



وحدة المعلومات المالية
Financial Information Unit

Guidance to Submitting Suspicious Transaction Reports for Designated Non- Financial Businesses and Professions (DNFBPs)

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I. Introduction

This guidance is issued to assist DNFBPs to meet their reporting obligations of any transaction suspected to be related to money laundering and terrorism (ML/TF) financing under Law No. (20) of 2019 on Combatting Money Laundering and Terrorism Financing.

Suspicious transaction reports (STRs) play a crucial role in the fight against money laundering and terrorist financing, and Qatar Financial Information Unit (QFIU) is committed to ensuring that DNFBPs file suspicious transaction reports of the highest quality.

This guidance applies to all DNFBPs when they carry out specified transactional activities for third parties (see below), and it has an explanatory and indicative value. This guidance applies to all DNFBPs when they carry out specified transactional activities for third parties (see below); it has an explanatory and indicative value and does not replace laws and implementing regulations related to money laundering and terrorism financing.

II. Who are considered the reporting DNFBPs?

Under Law No. 20 of 2019 on Combatting Money Laundering and Terrorism Financing DNFBPs shall report promptly to QFIU any information concerning any financial transaction or operation, including attempted transactions and operations, regardless of the value thereof, when there is a suspicion or reasonable grounds to suspect that such transactions and operations are associated with, or involve proceeds of a predicate offence or may be used in terrorism financing by terrorist organizations and terrorism financiers.

Law No. (20) of 2019 on Combatting Money Laundering and Terrorism Financing categorizes DNFBPs as¹:

¹ A separate Guidance will be issued for Dealers in Precious Metals or Stones, whenever they participate with their customers in cash transactions of a value equal to or exceeding the designated threshold set out in the Implementing Regulation.

- 1) Real estate agents, whenever they conduct transactions related to the sale and/or purchase of real estate for customers, or both.
- 2) Authorized notaries, lawyers, accountants, and legal/chartered accountants, whether sole practitioners, partners or employed professionals within professional firms when they arrange, execute or conduct transactions on behalf of or for their customers in relation to any of the following activities:
 - a) Purchase or sale of real estate.
 - b) Management of the customer's funds, securities or other assets.
 - c) Management of bank accounts, saving accounts or securities accounts.
 - d) Organizing contributions for the establishment, operation or management of companies or other entities.
 - e) Establishment, operation or management of legal persons or legal arrangements, and sale or purchase of business entities.
- 3) Trust and company service providers, when arranging or executing transactions for the customers, including the following activities:
 - a) Acting as a formation agent of legal persons.
 - b) Acting as, or arranging for another person to act as, a director or secretary of a company, a partner of a partnership or a similar position in relation to other legal persons.
 - c) Providing a registered office, place of business, correspondence address or administrative address for a company, a partnership or any other legal person or legal arrangement.
 - d) Acting as, or arranging for another person to act as a trustee for a direct credit fund or performing an equivalent function for another legal arrangement.
 - e) Acting as, or arranging for another person to act as, a nominee shareholder for another person.
- 4) Any other business or profession by virtue of a decision of the Council of Ministers upon the proposal of the National Anti-Money Laundering and Terrorism Financing Committee (NAMLC).

III. Reporting Suspicious Transactions

DNFBPs shall promptly report to QFIU any information concerning any transaction or operation, including attempted transactions and operations, regardless of the

value thereof, when there is a suspicion or reasonable grounds to suspect that such transactions and operations are associated with, or involve proceeds of a predicate offence or may be used in terrorism financing.

As per Article (21) of Law No. (20) of 2019 on Combatting Money Laundering and Terrorism Financing, “ Financial institutions and DNFBPs shall promptly report to the Unit any information concerning any transaction or operation, including attempted transactions and operations, regardless of the value thereof, when there is a suspicion or reasonable grounds to suspect that such transactions and operations are associated with, or involve proceeds of a predicate offence or may be used in terrorism financing”.

“Reasonable grounds to suspect” is determined by what is reasonable in the DBFBPs’ circumstances, including normal business practices and systems within the industry.

Where suspicious transactions and operations are generally identified based on set of factors or elements related to the facts, context, indicators of money laundering and terrorism financing, which will allow the reporting DNFBP to determine whether there are reasonable grounds to suspect that the transaction is related to the commission or attempted commission of a money laundering offence, or a terrorism financing offence.

