Ref. Ares(2026)6223018 - 18/06/2026

TEMPLATE FOR SPONTANEOUS EXCHANGE OF INFORMATION

Fields marked with * are mandatory, and must always be completed, while fields marked with ** are conditional mandatory and must be completed only when relevant or when the related information is available to the disclosing FIU. Fields marked with *** shall be replicated as necessary on a case-by-case basis.

SECTION 1 – SPONTANEOUS EXCHANGE DETAILS		
	Fields/Types of information	**Description**
*	From FIU: Name: _________________ Jurisdiction: _________________ To FIU(s): Name: _________________ Jurisdiction: _________________	Identification of the FIU through two-digit ISO code. Indication of the counterparts to which the spontaneous exchange is addressed.
*	Spontaneous exchange reference number: __________________	National system identifier allowing to trace the exchange back to each FIU's case file.
*	Date of the spontaneous exchange: ______________	Format DD-MM-YYYY
	FIU contact person: _________________	

SECTION 2 – GENERAL DESCRIPTION OF SPONTANEOUS EXCHANGE		
	Fields/Types of information	**Description**
*	Description: _________________	Free text narrative to allow the recipient to understand the case, the significance for own analyses so that the receiving FIU can properly assess the relevance for its own authorities.

In Sections 3 and 4, at least one of the fields – 3.1, 3.2, or 4 – must be completed. These fields are marked as mandatory because at least one of them is required; however, completing only one of the three is sufficient.

SECTION 3 – INVOLVED PERSONS		
	Fields/Types of information	**Description**
*	**3.1. NATURAL PERSON TO WHOM THE SPONTANEOUS DISCLOSURE REFERS TO (***)**	
	IDENTIFICATION	
*	Given Name (s)	Free text field (in cases where the distinction between given and family name is unknown, include here the full name)
**	Family Name(s)	Free text field

		In principle, full information on both given name and family name shall be included mandatorily and separately. In exceptional cases where the identity data on name and family names are not complete or cannot be confirmed, the relevant fields shall nonetheless be filled in with available information, while appropriate caveats and details should be provided in the “Comments” field.
**	Previous name(s)	Free text field
**	Gender ☐ Female ☐ Male ☐ Other	Enumeration
	Aliases	
**	☐ The distinction between name and family name cannot be confirmed	To be ticked in cases where it is not possible to distinguish with sufficient certainty the relevant identity information. Appropriate description shall be included in the “Comments” field.
**	Date of Birth	Date of Birth in the format *DD-MM-YYYY*

**	Nationality(ies)	Enumeration
	Place of Birth – Country	Enumeration
	Place of Birth - City	Free text field
	Occupation	Free text field
**	Unique Identification Number	Free text field
	Comments	Free text field (E.g. indications on reliability of ID data; references to other available identifiers such as social security numbers; useful data that can facilitate the identification)
**	Politically Exposed Person (PEP) ☐ Yes ☐ No	Enumeration
**	Sanction status: ☐ Yes ☐ No Sanctions list reference: ______________________	This field indicates whether the subject is a listed subject in Targeted Financial Sanction lists. When the 'Yes' is ticked, the list shall be indicated.
**	Person involved in an investigation ☐ Yes ☐ No	
	IDENTIFICATION DOCUMENTS	
	Identification Document Type ☐ ID card	

	☐ Passport ☐ Residence Permit ☐ Work Permit ☐ Other: free text	Enumeration
	Number	Free text field
	Country of Issuance	Enumeration
	Issuing Authority	Free text field
	Date of Issuance	Format *DD-MM-YYYY*
	Expiry date	Format *DD-MM-YYYY*
	Additional information	Free text field
	RESIDENCE	
	Country	Enumeration
	City	Free text field
	State/province	Free text field
	Street	Free text field
	Number	Free text field
	Postcode	Free text field
	Contacts: ☐ Telephone (with country code) ☐ E-mail ☐ Webpage (url) ☐ Social media ☐ IP address ☐ IMEI	Enumeration

