



وحدة المعلومات المالية
Financial Information Unit

Guidance to Submitting Suspicious Transaction Reports

Table of Contents

I.	Introduction.....	3
II.	Reporting Entities.....	3
	A. Financial Institutions	3
	B. Designated Non-Financial Businesses and Professions	4
	C. Non-Profit Organisations.....	5
III.	Reporting Suspicious Transactions	5
	A. How to Identify a Suspicious Transaction	6
	B. Indicators of Suspicious Transactions	6
IV.	STR Reporting Requirements.....	7
	A. STR Form	7
	B. When to submit the STR.....	8
	C. Who submits the STR.....	8
	D. Information to be contained in the STR	9
	E. How to submit STRs	9
V.	Requests for Information by QFIU	10
VI.	Failure to submit STR or Respond to QFIU's Requests for Information and Tipping Off	10
VII.	How to contact QFIU	11
	Annex A - Indicators of Suspicious Transactions	12
	Annex B - STR Form.....	19

I. Introduction

This guidance is issued to assist reporting entities (financial institutions, designated non-financial businesses and professions (DNFBP's) and non-profit organizations ('Reporting Entities') to meet their reporting obligations of any transaction suspected to be related to money laundering and terrorism financing under *Law No. 4 of 2010 on Anti- Money Laundering and Combating the Financing of Terrorism* (AML/CFT Law).

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

II. Reporting Entities

Under *Law No. 4 of 2010 on Anti- Money Laundering and Combating the Financing of Terrorism* (AML/CFT Law), financial institutions, Designated Non-Financial Businesses and Professions (DNFBP's), and Non-Profit Organizations (NPOs) and their personnel, shall report promptly to QFIU suspicious financial transaction or any attempts to perform such transactions when they suspect or have reasonable ground to suspect that the transactions include funds that are proceeds of a criminal activity or are linked to, or to be used in terrorist acts or by terrorist organizations or those who finance terrorism.

A. Financial Institutions

Refers to any person or entity who conducts as a business one or more of the following activities or operations for or on behalf of a customer:

- (1) accepting deposits and other repayable funds such as private banking services.
- (2) lending
- (3) financial leasing.
- (4) transferring money or things of value.
- (5) issuing or managing means of payment, such as credit and debit cards, cheques, traveller's cheques, money orders, banker's drafts and electronic money.
- (6) financial guarantees and commitments.
- (7) trading in money market instruments, such as cheques, bills, certificates of deposit and derivatives, foreign exchange, exchange instruments, interest rate, index instruments, transferable securities, and commodity futures trading.

- (8) participating in securities issues and providing financial services related to securities issues.
- (9) undertaking individual or collective portfolio management.
- (10) safekeeping or administering cash or liquid securities on behalf of other persons.
- (11) investing, administering or managing funds or money on behalf of other persons.
- (12) underwriting or placing life insurance and other investment-related insurance, whether as insurer or insurance contract intermediary.
- (13) money or currency changing.
- (14) any other activity or operation prescribed by resolution issued by the Prime Minister upon the proposal of the National Anti-Money Laundering and Terrorist Financing Committee.

B. Designated Non-Financial Businesses and Professions

- (1) Real estate brokers, if they act in transactions for customers in relation to buying or selling of real estate, or both.
- (2) Dealers in precious metals or stones, if they engage with their customers in cash transactions equal to a minimum of 55,000 Riyals.
- (3) Lawyers, notaries, other independent legal professionals, or accountants, whether sole practitioners, partners or employed specialists in specialist firms, if they prepare, execute, or conduct transactions for clients in relation to any of the following activities:
 - (a) buying or selling real estate.
 - (b) managing customer money, securities or other assets.
 - (c) managing bank, savings or securities accounts.
 - (d) organising contributions for the creation, operation or management of companies or other entities.
 - (e) creating, operating or managing legal persons or legal arrangements.
 - (f) buying or selling business entities.
- (4) Trust Funds and Company Service Providers, if they prepare, or conduct transactions for customer on commercial basis in relation to any of the following activities:

- a) acting as a founding agent of legal persons.
 - b) acting as, or arranging for another person to act as, a director or secretary of a company, a partner of a partnership, or a similar position in relation to other legal persons.
 - c) providing a registered office, a business headquarter, or correspondence address or an administrative address, for one of the companies, partnerships or any other legal person or legal arrangement.
 - d) acting as, or arranging for another person to act as, a trustee for a direct trust fund.
 - e) acting as, or arranging for another person to act as, a nominee shareholder on behalf of another person.
- (5) any other business or profession prescribed and regulated by a resolution issued by the Prime Minister upon the proposal of the National Anti-Money Laundering and Terrorist Financing Committee.

