Guidance on completing the Q27 AML/CFT Return for Authorised Firms

December 2024 (V.2)

Contents

Structure of this guidance

1. This guidance is for QFC Authorised Firms. You are advised to read the introductory sections from paragraphs 2 to 30 first. The rest of the guidance is divided into sections tailored to different types of firms. You only need to read the sections applicable to the nature of business of your firm. Links to guidance according to the nature of business.

Background

2. The purpose of the Q27 AML/CFT Return (Q27) is to provide the Qatar Financial Centre Regulatory Authority (QFCRA) and National Anti–Money Laundering and Terrorism Financing Committee (NAMLC) with all relevant data in connection to the firm's business activities. This includes information about customers, products, interface and jurisdictional Money Laundering (ML) and Terrorism Financing (TF) risks associated with the firm.

3. The Q27 must be submitted by 31 January each year, covering the previous calendar year.

4. The Q27 is primarily a quantitative data return. Some qualitative elements from previous returns have been removed e.g., firms are no longer required to complete a self–assessment questionnaire or provide a description of their business risk assessment methodology. These elements will be reviewed through other supervisory tools, such as thematic reviews or offsite and onsite assessments. The non–resident MLRO report sheet and the Representative Office AML Return are the only sheets in the Q27 where free–form, qualitative responses are required.

5. There are additional data points in the Q27 e.g., on the Products sheet, firms are required to report the number of customers using a particular product.

6. The Q27 must be submitted via the Electronic Submission System (ESS). The submission process includes a data validation process – further details are set out in the How to submit the Q27 Return section below.

7. The taxonomy used for the Q27, data validation rules and the contents of all drop–down lists for all Sheets are available here.

How to create a tailored Q27 according to the firm's type of business

Download the Q27 template, unblock and enable content

8. A template Q27 is available from the regulatory submission page in the Electronic Submission System (ESS). Download the template form and save it on your computer using this format: FIRM NAME RETURN YEAR Q27 Return, e.g., XYZ Bank 2024 Q27 AML Return is the file name for the return submitted by XYZ Bank on 31 January 2025 covering the period 1 January to 31 December 2024.

9. The Q27 return is an Excel workbook with macros that create a tailored form based on the answers given on the front sheet (firm type, nature of business, MLRO residency etc.) Security settings on your computer may prevent the macros from running, which will prevent the form from opening properly.

10. To allow the macros to run, you may need to:

    a. right click on the file name and select "Properties" from the bottom of the pop–up menu; and

    b. go to the General tab of the dialog box and check the "Unblock" box at the bottom right.
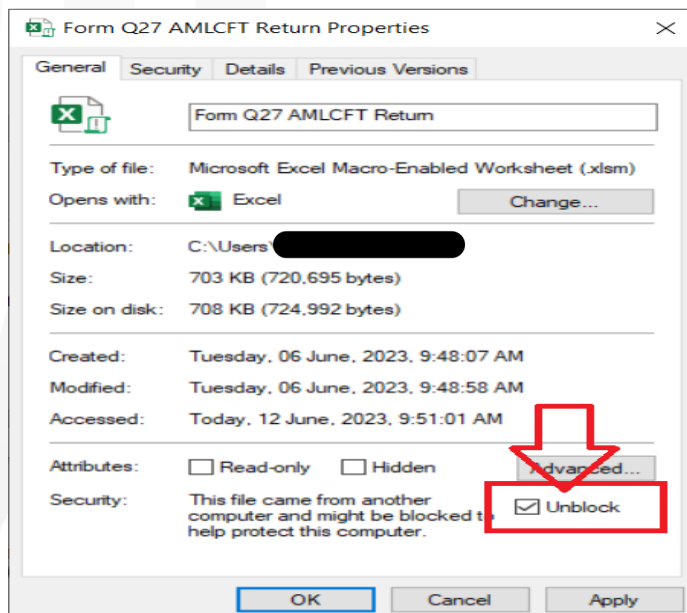
11. Now, open the Q27 in MS Excel. At the top of the document click "enable content".
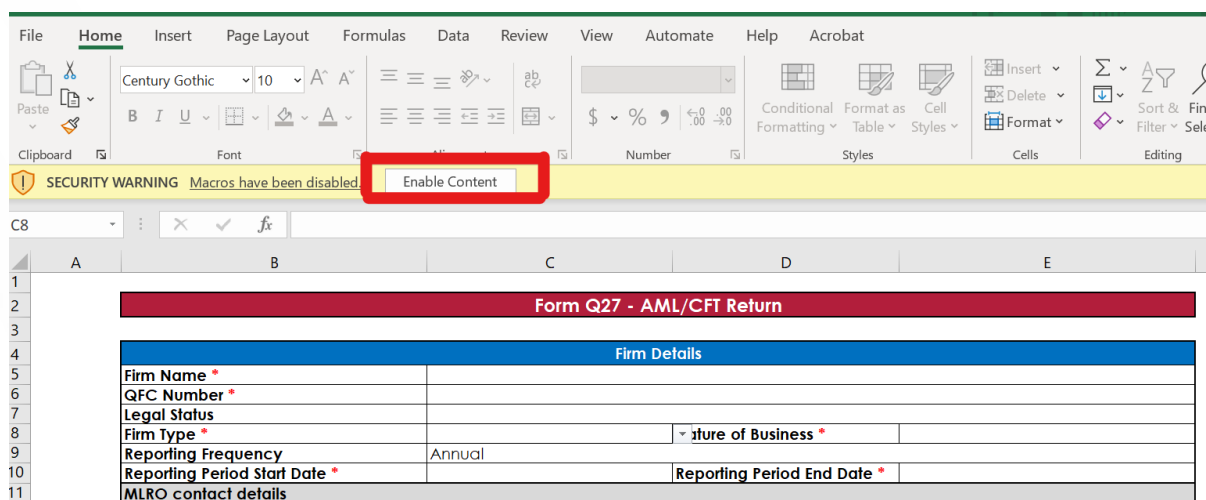
Complete the Front Sheet and Declaration to create a tailored Q27 depending on the firm's type of business