Facts:

The fact is defined as an event, action, occurrence, or element that exists at a particular time — it cannot be an opinion or impression.

In the context of financial transactions, facts could include the date, time, location, amount or type of the transaction, account details, customer’s business lines, customer’s financial history. A fact can be any information related to the customer when it is been validated, such as that the customer has been convicted.

Context:

Understanding the context surrounding the financial transaction, as it clarifies the circumstances or explains a situation or a financial transaction. The context of a transaction may be observed or understood through:

- A general awareness of the events occurring in the customer’s business environment or community;
- Knowledge of the typical financial activities of the customer;

- Regular know your customer (KYC) activities of the reporting DNFBP (for example, customers' occupation or business, how they generate their wealth, their typical or expected transactional behaviours, etc.);
- The information obtained through the application of the risk-based approach;
- Transactions, background, behaviours and actions of the customer.

If the context of a transaction seems unusual or suspicious, current and past financial transactions should be examined and assessed. A transaction may not appear suspicious in itself. However, a review of additional contextual elements surrounding the transaction may create suspicion.

When assessing multiple elements related to the facts and context, it is possible to determine whether there is suspicion of money laundering or terrorism financing. When these elements are viewed together, they create a picture that will either support or negate the suspicion of ML/TF.

Below are some examples of how suspicion may arise:

Example 1:

The customers ask several questions about reporting obligations (fact); want to know how they can avoid their transaction being reported to QFIU(context);structure their amounts to avoid customer identification (CDD) or reporting thresholds to QFIU (fact); keep changing their explanation for conducting a transaction or know few details about its purpose (context).

Example 2:

The customers make a deposit to a personal account, where the customer: have a low income (context) and deposited an unusual large sum (fact) ; keep changing their reason for the deposit or cannot or will not provide a reason (context); exhibit nervous behaviour (context).

Other Reporting Forms:

There are other forms to file a suspicion report when specific cases exist, such as:

1. When DNFBPs are unable to comply with CDD measures, including undertaking measures to identify and verify permanent or occasional customers using original papers or information from an independent and reliable source, or when the data related to the customer's identity is obviously fictitious or inadequate, they shall report to the QFIU any suspicious transactions related to the customer².

² Please refer to Article (11) of Law No. (20) of 2019

2. In cases where DNFBPs have a suspicion of money laundering or terrorism financing and have reasonable grounds to believe that performing the CDD measures will tip-off the customer, they shall not pursue the CDD measures, and shall instead file a suspicious transaction report with the QFIU³.

The reporting obligation imposed on the reporting DNFBPs does not imply that they are required to provide all the material elements and factual data related to the predicate offence committed or suspected of being committed by the customer, nor they are required to legally characterize the facts suspected of being committed by the customer, as the legal characterization of the facts remains a core task of the judicial authorities.

A. How to Identify a Suspicious Transaction

Transactions, whether completed or attempted, may give rise to reasonable grounds to suspect that they are related to money laundering or terrorism financing regardless of the sum of money involved. There is no monetary threshold for making a report on a suspicious transaction. A suspicious transaction may involve several factors that may on their own seem insignificant, but together may raise suspicion that the transaction is related to the commission or attempted commission of a money laundering offence, a terrorism financing offence, or both.

As a general guide, a transaction may be connected to money laundering or terrorism financing when the transaction (or a series of transactions) raises questions or gives rise to discomfort, apprehension, or mistrust.

The context in which the transaction or transactions occur or are attempted is a significant factor in assessing suspicion. This will vary from business to business and from one customer to another. DNFBPs should evaluate transactions in terms of what seems appropriate and is within normal practices in their particular line of business, and based on their knowledge of their customer. Transactions that are inconsistent with the customer profile established at onboarding or that do not appear to be in keeping with normal industry practices may be relevant factors for determining whether there are reasonable grounds to suspect that the transactions are related to money laundering or terrorism financing.

An assessment of suspicion should be based on a reasonable evaluation of relevant factors, including the knowledge of the customer's business, financial history, background and behavior. Remember that behavior is

³ Please refer to Article (22) of Law No. (20) of 2019

suspicious, not people. Suspicion could be based on a single factor, or it could be based on the combination of a number of factors. All circumstances surrounding a transaction or series of transactions should be reviewed.

B. Indicators of Suspicious Transactions

Attached as **Annex A** is a list of indicators to help DNFBPs assess whether or not transactions might give rise to reasonable grounds for suspicion.

