

## **Decision No. (59) of 2020**

### **Promulgating Guidelines to the Effective Implementation of the Targeted Financial Sanctions Regime in the State of Qatar**

**I, the Public Prosecutor,**

Having perused the Law No. (10) of 2002 on the Public Prosecution and its amending laws;

The Penal Code promulgated by Law No. (11) of 2004, and its amending laws;

The Criminal Procedure Code promulgated by Law No. (23) of 2004 and its amending laws;

The Law on Combating Terrorism promulgated by Law No.(27) of 2019; and  
Decision No. (1) of 2020 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 pursuant to UN Security Council Resolutions;

Have decided the following:

#### **Article (1)**

The Guidelines to the Effective Implementation of the Targeted Financial Sanctions Regime, attached hereto, shall come into force and effect.

#### **Article (2)**

All competent authorities at the Public Prosecution, each within its own competence, shall implement this Decision, which shall come into force as from the day of its issuance.

**Dr Ali bin Fetais Al Marri**

**Public Prosecutor**

Issued on: 3/6/2020 A.H

Corresponding to: 11/10/1441 A.D

## **Guidelines to the Effective Implementation of the Targeted Financial Sanctions Regime in the State of Qatar**

**In Compliance with the FATF standards** to establish the legal framework of the targeted financial sanctions regime, as reflected in Law No. (27) of 2019 on Combating Terrorism, and the Decision of the Public Prosecutor No. (1) of 2020 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 pursuant to the UN Security Council Resolutions;

**Taking into consideration** the competencies of the authorities concerned with the implementation of the targeted financial sanctions in accordance with the laws and other relevant provisions regulating their work, and

**Aiming at establishing a constructive coordination and cooperation**, to ensure the implementation of an effective and integrated system to combat the financing of terrorism and the financing of proliferation of weapons of mass destruction in the State of Qatar; and

**Aiming at enhancing** the capacity of each Party to combat financial transactions and financial flows suspected of being related to terrorism financing and to the financing of proliferation of weapons of mass destruction in the State of Qatar; and

**Whereas, all the Parties recognize** the importance of their integral roles to effectively implement the targeted financial sanctions regime in the State of Qatar; and

**Whereas, all the Parties are willing** to promote mutual cooperation to ensure the maximum efficiency in implementing the legislative framework of the targeted financial sanctions regime in the State of Qatar,

**This Guidelines document was developed to ensure the effective implementation of the targeted financial sanctions regime in the State of Qatar, and shall be considered as a standard reference mechanism regulating the operational requirements of the implementing parties, and specifying their mutual obligations, whether bilateral or multilateral, according to the following:**

**I. Identifying Persons and entities meeting the criteria for designation on the Sanctions List or the Security Council List:**

**For the purposes of implementing the provisions of Articles (4) and (5) of the Public Prosecutor’s Decision No. (1) of 2020:**

a. A dedicated “Targeted Financial Sanctions Group” shall be formed, consisting of a representative and a deputy of the Permanent Mission of the State of Qatar to the United Nations in New York, the Ministry of Foreign Affairs, the listing official, and the Committee (NCTC); whereas each within its own competence, shall exchange information and feedback at any time via email, phone, fax or other means of communication.

b. When the appropriate UN body addresses the designation notice to the Permanent Mission of the State of Qatar to the United Nations in New York, the Mission shall, through the “Targeted Financial Sanctions Group” approve it and address it to the Ministry of Foreign Affairs, which shall immediately refer it to the listing official and the National Counter Terrorism Committee(NCTC) through the Government e- correspondence System.

c. In parallel with the aforementioned notice, and to ensure a prompt notification of the decision of the appropriate UN body, the listing official and the Committee shall subscribe to the RSS feed on the website of the relevant appropriate UN body to receive emails regarding each designation order or relevant amendment as soon as it is issued.

d- The Committee shall publish the notice addressed by the appropriate UN body on its website within sixteen (16) hours from the date of receiving such notice by any of the means mentioned above.

e. The supervisory authorities, financial institutions, designated non-financial businesses and professions (DNFBPs), and non-profit organizations (NPOs) shall subscribe in the RSS Feed on the website of the NCTC, in order to be updated of the various notifications and announcements as soon as they are circulated on the mentioned website, and to subsequently initiate the freezing of the funds within eight (8) hours of notification.

f. In coordination with the supervisory authorities, financial institutions, DNFBPs, and NPOs shall develop an application / information system to identify designated persons and validate matches, monitor their financial operations and freeze relevant funds.