12. Using the drop–down lists, choose the following in the order specified (i.e., a, then b, then c, then d):

   a. Firm Type (Authorised or DNFBP);

   b. Nature of Business (e.g., Bank);

   c. Did the firm file any STRs during reporting period; and

   d. Country of residence of MLRO.

13. Complete all the other information on the Front Sheet and Declaration. Items marked * are mandatory.

14. Where items marked * cannot be completed (e.g., a representative office is not required to have a DMLRO), then respond not applicable or provide an explanation depending on the context.

15. After you complete the front sheet, a tailored Q27 form will be created for your firm, depending on the type of business. All the sheets relevant to your firm will be created as separate tabs at the bottom of the screen.

16. If you answered "Yes" to the question "Did the firm file any STRs during the reporting period", a STR sheet will be created and must be completed.

17. If the firm has a MLRO who resides outside of Qatar, a non–resident MLRO report sheet will be created and must be completed.

General guidance for entering valid data

18. The following general requirements apply to entering data in all sheets:

a. Use drop–down lists – this ensures consistency of data.

b. You can paste data into a sheet, instead of using the drop–down lists, however if the data does not match a drop–down item, an error will be generated when the form is uploaded to ESS. As set out below, a validation report setting out the errors will be produced by ESS and the firm must correct these errors before ESS will accept the submission.

c. All currency amounts must be in Qatari Riyals.

d. Currency is reported in actual amounts, **NOT** thousands, e.g., one hundred thousand riyals should be reported as 100,000.

e. Do not use the currency symbol 'QAR' – just enter an amount.

f. In number cells, insert only numbers.

g. Express decimal places to 2 decimal places.

h. If there is no activity to be recorded, insert "0" for number cells and "N/A" for text cells.

i. If any data is inserted into a row, all cells in that row must be completed – cells cannot be left blank.

How to submit the Q27 Return

19. The Q27 must be submitted via ESS. Here is a link to the ESS User Guide: QFCRA_Electronic_Submission_System_User_Guide.pdf

20. The link to submit the Q27 Return will be published in the firm's Reporting Schedule in ESS in January of each year.

21. Commencing in 2024, a data validation process will take place when the firm uploads the Q27 to ESS. The firm will not be able to electronically sign the Q27 and proceed to final submission until the data validation process is completed, without errors.

22. The validation process has two parts: front–end validation and back–end validation.

23. Front–end validation checks the information on the Front Sheet and Declaration is valid, including that the firm's name on the Sheet is exactly the same as the firm's name in ESS. Front–end validation will take only a short time.

24. If there are any validation errors, the firm will receive a notice which will request the firm to log into ESS and download the validation report, which will specify what the validation errors are. The firm must correct all validation errors and then upload the Q27 Return again.

25. Once the front–end validation is complete without errors, back–end validation will commence.

26. Back–end validation checks that the information in all other sheets is valid, consistent and error free.

27. Because of the complexity of the back–end validation, including cross checks between Sheets, the validation process may take some time.

28. If there are any validation errors, the firm will receive an email which will request the firm to log into ESS and download the validation report, which will specify what the validation errors are. The firm must correct all validation errors and then upload the Q27 Return again. This process will continue until all errors are corrected.

29. Firms will receive a notice once all validation processes are complete, without error. At that time, you can log back into ESS to complete the final Q27 submission process and electronic sign–off.

30. One of the following Approved Individuals **must** electronically sign the declaration section of the Return:
    a. Senior Executive Function;
    b. Money Laundering Reporting Officer; or
    c. Compliance Oversight Officer.

Links to guidance according to the nature of business

31. [Guidance for Advisors](#)
32. [Guidance for Banks and Investment Managers](#)
33. [Guidance for Insurers](#)
34. [Guidance for Insurance Intermediaries](#)
35. [Guidance for Representative Offices](#)

Advisors – guidance on completing the required Q27 Sheets

<u>Advisors – required sheets</u>

36.   Advisors must complete the following sheets:

   a.   <u>Front Sheet and Declaration</u>;

   b.   <u>Products – FI</u>;

   c.   <u>Customers – ADV</u>;

   d.   <u>AML Return – FI</u>;

   e.   <u>Jurisdictions</u>;

   f.   <u>STRs</u> (if applicable);

   g.   <u>General</u>; and

   h.   <u>Non–resident MLRO Report</u> (if applicable).