C. Non-Profit Organisations

Refers to any legal entity or organization which collects, or disposes of funds for charitable, religious, cultural, educational, social, or fraternal purposes, or to do any other kind of charitable activities.

III. Reporting Suspicious Transactions

Reporting Entities shall report promptly to QFIU any suspicious financial transaction or any attempts to perform such transactions, regardless of the amount of the transaction, when they suspect or have reasonable ground to suspect that:

- a) the transactions include funds that are proceeds of a criminal activity;
- b) or are linked to, or to be used in terrorist acts or by terrorist organizations or those who finance terrorism.

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

A. How to Identify a Suspicious Transaction

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

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

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

An assessment of suspicion should be based on a reasonable evaluation of relevant factors, including the knowledge of the customer's business, financial history, background and behavior. Remember that behavior is suspicious, not people. Suspicion could be based on a single factor, or it could be based on the combination of a number of factors. All circumstances surrounding a transaction or series of transactions should be reviewed.

B. Indicators of Suspicious Transactions

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

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

IV. STR Reporting Requirements

A. STR Form

Reporting Entities shall submit STRs to QFIU using the required STR Form (**Annex B**).

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

- 1) Is the suspicion related to money laundering or terrorist financing?
- 2) Are the funds subject to a freeze order or a potential freeze order?
- 3) Personal data of the individual and/or entities obtained by the Reporting Entity, consistent with the law and applicable regulations (Correct names and other key customer identifiers, such as date of birth, government issued ID, addresses and telephone numbers).
- 4) Adequate information about the reported suspicious transactions (sale and purchase of currencies, incoming and outgoing transfers, any other financial transactions).
- 5) Setting out in a clear manner the indicator used and the basis for suspicion. If known, identify the related predicate offense.
- 6) Provide evidence of suspicious transactions (Account name and information, transaction history, and any other documents that may support the basis for suspicion).
- 7) Identify the beneficial owner of the suspicious transactions.
- 8) Identify 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.

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

After filing an initial STR on a subject, the Reporting Entity shall file an STR every 30 days so long as the subject continues to conduct transactions in a similar manner. If a subject stops conducting transactions in a similar manner, the Reporting Entity shall file an STR

stating that the subject has stopped conducting transactions in suspicious manner and that the Reporting Entity will no longer be submitting follow-up STRs.

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

B. When to submit the STR

Reporting Entities shall **promptly** submit STR to QFIU to report any suspicious financial transaction or any attempts to perform such transactions. For post-transaction STRs, Reporting Entities shall submit an STR not exceeding **Three (3) working days** from the time it makes the determination that it suspects or has reasonable grounds to suspect that a transaction is related to criminal activity. However, when there is suspicion that the transactions are linked to, or to be used in terrorist acts or by terrorist organizations, the STR must be sent **within 24 hours of the financial institution determining that the transactions were suspicious.**

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

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

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

C. Who submits the STR

The STR should be made by the Money Laundering Reporting Officer (MLRO), or Deputy MLRO, or the duly authorized representative of the Reporting Entity.

The Reporting Entity shall provide QFIU with the contact information of the Reporting Entities' MLRO, Deputy MLRO and/or authorized representatives. The Reporting Entity shall inform/update QFIU of any changes in Reporting Entities' MLRO, Deputy MLRO and/or authorized representatives.

