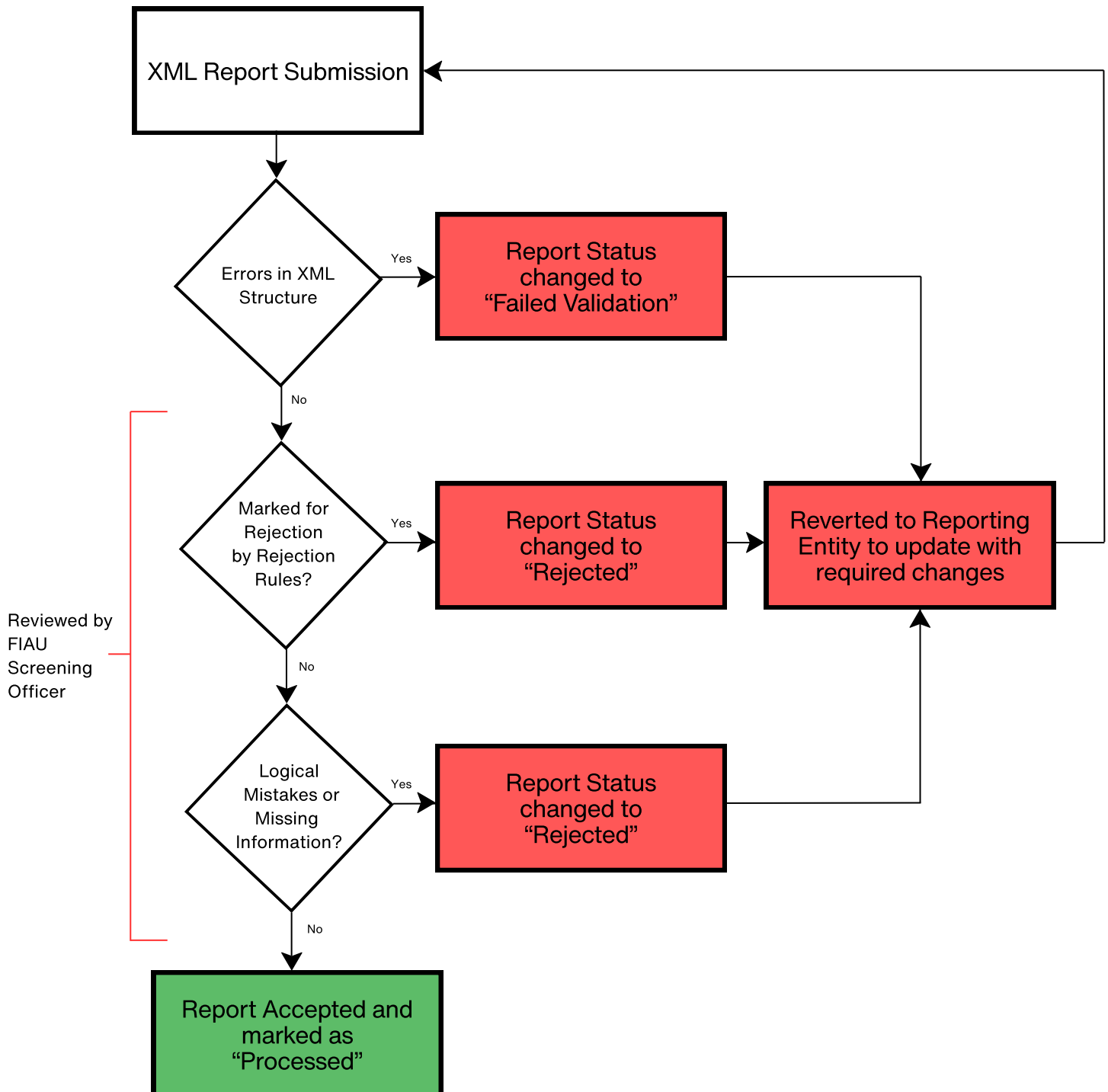
If the XML file submitted has any errors in the structure, then the status for the file can be seen as “Failed Validation”. This is only applicable for those reports uploaded directly via XML, as those submitted via a web report will always have a correct structure.

However, if there are mistakes or missing information in a validated XML file, then the screening officer may reject the report by providing the reason for the rejection. A rejected report is marked as “Rejected” within the GoAML portal.