<u>Advisors – completing the Products – FI sheet</u>

	Specified Activity or Product	Product or Service offered	If Other Product or Service offered, please specify	Inherent AML Risk Rating of Product or Service offered in <u>column C</u>	Product introduced during the Reporting Period?	Total number of customers using Product or Service offered in <u>column C</u> during the Reporting Period
	A	B	C	D	E	F	G
2	Product Information - Bank, Investment Manager or Advisor					
5	Credit Facility	Import Financing		High	No	10
6	Deposits	Account Services		Low	Yes	35
7	Credit Facility	Other	intra-day credit extension	Medium		4

37.   **General instructions:**

   a.   Use the drop–down lists provided. Firms can type or paste data into a cell, however, if this data does not match an item in the drop–down list, an error will be generated when the return is uploaded to ESS.

   b.   The variables in columns C to F describe the details of the specified activity or product listed in column B.

   c.   Each time any of the variables across columns B to F changes, start a new line. See the example above.

   d.   Only report active products (i.e., products in use during the reporting period by an active customer).

38.   **Column B – Specified Activity or Product** – this column must specify the specified activities or products the firm offered during the reporting period as listed in its scope of authorisation.

39. <u>**Column C – Product or Service offered**</u> – this column must set out the particular product or service offered that falls under the category of the specified activity or product listed in column B. If the firm provides multiple products or services under the same specified activity or product, list each product or service as a separate line item.

40. <u>**Column D – If Other Product or Service offered, please specify –**</u> this column should only be used if the product or service cannot be found in the drop–down list for column C. Provide details of the "other" product or service in column D (free–form text).

41. <u>**Column E – Inherent AML Risk Rating of Product or Service offered in column C**</u> – this column must specify the firm's inherent AML/CFT risk rating of the product or service using the options provided in the drop–down list (low, medium, or high). If your firm uses a different rating scale, for the purposes of this return, select the risk rating in the drop–down list that most closely matches the firm's internal risk rating.

42. <u>**Column F – Product introduced during the Reporting Period?**</u> – if the product was introduced during the reporting period, select "Yes" from the drop–down menu, otherwise select "No".

43. <u>**Column G – Total number of customers using Product or Service offered in column C during the Reporting Period**</u> – provide the total number of customers with same variables in columns B to F. Note that a customer may use for than one product or service.

<u>Advisors – completing the Customers – ADV sheet</u>

Type of Customer	Nationality or Country of Incorporation of Customer	Country of Residence (Individual) or Country of operation (Entity)	PEP?	AML/CFT Risk Rating of Customer	Total Number of New Customers Onboarded during the Reporting Period	Total Number of New and Existing Customers during the Reporting Period	Number of Customers subject to TF-targeted financial sanctions during the Reporting Period	Number of Customers subject to PWMD targeted financial sanctions during the Reporting Period
Corporate	Argentina	United Arab Emirates	No	Medium	3	4	0	0
Opted Up Business (	Syrian Arab Republic	Qatar	Yes	High	1	1	0	0

44. **General instructions:**

a. Use the drop–down lists provided. Firms can type or paste data into a cell, however, if this data does not match an item in the drop–down list, an error will be generated when the return is uploaded to ESS.

b. The variables in columns B to F describe the details of the customers listed in columns G and H.

c. Each time any of the variables across columns B to F changes, start a new line. See the example above.

d. Only report active customers (i.e., customers that the firm had a business relationship with during the reporting period). For example, where the customer has an open account with the firm, this customer should be reported, even if there was no activity on the account during the reporting period.

45. **Column B – Type of Customer** – this column must specify the type of customer, e.g., retail, corporate, financial institution, etc. If the customer type is a counterparty, e.g., Market Counterparty, select "Eligible Counterparty" from the drop–down list.

46. **Column C – Nationality or Country of Incorporation of Customer –** this column must specify the nationality (for natural persons) or country of incorporation/establishment (for legal persons or legal arrangements) of the customer.

47. **Column D – Country of Residence (Individual) or Country of operation (Entity)** – this column must specify the country of residence (for natural persons) or the geographic location of the customer's operations (for legal persons or legal arrangements). Where the customer has operations in multiple geographic locations, select the primary geographic location, e.g., the head office location.

48. **Column E – PEP? –** This column must specify if the customer is a Politically Exposed Person (PEP). If the customer is a PEP, select "Yes" from the drop–down list, otherwise select "No".

AML/CFTR rule 1.3.6 defines a PEP, their family members and associates, as follows:

A ***politically exposed person (PEP)*** means an individual who is, or has been, entrusted with prominent public functions. Unless the context requires otherwise, a reference to a PEP in these rules includes a family member of the PEP or a close associate of the PEP.

Examples of persons who can be PEPs

1. Heads of State or of government
2. senior politicians
3. senior government, judicial or military officials
4. members of Parliament
5. important political party officials
6. senior executives of state–owned companies
7. members of senior management (directors, deputy directors and members of the board or equivalent functions) in international organisations.

