



The Annual Report of Compliance Officer

Practical Instructions to Prepare and Present the Annual Report of Compliance Officer Regarding Issues of Combating Money Laundering and Terrorist Financing

October 2022



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Definitions

The law	The law of combating money laundering and terrorism financing issued as law no. (20) of 2019 and as amended and completed by later laws
The list	The executive list of Combating money laundering and terrorism financing law issued by cabinet's decision no. (41) of 2019 and as amended and completed by later texts
Rules of Combating money laundering and terrorism financing	Rules of commitment for statutory auditors, merchants of precious metals or gemstones, trust fund services clerks, and companies to fulfill the requirements of combating money laundering and terrorism financing, issued by Minister of Commerce and Industry's decision no. (48) of 2020
The ministry	Ministry of Commerce and Industry
The section	Combating money laundering and terrorism financing section at department of companies' affairs at the Ministry of Commerce and Industry
The unit	Financial information unit established according to article (31) of the law
Competent Authority	Any general authority assigned to specific responsibilities to combat money laundering and terrorism financing
Subject entity/entities	statutory auditors, merchants of precious metals or gemstones, trust fund services clerks, and companies, once practiced activities stipulated in the first article of the law
Compliance officer	An officer working for the subject entity, assigned to control its commitment to the requirements of combating money laundering and terrorism financing contained in the law, particularly preparing, and submitting suspicion reports to the unit
Higher management	Every normal person, or administrative organization in the subject entity, which have the power to make decisions related to the management of the subject entity, supervision, and oversight