D. Information to be contained in the STR

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

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

E. How to submit STRs

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

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

***Qatar's National Financial Crime Centre, Building 11, 8th Floor
Al Baladiya Street 810, Doha - Qatar
P.O. Box 1234***

V. Requests for Information by QFIU

Under Article 15 of Law No. 4 of 2010, QFIU is entitled to receive information it deems necessary from any entity or person subject to reporting obligation. Such information shall be delivered within the time and manner to be specified by QFIU. In the case of failure by any reporting entity to observe the obligations under the law, QFIU may inform the relevant regulatory authorities.

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

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

Law No. 4 of 2010 also sets out a number of criminal offences relating to STR obligations. The key offences include:

- 1) Article 5 - Failure to submit an STR to QFIU; and
- 2) Article 39 - Disclosing to a customer, beneficiary or any third party, other than competent authorities under the law, that an STR is being or has been submitted to QFIU or that a money laundering or terrorism financing investigation is being or has been carried out.

In this regard, QFIU will follow the following procedure in case of non-compliance by a reporting entity:

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

Reporting Entities that fail to meet their obligations under the law could be subject to criminal and administrative measures and sanctions.

VII. How to contact QFIU

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

Qatar's National Financial Crime Centre, Building 11, 8th Floor

Al Baladiya Street 810, Doha

P.O. Box 1234

Telephone No.: +974 44221746

Fax No. : +974 44221773

Email: info@qfiu.gov.qa

Indicators of Suspicious Transactions

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

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

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

(1) General

- Customer admits or makes statements about involvement in criminal activities.
- Customer does not want correspondence sent to home address.
- Customer appears to have accounts with several financial institutions in one area for no apparent reason.
- Customer conducts transactions at different physical locations in an apparent attempt to avoid detection.
- Customer repeatedly uses an address but frequently changes the names involved.
- Customer is accompanied and watched.
- Customer shows uncommon curiosity about internal systems, controls and policies.
- Customer has only vague knowledge of the amount of a deposit.

- Customer presents confusing details about the transaction or knows few details about its purpose.
- Customer appears to informally record large volume transactions, using unconventional bookkeeping methods or “off-the-record” books.
- Customer over justifies or explains the transaction.
- Customer is secretive and reluctant to meet in person.
- Customer is nervous, not in keeping with the transaction.
- Customer is involved in transactions that are suspicious but seems blind to being involved in money laundering activities.
- Client's home or business telephone number has been disconnected or there is no such number when an attempt is made to contact Customer shortly after opening account.
- Normal attempts to verify the background of a new or prospective Customer are difficult.
- Customer appears to be acting on behalf of a third party, but does not tell you.
- Customer is involved in activity out-of-keeping for that individual or business.
- Customer insists that a transaction be done quickly.
- Inconsistencies appear in the client's presentation of the transaction.
- The transaction does not appear to make sense or is out of keeping with usual or expected activity for the client.
- Customer appears to have recently established a series of new relationships with different financial entities.
- Customer attempts to develop close rapport with staff.
- Customer uses aliases and a variety of similar but different addresses.
- Customer spells his or her name differently from one transaction to another.
- Customer uses a post office box or General Delivery address, or other type of mail drop address, instead of a street address when this is not the norm for that area.
- Customer provides false information or information that you believe is unreliable.
- Customer offers you money, gratuities or unusual favours for the provision of services that may appear unusual or suspicious.
- Customer pays for services or products using financial instruments, such as money orders or traveller's cheques, without relevant entries on the face of the instrument or with unusual symbols, stamps or notes.
- You are aware that a Customer is the subject of a money laundering or terrorist financing investigation.
- You are aware or you become aware, from a reliable source (that can include media or other open sources), that a customer is suspected of being involved in illegal activity.
- A new or prospective customer is known to you as having a questionable legal reputation or criminal background.
- Transaction involves a suspected shell entity (that is, a corporation that has no assets, operations or other reason to exist).

(2) Knowledge of reporting or record keeping requirements

- Customer attempts to persuade employee not to complete any documentation required for the transaction.
- Customer makes inquiries that would indicate a desire to avoid reporting.
- Customer has unusual knowledge of the law in relation to suspicious transaction reporting.
- Customer seems very conversant with money laundering or terrorist activity financing issues.
- Customer is quick to volunteer that funds are “clean” or “not being laundered.”
- Customer appears to be structuring amounts to avoid record keeping, Customer identification or reporting thresholds.
- Customer appears to be collaborating with others to avoid record keeping, customer identification or reporting thresholds.