Status	Submitted On	#
<input type="text"/>	<input type="text"/>	<input type="text"/>
Rejected	09/01/2023	 

Following the receipt of a “Failed Validation” or “Rejection”, reporting entities should correct the mistakes in the report and resubmit their submission. It is important to note that reports which are rejected, or which fail validation are not put through the analytical process, which means the report is not considered as having been submitted to the FIAU.

Figure 1: XML Report Submission Flowchart



goAML Rejection Rules Validation

goAML rejection rules are automated validation checks which are conducted on new report submissions within goAML. These checks are based on a set of criteria to ensure a high level of data quality and analytical value, which is also used to feed into strategic analysis and risk assessments. Therefore, ensuring that the data being captured is structured and of good quality is of utmost importance.

When a report is marked for rejection by one of these rejection rules, the FIAU screening officer processing newly received reports is prompted with the reason for the validation errors. The screening officer manually confirms that these errors are present and if confirmed the report is rejected, and accompanied by a clear reason as to why it was rejected. Understanding why it was rejected is crucial for reporting entities, to not only amend and update their report but to help them avoid the same errors in future submissions. It is also imperative to highlight the fact that report rejections can may address more than one issue, at a time in a single rejected document, depending on the scenario, or circumstance.

Since the introduction of goAML, in June 2020, the FIAU has implemented **16 rejection rules** within its goAML system. It is imperative to point out that data quality enhancements are crucial in the FIAU's line of work and as a result, these rejection rules may be enhanced or changed over time, depending on the needs of the Unit. This allows it to improve the quality and value of the data obtained at submission.



Most of the rejection rules implemented are related to checks on:



i) Report Indicators



ii) Transactions and Accounts



iii) Involved Entities and Persons



iv) Other – which relate to various aspects

This guidance document explains the above types of rejections rules to provide an understanding to reporting entities in terms of what is being expected by the FIAU with reference to report submissions.



Rejection Rules and Applicable Report Types

Report Type	STR	SAR	PEPR	PEPTR	TFR	TFTR	TRN	AIF	CFAR	CFATR
Rejection Rule										
R1										
R2										
R3										
R4										
R5										
R6										
R7										
R8										
R9										
R10										
R11										
R12										
R13										
R14										
R15										
R16										

Table 1: Rejection Rules across different reporting types

Rejection Rules – Report Indicators

R1 - Report Indicators

Report indicators are split into a number of categories. The FIAU has created a new report indicator category related to the predicate offence Location. This is to be selected whenever a reporting entity identifies a Predicate offence, to highlight the location/region of the underlying predicate offences and/or suspicions.

Category	Description
Amount Indicators	The reporting entity should select the range of funds at risk of money laundering or funding of terrorism.
Internal Indicators	These indicators mainly relate to internal and/or administrative processes. The reporting entities should select either of these indicators whenever applicable.
Predicate Offence Indicators	The reporting entity should select any applicable predicate offence/s.
Product Indicators	Any products/service used in the perpetration of the underlying crime or that were relevant to the suspicion should be selected.
Reason for suspicion (RS): Account Usage	This category contains a list of reasons for suspicion that relate to the account and/or the transactions carried out within the suspected account.
Reason for suspicion (RS): Customer	This category contains a list of reasons for suspicion that relate to the involved persons/entities.
Predicate Offence - Location	The reporting entity should select any applicable indicators indicating the location/region of the underlying predicate offences and/or suspicions.

Table 2: A list of report category indicators

It is expected that at least one indicator from each of the 'Amount Indicators', 'Predicate Offence Indicators', 'Predicate Offence – Location', and 'Product Indicators' categories are to be selected. Moreover, at least one indicator from the 'Reason for suspicion (RS): Account Usage' and/or 'Reason for suspicion (RS): Customer' categories is to be selected.

Kindly note that if more than one predicate offence, product and/or reason for suspicion is identified, then multiple indicators from each category can be selected. The option for 'Unknown' (Code: PO-2) should only be selected if the reporting entity has no indications of any possible predicate offence. In such instances the reporting entity is not obliged to select an indicator from the 'Predicate Offence – Location' indicators.