If there is a lack of data or doubt about the information required to compare the identity data in the Security Council Resolution and verify their relevance to the

data available to them, financial institutions, DNFBPs, and NPOs shall refer back to the Committee and the relevant supervisory authority at all times, via phone and email to validate matches.

g. To ensure a quick access to the UN lists, financial institutions, DNFBPs, and NPOs can also refer to the following links:

**-ISIL (Da'esh) & Al-Qaida Sanctions List**

[https://www.un.org/securitycouncil/sanctions/1267/aq\\_sanctions\\_list](https://www.un.org/securitycouncil/sanctions/1267/aq_sanctions_list)

**-Taliban Sanctions List**

<https://www.un.org/securitycouncil/sanctions/1988/materials>

**-1718 Sanctions List (DPRK)**

<https://www.un.org/securitycouncil/sanctions/1718/materials>

**-2231 Sanctions List (Iran's Nuclear Issue)**

<https://www.un.org/securitycouncil/content/2231/list>

**-United Nations Security Council Consolidated List that includes all individuals and entities subject to sanctions:**

<https://www.un.org/securitycouncil/content/un-sc-consolidated-list>

**II. Proposals for Designation and Requests for Information to Identify Persons meeting the Criteria for Designation:**

**For the purposes of implementing the provisions of Articles (5), (6), (7) and (8) of the Public Prosecutor's Decision No.(1) of 2020:**

a. Proposals for designation shall be made by the different government authorities in the State of Qatar, according to the standard form published on the Committee's website.

b. Proposals for designation issued by the government authorities shall be referred to the Committee with the supporting documents by administrative means or through the Government e-correspondence System.

c. The Committee secretary shall gather the necessary information to consider the proposals for designation, whether by addressing the requesting authority or other security, supervisory, and administrative authorities, and any other authority concerned with implementing the targeted financial sanctions regime; such as the Ministry of Interior, the Ministry of Foreign Affairs, the Ministry of Justice, the Ministry of Finance, the Ministry of Commerce and Industry, the Ministry of Endowments and Islamic Affairs, the Ministry of Administrative Development, Labour and Social Affairs, the Ministry of Transport and Communications, the Real Estate Registration Department, the General Directorate of Traffic, the State Security Bureau, the General Authority of Customs and Ports, Qatar Financial Market Authority, Companies Control Department, Qatar Central Bank, Qatar Financial Information Unit, the National Anti-Money Laundering and Terrorism Financing Committee (NAMLC), financial institutions, DNFBPs, NPOs, civil aviation companies operating in the State of Qatar, and any other concerned authority.

d. The Committee shall use various channels to collect the information required to prepare the proposals for designation.

e. The Committee secretary shall ensure that the proposal for designation meets all formal applicable conditions and requirements, and shall refer this proposal to the listing official in a signed and sealed envelope, with a return receipt.

### **III. Considering and Responding to Requests From Foreign Jurisdictions to include a Person on the National Sanctions List:**

**For the purposes of implementing the provisions of Article (17) of the Public Prosecutor's Decision No. (1) of 2020:**

a. Proposals for designation by foreign jurisdictions shall be addressed to the State of Qatar by diplomatic means; whereas the requesting foreign competent authority shall transmit the designation package to its diplomatic mission/embassy in the State of Qatar. The embassy shall then address the designation package to the Consular Affairs at the Ministry of Foreign Affairs of the State of Qatar to refer it directly to the listing official through administrative means with a return receipt.

b. The proposal for designation and relevant annexes by the foreign jurisdiction shall be in English with Arabic translation. This shall also apply to any communications exchanged regarding the information required to decide on the proposal.

c. The Committee and its counterpart in the foreign jurisdiction can communicate in a direct and informal way to arrange the receipt of the proposal and collect useful information before and after receipt, provided that diplomatic means are used when receiving and responding to the proposal.