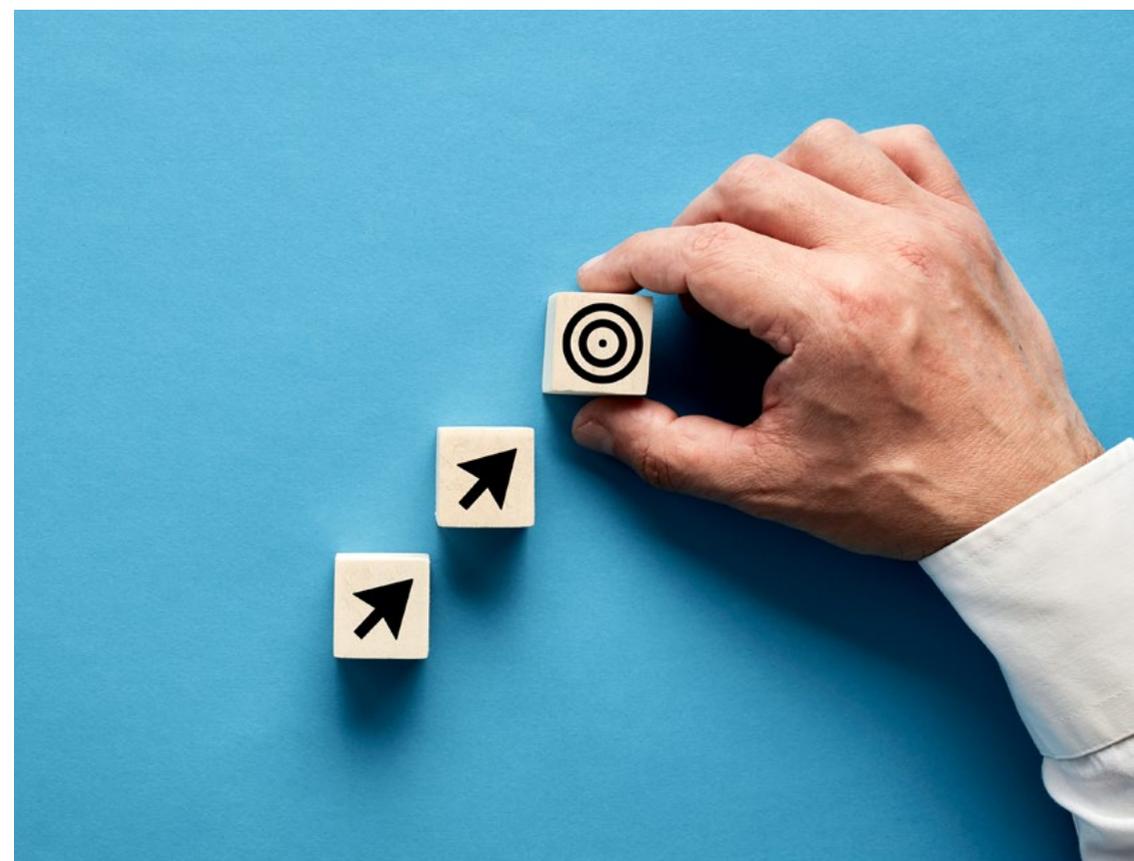
Objective

Article (23) of combating money laundering and terrorism financing law commanded the compliance officer to submit an annual report to the higher management in the subject entity regarding the issues of money laundering and terrorism financing, within four months of the end of each financial and tax year, allowing it to fulfil the requirements of combating money laundering and terrorism financing according to the provisions of the law, its executive list, and rules of combating money laundering and terrorism financing (indicated later in this guide as rules).

This duty applies to compliance officers in all entities subject to requirements of combating money laundering and terrorism financing, regardless

of the form of activity (individual or vocational establishment, or any form of company), and regardless of whether a subject entity has already practiced its activity or yet during the year covered in the report, and whether it is related to an independent subject entity, or one belonging to a financial group according to first article of rules of commitment.

This instructive guide of compliance officer annual report aims to help compliance officers in subject entities to prepare and edit the annual report about issues regarding combating money laundering and terrorism financing stipulated in article (23) of the rules of commitment, through providing them with instructive guidelines regarding the mentioned report.



Background and Context

Pursuant to article (6) of the executive list, and article (17) of rules of commitment, every subject entity should assign a permanent compliance officer and deputy whether from the administration or the employees, who are charged to manage its commitment to the requirements of combating money laundering and terrorism financing stipulated in the law, the list, and the rules. The compliance officer's main duty is to work as a focal point within the subject entity that supervises all activities related to preventing and exposing money laundering and terrorism financing, providing support and guidance to the higher management to guarantee that risks of money laundering and terrorism financing are being managed properly. In addition to that, a compliance officer is considered the focal point between the subject entity, the unit, the section, and the other competent authorities in the country in all the issues related to combating money laundering and terrorism financing.

If the subject entity is a normal person who practices an activity within an individual establishment or office, the normal person shall take the responsibility of higher management, compliance officer, or may assign one of the employees as a compliance officer. But if the subject entity is a commercial corporation, it must assign a compliance officer and a deputy to manage its commitment to the requirements of combating money laundering and terrorism financing permanently, whether from the administration, or the employees, and grant them the necessary powers that allow them to fulfill their duty effectively, independently, and objectively.

The compliance officer and deputy must be:

1. Experienced with the needed knowledge and expertise to fulfill their duties and work independently especially in preparing reports.
2. Aware of the legal and censorship responsibilities related to their tasks, according to the law, the list, and the rules.
3. Capable of putting auxiliary plans needed in case of their absence.
4. Residents of the country.

According to circular no. (7) of 2021 regarding the responsibilities and tasks of compliance officers and deputies¹, the section determined the general and private responsibilities of the compliance officer and deputy in a subject entity, one of which is submission of an annual report to the higher management regarding the issues of combating money laundering and terrorism financing, allowing it to fulfil the requirements of combating money laundering and terrorism financing according to the provisions of the law, its executive list, and rules of commitment.

Compliance officer's annual report shall at least include:

1. Evaluation of the effectiveness of the policies applied in the entity subject to combating money laundering and terrorism funding.
2. Number and types of internal suspicious transactions a compliance officer received.
3. Number of suspicion reports a compliance officer submitted to the unit.
4. Reasons of reports submitted to the unit of financial information, and reasons of not preparing or submitting reports about transactions that reports of suspicion have been submitted about.

