



وحدة المعلومات المالية
Financial Information Unit

INSTRUCTIONS ON IMPLEMENTING Suspicious Transactions Reporting Requirements

Guidance to All Reporting Entities

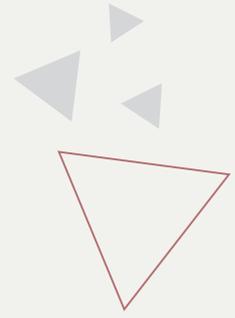
April 2024



**In the Name of God,
Most Gracious Most
Merciful**



وحدة المعلومات المالية
Financial Information Unit



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● April 2024



Introduction



Given the rapid pace of international developments and emerging challenges, the State of Qatar issued Law No. 20 of 2019 on Combatting Money Laundering and Terrorism Financing, as amended by Decree Law No. 19 of 2021, and its Implementing Regulations, to address the relevant emerging money laundering and terrorism financing risks.

The new Law included significant amendments to the reporting system in financial institutions (FIs), and Designated Non-Financial Businesses and Professions (DNFBPs) to enhance the overall efficiency of the AML/CFT system.

As the process of reporting suspicious transactions or operations related to money laundering, associated predicate offences, and/or terrorism financing is considered essential for an effective national AML/CFT system, filing and receiving quality suspicious transactions reports (STRs) in a timely manner is a prerequisite to a robust system.

Since the inception of the Forum of the Public-Private Dialogue in 2018, Qatar Financial Information Unit (QFIU) was keen to reach out to all reporting entities by holding periodic meetings with representatives of both sectors, to exchange views and feedback on how to submit high quality reports. During these meetings, QFIU discussed ways of improving the quality of reporting STRs, including the Reporting Guidance, the first version of which was issued in 2018 to relevant reporting entities.

As such, based on the new requirements set by the Law and its Implementing Regulations, meetings outcomes and discussions with the reporting entities, feedback of the concerned authorities and entities, and international best practices, the QFIU is issuing this document, which represents the Instructions that must be followed by all reporting entities when submitting reports or STRs to QFIU. The current Instructions on Implementing Suspicious Transactions Reporting Requirements supersedes the Guidance previously issued.

“ QFIU is issuing this document, which represents the Instructions that must be followed by all reporting entities when submitting reports or STRs to QFIU ”

01

Reporting Suspicious Transactions



0 Reporting Suspicious Transactions

The reporting scope of suspicious crimes was amended to include money laundering, terrorism financing, and predicate offences, as stipulated in the provisions of the AML/CFT Law:

Article 21

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.