#### **IV. Proposals for Designation by the State of Qatar on the Sanctions Lists of Foreign Jurisdictions:**

**For the purposes of implementing the provisions of Articles (13/ (a / c), (15) and (16) of the Public Prosecutor’s Decision No. (1) of 2020:**

a. If the listing official decides - upon the Committee’s proposal - to request the designation of a person or entity on the Sanctions List of a foreign jurisdiction, the request shall be addressed to the concerned foreign jurisdiction by diplomatic means. To that end, the designation package and its annexes shall be transmitted to the Ministry of Foreign Affairs (Consular Department or equivalent Department) in a closed envelope. The relevant Department shall submit the designation package in a diplomatic bag or by any other means to the Embassy of the State of Qatar at the foreign jurisdiction. The Embassy shall then address the package to the Ministry of Foreign Affairs at the foreign jurisdiction to refer it to the competent authority.

b. Responses to the requests for information received from the foreign jurisdiction shall be exchanged by diplomatic means, and wherever possible, by any other secure means, in agreement with the foreign competent authority.

#### **V. Communicating Designation, Freezing, Delisting or Unfreezing Orders to the Supervisory Authorities:**

**For the purposes of implementing the provisions of Articles (11) and (26) of the Public Prosecutor’s Decision No. (1) of 2020:**

- a. The listing official shall inform the Committee of the designation, freezing, delisting or unfreezing orders immediately upon their issuance through the Government e-correspondence System.
- b. The Committee shall publish the designation, freezing, delisting or unfreezing orders on its website as soon as received from the listing official.
- c. The supervisory authorities shall subscribe to the RSS Feed on the website of the NCTC, to ensure prompt notification of the various designation, freezing, delisting or unfreezing orders as soon as they are

published on the aforementioned website, and shall then communicate them to their supervised entities by email.

- d. The Committee shall notify the supervisory authorities of the designation, freezing, delisting, and unfreezing orders through the Government e-correspondence System.
- e. The supervisory authorities shall exchange communications with the Committee through the Government e-correspondence System, and shall appoint a liaison officer or a representative at the Committee, or a deputy from among the compliance officers, to receive notifications via email and send feedbacks, such as notifying the Committee of the implementation and any other feedbacks.
- f. The Committee shall notify the implementing parties of the designation, freezing, delisting or unfreezing orders, and shall receive their responses through the Government e- correspondence System, including but not limited to, the Ministry of Interior, the Ministry of Foreign Affairs, the Ministry of Justice, the Ministry of Finance, the Ministry of Commerce and Industry, the Ministry of Endowments and Islamic Affairs, the Ministry of Administrative Development, Labour and Social Affairs, the Ministry of Transport and Communications, the Real Estate Registration Department, the General Directorate of Traffic, the State Security Bureau, the General Authority of Customs and Ports, Qatar Financial Market Authority, Companies Control Department, Qatar Central Bank, Qatar Financial Information Unit, the National Anti-Money Laundering and Terrorism Financing Committee (NAMLC), financial institutions, DNFBPs, NPOs, civil aviation companies operating in the State of Qatar, and any other concerned authority.

## **VI. Communicating Designation, Freezing, Delisting and Unfreezing Orders to Financial Institutions, DNFBPs and NPOs:**

**For the purposes of implementing the provisions of Articles (11/a /b) and (26) of the Public Prosecutor’s Decision No. (1) of 2020:**

- a. The Committee shall announce the designation, freezing, delisting and unfreezing orders on its website as soon as received from the listing official through the Government e- correspondence System.
- b. The financial institutions, DNFBPs and NPOs shall subscribe to the RSS Feed on the website of the NCTC, to ensure prompt notification of the designation, freezing, delisting and unfreezing orders as soon as they are published on the Committee’s website.
- c. The Committee shall notify the supervisory authorities of the orders upon issuance, and shall send relevant notices through emails to the liaison

officer or the representative at the Committee of each supervisory authority.

- d. The supervisory authorities shall communicate the notices received from the Committee to their supervised entities through email and fax.
- e. The financial institutions, DNFBPs and NPOs shall refer the reports mentioned in Article (26) of the Public Prosecutor's Decision No.(1) of 2020 to the Committee and the relevant supervisory authority through email once drafted, and then send the original reports and relevant annexes through administrative means.