	☐ Other: free text	
	LINKAGE (***)	
**	Subject to which the natural person is linked	Enumeration with the subjects listed above
**	Type of link ☐ Owner ☐ Beneficiary ☐ Manager ☐ Board Member ☐ Authorized signatory ☐ Representative ☐ Employee ☐ Partner ☐ Family ☐ Other: free text	Enumeration
	Comments: ____________________________________	Free text
*	**3.2. LEGAL PERSON TO WHOM THE SPONTANEOUS DISCLOSURE REFERS TO (***)**	
	IDENTIFICATION	
*	Company name	Free text field
**	Previous name(s)	Free text field
**	Trade name	Free text field – It shall be completed with the name under which the legal entity

		trades, where this differs from the registered or legal name.
	Entity status	Free text field
**	Country of registration	Enumeration
	Date of registration	Format *DD- MM-YYYY*
	Date of closure	Format *DD-MM-YYYY*
	Registration number	Free text field
	Legal type	Free text field
	Contacts: ☐ Telephone (with country code) ☐ E-mail ☐ Webpage (url) ☐ Social media ☐ IP address ☐ IMEI ☐ Other: free text	Enumeration
	Managing Director	Free text field
	Beneficial Owner	Free text field
**	Tax Identification Number (TIN)	Free text field
	Legal Entity Identifier (LEI)	Free text field
	Business Sector	Free text field
	Additional details:___________________________	Free text field
	Sanction status:	This field indicates whether the subject is

**	☐ Yes ☐ No Sanctions list reference: ______________________	a listed subject in Targeted Financial Sanction lists. When the 'Yes' is ticked, the the list shall be indicated.
	ADDRESS	
	Country	Enumeration
	City	Free text field
	State/province	Free text field
	Street	Free text field
	Number	Free text field
	Postcode	Free text field
	Area of activity	Free text field
	Status: ☐ Current ☐ Previous ☐ Unknown	Enumeration
	LINKAGE (***)	
**	Subject to which the legal person is linked	Enumeration with the subjects listed above
**	Type of link ☐ Owner ☐ Beneficiary ☐ Manager ☐ Board Member ☐ Authorized signatory ☐ Representative	Enumeration

	☐ Employee ☐ Partner ☐ Family ☐ Other: free text	
	Comments: ___________________________________	Free text
	3.3. OTHER RELATED SUBJECTS - NATURAL PERSONS (***)	
	IDENTIFICATION	
*	Given Name (s)	Free text field
**	Family Name(s)	Free text field In principle, full information on both given name and family name shall be included mandatorily and separately. In exceptional cases where the identity data on name and family names are not complete or cannot be confirmed, the relevant fields shall nonetheless be filled in with available information, while appropriate caveats and details should be provided in the “Comments” field.

**	Previous name(s)	Free text field
**	Gender ☐ Female ☐ Male ☐ Other	Enumeration
	Aliases	
**	☐ The distinction between name and family name cannot be confirmed	To be ticked in cases where it is not possible to distinguish with sufficient certainty the relevant identity information. Appropriate description should be included in the "Comments" field.
**	Date of Birth	Format *DD-MM-YYYY*
**	Nationality(ies)	Enumeration
		(multiple choice option)
	Place of Birth - Country	Choose from drop down menu
	Place of Birth - City	Free text field

	Occupation	Free text field
**	Unique Identification Number	Free text field
	Comments	Free text field (E.g. indications on reliability of ID data; references to other available identifiers such as social security numbers; useful data that can facilitate the identification)
**	Politically Exposed Person (PEP) ☐ Yes ☐ No	Enumeration
**	Sanction status: ☐ Yes ☐ No Sanctions list reference: ______________________	This field indicates whether the subject is a listed subject in Targeted Financial Sanction lists. When the 'Yes' is ticked, the the list shall be indicated.
**	Person involved in an investigation ☐ Yes ☐ No	
	IDENTIFICATION DOCUMENTS	
	Identification Document Type ☐ ID card ☐ Passport ☐ Residence Permit ☐ Work Permit ☐ Other: free text	Enumeration
	Number	Free text field
	Country of Issuance	Enumeration