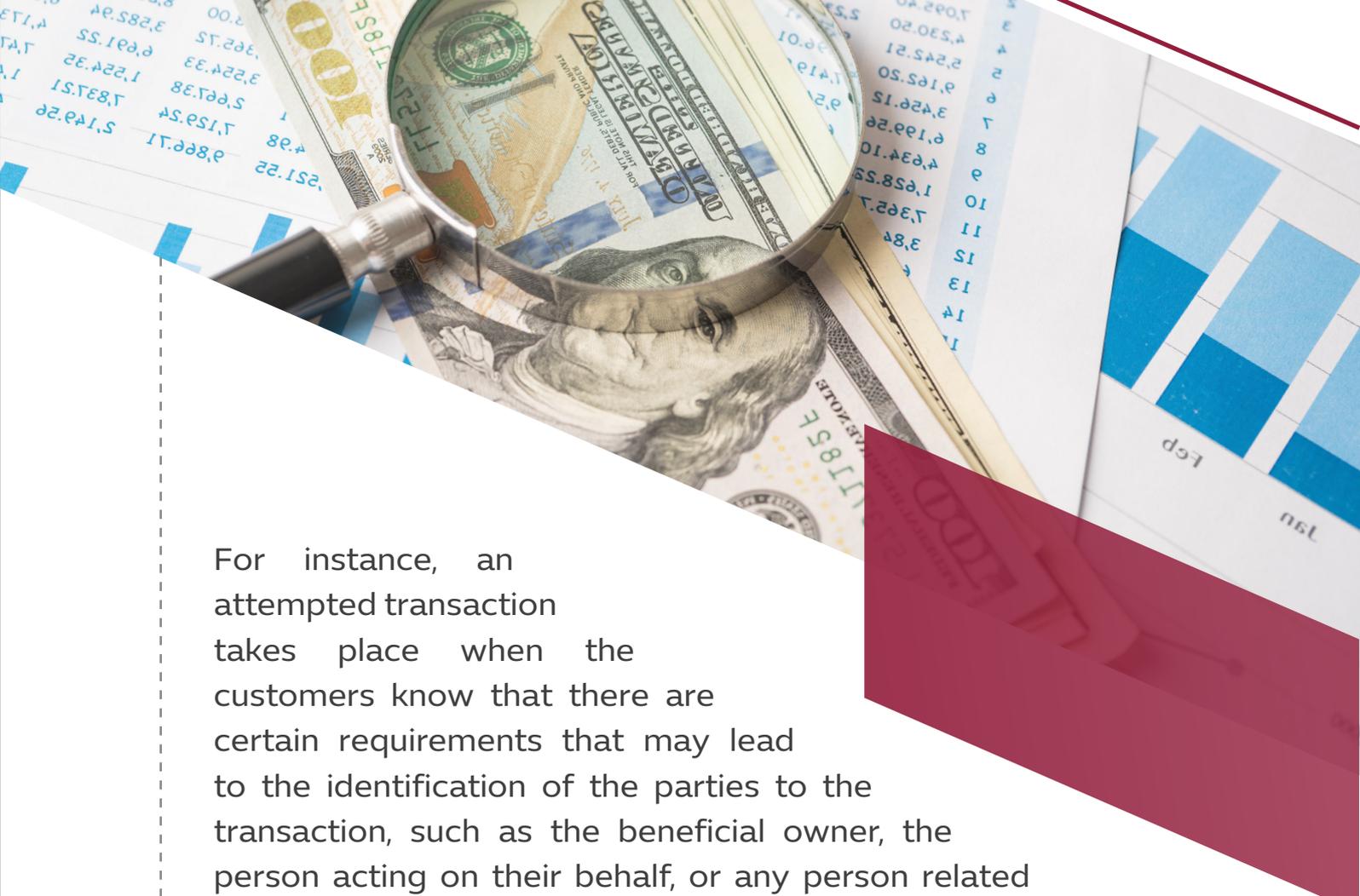
Article 32

The Unit shall serve as the national center responsible for receiving and analyzing Suspicious Transaction Reports from financial institutions and DNFBPs, as well as any other information related to money laundering, associated predicate offences, and terrorism financing, and for disseminating, spontaneously or upon request, the results of that analysis to competent authorities.

To ensure good quality content and format, reporting entities must take into account the following when reporting suspicious transactions to QFIU:

1 Reporting Completed or Attempted Transactions

The reporting obligations of the entities extend to completed transactions that have occurred and have existing suspicious elements as stated hereunder; and attempted transactions, that the customer intended or started to conduct and did not complete for any reason that may give rise to the suspicion of the reporting entity; or in cases where the reporting entity is unable to comply with some due diligence measures.



For instance, an attempted transaction takes place when the customers know that there are certain requirements that may lead to the identification of the parties to the transaction, such as the beneficial owner, the person acting on their behalf, or any person related to the transaction, which make the customers change their mind and not complete the transaction. It should be noted in this case that the reporting entity or officer must state such details in the “Details of the Suspicious Activity”, and that supporting documentation, such as identifying information of the customer as verified by the reporting entity, must be included, as appropriate.

2 Timeliness of Submitting Suspicious Transaction Reports

Timely reporting is a very important factor in the reporting process, as it directly affects the effectiveness of the report. Therefore, reporting entities must adhere to the following time limits to implement the requirements:

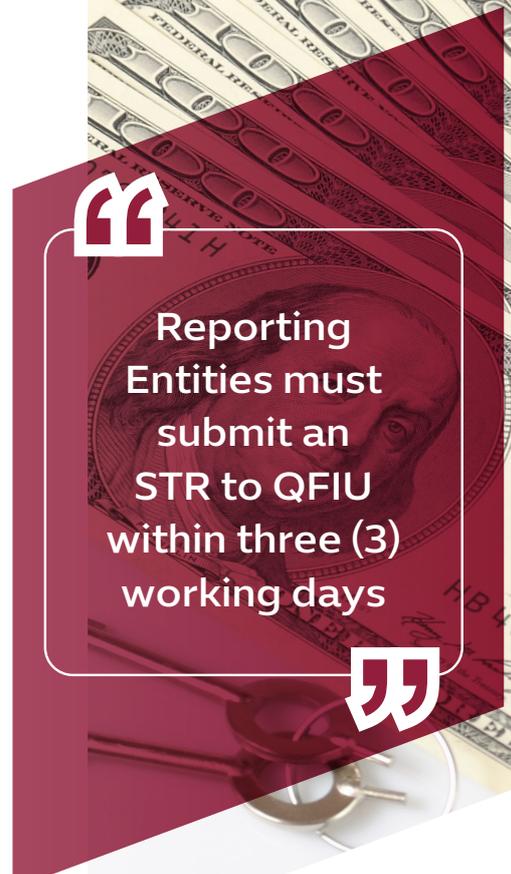
- Reporting Entities must submit an STR to QFIU within three (3) working days from determining, according to their internal regulations, that they suspect or have reasonable grounds to suspect that a transaction is related to proceeds of crime.

- **Within 24 hours** of the reporting entity determining, according to its internal regulations, that the transaction is suspicious and is linked to a terrorist, a terrorist act or a terrorist organization, or suspected of being related to high-risk crimes as stated in the National Risk Assessment.

Non-working days are excluded from the counting of the prescribed reporting period as follows:

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

The reporting entity must outline in the “Details of the Suspicious Activity” the suspicion date to reflect the extent of its compliance with this requirement, knowing that this is subject to the supervision of the relevant supervisory authorities.



3

No Monetary threshold amount for reporting suspicious transactions

There is no monetary threshold amount for reporting suspicious transactions. Suspicious activity arises from suspicion relating to the expected behavior of the customer or other customers of the same category.

It should be noted that certain types of high-risk crimes might be committed without the need for large amounts, such as terrorism financing.

4

Content of the Suspicious Transactions

Reporting entities must report to QFIU any transactions or activities suspected of being related to money laundering, predicate offence or terrorism financing. The reporting scope includes all predicate offences that include felonies and misdemeanors whenever the suspected offence generates proceeds, such as robbery in aggravated circumstances, fraud, embezzlement, etc.

Reporting Entities must promptly report to QFIU any information concerning any transaction or activity when there is a suspicion or reasonable grounds to suspect that:

- the transactions and operations are associated with, or involve proceeds of a criminal activity or a predicate offence; or
- the transactions and operations are linked to a terrorist, a terrorist act or a terrorist organization.

“Reasonable grounds to suspect” are determined by what is reasonable in the reporting entities’ circumstances, including normal business practices and systems within the industry, as defined in this Guidance.





5 Suspicion Criteria

Suspicion involves subjective and objective criteria. The objective criteria depend largely on the information that the reporting entity has collected about the customer and/ or what is available to it about customers belonging to the same category of the reported customer. As such, the reporting entity may become suspicious of the customer's transactions when any deviation from such criteria is identified.

It should be noted that reporting entities often get alerted to the objective criteria via Transaction Monitoring Systems used to monitor customers' transactions. Therefore, when there is a deviation in such criteria, the monitoring systems generate alerts to the reporting entity.

The subjective criteria, on the other hand, reflect the contextual circumstances and the experience of the person who reviews the alerts or patterns indicating the deviation in the customer's transactions or any unusual behavior by customers belonging to the same category of the suspected customer.

In order to reach the reporting bar set by the law; i.e., "reasonable grounds for suspicion", the suspicion must be based on objective and subjective factors, as stated above. When submitting a suspicious transaction report, the Money Laundering Reporting Officer (MLRO), must clearly outline all these criteria for suspicion in a way that shows the information and logic that lead to the formation of the suspicion based on the information available to the reporting entity, which must be included in the "Details of the Suspicious Activity".

On the other hand, the context in which the transactions are completed or attempted is considered an important factor in assessing the suspicion, and this context varies according to the reporting entity and to the customer subject of the suspicious transaction report.

Reporting entities should remember that suspicion is usually formed based on the behavior, which must be reported, not people. This means that suspicion should be based on the combination of a number of factors. One single factor is not usually enough to form a solid basis to suspect that there are reasonable grounds to conclude that the transaction is related to a committed or attempted money laundering crime, or terrorism financing crime, or predicate offence. **All circumstances surrounding a transaction must be reviewed in order to reach a sound decision.**

To enhance their ability in detecting suspicious transactions, reporting entities should refer to patterns internationally and regionally recognized or known to QFIU, to understand the association of certain types of transactions or behavioral patterns with particular crimes.