## **VII: False Positives and Consequent Unfreeze:**

### **For the purposes of implementing the provisions of Article (28) of the Public Prosecutor's Decision No. (1) of 2020:**

a. The authority holding the funds shall receive, with a return receipt, the written relief requests from persons or entities with the same or similar name as the designated persons or entities, who believe that their funds were mistakenly frozen.

b. The authority holding the funds shall consider the request based on the attached documents and the database of its relevant customers. It shall address the Committee and the relevant supervisory authority, if necessary, through email to seek the information required to decide on the request, no later than twenty-four (24) hours from the date of receiving the relief request.

c. If the authority holding the funds is satisfied with the relief request, it shall spontaneously initiate the release of the frozen funds and notify the petitioner by any written means, and notify the Committee and the relevant supervisory authority via email as soon as the funds are released.

d. If the authority holding the funds decides to reject the relief request, it shall draft a written notice of the rejection order, the reasons for rejection, and the right of the petitioner to petition the Committee against the decision.

e. The authority holding the funds shall send the rejection notice immediately upon issuance to the Committee and the supervisory authority via email; and shall then send the original notice and its annexes to the supervisory authority to refer it directly to the Committee through the liaison officer, no later than twenty-four (24) hours from the date of the notice.

f. The authority holding the funds shall send the rejection notice to the petitioner by any written means within twenty-four (24) hours from the date of the notice.



g. The Committee shall consider the request based on the rejection notice received from the supervisory authority, and shall refer it to the listing official with its recommendations through the Government e-correspondence System.

h. If satisfied with the request, the listing official shall issue a written decision to release the frozen funds of the petitioner, and shall notify the Committee immediately of his decision by any written means (fax, email, official letter addressed through the Government e-correspondence System).

i. The Committee, upon receipt of the listing official's decision, shall notify the liaison officers/representatives of the supervisory authorities via email to release the frozen funds of the petitioner. The supervisory authorities shall immediately circulate the notifications by fax and email to their supervised entities to implement the decision and release the frozen funds within twenty-four (24) hours from the date of the listing official's decision, and inform the supervisory authority and the Committee without delay of the implementation via email, enclosing a relevant official letter.

j. In all cases, as soon as the decision of the listing official is issued, the petitioner will be summoned through public authority officers or any appropriate mean, or otherwise by any written means. The listing official or his deputy shall in the presence of the petitioner, notify him in writing of the rejection and of his right to appeal before the criminal circuit of the Court of Appeal, within sixty (60) days of notification.

### **VIII. Publicly Known Procedures for Petition against the Designation Order:**

#### **For the purposes of implementing the provisions of Articles (11) and (25) of the Public Prosecutor's Decision No. (1) of 2020:**

a. The listing official shall summon the designated person within the timelines set forth in Article (11/c) through public authority officers or by any appropriate mean, or otherwise by any written means.

b. The listing official or his deputy shall, in the presence of the petitioner, notify him in writing of the designation order, the reasons for designation, the guarantees, the right to request de-listing and exemption of certain funds from freeze to cover some basic or extraordinary expenses, the competent body to whom the petitions shall be addressed, and the relevant applicable procedures.

c. The petition shall be made in writing, and it shall be submitted by the petitioner or his representative, under a special power of attorney, to the listing official with a return receipt.

- d. The listing official shall immediately refer the request to the Committee, which shall redraft it according to the standard form for petition and complete the data stipulated in Article (25/b). The Committee may, if necessary, summon the petitioner to hear his statements, and prompt him to complete his request and provide the supporting documents, or refer back to the competent authorities in the State of Qatar to obtain the necessary information.
- e. The Committee shall decide on the petition and send it by administrative means to the listing official, along with its relevant recommendations and the supporting documents within fifteen (15) days from the date of receipt.
- f- If the listing official decides to revoke the designation on the Sanctions List, he shall immediately notify the Committee of his decision by any written means (fax, email, official letter addressed through the Government e- correspondence System).
- g. The Committee, upon receipt of the listing official's decision, shall immediately remove the person or entity from the Sanctions List and from its website, and shall notify the representatives of the supervisory authorities via email. The supervisory authorities shall immediately circulate the notifications by fax and email to their supervised entities to implement the decision and release the frozen funds, and notify the supervisory authority and the Committee of the implementation via email, enclosing a relevant official letter.
- h. If the listing official decides to reject the petition, the petitioner shall be summoned through public authority officers or any appropriate mean, or otherwise by any written means. The listing official or his deputy shall, in the presence of the petitioner, notify him in writing of the rejection and of his right to appeal before the criminal circuit of the Court of Appeal, within the timelines set forth in (25/c).