The list of indicators is not an exclusive list. DNFBPs can identify suspicious transactions involving high-risk individuals, legal entities, and transactions based on other criteria or known indicators of money laundering, terrorism financing, or a predicate offence.

IV. STR Reporting Requirements

A. STR Form

DNFBPs shall submit written STRs to QFIU using the required STR Form (**Annex B**). It is prohibited to report verbally.

It is essential that DNFBPs complete all relevant fields in the standard form with as much accurate information as is available related to the type of suspicion, whether the funds are subject to freezing, the individuals and/or entities involved in the transactions, such as:

- 1) Is the suspicion related to money laundering or terrorism financing?
- 2) Personal data of the individuals and/or entities obtained by the Reporting DNFBP, consistent with the law and applicable regulations (correct names and other key customer identifiers, such as date of birth, government issued ID, addresses, telephone numbers, commercial register and establishment code).
- 3) Adequate information about the reported suspicious transactions (sale and purchase of currencies, incoming and outgoing transfers, any other financial transactions).
- 4) Set out in a clear manner the indicator used and the basis for suspicion, suspected predicate criminal activity.
- 5) Provide evidence of suspicious transactions (account name and relevant information, transaction history, and any other documents that may support the basis for suspicion).
- 6) Identify the beneficial owners of the suspicious transactions, and how they control the legal person.

- 7) Identify associated natural and legal individuals and the relationships between them, for example business associates or family members. The correct names of individuals and entities involved in transactions.

STRs are filed on a “**per person of interest/suspected person**” basis. The person of interest may be a customer or a non-customer. DNFBPs shall indicate in the narrative field of the STR the number of suspicious transactions in the report, and provide the transaction details separately as an Excel file and submit to QFIU as an STR attachment.

DNFBPs should disclose in any subsequent STR involving the same person of interest that the reported transaction is related to another STR by including the reference number of the STR related to the report.

B. When to submit the STR

DNFBPs shall **promptly** submit STR to QFIU to report any suspicious transaction or any attempts to perform such transactions. For post-transaction STRs, DNFBPs shall submit an STR not exceeding **three (3) working days** from the time it makes the determination that it suspects or has reasonable grounds to suspect that a transaction is related to criminal activity.

However, when there is suspicion that the transactions are linked to, or to be used in terrorist acts or by terrorist organizations, the STR must be sent **within 24 hours of determining that the transactions were suspicious.**

Non-working days are excluded from the counting of the prescribed reporting period. The following are considered non-working days:

- 1) Weekend (Friday and Saturday).
- 2) Official regular national holiday.
- 3) Officially declared national holiday (Special non-working day nationwide).

For attempted transactions, when a DNFBP receive an order from a customer to execute a transaction, and the DNFBP suspects that the transactions are proceeds of a criminal activity and/or are related to money laundering, or are linked to, or to be used in terrorist acts or by terrorist organizations, the STR must be submitted **within 24 hours of determining that the transactions were suspicious, or in the first business day, whichever is soonest.**

C. Who submits the STR

The STR should be made by the Compliance Officer/Money Laundering Reporting Officer (MLRO), or Deputy Compliance Officer /MLRO.

The DNFBPs shall provide QFIU with their relevant contact information and inform/ update QFIU when the Compliance officer/ MLRO, and/or Deputy Compliance officer/ MLRO is changed.

D. Information to be contained in the STR

DNFBPs should clearly, and to the extent available, describe all of the factors or unusual circumstances that led them to a suspicion of money laundering or terrorist financing activity, and provide as many relevant details as possible to support this determination, such as:

- 1) Is the suspicion related to money laundering or terrorist financing?
- 2) Related STRs previously filed on the individual and/or entity which is the subject of the STR.
- 3) Relevant facts about all parties facilitating the suspicious activity or transactions.
- 4) Identify all involved accounts and transactions in chronological order by date and amount.
- 5) Describe what is known about the subject or subjects' methods operations, providing as completely as possible a picture of the suspicious activity.
- 6) Explain in detail why the activity or transaction is illegal or suspicious.

E. How to submit STRs

DNFBPs must submit STRs through the QFIU Electronic STR System (E-STR).

If E-STR is not available, the STR shall be submitted by driver/courier to the QFIU Office as follows:

***Building 11, 8th Floor, Qatar Financial Crime Centre
Al Baladiya Street, Doha
P.O. 1234***

It is strictly prohibited to submit the STR by regular or electronic mail.