A **family member** of a PEP means an individual related to the PEP by blood, or by marriage, up to the second degree

<u>Examples of individuals related to a PEP in the first or second degree</u>
1. the PEP's father and mother
2. the PEP's husband or wife
3. the PEP's father–in–law or mother–in law
4. the PEP's son or daughter
5. the PEP's stepson or stepdaughter
6. the PEP's grandfather and grandmother
7. the PEP's brother or sister
8. the PEP's brother–in–law or sister–in–law
9. the PEP's grandson or granddaughter

A person is a ***close associate of a PEP*** if the person:

a) is in partnership with the PEP in a legal person or legal arrangement;

b) is associated with the PEP through a business or social relationship; or

c) is a beneficial owner of a legal person or legal arrangement owned, or effectively controlled, by the PEP.

49. <u>**Column F – AML/CFT Risk Rating of Customer**</u> – this column must specify the firm's overall AML/CFT risk rating of the business relationship with the customer using the options provided in the drop–down list (low, medium, or high). If your firm uses a different rating scale, for the purposes of this return, select the risk rating in the drop–down list that most closely matches the firm's internal risk rating.

50. <u>**Column G – Total Number of New Customers Onboarded during the Reporting Period**</u> – this column must specify the total number of customers onboarded during the reporting period, that meet the same criteria across

columns B to F. Where an account/mandate has been opened for an existing customer, that customer must **not** be considered a "new" customer (they will be counted as an existing customer in Column H).

51. **Column H – Total Number of New and Existing Customers during the Reporting Period** – this column must specify the total number of new customers onboarded during the reporting period **AND** the number of existing customers onboarded before the reporting period that were active during the reporting period, and that meet the same criteria across columns B to F.

52. **Column I – Number of Customers subject to TF–targeted financial sanctions during the Reporting Period** – this column must specify the number of new and existing customers that meet the same criteria across columns B to F and were subject to Terrorism Financing sanctions during the reporting period.

53. **Column J – Number of Customers subject to PWMD–targeted financial sanctions during the Reporting Period** – this column must specify the number of new and existing customers that meet the same criteria across columns B to F and were subject to Proliferation of Weapons of Mass Destruction (PWMD) sanctions during the reporting period.

Advisors – completing the AML Return – FI sheet

		AML/CFT Return - Bank, Investment Manager or Advisor
	Structural Information	
1	Total Assets **in QAR**	
		0.00
1.1	Total Assets under Management (for business booked in Qatar) **in QAR**	
		1000000.00
	Jurisdictions	
2	Has your Parent Entity been subject to AML/CFT sanctions related disciplinary action during the reporting period	
	No	
2.1	Do these sanctions have an impact on the QFC entity	
	Not Applicable	
	AML Programme and Framework	
3	Provide the residual AML/CFT risk rating of the Firm as stated in the business risk assessment.	
	Low	

54. **General instructions:**

a. Use the drop–down lists provided. Firms can type or paste data into a cell, however, if this data does not match an item in the drop–down list, an error will be generated when the return is uploaded to ESS.

55. **Question Number 1**: Advisors should report "0".

56. **Question Number 1.1:** Report only the Total Assets under Management where business is booked in Qatar. Do not include the value of business booked at an overseas booking centre.

57. **Question Number 2:** if the QFC entity is a subsidiary or a branch, state whether your parent entity or main office has been subject to AML/CFT related disciplinary action during the reporting period. If the answer to 2 is "Yes", then report in 2.1 whether the sanctions have an impact on the QFC entity. If the answer to 2 is "No", then choose "N/A" for 2.1.

58. **Question Number 3:** provide AML/CFT risk rating after the application of controls, as reflected in the firm's Business Risk Assessment conducted in accordance with Rule 3.1.1 of the AML/CFT Rules.

Advisors – completing the Jurisdictions sheet

	A	B	C	
1				
2		**Jurisdiction Information**		
3				
4		Jurisdiction (should include the nationality or country of incorporation and geographic location of the Firm's customers, and all jurisdictions with which the Firm has transactions)	Inherent Jurisdiction Risk	
5		Qatar	Low	
6		Syrian Arab Republic	High	
7				

59. **General instructions:**

   a. Use the drop–down lists provided. Firms can type or paste data into a cell, however, if this data does not match an item in the drop–down list, an error will be generated when the return is uploaded to ESS.

60. Column B – Jurisdiction – this column must list all the jurisdictions that appear in any other sheet in the Q27, i.e., in the Customers, Account/Policies/Engagements, Transactions/Detailed Transactions, STRs and General sheets.

61. Column C – Inherent Jurisdiction Risk – this column must specify the firm's inherent AML/CFT risk rating of the Jurisdiction using the options provided in the drop–down list (low, medium, or high). If your firm uses a different rating scale, for the purposes of this return, select the risk rating in the drop–down list that most closely matches the firm's internal risk rating.