	Issuing Authority	Free text field
	Date of Issuance	Format *DD-MM-YYYY*
	Expiry date	Format *DD-MM-YYYY*
	Additional information	Free text field
	RESIDENCE	
	Country	Enumeration
	City	Free text field
	State/province	Free text field
	Street	Free text field
	Number	Free text field
	Postcode	Free text field
	Contacts: ☐ Telephone (with country code) ☐ E-mail ☐ Webpage (url) ☐ Social media ☐ IP address ☐ IMEI ☐ Other: free text	Enumeration
	LINKAGE (***)	
**	Subject to which the natural person is linked	Enumeration with the subjects listed above

**	Type of link ☐ Owner ☐ Beneficiary ☐ Manager ☐ Board Member ☐ Authorized signatory ☐ Representative ☐ Employee ☐ Partner ☐ Family ☐ Other: free text	Enumeration
	Comments: ___________________________________	Free text
	3.4. OTHER RELATED SUBJECTS - LEGAL PERSONS (***)	
	IDENTIFICATION	
*	Company name	Free text field
**	Trade name	Free text field – It shall be completed with the name under which the legal entity trades, where this differs from the registered or legal name.
	Entity status	Free text field
**	Country of registration	Enumeration
	Date of registration	Format *DD- MM-YYYY*

	Date of closure	Format *DD- MM-YYYY*
	Registration number	Free text field
	Legal type	Free text field
	Contacts: ☐ Telephone (with country code) ☐ E-mail ☐ Webpage (url) ☐ Social media ☐ IP address ☐ IMEI ☐ Other: free text	Enumeration
	Managing Director	Free text field
	Beneficial Owner	Free text field
**	Tax Identification Number (TIN)	Free text field
	Legal Entity Identifier (LEI)	Free text field
	Business Sector	Free text field
	Additional details:_________________________	Free text field
**	Sanction status: ☐ Yes ☐ No Sanctions list reference: ______________________	This field indicates whether the subject is a listed subject in Targeted Financial Sanction lists. When the 'Yes' is ticked, the the list shall be indicated.
	ADDRESS	
	Country	Enumeration
	City	Free text field

	State/province	Free text field
	Street	Free text field
	Number	Free text field
	Postcode	Free text field
	Status: ☐ Current ☐ Previous ☐ Unknown	Enumeration
	LINKAGE (***)	
**	Subject to which the legal Person is linked	Enumeration with the subjects listed above
**	Type of link ☐ Owner ☐ Beneficiary ☐ Manager ☐ Board Member ☐ Authorized signatory ☐ Representative ☐ Employee ☐ Partner ☐ Family ☐ Other: free text	Enumeration

	Comments: ___________________________________	Free text

SECTION 4 – ACCOUNTS OR OTHER BUSINESS RELATIONSHIPS		
	Fields/Types of information	**Description**
*	**ACCOUNT OR BUSINESS RELATIONSHIPS INFORMATION (***)**	Information on accounts or other types of relationships that are either held by or otherwise associated to persons involved, or are relevant for the case and its analysis.
*	Type of the relationship	Free text field
*	Natural or legal person to which the account or the business relationship is linked.	Enumeration indicating the subjects listed in the sections above and residual option 'unknown'.
**	Type of link ☐ Holder ☐ Authorised signer	Enumeration This field shall be filled when the

	☐ Beneficial Owner ☐ Representative ☐ Other: specify	natural or legal person to which the account/relationship is linked is known and indicated in the field above.
	Country code	Enumeration
	Institution type	Free text field
	Institution name	Free text field
	Institution code	Free text field
	Branch name	Free text field
	Branch code	Free text field
**	Account number	Free text field
	Account type (name)	Free text field
**	IBAN	Free text field
	SWIFT/BIC	Free text field
	Currency	Enumeration
	Balance of the account	Free text field
	Date of balance	Format DD-MM-YYYY
	Balance in Euro	Free text field
	Exchange rate	Free text field
	Status of the account or the relationship ☐ Open Date: Additional info: free text ☐ Closed Date: Additional info: free text ☐ Temporarily suspended Date: Reason and additional info: free text	Enumeration

	☐ Other: free text	
	Comments	Free text field (balance, etc.)