V. Requests for Information by QFIU

Under Article (32) of Law No. (20) of 2019, QFIU shall identify the reports that financial institutions and DNFBPs must submit, as well as the data they must provide; set the reporting intervals; and create forms and procedures for reporting. These reports shall include, at minimum, reports of suspicious transactions.

QFIU may also require that financial institutions and DNFBPs submit additional information within the time limits set and the form specified, when such information is necessary to conduct its analysis.

In the case of failure by any reporting entity to observe the obligations under the law, QFIU shall notify the concerned supervisory authority.

As such, DNFBPs shall comply with request for information it receives from QFIU relating to suspicious transactions, operations or information that may be related to money laundering or terrorist financing.

VI. Failure to submit STR or Respond to QFIU's Requests for Information and Tipping Off

Law No. (20) of 2019 also sets out a number of criminal offences relating to STR obligations. The key offences include:

- 1) Article 21 - Failure to submit an STR to QFIU; and
- 2) Article 22 - Disclosing to a customer, beneficiary or any third party, other than competent authorities under the law, that an STR is being or has been submitted to QFIU or that a money laundering or terrorism financing investigation is being or has been carried out.

In this regard, QFIU will follow the following procedure in case of non-compliance with the provisions of (V) and (VI) above by a DNFBP:

- 1) After the deadline to comply with the order or request, QFIU shall issue a reminder to comply with the order or request for information within three (3) days;
- 2) After the lapse of the grace period given to comply with the order or request, the QFIU will warn the DNFBP that their continued non-compliance will be referred to their regulatory authority. The DNFBP is given another three (3) days to comply with the order or request; and
- 3) With the continued non-compliance by the DNFBP, QFIU shall inform the relevant regulatory authority the matter of non-compliance by the DNFBP.

DNFBPs that fail to meet their obligations under Law No.(20) of 2019, could be subject to criminal and administrative measures and sanctions.

Law No.(20) of 2019 stipulates the following criminalization provisions related to the above mentioned Articles:

Article (82)- Directors, board members, owners, authorized representatives or any other employees of financial institutions and DNFBPs, who contravene the provisions stipulated in Article (8), (9), (10), (11), (13), (14), (15), (16), (17), (18), (20), and (21)of this Law, whether willfully or as the result of gross negligence, shall be sentenced to imprisonment for a term not exceeding two (2) years or a fine not less than (QR 5.000.000) five million Qatari Riyals and not more than (QR10.000.000) ten million Qatari Riyals, or one of these two penalties.

Article (84)- Any person who commits the offence of disclosing information that may reveal that a suspicious transaction report has been submitted to the Unit, or has not been submitted, shall be sentenced to imprisonment for a term not exceeding three (3) years and a fine not more than (QR 500.000) five hundred thousand Qatari Riyals, or one of these two penalties.

VII. How to contact QFIU

This Guidance will be reviewed on a periodic basis. If you have any comments or suggestions to improve them, or need further information on QFIU and its activities, reporting and other obligations, you can contact QFIU:

Building 11, 8th Floor, Qatar Financial Crime Centre

Al Baladiya Street, Doha

P.O. 1234

Telephone No.: +974 44221746

E – mail: info@qfiu.gov.qa

Annex (A)

Indicators of Suspicious Transactions

The following indicators are provided to help assess whether or not transactions might give rise to reasonable grounds for suspicion. These are examples of common indicators that may be helpful when evaluating transactions, whether completed or attempted. These include indicators based on certain characteristics that have been linked to money laundering or terrorist activities in the past.

These indicators are not intended to cover every possible situation and are not to be viewed in isolation. A single indicator is not necessarily indicative of reasonable grounds to suspect money laundering or terrorist financing activity. However, if a number of indicators are present during a transaction or a series of transactions, DNFBPs might want to take a closer look at other factors prior to making the determination as to whether the transaction must be reported.

The indicators have to be assessed in the context in which the transaction occurs or is attempted. Each indicator may contribute to a conclusion that there are reasonable grounds to suspect that the transaction is related to the commission or attempted commission of a money laundering or a terrorist financing offence. However, it may also offer no indication of this in light of factors such as the customer's occupation, business, financial history and past investment pattern. Taken together, the presence of one or more indicators as well as the DNFBPs' knowledge of their customer's business or financial affairs will help them identify suspicious transactions.