Advisors – completing the STRs sheet

Date (in DD-MON-YYYY format) on which the STR was filed with QFIU	Aggregate value of Transaction(s) reported in the STR, in QAR	Nationality (Individual) or Country of Incorporation (Entity) of Customer	Country of Residence (Individual) or Country of operation (Entity)	Country where Account referenced to in the STR is held	Country where Transaction originated	Ultimate destination Country of the Transaction	Was the STR related to customer due diligence obligations?
21-Jun-2023	10000.00	United Kingdom	Qatar	Qatar	Qatar	United Arab Emirates	Yes
20-Dec-2023	50000.00	Iran, Islamic Republic Of	Qatar	Qatar	Qatar	Virgin Islands, British	No

Was the STR related to record keeping obligations?	Was the STR related to beneficial owner identification?	Was the STR related to an attempted transaction that was not completed?	Was the STR related to a local PEP?	Was the STR related to a foreign PEP?	Was the STR related to correspondent banking?	Was the STR related to new technologies?	Was the STR related to a wire transfer?	Was the STR related to TF targeted financial sanctions?	Was the STR related to PWMD targeted financial sanctions?	Was the STR related to misuse of legal persons or legal arrangements?	Was the STR related to any other AML/CFT/PWMD concerns?
No	No	No	No	No	No	No	Yes	No	No	No	No
No	Yes	Yes	No	Yes	No	No	Yes	Yes	No	No	No

61. **General instructions:**

   a. The STRs Sheet will only be created if the firm answers "Yes" to the question "Did the firm file any STRs during the reporting period" on the Front Sheet and Declaration.

   b. Use the drop–down lists provided. Firms can type or paste data into a cell, however, if this data does not match an item in the drop–down list, an error will be generated when the return is uploaded to ESS.

   c. Complete a new row for each STR filed with the QFIU by the firm, during the reporting period.

62. **Column B – Date (in DD–MON–YYYY format) on which the STR was filed with the QFIU –** this column must specify the date the STR was **filed** with the QFIU, **NOT** the date of the STR, or the date of the transaction or incident.

63. **Column C – Aggregate value of Transaction(s) reported in the STR, in QAR –** this column must specify the total of all transactions reported in the STR.

64. **Column D – Nationality (Individual) or Country of Incorporation (Entity) of Customer –** this column must specify the nationality (for natural persons) or country of incorporation/establishment (for legal persons or legal arrangements) of the customer.

65. **Column E – Country of Residence (Individual) or Country of operation (Entity) –** this column must specify the country of residence (for natural persons) or the geographic location of the customer's operations (for legal persons or legal arrangements). Where the customer has operations in multiple geographic locations, select the primary geographic location, e.g., the head office location.

66. **Column F – Country where Account referenced to in the STR is held** – this column must specify the country where the account is held, which may be different to the country of residence or operation of the customer.

67. **Column G – Country where transaction originated –** this is the country where transaction was initiated, e.g., the location of the ordering customer or remitter for a wire transfer.

68. **Column H – Ultimate destination Country of the Transaction –** this is the country where the transaction ended, e.g., the location of the beneficiary customer for a wire transfer.

69. **Columns H to U –** Respond "Yes" or "No" to each question, as appropriate. A response must be provided in every column H to U – do not leave any columns in a completed row blank.

Advisors – completing the General sheet

Sl. No.	Question	Response
	General Questions	
1	Number of cases where "tipping off" has occurred during the reporting period	0
2	Were there any updates/revisions to AML/CFT policies and procedures during the reporting period	Yes
3	Number of AML/CFT risk assessments conducted during the reporting period	1
4	Number of AML/CFT audits conducted during the reporting period	1
5	Number of AML/CFT staff working for the entity as at the end of the reporting period	2
6	Number of AML/CFT training programmes conducted during the reporting period	4

70. **Question 1 –** Tipping off is defined in rule 5.2.1 of the AML/CFT Rules.

71. **Question 2 –** Specify the number of updates/revisions to the firm's AML/CFT policies and procedures during the reporting period.

72. **Question 3 –** Specify only risk assessments conducted by the firm itself, e.g., business risk assessment or MLRO self–assessments.

73. **Question 4 –** Specify audits conducted by the firm, e.g., Internal Audits or reviews and any external audits or reviews.

74. **Question 5** – Specify the number of AML/CFT staff working for the QFC entity only and not the group. This should include staff who provide services to the QFC entity such as non-resident approval individuals and outsourced functions.

75. **Question 6 –** Specify both internal and external training programmes.

Advisors – completing the Non–resident MLRO Sheet

		Non-resident Money Laundering Reporting Officer (MLRO) Report
		Firm's AML/CFT oversight arrangements
	1	Explain how the MLRO and Deputy MLRO functions operate, including reporting lines and how the QFC office is supervised and monitored for AML/CFT purposes.
		Free-form text answering the question.
	2	Provide an outline of the systems in place to allow the MLRO to access the Firm's QFC records, monitor AML/CFT issues and to respond in a timely manner to questions and concerns of QFC staff.
		Free-form text answering the question.
	3	How many times did the MLRO (and Deputy MLRO if non-resident) visit Qatar during the reporting period? For each visit, how long did he or she spend in Qatar?
		Free-form text answering the question.
	4	What activities were undertaken during those visits? (Give details separately for the MLRO and the Deputy MLRO).
		Free-form text answering the question.

76.   The Non–resident MLRO Sheet will only be created if the firm specifies a country other than Qatar in response to the question "Country of residence of MLRO" on the Front Sheet and Declaration.

77.   A response is required for all questions 1 – 4. Free–form text is permitted.

Banks and Investment Managers – guidance on completing the required Q27 Sheets

Banks and Investment Managers – required sheets

78.   Banks and Investment Managers must complete the following sheets:

    a. Front Sheet and Declaration;

    b. Products – FI;

    c. Customers – FI;

    d. Accounts – FI;

    e. Transactions – FI;

    f. AML Return – FI;

    g. Jurisdictions;

    h. STRs (if applicable);

    i. General – FI; and

    j. Non–resident MLRO Report (if applicable).