SECTION 5 – TRANSACTIONS		
	Fields/Types of information	**Description**
**	**TRANSACTIONS (***)**	
**	Type of transaction: ☐ Deposit ☐ Withdrawal ☐ Transfer ☐ Remittance ☐ Purchase/sale of securities ☐ Other: free text Type of obliged entity: free text The following data should be provided, as relevant depending on the type of transactions: **Transfers**	The two tables are dedicated respectively to transfers (including for crypto assets) and to other types of transactions. For each transaction (row), the available information shall be included in the corresponding field, leaving the other fields in the row empty (or marked as “Unknown”). When translated into an IT procedure, a unique “table” is provided for all types of transactions, to be filled in as appropriate, depending on the type of activity and the information available.

	ORIGIN	DESTINATION

Date	Amount	Currency/ cryptocurrency	Amount in EUR	Transaction ID/ Hash	Ordering customer	Account/ address	Entity	Country	Beneficiary	Account/ address	Entity	Cou ntry

(1) The subjects indicated in the tables must be duly identified in the sections above.

Description/details of the transfer: ____

Other transactions

Date	Amount	Currency/crypto currency	Amount in EUR	Transaction ID/Hash		

SECTION 6 – ORIGIN OF THE SPONTANEOUS DISCLOSURE		
	Fields/Types of information	**Description**

*	FIU analysis (choose at least one):
	
	☐ Report of suspicions; Type of reporting entity: ________________________________
	☐ exchange with other FIUs (drop down menu)
	    ☐ request
	    ☐ response
	    ☐ other spontaneous disclosure
	    ☐ cross-border reports (XBR)
	    ☐ cross-border disseminations (XBD)
	    ☐ ma3tch hit
	☐ strategic/joint analysis
	☐ other (please specify): _____________	

SECTION 7 – GROUNDS FOR SUSPICION		
	Fields/Types of information	**Description**
* *	• **GROUNDS FOR SUSPICION:** Description: _________________ • **ML/TF INDICATORS (choose at least one)** ☐ Transactions inconsistent with declared activity/income ☐ Sudden change in financial profile/transactional activity ☐ Cash ☐ High-risk countries / territories	

	☐ High-risk areas/sectors of activity ☐ Involvement of shell entities ☐ False information/documents ☐ Open source information linking with criminal activities ☐ Geographical delocalisation ☐ Accounts used for pass-through activities ☐ Transactions involving luxury items ☐ Other (please specify): ________________________ **ALLEGED CRIMINAL OFFENCE:** ☐ **MONEY LAUNDERING** ☐ OFFENCES AGAINST PROPERTY ☐ Fraud/swindling ☐ Robbery/theft ☐ Asset stripping ☐ Counterfeiting and product piracy ☐ Other (please specify): _______________ ☐ OFFENCES AGAINST PUBLIC FINANCE ☐ VAT fraud ☐ Other taxes ☐ Subsidies/grants ☐ Other (please specify): ______________________________ ☐ OFFENCES AGAINST CONSTITUTION / PUBLIC ORDER ☐ Corruption/bribery ☐ Other (please specify): _____________________________________ ☐ OTHER SUSPECTED ACTIVITIES ☐ Organized crime ☐ Drug trafficking	Under '*alleged criminal offence*': it is mandatory to select at least one general category. Within ML, "*Not known or not available*" should be ticked when the predicate offence is unknown or in instances where this information is not available for the exchange (e.g. for confidentiality reasons).

☐ Trafficking in human beings (illegal immigration)
☐ Trafficking in protected species
☐ Illicit trade in human organs
☐ Illicit trade in arms
☐ Illicit trafficking in cultural goods
☐ Child pornography
☐ Religious sects
☐ Smuggling
☐ Prostitution
☐ Extortion
☐ Insider trading and market manipulation
☐ Kidnapping, illegal restraint and hostage-taking
☐ Forgery of means of payment/administrative documents
☐ Sanction evasion (EU, UN, OFAC, etc.)
☐ Financing of proliferation of weapons of mass destruction
☐ Cybercrimes
☐ Environmental crime
☐ Murder
☐ Illicit trafficking in stolen goods
☐ Other (please specify): ________________________
☐ Unknown / Not Applicable