You are kindly advised to review the guidance on typologies and patterns issued by FATF and FATF Styled Regional Bodies, and other International Organizations that have been made available to reporting entities by QFIU on its website⁽¹⁾.

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Suspicion should be based on the combination of a number of factors. One single factor is not usually enough to form a solid basis to suspect.

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1) http://www.qfiu.gov.qa/?page_id=36

02

STR Requirements



1 Registration of MLROs⁽²⁾ and Deputy MLROs

All reporting entities should submit the credentials of their Money Laundering Reporting Officer (MLRO), and Deputy MLRO, in order to be registered in the Approved Reporting Officers Database.

For registration, reporting entities should submit to QFIU the following documents:

- A** Letter to QFIU requesting access to E-STR and/or designating their MLRO, and/or Deputy MLRO as their authorized Reporting Officer;
- B** Approval from the concerned Supervisory Authority on the appointment of the reporting entities' MLRO, and/or Deputy MLRO;
- C** Valid Identification Documents of the MLRO, and/or Deputy MLRO (QID, Passport); and
- D** Complete the registration form of the MLRO, and/or Deputy MLRO⁽³⁾.

The reporting entity must, immediately and without delay inform QFIU of any changes in the reporting entities' MLRO or Deputy MLRO, as per the form designed for this purpose, and provide QFIU with the approval of the concerned Supervisory Authority for the appointment and resignation of the MLRO or Deputy MLRO.

No STRs will be accepted unless submitted by the approved MLRO, or Deputy MLRO. If STRs are submitted by other persons in different positions within the reporting entity, QFIU will take the necessary procedures in this regard.

² Or Compliance Officer according to the context.

³ https://www.qfiu.gov.qa/?page_id=2522

For more information regarding registration, reporting entities may reach QFIU at qcd@qfiu.gov.qa.

2 STR Form

All reporting entities must submit STRs to QFIU using the required STR Form. Reporting entities not connected to the QFIU E-STR must use the STR paper form to report suspicious transactions, which is available on its website⁽⁴⁾. In all cases, the STR Form must be signed by the MLRO or Deputy MLRO.

3 Overview of the Fields of the STR Form

Mandatory and Optional Fields



The STR form includes a number of mandatory fields referred to in the relevant fields as “mandatory.” The MLRO or the Deputy MLRO must ensure that the required data is filled out in the designated fields, as required, including all the details available to the reporting entity.

Accurate Information



It is essential to complete all relevant fields in the STR Form with accurate information. The information included in the report depends on the nature of the relationship between the reporting entity and the suspected customer. When making the report, the reporting entity must include the information obtained from the customer in application of the instructions of the supervisory authorities in relation to the Know Your Customer (KYC) measures, and must ensure that the customer is not tipped off.

⁴ http://www.qfiu.gov.qa/?page_id=1413

The STR form approved by the QFIU includes the following information:

A Submission Details

This Part is related to the reporting entity that filed the suspicious report, which is defined by the Law as financial institutions and designated non-financial businesses and professions (DNFBPs). This Part enables the reporting entity to indicate its name, the nature of its business, its relevant sector, the name and contact information of the MLRO or the Deputy MLRO who submitted the report.

B Reporting Details

- **New STR or STR linked to a previous report:** this part enables the reporting entity to identify some matters that are related to the suspicious report itself, which clarifies whether the report is a new report or linked to the initial report previously submitted to the QFIU.

If the STR is linked to a previous report, the reporting entity must indicate this in the designated field, by mentioning the reference number and the date of reporting of the STR previously filed with QFIU. The reporting entity must also restate the previous elements of suspicion, even if the reference number of the initial report is included in the new report, in addition to the other reasons for suspicion that prompted the submission of another STR involving the same person(s).

- **Type of the suspicious crime:** this Part enables the reporting entity to indicate whether the report is linked



to a predicate offence, money laundering, terrorism financing or sanctions (i.e. targeted financial sanctions) or proliferation (i.e. targeted financial sanctions related to proliferation).

- **Determining urgent actions**: this Part enables the reporting entity to indicate whether the report requires urgent action or not. In cases where the report requires urgent action, such as postponing transactions or freezing, it is preferable that the reporting entity contacts QFIU officials to highlight the urgency of the report.

