

**Ministry of Commerce and Industry**

**Companies Affairs Department**

Date: 24/02/2022

Ref No.: 307/2022

**Circular No. (3) of 2022 on the Subscription to the NCTC Electronic Notification Platform for the Implementation of the Designation Order on the Sanctions List (UNSC and National) and Implementation of Freezing**

**Messrs. Auditors, Dealers in Precious Metals and Stones and Trust and Company Service Providers,**

Pursuant to Law No. (27) of 2019 Promulgating the Law on Combating Terrorism,

The provisions of Article (12) and Article (26/c) of the Decision No. (1) of 2020 of the Public Prosecutor Regulating the Implementation Mechanisms of the Targeted Financial Sanctions related to Combatting the Financing of Terrorism and the Financing of the Proliferation of Weapons of Mass Destruction,

The provisions of Item (I/e), Item (V/c) and Item (VI/ (b) and (e)) of the Decision of the Public Prosecutor No. (59) of 2020 Promulgating the Guidelines to the Effective Implementation of the Targeted Financial Sanctions Regime in the State of Qatar,

Circular No. (6) of 2021 on the Implementation of Targeted Financial Sanctions by the Implementing Parties at the Ministry of Commerce and Industry, and

Pursuant to the provisions of Article (2) of the Decision of the Minister of Commerce and Industry No. (95) of 2019 on the Establishment of the AML/CFT Section under the Companies Affairs Department,

**The Anti-Money Laundering and Terrorism Financing Section (AML/CFT Section) under the Companies Affairs Department issued the following Circular:**

**I- Subscription to the NCTC Electronic Notification Platform relating to updates to the sanctions list regarding individuals and entities subject to targeted financial sanctions related terrorism financing and financing of proliferation of weapons of mass destruction.**

- Auditors, dealers in precious metals and stones (DPMSs) and trust and company service providers (TCSPs) shall subscribe, free of charge, to the RSS Feed service on

the NCTC's website for receipt of any updates to the sanctions list (designation/ amendment/ delisting), **within a period not exceeding five days from the date of issuance of this Circular**, in order to:

- Be updated of the various relevant notifications and announcements of the decisions of the competent UN body (UNSC List) as soon as they are circulated on the mentioned website.
  - Be informed of the various designation, freezing, delisting and unfreezing orders as soon as they are published on the NCTC's website.
- For subscribing to the above-mentioned service, auditors, DPMSs and TCSPs should visit the NCTC's website/Sanctions List, on the following link:

[National Counter Terrorism Committee \(moi.gov.qa\)](http://moi.gov.qa)

- Auditors, DPMSs and TCSPs shall subscribe to the RSS Feed service through the official email address rather than the personal address.

## **II- Feedback Reports:**

- Auditors, DPMSs and TCSPs shall comply with the feedback obligations for the implementation of the designation order on the sanctions list (UNSC and national) and implementation of freezing as follows:
- **Within a maximum of (48) hours from the notification of the designation order/update received from the Electronic Notification Platform**, submit a First Report in accordance with Article (26/c) of the Public Prosecutor's Decision No. (1) of 2020 to the Section at the MOCI, on the measures taken to implement the freezing order and all actions taken in compliance with the designation order. The report shall particularly include the value and type of the frozen funds, the date and time of freezing, and any attempted transactions or other relevant information,
  - Submit a report in case of changes in the information and data related to the funds and economic resources frozen for the same purposes.
  - Ensure that the above reports include **instances where no matches are found**, confirming that screening has been conducted and no matches are found between the designated person or entity and the identification data of existing or occasional customers; or instances confirming that screening has been conducted, where a confirmed match has been found, but there were no funds to freeze.
  - Refer the reports mentioned above to the NCTC and the Section **through electronic mail once drafted**.
  - Refer **the originals of the reports and attachments once drafted** to the Section which provides them to the NCTC through administrative means.
  - The feedback reports referred to above must contain as much data as possible, including, at minimum, the following:

- Details related to whether there is any direct or indirect link between the conducted or attempted operations subject of the report and any other designated person or entity.
  - Details related to the financial transactions, including the incoming transfers which led to the balance change or increase of the frozen account.
  - Details related to any attempt to breach the obligation of prohibiting the provision of funds and services for the benefit of the person or entity subject to freezing.
- The Implementing Parties must adopt adequate measures to take into account the interests and rights of bona fide third parties that have interest in such funds.

**III- Penalties and sanctions imposed for violation of the implementation of targeted financial sanctions:**

In case of violation by the auditors, DPMSs and TCSPs of the implementation requirements of this Circular:

- They shall be subject to penalties for contravening the preventive measures required for implementation of the targeted financial sanctions, whether wilfully or as the result of gross negligence, according to Articles (8) and (82) of the Law No. (20) of 2019 on Combating Money Laundering and Terrorism Financing.
- The Ministry of Commerce and Industry may apply all or some of the administrative and financial sanctions stipulated in Article (44) of the Law on Combating Money Laundering and Terrorism Financing and Article (40) of the Law on Combatting Terrorism, unless any other law provides for more severe penalties.

**IV- Final Provisions**

- This Circular shall be disseminated via email and published on the Ministry's website (AML/CFT Section).
- A copy of this Circular shall be circulated to the listing official and the NCTC.
- To contact the Section for all matters related to the implementation of the targeted financial sanctions, kindly contact the Focal Point or his representative via email, phone or fax, as the case may be:
- Mr. Badr Mohamed Al Dosari, fax: 44932032, phone: 40422905, email: [baldosari@moci.gov.qa](mailto:baldosari@moci.gov.qa)
- Mr. Nasser Hamad Al Naimi, fax: 44932032, phone: 40423281, email: [nhalnaimi@moci.gov.qa](mailto:nhalnaimi@moci.gov.qa)

**Respectfully yours,**

**Salem bin Salim Al Mannai**

**Director of Companies Affairs Department**

*Copy to:*

- *H.E. Public Prosecutor;*
- *H.E. Chairman of the National Counter-Terrorism Committee (NCTC);*
- *Secretary of the National Anti-Money Laundering and Terrorism Financing Committee (NAMLC);*
- *H.E. Assistant Deputy of Commerce Affairs.*