Moreover, it is important to highlight that if the suspicion within the report is related to unexplained wealth or unknown source of funds then the amount indicator should reflect the lifetime deposits of the suspicious account in question.



R2 - Report Specific Indicators (TFR/TFTR)

Reporting entities should include report specific indicators for specific report types, namely for TFRs and TFTRs.

Report Type	Indicators
TFR/ TFTR	PO-22 - Terrorism, including terrorist financing
TFR/ TFTR	PO-227 - Terrorism: Left-wing extremism (Anarchists, Environmental & Animal Rights extremists, Anti-fascist)
TFR/ TFTR	PO-228 - Terrorism: Radical Islamic terrorism (Extremist religious ideologies)
TFR/ TFTR	PO-229 - Terrorism: Right-wing extremism (White Supremacists, Anti-government, Anti-immigration, Neo-Nazi).

Table 3: TF related indicator



Rejection Rules and Applicable Report Types

R3 - Reports with Multiparty Transactions

Transactions within reports should always be bi-party transactions. Multi-party transactions will not be processed and accepted by the FIAU. This approach was adopted by the FIAU to simplify as much as possible transactions and thus be able to analyse the activity via GoAML in a more uniform manner.

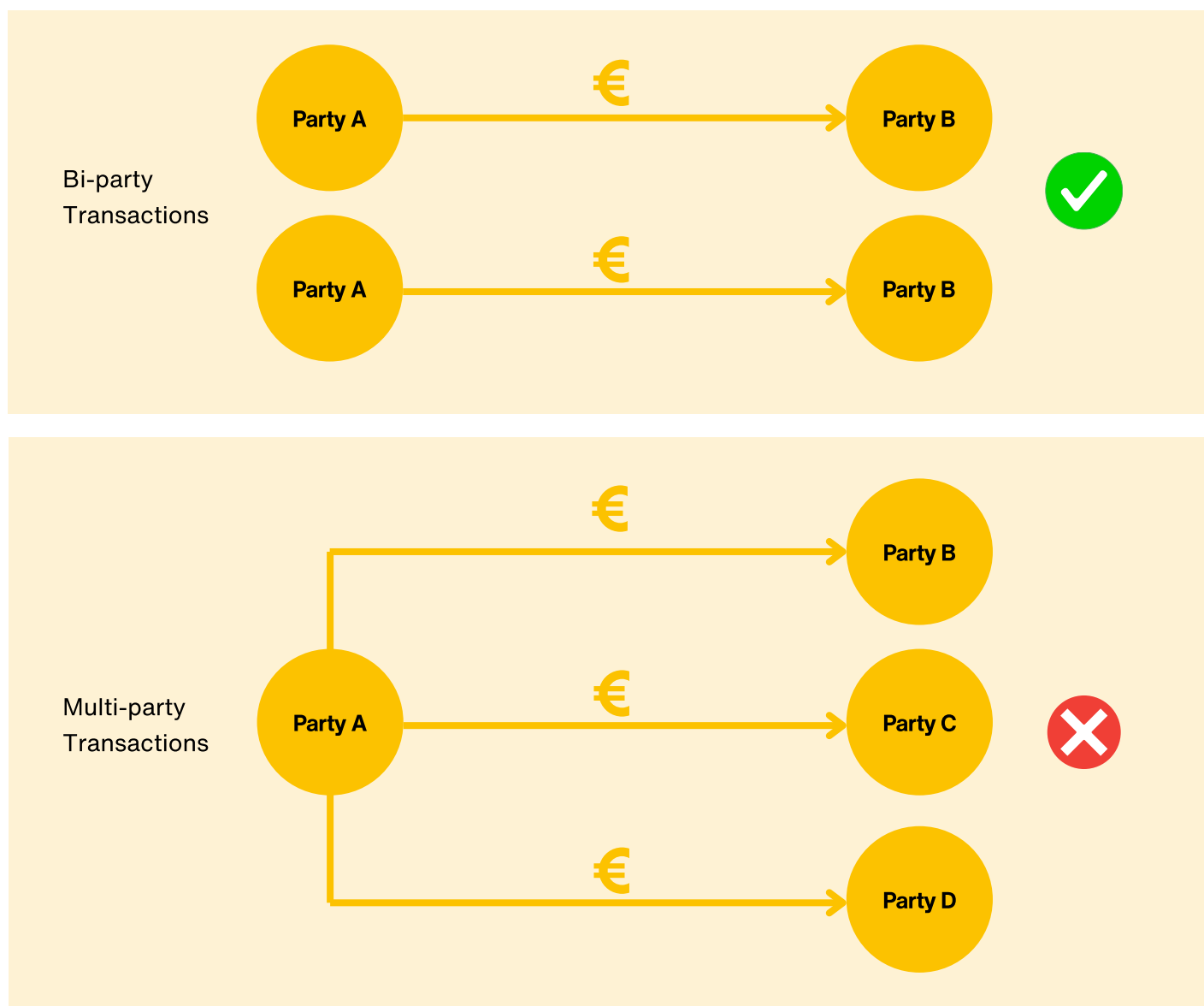


Figure 2: BI-Party versus Multi-Party Transactions

R4 - Local Currency Code

The 'currency_code_local' should always be set to 'EUR' when submitting reports via XML. If it is provided as another currency via XML the report will automatically be marked for rejection. Essentially, as an FIU our main currency on goAML is set as 'EUR', however, the system itself provides reporting entities the ability to include exchange rates accordingly. The foreign currency code is used when a transaction, is carried out in a currency other than 'EUR', to have full visibility of the exchange rate. In this case, the Reporting Entity must report the transaction with its actual details including the use of foreign currency along with the rate of conversion used on that day.