#### **IX. Submitting Proposals for Designation to the United Nations:**

**For the purposes of implementing the provisions of Article (13) (a/c), (14), (15) and (16) of the Public Prosecutor's Decision No.(1) of 2020:**

- a. For the purposes of collecting information and documents supporting the proposal for designation, the Committee shall address various ministries and relevant competent authorities in the State of Qatar through the Government e- correspondence System.
- b. Responses and supporting documents shall be sent directly to the Committee through official letters, provided that the documents referred to in Article (16) shall be in the approved standard forms (certified and official copies).

c. The Committee shall draft the proposal for designation according to the conditions provided for in Articles (13), (14) and (15) of the Public Prosecutor's Decision No. (1) of 2020, and shall send it directly with the supporting documents to the listing official in a closed confidential envelope with a return receipt.

d. If the listing official decides to approve the request, he shall send the request to the appropriate UN body through the Ministry of Foreign Affairs by the Permanent Mission of the State of Qatar to the United Nations in New York, and shall adopt the same approach in responding to requests for information received from the appropriate UN body.

e. The "Targeted Financial Sanctions Group" referred to above shall facilitate the communication means and expedite the exchange of information and responses between the listing official and the appropriate UN body.

#### **X. Submitting Delisting Requests to the UN or Removal from the Lists:**

##### **For the purposes of implementing the provisions of Article (18) and (23) of the Public Prosecutor's Decision No.(1) of 2020:**

a. The Committee shall provide all the supporting documents, when there are no reasonable grounds and reasonable basis for designation. It may for this purpose, address different competent authorities in the State of Qatar through the Government e-correspondence System, or outside the State of Qatar through diplomatic means in coordination with the Ministry of Foreign Affairs, and wherever possible, by direct administrative cooperation with foreign counterparts.

b. The Committee shall adopt the same approach in gathering information, if the request to revoke the designation is based on the death of the natural person or the will to liquidate the designated legal person in accordance with Article (23) of the Public Prosecutor's Decision No. (1) of 2020.

c. The Committee shall draft the proposal for revoking the designation, and shall refer the proposal and its annexes by administrative means to the listing official with a return receipt.

d. The listing official shall refer the request to the appropriate UN body in coordination with the Ministry of Foreign Affairs through the Permanent Mission of the State of Qatar to the United Nations in New York.

e. The "Targeted Financial Sanctions Group" referred to above shall facilitate the communication means and expedite the exchange of information and responses between the listing official and the appropriate UN body.

## **XI. Considering Delisting Requests by the Designated Persons/Entities and Removal from the Security Council List:**

**For the purposes of implementing the provisions of Articles (19), (20), (21), and (22) of the Public Prosecutor's Decision No. (1) of 2020:**

- a. The petition shall be made in writing on plain paper, and shall include at least the name and address of the designated person or entity, the ID number, the contact details, and the reasons for submitting the request, and shall be referred directly to the listing official with a return receipt.
- b. The listing official shall send the request and its annexes to the Committee via the Government e-correspondence System.
- c. The Committee shall redraft the petition according to the standard form for petition, and complete the data set forth in Article (19/b). The Committee may summon the petitioner, if necessary, to hear his statements and supporting evidence.
- d. The Committee shall decide on the petition and send it through the Government e-correspondence System to the listing official with its recommendations and supporting documents within fifteen (15) days from the date of referral thereto.
- e. The listing official shall send the request to the appropriate UN body in coordination with the Ministry of Foreign Affairs, through the Permanent Mission of the State of Qatar to the United Nations in New York. The same approach shall be adopted when responding to requests for information from the appropriate UN body as stipulated in Articles (20/a) and (20/b) of the Public Prosecutor's Decision No.(1) of 2020, or when receiving the UN body resolution to remove the person or entity from the Security Council List.
- f. The "Targeted Financial Sanctions Group" referred to above shall facilitate the communication means and expedite the exchange of information and responses between the listing official and the appropriate UN body.
- g. If the listing official decides to revoke the designation on the Sanctions List in implementation of the resolution of the appropriate UN body, and did not take another independent decision on the designation, pursuant to the provisions of Article (22/c), he shall immediately notify the Committee of his decision through the Government e- correspondence System, or by any other written means (fax, email).
- h. The Committee, upon receipt of the listing official's decision, shall immediately remove the name of the person or entity from its website, and notify

the representatives of the supervisory authorities via email. The supervisory authorities shall immediately circulate the notifications by fax and email to their supervised entities to implement the decision and release the frozen funds, and inform the supervisory authority and the Committee of the implementation via email, enclosing a relevant official letter.