5. Number and types of violations of the entity subject to law, list, and rules, or policies applied.

1 Circular no. (7) of 2021 published on "Combating money laundering and terrorism financing section" page on the website, national and international legal frame- circulars. <https://www.moci.gov.qa/مكافحة-غسل-الأموال-و-تمويل-الإرهاب/>

6. Issues to be improved in the policies and programs applied in the subject entity, and suggestions to avoid shortcomings in combating money laundering and terrorism financing.

7. A summary of the training courses regarding combating money laundering and terrorism financing given to employees and administrators in the subject entity, and recommendations to improve training courses.

8. Statement of the clients classified in high-risk criteria, considering national evaluation output, and business risk evaluation stipulated in article (24) of the rules.

9. Improvement achieved in applying any of the work-plans related to combating money laundering and terrorism financing.

10. Outcomes evolving from auditing reviews, or quality assurance reviews related to policies applied in subject entity.

1 - Circular no. (7) of 2021 published on "Combating money laundering and terrorism financing section" page on the website, national and international legal frame- circulars. <https://www.moci.gov.qa/مكافحة-غسل-الأموال-و-تمويل-الإرهاب/>



Annual Report Submission Date

A compliance officer shall submit an annual report regarding issues of combating money laundering and terrorism financing to the higher management for each calendar or Gregorian year², within four months of the end of each financial or tax year to the subject entity.

A tax year is 12-month period starts from the first of January and ends at the thirty-first of December of the same year (Article (1) of law no. 24 of 2018 about the issuance of income tax law)³, a financial year is the accountant period⁴ that a subject entity prepares its financial statements for⁵.

A compliance officer shall as well submit a copy of the annual report to Combating money laundering and terrorism financing section at Companies Affairs Department at Ministry of Commerce and Industry prior to 1st of June of the year following the reporting year through e-mail: control.aml@moci.gov.qa

2 - A Gregorian year is 12-month period that starts from 1st of January and ends at 31st of December of the same year (revise article no. 1 of the cabinet's decision no. (5) of 2019 regarding issuing an executive list to law no. (25) of 2018 regarding selective tax

3 - The glossary index of the Organization of Economic Cooperation and Development included a definition of a tax year as: any 12-month period assigned to a business entity accounting purposes (link: Glossary of Tax Terms - OECD)

4 - Regarding an accountant period, revise: article 3 of the executive list of income tax law issued by cabinet's decision no. (39) of 2019

5 - Revise: Article 1 of Minister's of Finance decision regarding reports each country distinctly.

Law no. (2) of 2015 regarding issuing a financial system in the country, a financial year is the period assigned to execution of the country's general budget, which is 12 months, starts from 1st of January and ends at 31st of December the same year.

Higher Management Responsibilities

The higher management must look at the annual report of the compliance officer and confirm it in writing that it has been considered and the work plan that emerged from its conclusions has been approved, if any work plan is to be approved. As stated in Circular no. (4) of 2022 about the responsibilities and tasks of higher management in subject entities⁶, a higher management shall commit to the following:

1. Approve the policies, procedures, and regulations followed by the subject entity to combat money laundering and terrorism financing.

2. Follow reasonable and adequate measures regularly and in time, to address deficiencies that the compliance officer addressed in the reports submitted periodically or upon request, including a work plan to correct them, which allows the entity to achieve the requirements of combating money laundering and terrorism financing according to provisions of the law, list, and rules.

Incompletion of the Report

In case the annual report of the compliance officer was incomplete, it shall require a resubmission of the report after addressing and avoiding the mentioned shortcomings.

Late Submission of the Report

A delay in the submission of the annual report of compliance officer shall result in the imposition of administrative and financial penalties stipulated in article 44 of law no. (20) of 2019 about the issuance of the law of combating money laundering and terrorism financing, which ranges between issuing written warnings to the withdrawal and cancelation of licenses and records.

6 - Revise Circular 4 of 2022 published on "Combating money laundering and terrorism financing section" page on the website, national and international legal frame- circulars. <https://www.moci.gov.qa/مكافحة-غسل-الاموال-و-تمويل-الإرهاب/>

Use of the Report Form

The section of combating money laundering and terrorism financing urges the subject entities to use the annual report form attached to this guide, to reassure covering all the requirements stipulated in article (23) of the rules.