Banks and Investment Managers – completing the Products – FI sheet

	Specified Activity or Product	Product or Service offered	If Other Product or Service offered, please specify	Inherent AML Risk Rating of Product or Service offered in column C	Product introduced during the Reporting Period?	Total number of customers using Product or Service offered in column C during the Reporting Period
	A B	C	D	E	F	G
5	Credit Facility	Import Financing		High	No	10
6	Deposits	Account Services		Low	Yes	35
7	Credit Facility	Other	intra-day credit extension	Medium		4

79.   **General instructions:**

    a. Use the drop–down lists provided. Firms can type or paste data into a cell, however, if this data does not match an item in the drop–down list, an error will be generated when the return is uploaded to ESS.

    b. The variables in columns C to F describe the details of the specified activity or product listed in column B.

    c. Each time any of the variables across columns B to F changes, start a new line. See the example above.

    d. Only report active products (i.e., products in use during the reporting period by an active customer.

80. **Column B – Specified Activity or Product** – this column must specify the specified activities or products that the firm offered during the reporting period as listed in its scope of authorisation.

81. **Column C – Product or Service offered** – this column must set out a particular product or service offered that falls under the category of the specified activity or product listed in column B. If the firm provides multiple products or services under the same specified activity or product, list each product or service as a separate line item.

82. **Column D – If Other Product or Service offered, please specify –** this column should only be used if the product or service cannot be found in the drop–down list for column C. Provide details of the "other" product or service in column D (free–form text).

83. **Column E – Inherent AML Risk Rating of Product or Service offered in column C** – this column must specify the firm's inherent AML/CFT risk rating of the product or service using the options provided in the drop–down list (low, medium, or high). If your firm uses a different rating scale, for the purposes of this return, select the risk rating in the drop–down list that most closely matches the firm's internal risk rating.

84. **Column F – Product introduced during the Reporting Period?** – if the product was introduced during the reporting period, select "Yes" from the drop–down menu, otherwise select "No".

85. **Column G – Total number of customers using Product or Service offered in column C during the Reporting Period** – provide the total number of customers with same variables in columns B to F. Note that a customer may use for than one product or service.

Banks and Investment Managers – completing the Customers – FI sheet

	Type of Customer	Nationality or Country of Incorporation of Customer	Country of Residence (Individual) or Country of operation (Entity)	PEP?	AML/CFT Risk Rating of Customer	Total Number of New Customers Onboarded during the Reporting Period	Total Number of New and Existing Customers during the Reporting Period	Total value of Transactions for Customers in Column H during the Reporting Period	Number of Customers subject to TF-targeted financial sanctions during the Reporting Period	Number of Customers subject to PWMD targeted financial sanctions during the Reporting Period
						Customer Information - Financial Institution				
Corporate	Argentina	United Arab Emirates	No	Medium	3	4	120000.00	0	0
Opted Up Business	Syrian Arab Republic	Qatar	Yes	High	1	1	50000.00	0	0

86. **General instructions:**

a. Use the drop–down lists provided. Firms can type or paste data into a cell, however, if this data does not match an item in the drop–down list, an error will be generated when the return is uploaded to ESS.

b. The variables in columns B to F describe the details of the customers listed in columns G and H.

c. Each time any of the variables across columns B to F changes, start a new line. See the example above.

d. Only report active customers (i.e., customers that the firm had a business relationship with during the reporting period). For example, where the customer has an open account with the firm, this customer should be reported, even if there was no activity on the account during the reporting period.

87. **<u>Column B – Type of Customer</u>** – this column must specify the type of customer, e.g., retail, corporate, financial institution, etc. If the customer type is a counterparty, e.g., Market Counterparty, select "Eligible Counterparty" from the drop–down list.

88. **<u>Column C – Nationality or Country of Incorporation of Customer –</u>** this column must specify the nationality (for natural persons) or country of incorporation/establishment (for legal persons or legal arrangements) of the customer.

89. **<u>Column D – Country of Residence (Individual) or Country of operation (Entity)</u>** – this column must specify the country of residence (for natural persons) or the geographic location of the customer's operations (for legal persons or legal arrangements). Where the customer has operations in multiple geographic locations, select the primary geographic location, e.g., the head office location.

90. **<u>Column E – PEP?</u>** – This column must specify if the customer is a Politically Exposed Person (PEP). If the customer is a PEP, select "Yes" from the drop–down list, otherwise select "No".

AML/CFTR rule 1.3.6 defines a PEP, their family members and associates, as follows:

A ***politically exposed person (PEP)*** means an individual who is, or has been, entrusted with prominent public functions. Unless the context

requires otherwise, a reference to a PEP in these rules includes a family member of the PEP or a close associate of the PEP.

<u>Examples of persons who can be PEPs</u>

8 Heads of State or of government
9 senior politicians
10 senior government, judicial or military officials
11 members of Parliament
12 important political party officials
13 senior executives of state–owned companies
14 members of senior management (directors, deputy directors and members of the board or equivalent functions) in international organisations.