(3) Identity documents

- Customer provides doubtful or vague information.
- Customer produces seemingly false identification or identification that appears to be counterfeited, altered or inaccurate.
- Customer refuses to produce personal identification documents.
- Customer only submits copies of personal identification documents.
- Customer wants to establish identity using something other than his or her personal identification documents.
- Customer's supporting documentation lacks important details such as a phone number.
- Customer inordinately delays presenting corporate documents.
- All identification presented is foreign or cannot be checked for some reason.
- All identification documents presented appear new or have recent issue dates.
- Customer presents different identification documents at different times.
- Customer alters the transaction after being asked for identity documents.
- Customer presents different identification documents each time a transaction is conducted.

(4) Cash transactions

- Customer starts conducting frequent cash transactions in large amounts when this has not been a normal activity for the Customer in the past.
- Customer frequently exchanges small bills for large ones.
- Customer uses notes in denominations that are unusual for the client, when the norm in that business is different.
- Customer presents notes that are packed or wrapped in a way that is uncommon for the client.
- Customer deposits musty or extremely dirty bills.

- Customer makes cash transactions of consistently rounded-off large amounts.
- Customer consistently makes cash transactions that are just under the reporting threshold amount in an apparent attempt to avoid the reporting threshold.
- Customer consistently makes cash transactions that are significantly below the reporting threshold amount in an apparent attempt to avoid triggering the identification and reporting requirements.
- Customer presents uncounted funds for a transaction. Upon counting, the Customer reduces the transaction to an amount just below that which could trigger reporting requirements.
- Customer conducts a transaction for an amount that is unusual compared to amounts of past transactions.
- Customer frequently purchases traveller's cheques, foreign currency drafts or other negotiable instruments with cash when this appears to be outside of normal activity for the client.
- Customer asks you to hold or transmit large sums of money or other assets when this type of activity is unusual for the client.
- Shared address for individuals involved in cash transactions, particularly when the address is also for a business location, or does not seem to correspond to the stated occupation (i.e., student, unemployed, self-employed, etc.)
- Stated occupation of the customer is not in keeping with the level or type of activity (for example a student or an unemployed individual makes daily maximum cash withdrawals at multiple locations over a wide geographic area).
- Cash is transported by a cash courier.
- Large transactions using a variety of denominations.

(5) Economic purpose

- Transaction seems to be inconsistent with the client's apparent financial standing or usual pattern of activities.
- Transaction appears to be out of the normal course for industry practice or does not appear to be economically viable for the customer.
- Transaction is unnecessarily complex for its stated purpose.
- Activity is inconsistent with what would be expected from declared business.
- A business customer refuses to provide information to qualify for a business discount.
- No business explanation for size of transactions or cash volumes.
- Transactions of financial connections between businesses that are not usually connected (for example, a food importer dealing with an automobile parts exporter).
- Transaction involves non-profit or charitable organization for which there appears to be no logical economic purpose or where there appears to be no link between the stated activity of the organization and the other parties in the transaction.

(6) Transactions involving accounts

- Funds are being deposited into several accounts, consolidated into one and transferred outside the country.
- Reactivated dormant account containing a minimal sum suddenly receives a deposit or series of deposits followed by frequent cash withdrawals until the transferred sum has been removed.
- Attempting to open or operating accounts under a false name.
- Customer frequently uses many deposit locations outside of the home branch location.
- Opening accounts when the client's address is outside the local service area.
- Opening accounts in other people's names.
- Opening accounts with names very close to other established business entities.
- Account with a large number of small cash deposits and a small number of large cash withdrawals.
- Multiple transactions are carried out on the same day at the same branch but with an apparent attempt to use different tellers.
- Activity far exceeds activity projected at the time of opening the account.
- Establishment of multiple accounts, some of which appear to remain dormant for extended periods.
- Account that was reactivated from inactive or dormant status suddenly sees significant activity.
- Unexplained transfers between the client's products and accounts.
- Large transfers from one account to other accounts that appear to be pooling money from different sources.
- Multiple deposits are made to a client's account by third parties.
- Frequent deposits of bearer instruments (for example, cheques, money orders or bearer bonds)
- Unusually large cash deposits by a Customer with personal or business links to an area associated with drug trafficking.
- Regular return of cheques for insufficient funds.
- Correspondent accounts being used as "pass-through" points from foreign jurisdictions with subsequent outgoing funds to another foreign jurisdictions.
- Multiple personal and business accounts are used to collect and then funnel funds to a small number of foreign beneficiaries, particularly when they are in locations of concern, such as countries known or suspected to facilitate money laundering activities.