In case of STRs requiring URGENT action, reporting entities should contact QFIU, as follows:

Analysis Department

By Telephone: +974 44456368

- **Type of the predicate offence**: this Part enables the reporting entity to indicate the suspected predicate offence the report may be related to, or which are suspected of having generated proceeds subject of the report.
- **Reason for suspicion**: this Part enables the reporting entity to define the indicators that lead to the suspicion reached by the reporting entity.
- **Number and value of transactions**: this Part includes fields where the reporting entity can indicate the number of transactions reported and value of the transactions.
- **Type of fund, service or product used**: this Part enables the reporting entity to outline the channel used for conducting the transaction(s) reported as suspicious.



C Details of the Suspects and their Associates, and Account Information

This Part is divided into four sections, as follows:

- 1 Section (3) should be used to provide the data of the suspected natural person.
- 2 Section (4) should be used to provide account information data related to the suspects. Please consider possible updated accounts. Ex. Wallet info.
- 3 Section (5) should be used to provide the data of the suspected legal persons.
- 4 Section (6) should be used to provide the data of the suspected legal arrangements, such as Trusts and Endowments.

In cases where the STR is wholly or partially about natural persons, legal persons and/or legal arrangements, the designated field related to each type of suspect must be filled out as per the STR Form, as applicable or appropriate.

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In case of Bulk reports (where there are common suspects/beneficiaries/persons/multiples parties), the reporting entity must clearly indicate the common links between them and attach to the file a report clarifying the links in a manner that provides the conviction that there is a pattern or typology used.

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D Details of the Suspicious Activity

This Part enables the reporting entity to clarify the circumstances surrounding the suspicious transaction that is reported to the QFIU, which includes a statement of the branch/place in which the suspicion occurred, the date of the suspicious transactions, how the suspicious transaction was identified, and the detailed narrative about the suspicious activity, including the factors or unusual circumstances that led to the suspicion.

The field of reason for suspicion must include an adequate narration of the reasons that led the reporting entity to suspect the transactions or the behavior of the reported person. The reporting entity, should in the reason for suspicion, clarify the extent it knows its customer, his usual behavior in normal circumstances, and his unusual behavior that led to the suspicion.

When the reporting entity decides not to conduct the KYC measures to avoid tipping off, it should explicitly mention it in the narrative, provided that this should remain the exception rather than the rule.

Reporting entities should provide as many relevant details as possible to support their grounds for suspicion. The following checklist can be used as a guideline in this regard:

- Identification of the beneficial owner of the suspicious transactions.
- Identification of associated entities and individuals and the relationships between them, for example business associates or family members. The correct names of individuals and entities involved in transactions.



- How did they get involved?
- What is the location of the suspicious property associated with the person being reported? (Example: real estate in (state, territory, region, etc.), shares in a company with a commercial registry, etc.)
- When did the suspicious transaction/activity take place (i.e., events in chronological order and the suspect's scheme identified by the reporting officer).
- Description of the circumstances that gave rise to the suspicion of the reporting officer.
- Identification of all involved accounts and transactions in chronological order by date and amount - account name and information, transaction history, and any other documents.
- Avoiding use of acronyms and jargon as it may not be understandable and may lead to misinterpretation or may imply an opposite interpretation.
- When applicable, the reporting entity should disclose in the STR that the suspected person or entity is subject to an ongoing investigation by a law enforcement authority in coordination with the reporting entity. In such cases, the reporting entity should not mention or reveal the names of the law enforcement officials conducting the investigation but rather the relevant authority or the Department in charge, and the files numbers and other investigative references.

“

Reporting entities should not limit reasons for filing an STR to receiving a request from a competent authority to provide financial information on certain persons or entities; but rather the reporting entity should provide an overall analysis along with its conclusions based on its own analysis of the customer's transactions/operations.

”

D Supporting Documentation

This Part allows the reporting entity to attach any supporting documents relevant to the STR, such as identifying documents of the suspect, transaction records, etc., that must be as much as possible updated and complete.

4 How to submit the STR

Reporting entities that are connected to the QFIU E-STR must report electronically suspicious transactions, using their credentials (assigned username and password).

As to reporting entities that are not connected yet to the E-STR- or in Urgent cases- they must file the report as appropriate using the approved STR paper form and manually submit it to the QFIU in a sealed envelope at the following address:



Qatar Financial Crime Centre

Al Baladiya Street 810, Building 11, 8th Floor

Doha, P.O. 1234

5 Validation of STRs

Suspicious transactions reports have been instrumental in enabling competent authorities to initiate investigations. STRs are linked to information protected under the common law. Therefore, reporting entities must, when reporting any suspicious transaction, take into account the format and content limitations set by QFIU, in line with the procedures and safeguards established.