All instructions and extra information are highlighted in "Italic Red", which provides more help to compliance officers to fulfill all the necessary issues that must be included in the report. Subject entities must delete the instructions and extra information highlighted in "Italic Red", as well as any items in the form that does not apply, when completing the report.

The use of report form is not mandatory to subject entities, only the section consider its use as "best practice" in preparing and submitting the annual report of compliance officer in application of the article (23) of the rules of combating money laundering and terrorism financing.

The form covers the minimum requirements of the annual report of compliance officer. It includes the evaluation of the relevance and effectiveness of the policies and regulations applied in the entity subject to combating money laundering and terrorism financing, report of suspicious transactions and violations, issues to be improved, training, clients classified in high-risk criteria, work plans related to combating money laundering and terrorism financing, reviews of policies, procedures, and systems of the subject entity, and risk evaluation.

The annual report of compliance officer shall state the way a compliance officer is evaluating the effectiveness of policies, procedures, and systems of the subject entity in preventing money laundering and terrorism financing. In case of determining any violations or shortcomings, the report must include detailed corrective work plans.

Important notes

The annual report of compliance officer is not a report to the Ministry of Commerce and Industry, rather it is a working mechanism a compliance officer uses to evaluate the effectiveness of policies, procedures, and systems of the subject entity, and help the higher management to fulfill its commitment and responsibilities according to the law, list, and rules.

The section of combating money laundering and terrorism financing has issued a self-evaluation form regarding combating money laundering and terrorism financing according to Circular (6) of 2022 about the self-evaluation survey of subject entities⁷, which is available on its website (guides and useful forms) via the following link:

Subject entities are urged to use this document when evaluating its commitment to the law, list, and rules of combating money laundering and terrorism financing.

The section reminds subject entities that submitting false or misleading information to the ministry with or without intention or hiding information in a way that misleads or deceives, is considered a violation of the law and rules of commitment.

⁷ Revise Circular 6 of 2022 published on "Combating money laundering and terrorism financing section" page on the website, national and international legal frame- circulars. <https://www.moci.gov.qa/مكافحة-غسل-الاموال-وتمويل-الارهاب/>

Annual Report of Compliance Officer to Higher Management Form

Data of Subject Entity and Compliance Officer:

Name of the company/ establishment/ corporation/ office (subject entity):

Commercial record number/ the entry number in the operating auditors record:

Number of commercial license:

Registered center/ business headquarters/ address/ (vocational) headquarter

Telephone number

e-mail

website (if any)

Compliance officer's full name:

Local address or residency address:

Position of compliance officer within the subject entity:

Date of assignment as a compliance officer and date the section was notified about it:

Compliance officer deputy's full name:

Position of compliance officer's deputy within the subject entity:

Date of assignment as a compliance officer's deputy and date the section was notified about it:

Information about structural organization and human resources of the section assigned in the subject entity
(if any)

Time period covered in the report: 1 January to 31 December (kindly enter the year)

Executive Summary:

According to article (23) of the rules of commitment, I the signed below, (kindly enter name of compliance officer), have prepared this report to be presented to the higher management, in carrying out my responsibilities represented in preparing an annual report on the issues of combating money laundering and terrorism financing, in a way to allow the higher management to achieve the requirements of combating money laundering and terrorism financing according to the provisions of the law, list, and rules.

A compliance officer is to make a brief presentation about compliance management at the subject entity through stating the main activities (tasks) and events related to preventing and combating money laundering and terrorism financing during the year covered in the report, main risks defined, and corrective measures taken.