☐ **TERRORIST FINANCING**
- ☐ Radical Islamism
- ☐ Nationalist terrorism
- ☐ Violent radicalism
- ☐ Other (please specify): ____________________________________

☐ **PROLIFERATION FINANCING**

☐ **OTHER:** free text

SECTION 8 – INFORMATION		
	Fields/Types of information	**Description**
	8.1. RELEVANT REPORTS OF SUSPICIONS	
	Searches in our report database have produced the following results: • Type of reporting entity: • Period of operations: • Amount of funds involved: Description of other relevant information: ______________________________	Free text for each field. Description of suspicions transactions/activities detected. Description of the information collected as these relates to the underlying cases involved subjects. Emphasis on identified matches possible and data that can confirm or better understand the case and the suspected illegal activities.

	8.2. THRESHOLD-BASED DISCLOSURES	
	Searches in our threshold-based disclosures database have produced the following results: • Types of funds or assets (e.g. cash, …): • Types of transactions (e.g. deposit/withdrawal, wire transfer, …): • Amounts or value of transactions or funds/assets: • Dates/timeframe: • Counterparts (if applicable/relevant):	Free text for each field. Description of threshold-based transactions.
	8.3. COMPANY INFORMATION	
	Description: ____	Free text with additional explanation about: ownership; positions; type of companies, entities or trusts; assets and purposes of trusts; etc.
	8.4. FINANCIAL INFORMATION AND OTHER INFORMATION OBTAINED FROM OBLIGED ENTITIES	
	Description: ____	Free text with references to and description of transactions, accounts or any other element obtained, e.g., from obliged entities with attachments with structured information, when relevant (e.g. statements of accounts, lists or remittances, etc.).
	8.5. CENTRAL BANK ACCOUNTS REGISTER	
	Description: ____________________	Free text with data retrieved on banking or other financial relationships.

	8.6. REAL ESTATE INFORMATION	
	Description: ____________________	Free text with data on real estate properties (e.g. type, value and location of properties; dates of purchase or sell; …).
	8.7. TAX/CUSTOM DATA	
	Description: ____________________	Free text with data on taxable income or profits, taxes and duties.
	8.8. LAW ENFORCEMENT AGENCIES (LEAs) / CRIMINAL DATA	
	Description: ____________________	Free text with information on investigations, legal proceedings, mutual legal assistance requests, criminal records.
	8.9. INFORMATION FROM OTHER AUTHORITIES	
	Description: ____________________	Free text with information obtained from other authorities (e.g. LEAs, prosecutors, supervisors, …).
	8.10. OTHER DATA	

	Description: ____	Additional data available (e.g. physical cross-border transportation of cash and valuables; transactions in gold, ...).
	7.11 DESCRIPTION AND COMMENTS:	
	Description: _______________________________	

SECTION 9 – SUSPENSION		
	Fields/Types of information	**Description**
**	Transaction/account suspended: ☐ Yes ☐ No	Boxes to tick. If "yes" is ticked, then the next two fields shall be filled in.
**	☐ the transaction has been suspended until __________. ☐ the account/business relationship _________ (to be specified) has been suspended until _________. Current balance is .	To be filled-in in cases where the transaction /account has been suspended.
**	Amount of assets suspended:	Amount (with currency). Mandatory if the transaction /account has been suspended.
	Description: _________________	Additional relevant information about suspension. In case actions other than, or prior to, suspension is taken (e.g. monitoring orders or other instructions) these actions should be described here.