QFIU shall confirm that STRs received from reporting entities are valid, meet both the formalistic as well as objective criteria, and submitted in a timely manner by the authorized officer.

If the STR does not meet any of the formalistic or objective criteria, or where it does not contain sufficient information, QFIU shall provide the reporting entity with a relevant feedback, ask for more information, and/or require the concerned reporting entity to submit a new/revised/amended STR, through a notification.

From the date of notification, the reporting entity shall have five (5) days to submit the additional information, and/or submit a revised/amended STR to QFIU. QFIU shall review the STR after receipt of the additional information, and/or receipt of the revised/amended STR.

In case of non-submission of the requested additional information by the reporting entity within the required timeline, or when the revised/amended STR does not meet the essential requirements/criteria, QFIU may reject the STR. QFIU shall inform the reporting entity that the STR had been rejected, along with the relevant reason(s) for rejection.

QFIU shall keep on file or record all rejected STRs and provide a report on such records to the supervisory authorities on reporting entities' compliance with their obligation to submit STRs, including an assessment on the quality of STR submissions.



03

Feedback on STRs



0 Feedback on STRs

In order to raise the awareness of the reporting entities and enhance the efficiency of the reporting system, the QFIU provides two types of feedback to the reporting entities as follows:



General feedback:

- It includes acknowledgment of receipt of the STRs filed by the reporting entities.
- The general feedback also includes the comments and presentations that QFIU shares with the reporting entities during periodic meetings held in the framework of QFIU Forum of the Public-Private Dialogue.



Special feedback:

- The special feedback includes the notification of the status of STRs filed by the reporting entities, which meet the format and content criteria for STRs and are under consideration by the QFIU.

The following is an explanation on how the QFIU provides feedback to reporting entities:

1 Feedback on STR Receipt

For entities connected to the QFIU E-STR, QFIU will provide initial feedback to the reporting entities by acknowledging the receipt of the STR filed and the date of receipt, along with the STR Reference Number generated in QFIU.

For entities that are not connected to the E-STR, QFIU will stamp the STR envelope on the date of receipt. The stamp serves as the acknowledgement of receipt of the STR.

2 Feedback on the STR

If the STR does not meet the formalistic and objective criteria or is not complete, QFIU shall provide feedback to the concerned reporting entity and ask for more information, or require resubmission of a complete STR, as follows:

- For entities that are connected to the E-STR, QFIU will notify them via email the STR reference number recorded in the QFIU database, requiring the concerned reporting entity to provide additional information, or resubmit the STR.
- As to the reporting entities that are not connected to the E-STR, they will be notified via secure e-mail using the same STR reference number of the reporting entity.

3 Feedback on Rejecting the STR

In case of non-submission of the requested additional information within the required timeline, or when the resubmitted STR do not meet the additional requirements or criteria, QFIU may reject the STR. QFIU should inform the reporting entity that the STR had been rejected, along with the relevant reason(s) for rejection.

QFIU will communicate the rejection using the reference number of the reporting entity. Data included in the rejected report is filed in the QFIU database and will be used when necessary.

4

Feedback on Action and Measures taken by QFIU

The QFIU should provide the reporting entities with a feedback on the STRs submitted as follows:

- With regard to STRs filed administratively in QFIU database after analysis, reporting entities will be provided with the STRs reference biannually.
- For STRs that were disseminated or referred after analysis to the competent authorities, upon the discretion of QFIU, the reporting entity will be notified upon dissemination, as appropriate.

5

Requests for additional information by QFIU

Under Article (32), Paragraph (3) of AML/CFT Law, QFIU may require financial institutions and DNFBPs to submit additional information within the time limits set and the form specified by the Unit, when such information is necessary to the Unit's own analysis. In case of failure by the financial institutions or the DNFBPs to abide by the obligations provided for in the Law, the Unit and the concerned supervisory authority should take the relevant necessary procedures.