A compliance officer must specifically include in the report the following:

- A summary of the procedures and measures applied in the subject entity within the field of combating money laundering and terrorism financing.
- Brief presentation about the systems, and procedures followed to implement the necessary measures (know your client) in the subject entity.
- Brief presentation about risk evaluation system in the subject entity, and how are high risk clients are dealt with.
- Changes in policies and procedures in the issues related to combating money laundering and terrorism financing.
- A brief about control operations the compliance officer has made within the subject entity to assess the compliance level of the entity to the requirements of combating money laundering and terrorism financing and its results.
- Criminal and disciplinary consequences taken against employees or administrators at the subject entity during the period covered in the report (if any)

Following is the results brief:

(kindly provide a brief about the results reached and specific issues and outcomings that require to be submitted to the higher management to consider)

Content of the annual report:

Pursuant to requirements of article (23) of rules of combating money laundering and terrorism financing, the annual report of compliance officer shall include at least:

1. Relevance and effectiveness- provision 1 of article (23) of the rules of combating money laundering and terrorism financing is to evaluate the relevance and effectiveness of policies, procedures, systems, and regulations of combating money laundering and terrorism financing:

I have assessed the relevance and effectiveness of policies, procedures, systems, and regulations of combating money laundering and terrorism financing certified in the office/corporation to prevent money laundering and terrorism financing through the following methodology:

(kindly clarify the way of evaluating the commitment to this requirement. What is the methodology used in evaluating the relevance and effectiveness of policies, procedures, systems, and regulations- Have you done any experiment or sample test?)

2. Internal and External report- provisions 2,3, and 4 of article (23) of the rules:

Provision 2: number and types of suspicious interactions reports the compliance officer has received.

Provision 3: number of suspicion reports the compliance officer has submitted to the unit.

Provision 4: Reasons of submitting suspicion reports to the unit, and reasons of not submitting suspicion reports to the unit about interactions to which suspicion reports have been reported.

Internal reports about suspicious interactions are reports a compliance officer receives from other employees and managers in the subject entity in case of suspicion or existence of reasonable reasons to suspect the commission of money laundering or terrorism financing crimes, where as a suspicion report is a report the compliance officer in a subject entity is assigned to report to the unit immediately, in case of suspicion or existence of reasonable reasons to suspect that an interaction, operation, or an attempt of any, regardless of its value, is related to the outcomes of an original crime or included in/related to terrorism financing.

The compliance officer has received a total of (kindly include the number of internal reports about the suspicious interactions) of internal reports about suspicious interactions during the period of (kindly include the period covered in the report from 1 January 2021 to 31 December 2021)

And a total of (kindly include the number of suspicion reports) suspicion reports have been submitted to the Financial Information Unit.

The reasons the suspicion reports are submitted are as follows (kindly include the reasons the suspicion reports have been submitted to the unit)

And a total of (kindly include the number of suspicion reports) of those reports have not been submitted to the Financial Information Unit due to the following reasons:

(If applicable, kindly address the reasons)

The section has been informed through a written notification that the subject entity (corporation or office) has submitted a total of (kindly include the number of suspicion reports) report/s to the Financial Information Unit without specifying any details of that report according to article (77) of the rules.

3. Reports of violations- provision 5 of article (23) of the rules: number and types of violations of the entity subject to provisions, list, and rules, or policies applied within its structure. .

(kindly select the answers applicable below, regarding if any violations were determined. The subject entities must obtain these information from its violations record to verify the accuracy of submitted reports about such violations)

I have revised the violations record of the subject entity, where the latter has committed the following violations of combating money laundering and terrorism financing law, its executive list, rules of commitment, policies, procedures, regulations, and certified measures:

Violations of combating money laundering and terrorism financing law, and its executive list

(kindly specify number and types of violations and way to address them)

Violations of combating money laundering and terrorism financing rules

(kindly specify number and types of violations and way to address them)

Violations of combating money laundering and terrorism financing policies, procedures, regulations, and measures certified in the subject entity

(kindly specify number and types of violations and way to address them)

Statement of the disciplinary actions taken against the employees or administrators of the subject entity who committed those violations (If any and such violations could be attributed to specific people in the subject entity)

Statement of the corrective measures taken to avoid the repetition of such violations and limit their impacts.

I have listed the violations which the entity subject to the provisions of the law, list, rules, and certified policies, procedures, regulations, and measures of combating money laundering and terrorism financing has committed.