A **family member** of a PEP means an individual related to the PEP by blood, or by marriage, up to the second degree

<u>Examples of individuals related to a PEP in the first or second degree</u>

10 the PEP's father and mother
11 the PEP's husband or wife
12 the PEP's father–in–law or mother–in law
13 the PEP's son or daughter
14 the PEP's stepson or stepdaughter
15 the PEP's grandfather and grandmother
16 the PEP's brother or sister
17 the PEP's brother–in–law or sister–in–law
18 the PEP's grandson or granddaughter

A person is a ***close associate of a PEP*** if the person:

a) is in partnership with the PEP in a legal person or legal arrangement;

b) is associated with the PEP through a business or social relationship; or

c) is a beneficial owner of a legal person or legal arrangement owned, or effectively controlled, by the PEP.

91. **Column F – AML/CFT Risk Rating of Customer** – this column must specify the firm's overall AML/CFT risk rating of the business relationship with the customer using the options provided in the drop–down list (low, medium, or high). If your firm uses a different rating scale, for the purposes of this return,

select the risk rating in the drop–down list that most closely matches the firm's internal risk rating.

92. **Column G – Total Number of New Customers Onboarded during the Reporting Period** – this column must specify the total number of customers onboarded during the reporting period, that meet the same criteria across columns B to F. Where an account/mandate has been opened for an existing customer, that customer must **not** be considered a "new" customer (they will be counted as an existing customer in Column H).

93. **Column H – Total Number of New and Existing Customers during the Reporting Period** – this column must specify the total number of new customers onboarded during the reporting period **AND** the number of existing customers onboarded before the reporting period that were active during the reporting period, and that meet the same criteria across columns B to F.

94. **Column I – Total value of Transactions for Customers in Column H during the Reporting Period** – this column must specify the total value of transactions for the total new and existing customers recorded in column H that meet the same criteria across columns B to F. This is the gross value of transactions, i.e., do not nett out credits and debits.

95. **Column J – Number of Customers subject to TF–targeted financial sanctions during the Reporting Period** – this column must specify the number of new and existing customers that meet the same criteria across columns B to F and were subject to Terrorism Financing sanctions during the reporting period.

96. **Column K – Number of Customers subject to PWMD–targeted financial sanctions during the Reporting Period** – this column must specify the number of new and existing customers that meet the same criteria across columns B to F and were subject to Proliferation of Weapons of Mass Destruction (PWMD) sanctions during the reporting period.

Banks and Investment Managers – completing the Accounts – FI sheet

	Type of Customer	Nationality or Country of Incorporation of Customer	Country of Residence (Individual) or Country of operation (Entity)	Country where Account is held	Total Number of Accounts Opened during the Reporting Period	Total value of Accounts during the Reporting Period, in QAR	Number of Accounts terminated due to customer due diligence concerns during the Reporting Period	Number of Accounts that were subject to TF-targeted financial sanctions during the Reporting Period	Total value of Accounts that were subject to TF targeted financial sanctions during the Reporting Period, in QAR	Number of Accounts that were subject to PWMD targeted financial sanctions during the Reporting Period	Total value of Accounts that were subject to PWMD targeted financial sanctions during the Reporting Period, in QAR
					Account Information - Bank, Investment Manager or Advisor						
	Corporate	Argentina	United Arab Emirates	Qatar	3	100000.00	0	0	0.00	0	0.00
	Opted Up Business	United Kingdom	Qatar	Qatar	8	500000.00	0	0	0.00	0	0.00

97. **General instructions:**

   a. "Account" is defined in the [Glossary](#) of the AML/CFTR. Where the customer holds two or more accounts, the total number and value of all accounts must be reported.

   b. Use the drop–down lists provided. Firms can type or paste data into a cell, however, if this data does not match an item in the drop–down list, an error will be generated when the return is uploaded to ESS.

   c. The variables in columns B to E describe the details of the customers holding accounts. Columns F to L provide information about the number of accounts held by those customers.

   d. Each time any of the variables across columns B to E changes, start a new line. See the example above.

   e. While there is some repetition of information in the Customers – FI sheet, this repetition is necessary to allow analysis of the accounts data.

98. **Column B – Type of Customer** – this column must specify the type of customer, e.g., retail, corporate, financial institution, etc. If the customer type is a counterparty, e.g., Market Counterparty, select "Eligible Counterparty" from the drop–down list.

99. **Column C – Nationality or Country of Incorporation of Customer –** this column must specify the nationality (for natural persons) or country of incorporation/establishment (for legal persons or legal arrangements) of the customer.

100. **Column D – Country of Residence (Individual) or Country of operation (Entity)** – this column must specify the country of residence (for natural persons) or the geographic location of the customer's operations (for legal persons or legal arrangements). Where the customer has operations in multiple geographic locations, select the primary geographic location, e.g., the head office location.

101. **Column E – Country where account is held** – this column must specify the country where the account is held, which may be different to the country of residence or operation of the customer.

102. **Column F – Total number of accounts opened during the reporting period** – this column must specify the total number of all accounts opened during the

reporting period that meet the same criteria across columns B to E. This includes accounts that were opened and then closed within the reporting period.

103. **Column G – Total value of accounts during the reporting period** – this column must specify the total value of accounts that meet the same criteria across columns B to E during the reporting period. For the purpose of this report, the total value of accounts means the balance of active customer accounts as at 31 December, **PLUS** the final balance prior to closure of any accounts that were closed during the reporting period (but before 31 December).