04

Compliance



0 Compliance

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

01 Article 82

Failure to submit an STR to QFIU; and



02 Article 84

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 case of non-compliance by a reporting entity, QFIU will adopt the following procedures:

01 After the deadline to comply with the order or request, QFIU will issue to the reporting entity a reminder to comply with the order or request for information within three (3) days;

02 After the lapse of the grace period given to comply with the order or request, the QFIU will warn the reporting entity that in case of continued non-compliance, it will take the necessary procedures in coordination with the supervisory authority. The reporting entity is given another three (3) days to comply with the order or request; and

03 With the continued non-compliance by the reporting entity with the instructions of its supervisory authority, QFIU will, in cooperation with the relevant supervisory authority, take the necessary procedures. Reporting entities that fail to meet their obligations could be subject to administrative and financial sanctions.

05

How to contact QFIU



0 How to contact QFIU

Reporting entities may send any inquiries or suggestions to exchange views and enhance the efficiency of the reporting system, as follows:

By post at the following address:



Al Baladiya Street 810, Doha P.O. 1234
Building 11, 8th Floor, Qatar Financial Crime Centre



By Telephone: +974 4422 2487
+974 4422 1511



By Email: info@qfiu.gov.qa



Definitions



0 Definition

Term	Definition
Law	Law No. (20) of 2019 on Combatting Money Laundering and Terrorism Financing.
Implementing Regulations	Council of Ministers' Decision No. (41) of 2019 Promulgating the Implementing Regulations of Law No. (20) of 2019 on Combatting Money Laundering and Terrorism Financing.
QFIU	Qatar Financial Information Unit.
Supervisory Authorities	Competent authorities responsible for licensing or supervising financial institutions, Designated Non-Financial Businesses and Professions (DNFBPs) and Non-Profit Organizations (NPOs), or for ensuring compliance thereof with the AML/CFT requirements, as stipulated in the Implementing Regulations.
Financial Institutions	<p>Refers to any natural or legal person who conducts as a business one or more of the following activities or operations for or on behalf of a customer:</p> <ol style="list-style-type: none"> 1 Accepting deposits and other repayable funds from the public; 2 Lending, including consumer credit and mortgage credit; financing of commercial transactions (including forfeiting and factoring whether with or without the right to recourse); 3 Financial leasing, except for leasing arrangements related to consumer products; 4 Money or value transfer services. This shall not apply to any natural or legal person providing the financial institutions with support or messaging systems for funds transfer;

Financial Institutions

- 5 Issuing or managing means of payment(such as credit and debit cards, cheques, traveler’s cheques, transfers, bank cheques, electronic money, money orders, bankers’ drafts);
- 6 Financial guarantees and commitments;
- 7 Activities related to securities;
- 8 Trading in money market instruments(such as cheques, bills, certificates of deposit, financial derivatives, etc.), foreign exchange, currency exchange instruments, interest rate, index instruments, transferable securities and commodity futures trading;
- 9 Participating in securities issues and providing financial services related to such issues;
- 10 Management of individual or collective portfolio;
- 11 Safekeeping and administering cash or liquid securities on behalf of, or for the benefit of, other persons;
- 12 Investing, administering or managing funds or money on behalf of, or for the benefit of, other persons;
- 13 Underwriting or placement of life insurance and other investment related insurance; this shall apply to insurance intermediaries (agents and brokers);
- 14 Money and currency changing;
- 15 Any other activity or transaction defined by a decision of the Council of Ministers, upon the proposal of the National Anti-Money Laundering and Terrorism Financing Committee.

Designated Non-Financial Businesses and Professions

- 1** Real estate agents, whenever they conduct transactions related to the sale and/or purchase of real estate for customers, or both.
- 2** Traders in precious metals or precious stones, whenever they participate with their customers in cash transactions of a value equal to or exceeding the threshold of fifty thousand Qatari Riyals (QR50,000).
- 3** Notaries, lawyers, accountants, and legal 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.
- 4** Trust Funds 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.

Designated Non-Financial Businesses and Professions

- (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

5 Any other business or profession by virtue of a decision of the Council of Ministers upon the proposal of the Committee.

Predicate Offence

Any act constituting a misdemeanor or a felony under any Law in force in the State, whether committed inside or outside the State, whenever it generates funds and is an offence punishable by law in both countries.

STR Form

The Paper/ Electronic Form adopted by QFIU to be used by the reporting entities as per law for filing suspicious transaction reports.

Rejected STRs

STRs sent by the reporting entities that do not meet the content and format in the standard form, as established by QFIU.

Request for Information

Request submitted by QFIU to another party/ authority for additional information.



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