i. In order to ensure direct contact with the appropriate UN body, by the designated persons or entities, the Committee shall:

1- Establish a dedicated hotline to automatically direct the voice calls and inform the callers about the procedures related to their requests, including their right to directly submit petitions and delisting requests with the supporting documents to the Ombudsperson of the ISIL (Da'esh) and Al-Qaida Sanctions Committee via [ombudsperson@un.org](mailto:ombudsperson@un.org), if the designation is by that Committee; or to the Focal Point for De-listing, pursuant to Resolution 1730(2006), via <https://www.un.org/securitycouncil/sanctions/delisting>, if the designation is by any Sanctions Committee.

2- Provide on its website independent and addressed links, with simplified, concise and indicative information to the Public, related respectively to the following:

- The concept of targeted financial sanctions, their legal basis and features (administrative / circumstantial / preventive ...).
- Identification of the Sanctions List and the Security Council List.
- Identification of freezing, persons and entities subject to freezing, and specific funds subject to freezing.
- Overview of the guarantees of the designated person or entity (notification of freezing, the appropriate body to whom the petitions, and requests to delist or exempt certain funds from freeze to pay basic or extraordinary expenses shall be addressed, and the relevant procedures).

j. When the appropriate UN body assumes petitions directly from the designated persons or entities, the listing official shall respond to requests for information from the UN body, and shall implement its resolutions as if the request was at first place by the listing official.

**XII. Responding to Exemptions Requests of Persons and Entities designated on the Sanctions List upon the Proposal of the Committee:**

**For the purposes of implementing the provisions of Articles (36) and (37) of the Public Prosecutor's Decision No. (1) of 2020:**

- a. The petition shall be made in writing on plain paper, and shall include at least the name and address of the designated person or entity, the ID number, the contact details and the amount to be exempted, and shall be referred directly to the Committee by the petitioner or his representative, under a special power of attorney, with a return receipt.
- b. The Committee shall redraft the request according to the adopted standard form for petition and complete the necessary data. The Committee may summon the petitioner, if necessary, to hear his statements, and prompt him to complete his request and provide the supporting documents, or refer back to the competent authorities in the State of Qatar to obtain the necessary information.
- c. The Committee shall decide on the request and estimate the amount allocated for basic and extraordinary expenses, and shall send it to the listing official by administrative means within forty-eight (48) hours from the date of receipt.
- d. The listing official shall immediately notify the Committee of his decision upon issuance by any written means (fax, email, official letter through the Government e- correspondence System).
- e. If the listing official decides to approve the request, the Committee shall immediately inform the petitioner by any written means, and shall send via email relevant notifications to the representatives of the supervisory authorities. The supervisory authorities shall immediately circulate such notifications via fax and email to their supervised entities to implement the decision and unfreeze certain funds, and shall inform the supervisory authority and the Committee of the implementation thereof within the timelines set forth in Article (37) of the Public Prosecutor's Decision No. (1) of 2020.
- f. If the listing official decides to revoke the request, the Committee shall by any written means, notify the petitioner immediately of the rejection and of his explicit right to petition against the decision directly to the listing official by filing a request written on plain paper. The listing official shall consider again the same request and decide whether to approve or reject it, and shall refer his decision to the Committee for implementation as per the same procedures above mentioned.

**XIII- Responding to Exemption Requests of the Persons and Entities designated on the Security Council List:**

**For the purposes of implementing the provisions of Article (31), (32), (33), (34), and (35) of the Public Prosecutor's Decision No. (1) of 2020:**

a. If the authority holding the frozen funds receives a request to make or release the payments referred to in Articles (31), (32), and (33) of the Public Prosecutor's Decision No.(1) of 2020, the request shall be immediately referred with the supporting documents to the supervisory authority to send it without delay to the Committee through the liaison officer.

b. The Committee shall verify that the application meets the payment conditions, and once satisfied, it shall propose to the listing official to issue the authorization after notifying the appropriate UN body of the State's intention to respond to the request.