4. Improvements- provision 6 of article (23) of the rules: issues to be improved in the policies, and programs applied in the subject entity, and suitable suggestions to avoid any shortcomings in combating money laundering and terrorism financing.

(kindly delete parts that does not apply)

I have specified the following areas to be improved in the certified policies, procedures, regulations, and measures in the subject entity, and have proposed suitable improvements as follows:

(kindly specify the improvements, work plans/time plan, required resources, determine the person assigned to improvement process, higher management participation and support, etc. In case those areas have not been tackled, kindly specify the reasons, and suggest corrective plans)

I have revised the policies, procedures, regulations, and measures certified in the subject entity, and there isn't any field to be improved, or any suggestion to be considered, following is my explanation to such outcomes:

(kindly explain the reasons why no improvements needed)

5. Training- provision 7 of article (23) of the rules: a summary of the training courses on combating money laundering and terrorism financing provided to administrators and employees in the subject entity, and suggestions to improve training program.

A subject entity shall set and design a training program about combating money laundering and terrorism financing that is relevant and sustainable to its managers and employees, in a way guarantees they obtain enough awareness and perception to:

- a. Their legal and censorship responsibilities and duties, especially those included in the law, list, and rules of commitment.
- b. Their role in preventing money laundering and terrorism financing and the responsibility they or the subject entity may fall on from due to being involved in money laundering or terrorism financing operations, or not committing to the law, list, or rules.
- c. The applied regulations to control the risks of money laundering and terrorism financing and decrease them, the role of compliance officers, and the nature and importance of due diligence measures.
- d. The risks, techniques, directions, patterns, and indicators of money laundering and terrorism financing, the weaknesses in products and services provided by the subject entity and how they are provided, and how information are pursued and evaluated to expose suspicious interactions.
- e. Internal workflow of the subject entity internal reports of suspicious interactions.

∩The following training courses in combating money laundering and terrorism financing have been provided to administrators and employees of the subject entity in a way reassures they obtain the knowledge, qualifications, and abilities needed to combat money laundering and terrorism financing and improve them to keep up with the latest techniques, directions, patterns, and indicators of money laundering terrorism financing, in line with the requirements of article (84) of the rules.

(kindly include a summary of the training courses provided, for example: the title of the course, its main aspects, type of training:(in actual presence or online, training upon assigning or during service, training inside or outside the corporation...), date, time-period, number of participants. In case training courses weren't held, kindly address the reasons. And kindly revise article (84) of the rules of combating money laundering and terrorism financing for more information about the level of training that must be provided to administrators and employees in the subject entity, including the compliance officer and his deputy).

(kindly delete parts that does not apply)

(Mention the courses the compliance officer participated in for improvement purposes, and to update his skills and knowledge in combating money laundering and terrorism financing).

I have specified the following fields that require improvement in the training courses of the subject entity, and I have proposed improvements as follows:

(kindly specify any fields that require improvements, including any suggestions and implementation timetable)

No fields to be improved detected in the training courses of the subject entity, and I am convinced of the company/office commitment to the requirements of article (84) of the rules..

6. Clients classified as high-risk clients- provision 8 of article (23) of the rules: a statement of the subject entity's clients and the clients classified as high-risk with consideration of the outcomes of the national risk evaluation and the business risk evaluation stipulated in article (24) of the rules.

(kindly select the suitable answer that applies in line with the requirements included in article (23) of the rules of combating money laundering and terrorism financing)

The subject entity is to determine, evaluate, and understand the risks of money laundering and terrorism financing within its work environment by considering the risk factors related to its clients or possible clients, the real beneficiaries⁸ of the clients, and the beneficiaries from the clients interactions.

Following are the number and total of the subject entity's clients classified as high-risk client, according to the curriculum based on in article (24) of the rules of money laundering and terrorism financing.

Normal People

(kindly specify the number of normal people classified as high-risk, especially politicians risk-potentials, their family or relatives, and the number of clients who holds a high-risk nationality or live in a high-risk country)

Moral People

(kindly specify the number of non-profit corporations/organizations classified as high-risk, where the politicians who are risk-potentials are the real beneficiaries or the higher management members)

Legal Arrangements (including Awqaf)

(kindly specify the number of direct investment funds or any other similar arrangements)

Others

(kindly specify the number)

High-risk clients haven't been detected in the subject entity according to the curriculum based on the risks stipulated in article (24) of the rule of combating money laundering and terrorism financing.