Red flags for legal professionals

- a) The transaction is unusual, e.g.:
 - the type of operation being notarised is clearly inconsistent with the size, age, or activity of the legal entity or natural person acting;
 - the transactions are unusual because of their size, nature, frequency, or manner of execution;
 - there are remarkable and highly significant differences between the declared price and the approximate actual values in accordance with any reference which could give an approximate idea of this value or in the judgement of the DNFBP;

- legal person or arrangement, including NPOs, that request services for purposes or transactions, which are not compatible with those declared or not typical for those organisations.
 - the transaction involves a disproportional amount of private funding, bearer cheques or cash, especially if it is inconsistent with the socioeconomic profile of the individual or the company's economic profile.
- b) The customer or third party is contributing a significant sum in cash as collateral provided by the borrower/debtor rather than simply using those funds directly, without logical explanation.
 - c) The source of funds is unusual:
 - third party funding either for the transaction or for fees/taxes involved with no apparent connection or legitimate explanation;
 - funds received from or sent to a foreign country when there is no apparent connection between the country and the customer;
 - funds received from or sent to high-risk countries.
 - d) The customer is using multiple bank accounts or foreign accounts without good reason.
 - e) Private expenditure is funded by a company, business or government.
 - f) Selecting the method of payment has been deferred to a date very close to the time of notarisation, in a jurisdiction where the method of payment is usually included in the contract, particularly if no guarantee securing the payment is established, without a logical explanation.
 - g) An unusually short repayment period has been set without logical explanation.
 - h) Mortgages are repeatedly repaid significantly prior to the initially agreed maturity date, with no logical explanation.
 - i) The asset is purchased with cash and then rapidly used as collateral for a loan.
 - j) There is a request to change the payment procedures previously agreed upon without logical explanation, especially when payment instruments are suggested that are not appropriate for the common practice used for the ordered transaction.
 - k) Finance is provided by a lender, either a natural or legal person, other than a credit institution, with no logical explanation or economic justification.
 - l) The collateral being provided for the transaction is currently located in a high-risk country.
 - m) There has been a significant increase in capital for a recently incorporated company or successive contributions over a short period of time to the same company, with no logical explanation.
 - n) There has been an increase in capital from a foreign country, which either has no relationship to the company or is high risk.
 - o) The company receives an injection of capital or assets in kind that is excessively high in comparison with the business, size or market value of the company performing, with no logical explanation.

- p) There is an excessively high or low price attached to the securities transferred, with regard to any circumstance indicating such an excess (e.g. volume of revenue, trade or business, premises, size, knowledge of declaration of systematic losses or gains) or with regard to the sum declared in another operation.
- q) Large financial transactions, especially if requested by recently created companies, where these transactions are not justified by the corporate purpose, the activity of the customer or the possible group of companies to which it belongs or other justifiable reasons.

See also the Joint FATF and Egmont Group Report on “Concealment of Beneficial Ownership”, on the following link:

<https://www.fatf-gafi.org/publications/methodsandtrends/documents/concealment-beneficial-ownership.html>

Annex (B)

STR Form for DNFBPs

QFIU Suspicious Transaction Report Form		
1.	Submission details:	
1.1	Date:	
1.2	Submitting Officer:	
1.3	Type of Reporting Entity:	<input type="checkbox"/> Trust and Company Service Providers <input type="checkbox"/> Single Family Office <input type="checkbox"/> Accountants <input type="checkbox"/> Accounting and Auditing Services <input type="checkbox"/> Legal Services <input type="checkbox"/> Lawyers <input type="checkbox"/> Authorized Notaries <input type="checkbox"/> Real Estate Brokers/Agents <input type="checkbox"/> Dealers of Gold and other precious metal <input type="checkbox"/> Dealers of diamond and other precious stones <input type="checkbox"/> Other: Specify <i>(Mandatory if chosen)</i> :
1.4	Submitting Entity:	
1.5	Contact details: Address: Direct Phone No: Email:	
1.6	Your reference No.	