The Financial Action Task Force's website (<http://www.fatf-gafi.org>) has information about non-cooperative countries and territories in the fight against money laundering and terrorist financing (see "High-risk and non-cooperative jurisdictions" section).

(7) Transactions involving areas outside Qatar

- Customer and other parties to the transaction have no apparent ties to Qatar.
- Transaction crosses many international lines.
- Use of a credit card issued by a foreign bank that does not operate in Qatar by a Customer that does not live or work in the country of issue.
- Cash volumes and international remittances in excess of average income for migrant worker clients.
- Transactions involving high-volume international transfers to third party accounts in countries that are not usual remittance corridors.
- Transaction involves a country known for highly secretive banking and corporate law.
- Transactions involving any countries deemed by the Financial Action Task Force as requiring enhanced surveillance.
- Foreign currency exchanges that are associated with subsequent wire transfers to locations of concern, such as countries known or suspected to facilitate money laundering activities.
- Deposits followed within a short time by wire transfer of funds to or through locations of concern, such as countries known or suspected to facilitate money laundering activities.
- Transaction involves a country where illicit drug production or exporting may be prevalent, or where there is no effective anti-money-laundering system.
- Transaction involves a country known or suspected to facilitate money laundering activities.

The Financial Action Task Force's website (<http://www.fatf-gafi.org>) has information about non-cooperative countries and territories in the fight against money laundering and terrorist financing (see "High-risk and non-cooperative jurisdictions" section).

(8) Transactions related to offshore business activity

- Accumulation of large balances, inconsistent with the known turnover of the client's business, and subsequent transfers to overseas account(s).
- Frequent requests for traveller's cheques, foreign currency drafts or other negotiable instruments.
- Loans secured by obligations from offshore banks.
- Loans to or from offshore companies.
- Offers of multimillion-dollar deposits from a confidential source to be sent from an offshore bank or somehow guaranteed by an offshore bank.
- Transactions involving an offshore "shell" bank whose name may be very similar to the name of a major legitimate institution.
- Unexplained electronic funds transfer by Customer on an in-and-out basis.
- Use of letter-of-credit and other method of trade financing to move money between countries when such trade is inconsistent with the client's business.

- Use of a credit card issued by an offshore bank.

This list of indicators is not an exclusive list. Reporting Entities can identify suspicious transactions involving high risk individuals, legal entities, and transactions based on other criteria or known indicators of money laundering, terrorist financing, or a predicate offense.

STR Form

QFIU Suspicious Transaction Report Form		
1.	Submission details:	
1.1	Date:	
1.2	Submitting Officer:	
1.3	Type of Reporting Institution:	<input type="checkbox"/> Bank <input type="checkbox"/> Exchange House <input type="checkbox"/> Insurance Company <input type="checkbox"/> Investment Company <input type="checkbox"/> Finance Company <input type="checkbox"/> Asset Management Company <input type="checkbox"/> Accountants <input type="checkbox"/> Lawyers <input type="checkbox"/> Real Estate Brokers/Agents <input type="checkbox"/> Dealers of Gold and other precious metal <input type="checkbox"/> Dealers of diamond and other precious stones <input type="checkbox"/> Other: Specify
1.4	Submitting Institution:	
1.5	Contact details: Address: Direct Phone No: Email:	
1.6	Your reference No.	