```
-<report>
  [REDACTED]
  <entity_branch>MLRO</entity_branch>
  <submission_code>E</submission_code>
  <report_code>STR</report_code>
  [REDACTED]
  <submission_date>2023-02-04T00:00:00</submission_date>
  <currency_code_local>EUR</currency_code_local>
```

R5 - Transactions which have no account holders

Third party accounts (non-clients of the reporting entity) listed within submissions should be accompanied with at least one entity (t_entity) or one signatory. The names provided should reflect the account holder name associated with the respective account. The FIAU understands that the data provided is limited to what the subject person has available and thus cannot be confirmed by the reporting entity. Nevertheless, it is still important that the added nodes and data are provided to the FIAU for processing and added analytical purposes.

In turn, where client accounts are included in reporting submissions, reporting entities must always provide all signatories and entities (if applicable) associated with the account.

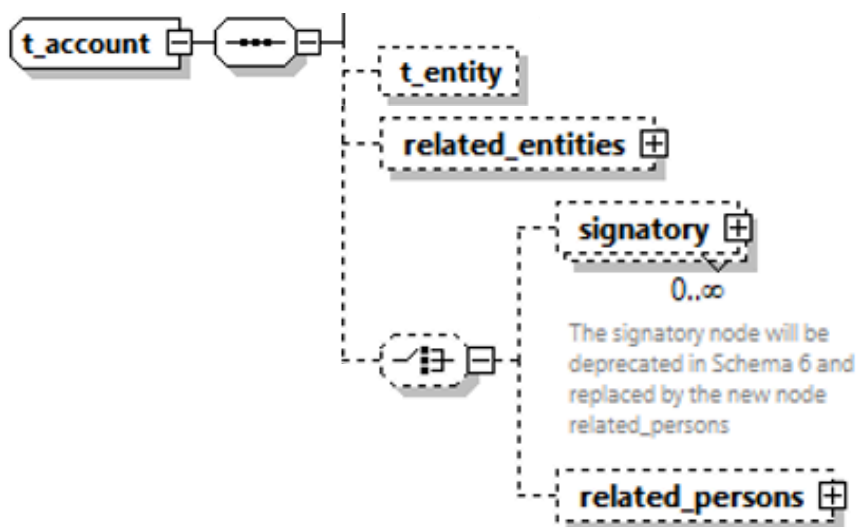


Figure 3: Entities and signatory nodes associated with Accounts

R6 - Transactions which are post dated

Transaction dates ('date_transaction' field) should not be post-dated within reports. While a number of payments can be postdated in a number of different circumstances, these are not permissible upon submission.

R7 - Transaction with no value (zero as amount)

It is imperative to highlight that to have good quality data, subject persons should ensure that the transaction value ('amount_local' field) should never have a value of zero.