c. The listing official shall send the necessary notifications to the appropriate UN body through the Permanent Mission of the State of Qatar to the United Nations in New York, and the "Targeted Financial Sanctions Group" shall ensure the receipt of such notifications by the UN body. After ten (10) days from the date of notification, the listing official shall issue the authorization to pay or release the funds and send it to the Committee through the Government e-correspondence System. The Committee shall notify the relevant supervisory authority and the authority holding the funds by email to immediately implement the payment authorization.

d. If the authorization is to cover basic expenses as stipulated in Article (34) of the Public Prosecutor's No. (1) of 2020, the same procedures shall be adopted as described above. However, the authorization shall be issued and implemented only after receiving an explicit no objection notification from the appropriate UN body, or after the end of the period mentioned in the said Article (34), if no objection notification is received from the appropriate UN body.

The "Targeted Financial Sanctions Group" shall verify that this condition is met.

e. If the authorization is to cover extraordinary expenses as stipulated in Article (35/a) of the Public Prosecutor's No. (1) of 2020, the same procedures of communication and implementation shall be adopted as described above. However, the authorization shall be issued only after receiving a written and explicit no objection notification from the appropriate UN body.

f. If the authorization is to cover fees, expenses or charges as stipulated in Article (35/b) of the Public Prosecutor's No. (1) of 2020, the relevant requests shall be sent with the supporting documents directly to the Committee. The Committee shall ensure that the request meets the payment conditions, and

shall coordinate with the listing official and the Ministry of Foreign Affairs to address the concerned foreign jurisdictions and receive their responses by diplomatic means.

If all foreign jurisdictions involved approve the request, the Committee shall propose to the listing official to issue the payment authorization, after notifying the appropriate UN body, through the Permanent Mission of the State of Qatar to the United Nations in New York and in coordination with the "Targeted Financial Sanctions Group". After ten (10) days from the date of notification, the listing official shall issue the final payment authorization and send it to the Committee through the Government e-correspondence System. The Committee shall notify the relevant supervisory authority and the authority holding the funds via email to immediately implement the payment authorization.

#### **XIV. Complementary Procedures**

a. In addition to the data available on the Committee's website, the Committee shall also provide on its website independent and addressed links in the form of guidelines for the implementing parties in relation to the following:

- Identification of the implementing parties (financial institutions, DNFBPs, NPOs, supervisory, security, and administrative authorities).
- Deadlines for implementing the freezing, and the funds subject to freezing.
- Obligations of the implementing parties, and sanctions imposed for any breach.
- Procedures for tracing funds, transactions and financial operations, and the notifications process.
- Procedures for dealing with certain frozen assets requiring active management.
- List of the representatives of the implementing parties and liaison officers at the Committee (one representative for each authority and his deputy from the Compliance Department, with the phone number and email to receive the Committee's notifications).

b. The Committee shall publish this Mechanism on its website along with the Public Prosecutor's Decision No. (1) of 2020.

c. The supervisory authorities shall:

- Draft written internal procedures for their supervised entities to verify identities and ensure vigilance and fast decision-making to suspend operations or transactions relating to designated persons or entities.
- Provide the oversight staff with a copy of the written procedures.



- Redraft the terms of this Mechanism, each within its own competence, in the form of written internal instructions and refer them to their supervised entities within fifteen (15) days from the effective date of this Mechanism to publish these instructions on their website, and notify the listing official and the Committee of the implementation thereof no later than thirty (30) business days from the effective date of this Mechanism.

#### **XV. Final Provisions:**

- a. Each Party shall appoint a representative to coordinate the implementation of the provisions of this Mechanism, and a deputy acting in his absence or in the event of emergency. The information related to the representatives and deputies shall be regularly updated.
- b. Periodic meeting shall be held whenever needed, at least by the representatives of the Parties, in order to follow-up the implementation of this Mechanism and coordinate the work. Each Party shall prepare written reports of all the coordination meetings held for the implementation of this Mechanism.
- c. The Parties shall submit periodic reports on the implementation of the provisions of this Mechanism to the listing official. The reports shall then be referred to the Committee for consideration. The Committee shall provide its relevant outputs to the listing official to take the necessary action in conformity with the State policy in combating the financing of terrorism and the financing of proliferation of weapons of mass destruction.
- d. The Parties shall develop and conduct training courses aiming at enhancing the capacities of the human resources responsible for implementing the targeted financial sanctions.