2.	Reporting details:	
2.1	<i>Is this report related to a previously filed STR?</i> (Mandatory)	<input type="checkbox"/> Yes <i>If yes, include the reference number to the report _____</i> <input type="checkbox"/> No

2.2	Is this report related to Terrorism Financing , Money Laundering, Sanctions or another type of suspicion? <i>(Mandatory)</i>	<input type="checkbox"/> Terrorism Financing <input type="checkbox"/> Money Laundering <input type="checkbox"/> Sanctions <input type="checkbox"/> Another type of suspicion <input type="checkbox"/> Other
2.3	Is this report subject to any urgent requirements to freeze funds?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown
2.4	Reason for suspicion: <i>(Mandatory)</i>	<input type="checkbox"/> Structuring <input type="checkbox"/> Unusual transaction <input type="checkbox"/> Source of funds not established <input type="checkbox"/> Uneconomical transaction <input type="checkbox"/> Transaction with no business purpose <input type="checkbox"/> Fraud <input type="checkbox"/> Incomplete KYC <input type="checkbox"/> False identity <input type="checkbox"/> Large amount of cash <input type="checkbox"/> Conduct of the individual suspicious <input type="checkbox"/> Other: Specify
2.5	No. of transactions reported <i>(Mandatory)</i>	<input type="checkbox"/> One Transaction <input type="checkbox"/> Multiple Transactions <ul style="list-style-type: none"> <input type="checkbox"/> No. of Transactions __
2.6	What is the suspected value of the transaction/s, including any attempted transaction? <i>(Mandatory)</i>	Value in Qatari Riyal: Value in Other Currencies:
2.7	What type of fund, service or product was used for the transaction? <i>(Mandatory)</i>	<input type="checkbox"/> Cash <input type="checkbox"/> Wire transfer <input type="checkbox"/> Bank account <input type="checkbox"/> Trust Account <input type="checkbox"/> Securities <input type="checkbox"/> Cheque <input type="checkbox"/> Insurance policy <input type="checkbox"/> Investment certificates <input type="checkbox"/> Stocks <input type="checkbox"/> Currency exchange <input type="checkbox"/> Credit Card

		<input type="checkbox"/> Debit Card <input type="checkbox"/> Crypto Currency <input type="checkbox"/> Gold <input type="checkbox"/> Other precious metal <input type="checkbox"/> Diamonds <input type="checkbox"/> Other Precious stones <input type="checkbox"/> Real estate <input type="checkbox"/> Consulting/Advisory services <input type="checkbox"/> Other; Specify
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3.	Details of the person/s of interest (POI)/ Suspect or associates related to the transaction If the POI is a natural person fill Part 3, If POI/ Suspect is a legal person fill Part 5. If the POI / Suspect involves both natural and legal person fill both Part 3 and 5. If POI/ Suspect is a Trust, fill Part 6.
3.1	Person of Interest: Provide as much details as you know about the POI/ Suspect and include copies of any identification documents obtained
	<u>Nationality and Residency Information</u> Nationality : (Mandatory) <input type="checkbox"/> Qatari <ul style="list-style-type: none"> ○ QID No.(Mandatory) ○ Passport No. (Optional) <input type="checkbox"/> Resident <ul style="list-style-type: none"> ○ QID No. (Mandatory) ○ Passport No. (Optional) <input type="checkbox"/> GCC Counties: (Either/Or) <ul style="list-style-type: none"> ○ GCC ID No. ○ Passport No. <input type="checkbox"/> Non Resident <ul style="list-style-type: none"> ○ Passport No. (Mandatory)
	<input type="checkbox"/> Arabic Name: <input type="checkbox"/> English Name: (Either, English or Arabic Name Mandatory) <input type="checkbox"/> DOB: (Mandatory) <input type="checkbox"/> Gender: (Mandatory) <input type="checkbox"/> Address/s: <input type="checkbox"/> Phone No: <input type="checkbox"/> Mobile No: <input type="checkbox"/> Email:

		<input type="checkbox"/> Country of residence: <input type="checkbox"/> Occupation: <input type="checkbox"/> Driver's license details: <input type="checkbox"/> Employer details: <input type="checkbox"/> Any other personal information:
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4. Account information (1)		
4.1.1	Account type: (Mandatory)	<input type="checkbox"/> Retail <input type="checkbox"/> Corporate <input type="checkbox"/> Other: Details:
4.1.2	Sub-account type:	<input type="checkbox"/> Personal account <input type="checkbox"/> Business account <input type="checkbox"/> Trust account <input type="checkbox"/> Other: Details:
4.1.3	Account Institution Branch: (Mandatory)	
4.1.43	Account name: (Mandatory)	
4.1.5	Account opening date:	
4.1.56	Account number: (Mandatory)	
4.1.67	Account signatories:	
4.1.8	Account closed date, if applicable:	
4.1.9	Account balance: (Mandatory)	
4.1.10	Account transaction history:	Please attach account transaction history covering the period of suspicion
Account information (2)		
4.2.1	Account type: (Mandatory)	<input type="checkbox"/> Retail <input type="checkbox"/> Corporate <input type="checkbox"/> Other:

		Details:
4.2.2	Sub-account type:	<input type="checkbox"/> Personal account <input type="checkbox"/> Business account <input type="checkbox"/> Trust account <input type="checkbox"/> Other: Details:
4.2.3	Account Institution Branch: (Mandatory)	
4.2.4	Account name: (Mandatory)	
4.2.5	Account opening date:	
4.2.6	Account number: (Mandatory)	
4.2.7	Account signatories:	
4.2.8	Account closed date if applicable:	
4.2.9	Account balance: (Mandatory)	
4.2.10	Account transaction history:	Please attach account transaction history cover the period of suspicion

5.	Company/Business Information	
5.1	Name of company/business: (Mandatory)	
5.2	Type of company/business: (Mandatory)	<input type="checkbox"/> Private Company <input type="checkbox"/> Public Company <input type="checkbox"/> Partnership <input type="checkbox"/> Other
5.3	Which jurisdiction is the company/business registered? (Mandatory)	<input type="checkbox"/> Qatar <input type="checkbox"/> Other: Specify
5.4	Company or Business	No.

	Registration No.: (Mandatory)	
5.5	Establishment Code (Mandatory if company/business is local)	No.
5.6	Foreign Company Registration No. (Mandatory if company/business is foreign)	No.
5.7	Registered address: (Mandatory)	
5.8	Operational address, if different from registered address:	
5.9	Company/business contact details:	Name: Phone No. Mobile No. Email: Other information:
5.10	Company Directors and/or business owners.	Name: Phone No. Mobile No. Email: Other information:
5.11	Reason for association to other person of interest (POI)/ Suspect.	

6. Trust	
6.1	Trust name
6.2	Nature and purpose of the trust
6.3	Jurisdiction and date of the establishment of the trust
6.4	Identity of settlor (s)
6.5	Identity of trustee (s)
6.6	Identity of protector (s)
6.7	Beneficiary or beneficiaries
6.8	Other particulars

7. Details of the suspicious activity	
7.1	When did this suspicious activity occur? (Mandatory)
7.2	Where did this suspicious activity occur? (Mandatory)
7.3	How was the suspicious activity identified? (Mandatory)
	<input type="checkbox"/> Face to face transaction <input type="checkbox"/> Transaction monitoring system <input type="checkbox"/> Compliance Officer or MLRO <input type="checkbox"/> Anonymous Tip <input type="checkbox"/> Manual Audit <input type="checkbox"/> Negative News <input type="checkbox"/> Other Specify

<p>7.4</p>	<p>Provide a detailed narrative about the actual suspicious activity resulting in the filing of this STR. What raised your suspicious? Describe clearly and completely the factors or unusual circumstances that led to the suspicion of ML or TF activity. <i>(Mandatory)</i></p>	
<p>7.5</p>	<p>Provide any additional information that you consider important to filing this STR.</p>	

<p>8. Supporting documentation</p>	
<p>8.1</p>	<p>Please list any supporting documents relevant to the filing of this STR</p> <p>List attachments:</p> <ul style="list-style-type: none"> <input type="checkbox"/> POI/ Suspect Identification documents <input type="checkbox"/> Account information <input type="checkbox"/> Transaction records <input type="checkbox"/> Company/business records <input type="checkbox"/> Any other documents or records <p>List:</p>