R8 - Updating of closing date when an account is closed or blocked

Reporting entities are required to provide the closing date of an account ('closed' field within the account node) when the status is marked as 'Closed' (goAML code: 'CL') or 'Blocked' (goAML code: 'BL'). From an analytical perspective, it's a crucial piece of information, thus extremely important to be filled in.



Rejection Rules – Involved Entities and Persons

R9 - Trusts should be marked as 'Trust' within the legal form

Any designated trusts should be adequately indicated accordingly within the involved entities immediately upon report submission. Predominantly, it should be marked as 'Trust' (Code: 273) within the legal form ('incorporation_legal_form').

```
-<t_entity>
  <name>[REDACTED] Trust</name>
  <incorporation_legal_form>273</incorporation_legal_form>
</t_entity>
</to_account>
<to_country>MT</to_country>
```

Figure 4: Proper Trust designation via XML

R10 - Involved Persons - Date of Birth (Activity Reports)

One of the most critical and crucial elements of intelligence analysis are basic identifiable details such as the date of birth. It is very important that the date of birth for involved persons within activity reports is not left blank or filled in with erroneous data such as '01/01/1900'. This is fundamental for data quality purposes and to have a form of identification with the full name of the involved person within the report.

R11 - Involved Persons - Date of Birth (Transactional Reports)

Date of birth for involved persons within transactional reports who are clients of the reporting entity should not be left blank or filled in with erroneous data such as '01/01/1900'. This is fundamental for data quality purposes and to have a form of identification with the full name of the involved person within the report.

R12 - Involved Persons - Nationality

Nationality for involved persons who are clients of the reporting entity should be provided and not marked as 'UNKNOWN'. This rejection rule is not applicable for the remote gaming industry because the minimum level of customer due diligence required does not entail collecting such details. The nationality is mostly vital as it enables the FIAU to identify new links with foreign jurisdictions.

Rejection Rules – Other

R13 - Reason for suspicion

The reason for suspicion ('reason' field) needs to be filled for all report types except for the Additional Information Files (AIFs). A summary of the suspicion should be provided within this field, while a full detailed report can be provided as an attachment to the report. However, it is very important to include a summary within this field.

Local Currency Code: EUR	Reporting Entity: Financial Intelligence Analysis Unit (FIAU)	Entity ID: 1	Report ID: 47839-0-0
* Reporting Entity Branch	Reporting Entity Reference	* Reference Date	FIU Reference
test	test	27/09/2022	
<div>Reason</div> <div>The reason for suspicion should not be left blank.</div>			

```

- <report>
  <entity_id>Test</entity_id>
  <entity_branch>Bank</entity_branch>
  <submission_code>E</submission_code>
  <report_code>STR</report_code>
  <entity_reference>Test</entity_reference>
  <submission_date>2022-10-11T00:00:00</submission_date>
  <currency_code_local>EUR</currency_code_local>
+ <reporting_person>
+ <location>
  <reason>The reason for suspicion should not be left blank.</reason>
  <action>Test</action>
+ <transaction>
+ <report_indicators>
</report>
  
```

R14 – Reporting Entity Reference

The reporting entity reference ('entity_reference') should be included within any report submitted to the FIAU. This reference refers to an internal reference used by the reporting entities submitting the report. This is required to facilitate communication between the FIAU and the reporting entity.

R15 - Attachments Required

It is expected that a report submission is backed by supporting documentation. This is a requirement to ensure that the FIAU is privy to the same information available to the subject person. Thus, enabling it to reach the same conclusions based on the same facts as the subject person submitting the report.

R16 – FIU Ref No. Required when submitting AIF and TRN reports

When submitting TRN and AIF reports it is required to provide the report key also known as the 'report submission reference' of the previously submitted report (such as an STR) within the 'fiu_ref_number' field. The 'report submission reference' is usually in this format ('12345-0-0') and is provided both in the GOAML portal 'Submitted Reports' section and in a notification sent via the 'Message Board' once the report is submitted.

Conclusion

In the case of any additional queries in terms of transactional activity reporting or XML Schema submissions, kindly refer to the Technical Documentation on the FIAUs website (Refer: <https://fiaumalta.org/what-we-do/report-a-suspicious-transaction>) otherwise kindly forward an email to the below mentioned email addresses.

- goAMLsupport@fiaumalta.org
- goAMLtechnical@fiaumalta.org



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