2.	Reporting details:	
2.1	Is this report related to a previously filed STR? (Mandatory)	<input type="checkbox"/> Yes If yes, include the reference number to the report _____ <input type="checkbox"/> No
2.2	Is this report related to Terrorism Financing, Money Laundering, Sanctions or Proliferation, or other type of suspicion?	<input type="checkbox"/> Terrorism Financing <input type="checkbox"/> Money Laundering <input type="checkbox"/> Sanctions <input type="checkbox"/> Proliferation

	(Mandatory)	<input type="checkbox"/> Other type of Suspicion (<i>Please identify, where possible</i>).
2.3	Is this report subject to any urgent requirements to freeze funds?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown
2.4	What is the suspected predicate offense? (Mandatory)	<input type="checkbox"/> Smuggling <input type="checkbox"/> Evasion of Taxes and Duties <input type="checkbox"/> Fraud <input type="checkbox"/> Electronic crimes <input type="checkbox"/> Drug Crimes <input type="checkbox"/> Corruption and Bribery <input type="checkbox"/> Public Morality <input type="checkbox"/> Counterfeiting/Intellectual property <input type="checkbox"/> Provision of financial services without a license <input type="checkbox"/> Other Predicate Offense (please specify(Mandatory if chosen)) <input type="checkbox"/> Unknown
2.5	Reason for suspicion: (Mandatory)	<input type="checkbox"/> Cash deposits <input type="checkbox"/> Cash withdrawals <input type="checkbox"/> Financial Transfers not commensurate with the customer's profile <input type="checkbox"/> Fund transfer to countries/jurisdictions not clearly associated with the customer <input type="checkbox"/> Structuring <input type="checkbox"/> Source of funds could not be established <input type="checkbox"/> Transaction with no business purpose <input type="checkbox"/> Uneconomical Transaction <input type="checkbox"/> Unwillingness of buyer to disclose identity of beneficial owner <input type="checkbox"/> Customer identification is insufficient or inaccurate <input type="checkbox"/> Doubt about the authenticity or veracity of the customer identification information <input type="checkbox"/> False identity <input type="checkbox"/> Dealing with a high-risk country/jurisdiction with no apparent/valid reason <input type="checkbox"/> Large amount of cash <input type="checkbox"/> Conduct of the individual suspicious <input type="checkbox"/> Asking the officials about matters unrelated to the business relationship

		<input type="checkbox"/> Frequent appearance of the customer name in the tracking system of the daily operations <input type="checkbox"/> Person/Entity is in the UN Sanction List <input type="checkbox"/> Person/Entity is on the domestic sanctions list <input type="checkbox"/> Person/Entity is in other Sanction list, (please specify(Mandatory if chosen)) <input type="checkbox"/> Other Suspicion: Specify (<i>Mandatory if chosen</i>):
2.6	No. of transactions reported (Mandatory)	<input type="checkbox"/> One Transaction <input type="checkbox"/> Multiple Transactions <ul style="list-style-type: none"> ○ 2-5 ○ 6-20 ○ More than 20
2.7	What is the suspected value of the transaction/s, including any attempted transaction? (Mandatory)	<input type="checkbox"/> Value in Qatari Riyal: <input type="checkbox"/> Value in Other Currencies:
2.8	What type of fund, service or product was used for the transaction? (Mandatory)	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input type="checkbox"/> Wire transfer <input type="checkbox"/> Bank account <input type="checkbox"/> Trust Account <input type="checkbox"/> Securities <input type="checkbox"/> Insurance policy <input type="checkbox"/> Investment certificates <input type="checkbox"/> Stocks <input type="checkbox"/> Currency exchange <input type="checkbox"/> Credit Card <input type="checkbox"/> Debit Card <input type="checkbox"/> Gold or Silver Bars <input type="checkbox"/> Other precious metal <input type="checkbox"/> Diamonds <input type="checkbox"/> Other Precious stones <input type="checkbox"/> Real estate <input type="checkbox"/> Consulting/Advisory services <input type="checkbox"/> Other: Specify (<i>Mandatory if chosen</i>):