8 - Revise Circular no. 6 of 2020 about high-risk countries that acquires financial business groups to take actions on them, and countries under intense censorship like going continuously to high-risk window in the section of combating money laundering and terrorism financing page

7. Work plans- provision 9 of article (23) of the rules: the achieved progress in the application of any work plans related to combating money laundering and terrorism financing. .

(kindly select the answers that apply, where subject entities might have several work plans emerging from self-evaluation, auditing, independent review, or the risk assessment visit conducted by the Ministry of Commerce and Industry).

Once the evaluation of relevance and effectiveness of policies, procedures, regulations, and measures certified to combat money laundering and terrorism financing in the subject entity is finished, the following work plan is applied/will be applied in relation with combating money laundering and terrorism financing:

(kindly specify the details related to any work plans, including work plans applied in the period covered in the report, based on the outputs of the annual report of the compliance officer for the previous year)

(kindly specify the details of any changes in the subject entity's operations related to combating money laundering and terrorism financing that have occurred during the period covered in the report. It shall include any changes as well in policies, procedures, regulations, and measures, specifically "know your client", and "client due diligence measures", client identification documents, the process of accepting new clients who are classified as high-risk, check-ups according to the penalty list, transactions' monitoring, and reporting suspicious transactions. Kindly address any changes in detail)

In addition to that, article (16) of the rules of combating money laundering and terrorism financing should be considered- higher management approval of a work plan, and article (58) cases that do not acquire clients due diligence measures application on businesses transferred to the subject entity, and article (86) completing and revising a training course.

After conducting the self-evaluation of policies, procedures, regulations, and measures a subject entity certified to combat money laundering and terrorism financing, the following work plan related to combating money laundering and terrorism financing has been applied:

(kindly specify the detailed work plan applied after conducting the self-evaluation of risks related to combating money laundering and terrorism financing)

After the risk evaluation visit conducted by the Ministry of Commerce and Industry's field monitoring team during the period covered in the report, the following work plan was applied in relation with combating money laundering and terrorism financing:

(The Ministry of Commerce and Industry's field monitoring team may have conducted a risk-evaluation visit during the period covered in the report and issued a report and/or risk reduction program. Kindly specify details of the outcomes related to combating money laundering and terrorism financing included in the annual report of the compliance officer that has been submitted to the higher management and the suggested corrective measures)

8. Audit reviews and quality assurance 9- provision 10 of article (23) of the rules of combating money laundering and terrorism financing: outcomes emerging from auditing reviews or quality assurance related to the policies applied in the subject entities.

Combating money laundering and terrorism financing program must include an independent auditing unit to evaluate, review, and test the adherence to policies levels continuously. The test includes the program of combating money laundering and terrorism financing, personnel investigation procedures, keeping and maintaining records, constant monitoring of clients. The subject entity shall consider a review at least once in two years by its internal auditing unit or the compliance officer of any other branch of the entity, the review and test may as well be conducted by an external auditor or another qualified independent person.

(kindly select the answers that apply)

During the period covered in the report, a quality assurance review, an independent review, or auditing of the policies, procedures, regulations, and measures certified in the subject entity has been conducted by (kindly define the review conductors, names of people, their qualifications, and skills in combating money laundering and terrorism financing, expertise, and knowledge).

This review has been conducted according to article (8) of the rules.

(kindly specify the period covered in the independent review, knowing that the last paragraph of article (8) of the rules requires that all subject entities must conduct an independent review once in two years where the first report must be submitted to the section by 31 July 2021, and every two years after that date 10).

Following are the outcomes of the review (reviews):

(kindly specify the outcomes and recommendations concluded from the quality assurance review, independent review, or auditing, inclusive of the general frame of combating money laundering and terrorism financing evaluation of the subject entity, any work plans, plans due dates, and names of personnel responsible of plans' achievement.