SECTION 10 – LINK TO THE COUNTRY OF THE RECEIVING FIU AND OTHER ELEMENTS		
	Fields/Types of information	**Description**
	10.1. LINK TO THE COUNTRY OF THE RECEIVING FIU	

*	Link to the Country of the receiving FIU **(***)**: ☐ Nationality ☐ Residence ☐ Contact Details ☐ Accounts ☐ Origin/Destination of funds ☐ Investigations ☐ "Ma3tch" Hits ☐ Other: specify Description: _________________	Enumeration and free text for 'Other' and 'Description'. The description must specify which subject(s)/asset(s)/fund(s) the link refers to. If there is more than one link with the country, the field shall be duplicated.
	10.2. REFERENCE TO OTHER EXCHANGES, PAST OR ONGOING	
u **	Description: _________________	Free text describing previous related exchanges with the same counterpart or with other FIUs or foreign agencies, including the corresponding reference numbers.
	10.3. OTHER AGENCIES/COUNTRIES THAT HAVE KNOWLEDGE OF THIS CASE	
	Agencies: free text Countries: enumeration	

SECTION 11 – CONDITIONS FOR USE OR DISSEMINATION

To ensure a correct understanding of the terminology used throughout the document, the following definitions apply:

'**intelligence purposes**' means the use of the information by any competent authority, as defined by Article 2(44) of the Regulation (EU) 2024/1624, for the purposes of analysing and processing it in order to identify possible money laundering, terrorist financing or related criminal risks.

'*investigative purposes*' means the use of information for the purposes of investigating or assisting prosecutions related to money laundering, its predicate offences or terrorist financing, or for tracing, seizing or freezing and confiscating criminal assets but not for use as evidence.

	Fields/Types of information		Description
	The information should be kept under the strictest confidentiality and not processed or divulged outside of the cases consented.		
	EXTENT OF THE CONSENT TO USE / TO DISSEMINATE (one option shall be chosen among 1, 2 and 3)		
*	1. ☐	**General consent** The information in this document may be disseminated to any competent authority as defined in Article 2(44)(c) and (d) AMLR, including Law Enforcement Authorities, of the country of the recipient FIU, as well as to the European Public Prosecutor's Office (EPPO) and European Anti-Frad Office (OLAF), where competent, and to the relevant foreign FIUs expressly identified in the exchange.	Option 1 (General consent) applies by default and shall be preselected, while option 2 and 3 shall be expressly selected by the responding FIU.

2. ☐	**Restricted consent (internal use - no dissemination)** This information remains within your FIU and is for your exclusive use only, for intelligence purposes in analysis on ML, associated predicate offences or TF. It cannot be disseminated to a third party without prior written consent. Reasons: ____	
3. ☐	**Consent to disseminate to third parties (it is possible to select more than one option)** The information in this document may be shared with: 3.1.1 ☐ Your competent Law Enforcement Authorities (LEAs) 3.1.2 ☐ The following competent authority(ies) as defined in Article 2(44) (c) and (d) AMLR: 3.1.3 ☐ The following entities subject to national AML/CFT legislation (elements strictly necessary to respond to a request for information): ____ 3.1.4 ☐ The following authority(ies) deemed appropriate: _____________________________________ Reasons: ______________________________ 3.1.5 ☐ The following FIU(s): [enumeration with country codes with possibility to select more than one]	

**			**Conditions (only applicable to General consent (1) and Specific consent (3))** ☐ No conditions apply to the consent for dissemination of the information ☐ Without mentioning the origin of this information ☐ Without sharing the documents or attachments transmitted ☐ Further dissemination is permitted under the same conditions and extent as the original consent granted	This field must be completed only when 'General consent' and 'Specific consent' are selected. The option indicating the absence of any such restrictions constitutes the default choice and shall be pre-selected.

*		**EXTENT OF THE CONSENT TO USE OF THE INFORMATION** **The information in this document may be used for (at least one option shall be selected):** ☐ Intelligence purposes ☐ Investigative purposes ☐ To prepare a Mutual Legal Assistance request ☐ As evidence in legal proceedings ☐ Additional use (specify): ____________________________	This section shall be always completed.

SECTION 12 – REQUEST FOR FEEDBACK		
	Fields/Types of information	**Description**
	(Description): ____________________________	Request for feedback on the use of the information provided or on the outcomes of the analyses or the ensuing investigations.

SECTION 13 – ATTACHMENTS		
	Fields/Types of information	**Description**
	Attachment 1 description: ___________________ Attachment 2 description: ___________________ Attachment 3 description: ___________________	Attachments should be referenced here with short description of the contents.