3.	Details of the person/s of interest (POI)/ Suspect or associates related to the transaction If the POI is a natural person fill Part 3, If POI/ Suspect is a legal person/arrangement fill Part 4 and/or 5. If the POI / Suspect involves both natural and legal person/arrangement fill both Part 3 and 4 and/or 5.	
3.1	Person of Interest: <i>Provide as much details as you know about the POI/ Suspect and include copies of any identification documents obtained</i>	<u>Nationality and Residency Information</u> Nationality : (Mandatory) <input type="checkbox"/> Qatari <ul style="list-style-type: none"> <input type="radio"/> QID No. (Mandatory) <input type="radio"/> Passport No. (Optional) <input type="checkbox"/> Resident <ul style="list-style-type: none"> <input type="radio"/> QID No. (Mandatory) <input type="radio"/> Passport No. (Optional) <input type="checkbox"/> GCC Counties: (Either/Or) <ul style="list-style-type: none"> <input type="radio"/> GCC ID No. <input type="radio"/> Passport No. <input type="checkbox"/> Non Resident <ul style="list-style-type: none"> <input type="radio"/> Passport No. (Mandatory)
3.2		<input type="checkbox"/> Arabic Name: <input type="checkbox"/> English Name: (Either, English or Arabic Name Mandatory) <input type="checkbox"/> DOB: (Mandatory) <input type="checkbox"/> Gender: (Mandatory) <input type="checkbox"/> Address/s: <input type="checkbox"/> Phone No: <input type="checkbox"/> Mobile No: <input type="checkbox"/> Email: <input type="checkbox"/> Country of residence: <input type="checkbox"/> Occupation: <input type="checkbox"/> Driver's license details: <input type="checkbox"/> Employer details: <input type="checkbox"/> Any other personal information:

4.	Suspected Legal Person/Arrangement	
4.1	Name of legal person/arrangement: (Mandatory)	

4.2	Type legal person/arrangement: <i>(Mandatory)</i>	<input type="checkbox"/> Private Company <input type="checkbox"/> Public Company <input type="checkbox"/> Partnership <input type="checkbox"/> Trust or similar legal arrangement ² <input type="checkbox"/> Other Specify: <i>(Mandatory if chosen)</i>
4.3	Which jurisdiction is the legal person/arrangement registered? <i>(Mandatory)</i>	<input type="checkbox"/> State of Qatar <input type="checkbox"/> GCC <input type="checkbox"/> MENA <input type="checkbox"/> Other: Specify: (List Of countries)
4.4	Registration No. of the legal person/arrangement: <i>(Mandatory)</i>	No.
4.5	Registered address: <i>(Mandatory)</i>	
4.6	Operational address, if different from registered address:	
4.7	Establishment Code <i>(Mandatory if legal person/arrangement is local)</i>	No.
4.8	Legal person/arrangement contact details:	Name: Phone No. Mobile No. Email: Other information:
4.9	Directors of the legal person/arrangement and/or business owners.	Name: Phone No. Mobile No. Email: Other information:
4.10	Reason for association to other person of interest (POI)/ Suspect.	<input type="checkbox"/> Manager/Director <input type="checkbox"/> Partner <input type="checkbox"/> Signatory <input type="checkbox"/> Power of Attorney <input type="checkbox"/> Beneficial Owner <input type="checkbox"/> Other: Specify: <i>(Mandatory if chosen)</i>

² Similar legal arrangements include Awqaf.

5.	Trust	
5.1	Trust name	
5.2	Nature and purpose of the trust	
5.3	Jurisdiction and date of the establishment of the trust	
5.4	Identity of settlor (s)	
5.5	Identity of trustee (s)	
5.6	Identity of protector (s)	
5.7	Beneficiary or beneficiaries	
5.8	Other particulars	

6.	Details of the suspicious activity	
6.1	When did this suspicious activity occur? <i>(Mandatory)</i>	Date:
6.2	Where did this suspicious activity occur? <i>(Mandatory)</i>	
6.3	How was the suspicious activity identified? <i>(Mandatory)</i>	<input type="checkbox"/> Face to face transaction <input type="checkbox"/> Compliance Officer or MLRO <input type="checkbox"/> Anonymous Tip <input type="checkbox"/> Internal Audit <input type="checkbox"/> Negative News <input type="checkbox"/> Other Specify <i>(Mandatory if chosen)</i>
6.4	Provide a detailed narrative about the actual suspicious activity resulting in the filing of this STR. What raised your suspicions?	

	Describe clearly and completely the factors or unusual circumstances that led to the suspicion of ML or TF activity. <i>(Mandatory)</i>	
6.5	Provide any additional information that you consider important to filing this STR.	

7.	Supporting documentation	
7.1	Please list any supporting documents relevant to the filing of this STR	<p>List attachments:</p> <ul style="list-style-type: none"> <input type="checkbox"/> POI/ Suspect Identification documents <input type="checkbox"/> Transaction records <input type="checkbox"/> Company/business records <input type="checkbox"/> Any other documents or records <p>List:</p> <p><i>(Reminder: Mandatory if chosen)</i></p>