During the period covered in the report, there isn't any quality assurance review, independent review, or auditing of the policies, procedures, regulations, and measures certified in the subject entity has been conducted.

Due to the following reasons:

(kindly specify the reasons that led to not conducting any review of quality assurance, independent review, or auditing, taking into consideration the requirements of article (8), and provision 4 of article (15) of the rules of combating money laundering and terrorism financing, and the subject entity policy regarding the providing of an independent auditing position and the related resources)

¹⁰ يرجى الإطلاع على الدليل الإرشادي الخاص بإعداد تقارير المراجعة المستقلة بشأن مكافحة غسل الأموال وتمويل الإرهاب الصادر عن وزارة التجارة والصناعة، منشور على صفحة قسم مكافحة غسل الأموال و تمويل الإرهاب <https://www.moci.gov.qa> /مكافحة-غسل-الأموال-و-تمويل-الإرهاب / يرجى مراجعة التعميم رقم 7 لسنة 2020 بشأن تنفيذ قواعد التزامات مدققي الحسابات و تجار المعادن الثمينة أو الأجار الكريمة و مقدمي خدمات الصناديق الاستثنائية و الشركات بمتطلبات مكافحة غسل الأموال و تمويل الإرهاب المنشور على الموقع الإلكتروني لصفحة القسم - الاطار القانوني الدولي و الوطني – التعميم. <https://www.moci.gov.qa> /مكافحة-غسل-الأموال-و-تمويل-الإرهاب/

9. Risk evaluation outcomes- provision 10 of article (23) of the rules of combating money laundering and terrorism financing

(kindly select the answers that apply)

During the period covered in the annual report, the policies, procedures, regulations, and measures related to risk evaluation in the subject entity have been reviewed, and the conclusions are as follows:

(kindly specify the corporation/office's general risk rank, risk classification methodology, outcomes of any assessment of policies, procedures, regulations, and measures related to risk evaluation in the subject entity in combating money laundering and terrorism financing).

During the period covered in the annual report, there isn't any review of the policies, procedures, regulations, and measures related to risk evaluation certified in the subject entity conducted, due to the following reasons:

(kindly address the reasons of not conducting any reviews and dates of upcoming reviews scheduled)

Outcomes

After evaluating the relevance and effectiveness of policies, procedures, regulations, and measures certified in the corporation/office to prevent money laundering and terrorism financing, the outcomes concluded are as follows:

(kindly provide a summary of the outcomes concluded, and a report of how effective the certified policies, procedures, regulations, and measures in the corporation/office are and define the related shortcomings. In addition to that, address any other issues to discuss with the higher management, for example: systems development, etc.).

Recommendations

Based on the outcomes referred to in the previous part, I present these recommendations to your consideration, according to article (16) of rules of combating money laundering and terrorism financing:

(kindly specify any recommendations and time frames suggested to achieve them)

1.

2.

3.

Signature:

Name:.....

Job title:.....

Date:

Higher management report consideration- article (16) of rules of combating money laundering and terrorism financing, Circular no. (4) of 2022 about the responsibilities and tasks of the higher management of a subject entity:

(A higher management in a subject entity is obligated to consider any report submitted to it by the compliance officer, within (5) months of the end of a calendar year. In case the report addresses any shortcomings in the subject entity's commitment to the law, list, and rules in relation, a work plan is approved to treat the shortcomings on time- articles (16) & (87) of the rules mandates a higher management in a subject entity to reassure its commitment to the requirements of maintaining and keeping records)

On behalf of the higher management in the subject entity, I (name and job title) assure that the report of compliance officer has been considered under article (16) of the rules. I also confirm compliance with the general requirements, as stipulated in article (87) of the rules.

(The higher management considering and signing the report must be independent of the compliance officer's position)

The higher management has provided the following notes in relation to the report:

(The higher management shall provide any notes or feedback related to the annual report of the compliance officer, inclusive of the approval of a work plan to treat any flaws addressed in time)

Signature:

Name:.....

Job title:.....

Date:

