

# Guidance on the Implementation of an Effective Suspicious Transaction and Activity Reporting Programme

## Contents

<b>Glossary of Terms</b> .....	<b>3</b>
<b>Overview of Guidance</b> .....	<b>4</b>
Purpose.....	5
Background .....	5
Regulatory Framework.....	6
<b>STR and SAR Programme</b> .....	<b>8</b>
Developing a STR and SAR Programme .....	8
Transaction Monitoring.....	8
Fundamental obligations for PPSC.....	9
Matters for Considerations with Implementing and Updating PPSC.....	13
Other Requirements to Consider.....	13
<b>Regulatory Authority Contact Details</b> .....	<b>15</b>
<b>Reference Documents &amp; Links</b> .....	<b>15</b>
<b>Appendix 1: Checklist</b> .....	<b>16</b>

## Glossary of Terms

<b>AML/CFT</b>	Anti-Money Laundering/Combating the Financing of Terrorism
<b>DNFBP</b>	Designated Non-Financial Businesses and Professions
<b>DTSP</b>	Designated Token Service Provider
<b>ESS</b>	Electronic Submission System
<b>FCC</b>	Financial Crime Compliance
<b>FI</b>	Financial Institution
<b>FIRM</b>	A Financial Institution, DNFBP, or DTSP operating in the Qatar Financial Centre
<b>MLRO</b>	Money Laundering Reporting Officer
<b>OSP</b>	Outsourced Service Provider
<b>PPSC</b>	Policies, Procedures, Systems and Controls
<b>QFC</b>	Qatar Financial Centre
<b>QFCRA</b>	Qatar Financial Centre Regulatory Authority
<b>QFIU</b>	Qatar Financial Information Unit
<b>STR</b>	Suspicious Transaction Report
<b>SAR</b>	Suspicious Activity Report

## Overview of Guidance

This document provides comprehensive guidance for firms operating within the Qatar Financial Centre on developing and implementing an effective Suspicious Transaction Reporting (STR) and Suspicious Activity Reporting (SAR) programme. It outlines regulatory requirements, key obligations, and best practices to ensure compliance with anti-money laundering and counter-terrorism financing laws and rules.

**STR and SAR programme:** Firms must establish policies, procedures, systems, and controls (PPSC) to identify and report suspicious transactions and activities to the Money Laundering Reporting Officer (MLRO) and the Qatar Financial Information Unit (QFIU).

**Regulatory framework:** The obligations are governed by Article 21 of the AML/CFT Law No. 20 of 2019 and Chapter 5 of the QFCRA AML/CFT Rules of 2019, requiring prompt reporting of any suspicious transaction or operation regardless of the value.

**Identifying suspicious transactions:** For example, firms should assess if transactions lack economic or lawful purpose, have no reasonable explanation, deviate from customer patterns, involve new relationships, offshore accounts, or unnecessary routing of funds and complex arrangements of entities. Knowing the customer well is crucial and fundamental to assessing the ML and TF risks.

**Developing STR and SAR programme:** Firms should integrate a programme within their broader financial crime compliance frameworks, applying a risk-based approach and document the rationale for decisions made.

**Transaction and customer monitoring:** Effective monitoring includes transaction scrutiny and customer screening throughout the business relationship lifecycle, using robust methodologies and adopting appropriate automated tools and avoiding reliance solely on manual systems. Resolution of alerts must be diligent with justified documented outcomes.

**Fundamental PPSC obligations:** Senior management is responsible for approving and implementing PPSC. Firms must appoint a qualified MLRO and Deputy MLRO to oversee internal reporting, liaise with authorities, and ensure timely suspicious transaction reports to the QFIU. All employees must have direct access to the MLRO (or the Deputy MLRO when the MLRO is not available) and report suspicions promptly.

**Reporting and record-keeping:** Suspicious transaction reports must be submitted in the approved formats, and firms must notify the QFCRA upon reporting to the QFIU.

Records related to suspicious activities must be retained for at least ten years, and firms must prevent tipping-off.

**PPSC review and training:** Policies and procedures should be reviewed annually and tested for effectiveness. Regular training for staff on AML/CFT obligations and reporting responsibilities is essential.

**Best practices for STR and SAR risk management:** Firms should conduct annual risk assessments, align PPSC accordingly, report trigger events promptly, maintain screening tools, and perform independent testing of monitoring systems at least annually.

## Purpose

1. This paper provides guidance to assist firms in developing, enhancing, or implementing a comprehensive Suspicious Transaction Reporting (STR) and Suspicious Activity Reporting (SAR) programme. Firms must have appropriate policies, procedures, systems, and controls (PPSC) to identify suspicious transactions and activities, including obligations to screen customers, related individuals and entities and transactions, and report such suspicious matters to the Money Laundering Reporting Officer (MLRO) and the Qatar Financial Information Unit (QFIU).

## Background

2. STR and SAR compliance is critically important to ensure QFCRA Financial Institutions (FIs), Designated Non-Financial Businesses or Professions (DNFBPs) and Designated Token Service Providers (DTSPs) (collectively referred to as 'firms') meet transaction and activity monitoring and reporting obligations.
3. This guidance should be read in conjunction with the QFIU [INSTRUCTIONS ON IMPLEMENTING Suspicious Transaction Reporting Requirements \(April 2024\)](#) (herein referred to as the QFIU guidance), and future guidance that may be issued. Pursuant to the AML/CFT Law and Rules FIs and DNFBPs shall promptly report to the QFIU any information concerning any transaction, activity or operation, including attempted transactions, activities and operations, regardless of the value thereof, when there is a suspicion or reasonable grounds to suspect that such transactions, activities and operations are associated with, or involve proceeds of a predicate offence or may be used in terrorism financing.
4. Therefore, while the AML/CFT Law and AML/CFTR reference Suspicious Transaction Reports, this term has a broad meaning covering suspicious transactions and suspicious activity.

### Extracted from the QFIU guidance:

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.*

## Regulatory Framework

5. The regulatory framework on suspicious reporting obligations is set forth in Article 21 of the AML/CFT Law No. 20 of 2019 and Chapter 5 of the QFCRA AML/CFT Rules of 2019.

A transaction is defined in the AML/CFT Rules, as follows:

*Transaction means a transaction or attempted transaction of any kind, and includes, for example:*

- (a) the giving of advice;*
- (b) the provision of any service; and*
- (c) the conducting of any other business or activity.*

6. Unusual and inconsistent transactions are set out in the AML/CFT Rules 5.1.1 as follows:

- (1) A transaction that is unusual or inconsistent with a customer's known legitimate business and risk profile does not of itself make it suspicious.

**Note 1:** The key to recognising unusual or inconsistent transactions is for a firm to know its customers and connected parties well enough under Chapter 4 (Know your customer).

**Note 2:** A firm's AML/CFT policies, procedures, systems and controls must provide for the identification and scrutiny of certain transactions (refer to rule 2.1.3 (2) (a))<sup>1</sup>.

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<sup>1</sup> The firm's AML/CFT policies, procedures, systems and controls must: (a) provide for the identification and scrutiny of: (i) complex or unusual large transactions, and unusual patterns of transactions, that have no apparent economic or visible lawful purpose; and (ii) **any other** transactions that the firm considers particularly likely by their nature to be related to money laundering or terrorism financing.

- (2) A firm must consider the following matters in deciding whether an unusual or inconsistent transaction is a suspicious transaction:
- (a) whether the transaction has no apparent or visible economic or lawful purpose;
  - (b) whether the transaction has no reasonable explanation;
  - (c) whether the size or pattern of the transaction is out of line with any earlier pattern or the size or pattern of transactions of similar customers;
  - (d) whether the customer has failed to give an adequate explanation for the transaction or to fully provide information about it;
  - (e) whether the transaction involves the use of a newly established business relationship or is for a one-off transaction.
  - (f) whether the transaction involves the use of offshore accounts, companies or structures that are not supported by the customer's economic needs;
  - (g) whether the transaction involves the unnecessary routing of funds through third parties

**Subrule (2) does not limit the matters that the firm may consider.**

7. Furthermore, the 2024 QFIU's guidance highlights "Suspicious activity arises from suspicion relating to the expected behaviour of the customer or other customers of the same category" which indicates the focus is also on 'suspicious activity' and not limited to suspicious transactions only.

## STR and SAR Programme

### Developing a STR and SAR Programme

8. Many firms have developed an AML/CFT Programme to combat money laundering and terrorism financing risks, taking into account the QFCRA's ["Guidance on the Risk-Based Approach"](#). However, firms must ensure that transaction and activity monitoring are also considered part of the firm's broader '**operational risks**' or '**financial crime compliance (FCC)**' programme obligations.
9. Whilst the QFCRA does not prescribe a particular methodology for developing a STR and SAR programme, firms should develop a '*programme*' as part of their PPSC as a control mechanism to identify, detect, prevent and report suspicious matters. This should incorporate applying the AML/CFT Law and Rule obligations, along with the QFIU guidance to assess customers, entities, persons, currencies, funds, and assets that the firm transacts with and conduct screening to assist with identifying any suspicious persons, entities or activities.
10. The PPSC, should be documented and articulate the rationale for any decisions made.

### Transaction Monitoring

11. Transaction monitoring is crucial to any compliance programme, including for AML/CFT purposes<sup>2</sup>. It is vital to note that transaction monitoring should incorporate **two** main monitoring controls, transaction monitoring and customer monitoring, including connected parties of the customer. While transaction monitoring helps identify suspicious transactions involving individuals or entities, customer monitoring (and name screening) is equally crucial during customer onboarding and the lifecycle of the customer and business relationship.
12. All firms must adopt and implement a robust monitoring methodology taking into consideration the nature, scale and complexity of operations. In addition, the firm must pay special attention to all complex, unusual large transactions, or unusual patterns of transactions, that have no apparent or visible economic or lawful purpose<sup>3</sup>. Whilst many firms may use external vendors and/or a combination of external and internal systems to fulfil this function the QFCRA does not endorse any specific vendor or monitoring/screening

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<sup>2</sup> AML/CFT Rule 4.3.13

<sup>3</sup> AML/CFT Rule 4.3.13 (2)

system, however, we discourage firms from relying only on manual systems as lists are dynamic and constantly changing.

13. Whilst this monitoring should be designed to establish an effective control for identifying suspicious transactions and activities, consideration must be given to the resolution and closure of a suspicious transaction or activity identified, including firms utilising their head office or a centralised office (outside of the QFCRA entity) as part of the firms ongoing monitoring policies and procedures. Note, it is importance to resolve all alerts with sufficient justification in a diligent manner and to ensure that, where warranted, STRs are lodged with the QFIU.

### **Fundamental obligations for PPSC**

14. PPSC should identify clear lines of reporting and responsibilities, noting it is the overall responsibility of the governing body for approving the PPSC necessary to ensure the effective prevention of money laundering and terrorism financing. Whilst senior management must ensure that the PPSC are implemented, and that they are appropriately adequately address the requirements of the AML/CFT Law and Rules<sup>4</sup>.
15. A firm must have effective measures in place to ensure that there is internal and external reporting whenever money laundering or terrorism financing is known or suspected<sup>5</sup>.
16. Firms need to appoint a suitably qualified MLRO who is responsible for receiving, investigating and assessing internal suspicious transaction reports for the firm; making suspicious transaction reports to the QFIU and telling the Regulator about them; acting as a central point of contact between the firm, and the QFIU, the Regulator and other State authorities, in relation to AML/CFT issues; and responds promptly to any request for information by the QFIU, the Regulator and other State authorities in relation to AML/CFT issues<sup>6</sup>.
17. As part of the firms ongoing monitoring PPSC need to be clear and effective for the internal reporting of all known or suspected instances of money laundering or terrorism financing. This includes the prompt making of internal suspicious transaction reports to the firm's MLRO<sup>7</sup>. All officers and employees must have direct access to the firms MLRO and reporting lines between them should be as short as possible<sup>8</sup>. Firms utilising an Outsourced Service Provider

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<sup>4</sup> AML/CFT Rules, Principle 1.2.1

<sup>5</sup> AML/CFT Rule, Principle 1.2.4

<sup>6</sup> AML/CFT Rule, 2.3.4 (1) (a-d)

<sup>7</sup> AML/CFT Rule 5.1.2

<sup>8</sup> AML/CFT Rule 5.1.3

(OSP) for this function need to ensure PPSC reflect these reporting requirements.

18. All officers and employees must make a report (*an internal report*) if they know or suspect, or have reasonable grounds to know or suspect, that funds are the proceeds of crime, related to terrorism financing or linked to or related to terrorism, terrorist acts or by terrorist organisations, irrespective of the amount of the funds or whether or not the funds involve tax matters. Furthermore, even though no transactions has been or will be conducted by the firm in relation to the funds, no business relationship has been or will be entered into by the firm with the applicant, or the firm has terminated any relationship with the customer or any attempted money laundering or financing activity in relation to the funds has failed for any other reason a report still needs to be made<sup>9</sup>.
19. If the officer or employee makes a suspicious transaction report to the MLRO in relation to the applicant for business or customer, the officer or employee must promptly give the MLRO details of every subsequent transaction of the applicant or customer (*whether or not of the same nature as the transaction that gave rise to the internal report*) until the MLRO tells the officer or employee not to do so. Note, an officer or employee who fails to make a report under this rule may commit an offence against the AML/CFT Law; and may also be dealt with under the Financial Services Regulations, Part 9 (*Disciplinary and enforcement powers*).
20. Once the MLRO receives an internal report they must ensure it is appropriately documented, give the individual making the report a written acknowledgement of receiving the report (*including notification of any decision*), remind the individual of the “*tipping off*” provisions<sup>10</sup>, consider the report in light of all other relevant information held by the firm about the applicant, customer or transaction and decided whether the transaction is suspicious. Note, the final decision on filing a report in the first instance, should be made by the MLRO or Deputy MLRO or by other senior AML/CFT staff. This decision must be independent from a management or business function.
21. The firm’s PPSC must ensure there are established reporting mechanisms to the QFIU of all known or suspected instances of money laundering or terrorism financing<sup>11</sup>. Firms are required to update their policies and procedures to

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<sup>9</sup> AML/CFT Rule 5.1.4

<sup>10</sup> AML/CFT Rule Part 5.2

<sup>11</sup> AML/CFT Rule 5.1.6

reflect the latest guidance<sup>12</sup> issued by the QFIU and ensure they have registered the MLRO and Deputy MLRO with the QFIU on Ekhtar<sup>13</sup>.

22. Once the firm has decided to make a report to the QFIU, they must ensure that any proposed transaction mentioned in the report does not proceed without consultation with the QFIU. Note, the report must be made by the firm on behalf of the MLRO, or in their absence the Deputy MLRO. However, in the case that neither of these officers are available, then a person at management level or by a legal person of the same group who has sufficient seniority may lodge the report<sup>14</sup>. It is important to ensure that any alternative lodgement arrangements are documented and consider the QFIUs registration requirements on Ekhtar.
23. The report must be submitted in the form approved by the QFIU and in accordance with the QFIUs instructions (*guidance*). The report must include a statement about the facts or circumstances on which the firm's knowledge or suspicion is based or the grounds for the firm's knowledge or suspicion; and if the firm knows or suspects that the funds belong to a third person—the facts or circumstances on which that knowledge or suspicion is based or the grounds for the firm's knowledge or suspicion<sup>15</sup>.
24. In addition to filing a report with the QFIU, the firm must immediately advise the QFCRA that it has made a report<sup>16</sup>. In this connection when a firm makes a report to the QFIU submit a Form Q07 (Section 7 [FormQ07-VER5-Nov14.pdf](#)) via the Electronic Submission System (ESS) to notify the QFCRA. **DO NOT INCLUDE A COPY OF THE STR.**
25. If a firm makes a suspicious transaction report to the QFIU in relation to an applicant for business or a customer; or the firm knows that an applicant for business or customer is under investigation by a law enforcement agency in relation to money laundering or terrorism financing, then the firm **must not** destroy any records relating to the applicant for business or customer without consulting with the QFIU<sup>17</sup>.
26. A firm is not prevented or restricted from terminating, for normal commercial reasons, its business relationship with a customer after the firm makes a suspicious transaction report about the customer to the QFIU. However, the firm must ensure that restricting or terminating the business relationship does

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<sup>12</sup> [INSTRUCTIONS ON IMPLEMENTING Suspicious Transaction Reporting Requirements \(April 2024\)](#)

<sup>13</sup> Ekhtar is the QFIU on-line portal for the lodgment of an STR.

<sup>14</sup> AML/CFT Rule 5.1.7

<sup>15</sup> AML/CFT Rule 5.1.7 (5)

<sup>16</sup> AML/CFT Rule 5.1.7 (6)

<sup>17</sup> AML/CFT Rule 5.1.8

not inadvertently result in “*tipping-off*” the customer. If the firm restricts or terminates a business relationship with a customer, it must immediately notify the Regulator about the restriction or termination<sup>18</sup>, utilising the Form Q7.

27. The MLRO of a firm must make and keep records showing the details of each internal suspicious transaction report the MLRO receives necessary to demonstrate how the obligations of the MLRO on receipt of an internal report was complied with in relation to each internal suspicious transaction report and showing the details of each suspicious transaction report made to the QFIU by the firm<sup>19</sup>. Note, records should be maintained for a least 10 years, as set forth in the Part 7.1 of the AML/CFT Rules general record keeping obligations. Furthermore, a firm must establish and maintain systems that enable it to respond fully and quickly to inquiries from the QFIU and law enforcement authorities about whether it maintains, or has maintained during the previous 10 years, a business relationship with any person; and the nature of the relationship<sup>20</sup>.
28. In addition, PPSC need to prevent “*tipping-off*”<sup>21</sup> within the firm or its group. If a firm believes, on reasonable grounds, that an applicant for business or a customer may be tipped off by conducting CDD or ongoing monitoring, the firm may make a suspicious transaction report to the QFIU instead of conducting CDD or monitoring<sup>22</sup>.
29. The firms PPSC should ensure information relating to suspicious transaction reports are safeguarded, in particular, that information relating to a suspicious transaction report is not disclosed to any person (*other than a member of the firm's senior management*) without the consent of the firm's MLRO. The MLRO must not consent to information relating to a suspicious transaction report being disclosed to a person unless the MLRO is satisfied that disclosing the information to the person would not constitute tipping-off. If the MLRO gives

<sup>18</sup> AML/CFT Rule 5.1.9

<sup>19</sup> AML/CFT Rule 5.1.10

<sup>20</sup> AML/CFT Rule 7.1.3

<sup>21</sup> AML/CFT Rule 5.2.1 **Tipping-off**, in relation to an applicant for business or a customer of a firm, is the unauthorised act of disclosing information that:

(a) may result in the applicant or customer, or a third party (other than the FIU or the Regulator), knowing or suspecting that the applicant or customer is or may be the subject of:

(i) a suspicious transaction report; or

(ii) an investigation relating to money laundering or terrorism financing; and

(b) may prejudice the prevention or detection of offences, the apprehension or prosecution of offenders, the recovery of proceeds of crime, or the prevention of money laundering or terrorism financing.

<sup>22</sup> AML/CFT Rule 5.2.2

consent, the MLRO must make and keep records to demonstrate how the MLRO was satisfied that disclosing the information to the person would not constitute tipping-off<sup>23</sup>.

## Matters for Considerations with Implementing and Updating PPSC

30. It is important to ensure that the firms PPSC are reviewed annually<sup>24</sup> and signed off by Senior Management<sup>25</sup>. Furthermore, the firm should test the effectiveness of their PPSC, incorporating the monitoring of suspicious transactions and activities, in the context of this guidance, the QFIU guidance and any other matters discussed during workshops organised by the QFIU. Note, the QFCRA 2024 revised Independent Review Report (IRR)<sup>26</sup> guidance has included the requirement for testing of the transaction monitoring system and testing of the overall process for identifying and reporting suspicious transactions and activities, including a review of internal and external Suspicious Transaction Reports to determine their accuracy, timeliness, and completeness, and overall effectiveness of the firm's policy. Firms need to ensure that testing of ongoing monitoring is conducted which should extend to the activities of the customer.
31. Furthermore, it is recommended that all firms ensure sufficient training<sup>27</sup> is undertaken with their officers and employees, particularly in connection to their role in preventing money laundering and terrorism financing, and the liability that they, and the firm, may incur for failure to comply with the AML/CFT Law and the Rules.

## Other Requirements to Consider

32. Firms must ensure that the people involved in the development, implementation, management and oversight of their STR and SAR programme and PPSC are appropriately trained and skilled to carry out their function and have the appropriate resources and support from Senior Management.
33. The firm's STR and SAR programme should have established roles and responsibilities, as well as reporting protocols to escalate suspicious transactions and activities or report on failures or breaches.

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<sup>23</sup> AML/CFT Rule 5.2.3

<sup>24</sup> AML/CFT Rule 2.1.4

<sup>25</sup> AML/CFT Rules Part 2.2

<sup>26</sup> [Guidance for the AMLCFT Independent Review Report.pdf](#)

<sup>27</sup> AML/CFT Rule Part 6.2

34. Firms must establish appropriate processes for managing their STR and SAR risks and obligations. In this connection, the QFCRA recommends the following '*best practices*', as a minimum:

- STR and SAR Risk Assessments should be conducted at least annually and reviewed when significant changes occur at the firm, e.g., in its customer base, products, services, distribution channels, or jurisdictions.
- PPSC must be reviewed at least annually and aligned to the STR and SAR Risk Assessment.
- Reporting to the MLRO must occur whenever a trigger event occurs, for example, a suspicious transaction or activity is identified, there are reasonable grounds of suspicion, a positive name match, adverse media information, changes in customer behaviour and transactional patterns, test failure, or breach. Reporting to the Board or governing body (where applicable) should be done regularly and at least annually.
- Staff must be trained at least annually regarding the firm's transaction monitoring and reporting obligations or whenever there is any material change to the PPSC.
- Screening tools must be acquired and/or developed by the firm to ensure appropriate measures are in place to assist with identifying suspicious transactions and activities.
- The firm's screening systems must be tested regularly to ensure the effectiveness. The internal and/or external auditor should conduct independent testing at least annually.

## Regulatory Authority Contact Details

35. If a firm has any questions regarding the development, enhancement, or implementation of a comprehensive Suspicious Transaction Reporting (STR) and Suspicious Activity Reporting (SAR) programme you should contact the AML/CFT Department of the Regulatory Authority by email at [aml@qfcra.com](mailto:aml@qfcra.com) or by telephone at +974 4495 6888.

## Reference Documents & Links

36. The QFCRA and QFIU has published several guidance notes that firms should refer to when developing, enhancing, or implementing a comprehensive Suspicious Transaction Reporting (STR) and Suspicious Activity Reporting (SAR) programme including the following:

Reference documents & links	
QFIU	<a href="#">INSTRUCTIONS ON IMPLEMENTING Suspicious Transaction Reporting Requirements (April 2024)</a>
QFCRA	<a href="#">Guidance on the Risk-Based Approach</a>
QFCRA	<a href="#">Guidance on Sanctions</a>
QFCRA	<a href="#">Guidance for the AMLCFT Independent Review Report.pdf</a>
Forms	
QFCRA	<a href="#">Form Q07</a>
QFCRA	<a href="#">Electronic Submission System (ESS)</a>
AML/CFT Law and Rules:	
<a href="#">Decree Law No. [18] of 2025 Amending Some Provisions of the Law No. (20) of 2019 on Combatting Money Laundering and Terrorism Financing</a>	
<a href="#">Decree Law No. [19] of 2021 Amending Some Provisions of the Law No. (20) of 2019 on Combatting Money Laundering and Terrorism Financing</a>	
<a href="#">Law No (20) of 2019 on Combating Money Laundering and Terrorism Financing</a>	
<a href="#">Implementing Regulations of Law No. (20) of 2019 on Combatting Money Laundering and Terrorism Financing</a>	
<a href="#">Council of Ministers' Decision No. [14] of 2021 Amending some Provisions of the Implementing Regulations of the Law on Combatting Money Laundering and Terrorism Financing Promulgated by the Council of Ministers' Decision No. (41) of 2019</a>	
<a href="#">QFCRA AML/CFT Rules 2019</a>	
<a href="#">QFCRA AML/CFT (General Insurance) Rules 2019</a>	

## Appendix 1: Checklist

This **CHECKLIST** will assist firms to self-evaluate and confirm they have developed and are maintaining an effective Suspicious Transaction Reporting (STR) and Suspicious Activity Reporting (SAR) programme to comply with anti-money laundering and counter-terrorism financing obligations.

No.	ITEM	CONFIRM
1.	Developed and documented an integrated STR and SAR programme.	
2.	Taken into consideration the QFCRA and QFIU Guidance on reporting suspicious transactions and activities.	
3.	<p>Does your programme clearly define what a suspicious transaction and suspicious activity is, including unusual or inconsistent transactions and activities of the customer? Examples:</p> <ul style="list-style-type: none"> <li>• Whether the transaction has no apparent or visible economic or lawful purpose;</li> <li>• Whether the transaction has no reasonable explanation;</li> <li>• Whether the size or pattern of the transaction is out of line with any earlier pattern or the size or pattern of transactions of similar customers;</li> <li>• Whether the customer has failed to give an adequate explanation for the transaction or to fully provide information about it;</li> <li>• Whether the transaction involves the use of a newly established business relationship or is for a one-off transaction;</li> <li>• Whether the transaction involves the use of offshore accounts, companies or complex structures that are not supported by the customer's economic needs; and</li> <li>• Whether the transaction involves the unnecessary routing of funds through third parties.</li> </ul>	
4.	Does your programme include transaction monitoring, incorporating actual transactions, customer monitoring and connected parties?	

5.	Does your firm's transaction and customer monitoring systems have the ability to raise alerts of suspicious transactions and activities?	
6.	Does your programme detail how alerts should be dealt with, who these should be reported to and how they are to be resolved?	
7.	If alerts are managed outside of the Qatar office or via third parties ( <i>including Head office and outsourced service providers</i> ) does the firm have documents procedures for submitting an STR to the QFIU?	
8.	Is the MLRO and Deputy MLRO registered with on Ekhtar, the QFIU on-line STR portal?	
9.	Does the firm have a documented internal suspicious transaction and suspicious activity reporting mechanism to the MLRO, including direct access to the MLRO for all staff and employees?	
10.	Is the MLRO suitably qualified for receiving, investigating and assessing internal suspicious transaction reports and activities for the firm and reporting these to the QFIU and QFCRA?	
11.	Are all officers and employees of the firm aware of their obligations to make an internal report if they know or suspect or have reasonable grounds to know or suspect that funds are the proceeds of crime, even though no transaction proceeded or no business relationship was established?	
12.	Does the reporting by an officer or employee to the MLRO included the obligation to report every detail of the transaction and subsequent transactions ( <i>whether or not of the same nature as the transaction that gave rise to the internal report</i> ) until the MLRO tells the officer or employee not to do so?	
13.	Does your programme include details of the MLROs responsibilities once an internal suspicious transaction or suspicious activity report is made, including written acknowledgement of the report, notification of any decision and reminder about ' <i>tipping off</i> '?	
14.	Does your programme note the final decision for filing a report with the QFIU should be the responsibility of MLRO or Deputy MLRO?	
15.	Once a report has been made to the QFIU, does your programme detail how this suspicious transaction or activity should be dealt with, including	

	ensuring the transaction does not proceed without consulting with the QFIU?	
16.	Does your firm have procedures for notifying the QFCRA once a report has been made to the QFIU, including the lodgement of a Form Q07?	
17.	Does your firm have documented procedures for dealing with and retaining transaction and customer records in connection to any report made to the QFIU, including the retention of those records for 10 years?	
18.	Does your firm have documented procedures for dealing with a customer after it makes a report to the QFIU, including ensuring that 'tipping off' does not inadvertently occur?	
19.	Does your firm have documented procedures relating to a suspicious transaction report <b>not to be disclosed</b> to any person ( <i>other than a member of the firm's senior management</i> ) without the consent of the firm's MLRO and would not constitute 'tipping off'.	
20.	Does your suspicious transaction and activity reporting programme include the following: <ul style="list-style-type: none"> <li>• Defined roles and responsibilities;</li> <li>• Lines of reporting, including to senior management and the governing body;</li> <li>• Risk Assessment of suspicious transactions and activity reporting;</li> <li>• An annual review mechanism;</li> <li>• Testing of the programme, including monitoring systems;</li> <li>• Independent review; and</li> <li>• Staff training of the programme and reporting obligations.</li> </ul>	