104. **Column H – Number of accounts terminated due to customer due diligence concerns during the reporting period** – this column must specify the number of accounts that meet the same criteria across columns B to E, which were terminated due to CDD concerns during the reporting period.

105. **Column I – Number of accounts subject to TF targeted financial sanctions during the reporting period** – this column must specify the number of accounts that meet the same criteria across columns B to E and were subject to Terrorism Financing sanctions during the reporting period.

106. **Column J – Total value of accounts subject to TF targeted financial sanctions during the reporting period** – this column must specify the total value of the accounts set out in column I, i.e., the total value of accounts that meet the same criteria across columns B to E and were subject to Terrorism Financing sanctions during the reporting period.

107. **Column K – Number of accounts subject to PWMD targeted financial sanctions during the reporting period** – this column must specify the number of accounts that meet the same criteria across columns B to E and were subject to Proliferation of Weapons of Mass Destruction (PWMD) sanctions during the reporting period.

108. **Column L – Total value of accounts subject to PWMD targeted financial sanctions during the reporting period** – this column must specify the total value of the accounts set out in column K, i.e., the total value of accounts that meet the same criteria across columns B to E and were subject to

Proliferation of Weapons of Mass Destruction (PWMD) sanctions during the reporting period.

Banks and Investment Managers – completing the Transactions – FI sheet

Specified Activity or Product	Product or Service offered	If Other Product or Service offered, please specify	Country where transaction originated	Ultimate destination country of the transaction	Interface	Cash or Non-Cash?	AML/CFT Risk Rating of Account Holder	Total Number of Transactions during reporting period
Deposits	Account Services		Qatar	United States of America	Face to Face	Non-Cash	Medium	300
Credit Facility	Trade Finance Services		China	Qatar	Non-Face to Face	Non-Cash	Medium	200

Total Value of Transactions during reporting period, in QAR	Transactions Subject to TF Targeted Financial Sanctions			Transactions Subject to PWMD Targeted Financial Sanctions			CDD Concerns	
	Number of Transaction Attempts Subject to TF Targeted Financial Sanctions during reporting period	Value of Transaction Attempts Subject to TF Targeted Financial Sanctions during reporting period, in QAR	Number of Transactions Rejected for TF Targeted Financial Sanctions during reporting period	Number of Transaction Attempts Subject to PWMD Targeted Financial Sanctions during reporting period	Value of Transaction Attempts Subject to PWMD Targeted Financial Sanctions during reporting period, in QAR	Number of Transactions Rejected for PWMD Targeted Financial Sanctions during reporting period	Number of Transactions discontinued/rejected due to customer due diligence concerns during reporting period	Value of Transactions discontinued/rejected due to customer due diligence concerns during reporting period, in QAR
3000000.00	0	0.00	0	0	0.00	0	0	
2000000.00	0	0.00	0	0	0.00	0	1	10000.00

109. **General instructions:**

   a. Use the drop–down lists provided. Firms can type or paste data into a cell, however, if this data does not match an item in the drop–down list, an error will be generated when the return is uploaded to ESS.

   b. Only report customer related transactions. Do not include the firm's own transactions, e.g., treasury transactions or payments of the firm's own expenses.

   c. While the AML/CFT Rules define "transaction" broadly, for the purpose of the Q27, **only monetary transactions are to be reported**. All non–monetary transactions must be excluded (e.g., the giving of advice should not be included in the Transactions – FI sheet).

   d. Do not report attempted transactions, except where a transaction attempt was subject to Terrorist Financing (TF) Targeted Financial Sanctions (columns L and M) and Proliferation of Weapons of Mass Destruction (PWMD) Targeted Financial Sanctions (columns O and P).

   e. Transactions are primarily grouped by product or service (columns B to D). While there is some repetition of information from the Products – FI sheet, this is necessary to allow analysis of the transactions data.

f. The variables in columns B to I describe the details of the transactions. Columns J and K provide information about the number and value of the transactions that meet the same criteria across columns B to I.

g. Each time any of the variables across columns B to I changes, start a new line. See the example above.

h. If any of the transactions with the same criteria across columns B to I were subject to Targeted Financial Sanctions or CDD concerns, report this in columns L to S.

110. **Column B – Specified Activity or Product** – this column must specify the specified activities or products that the firm offered during the reporting period as listed in its scope of authorisation.

111. **Column C – Product or Service offered** – this column must set out a particular product or service offered that falls under the category of the specified activity or product listed in column B. If the firm provides multiple products or services under the same specified activity or product, list each product or service as a separate line item.

112. **Column D – If Other Product or Service offered, please specify –** this column should only be used if the product or service cannot be found in the drop–down list for column C. Provide details of the "other" product or service in column D (free–form text).

113. **Column E – Country where transaction originated –** this is the country where transaction was initiated, e.g., the location of the ordering customer or remitter for a wire transfer.

114. **Column F – Ultimate destination country of the transaction –** this is the country where the transaction ended, e.g., the location of the beneficiary customer for a wire transfer.

115. **Column G – Interface –** this is the way the firm deals with its customer. If the firm has met the customer in person choose "Face to Face", otherwise choose "Non–Face to Face". Where the customer was introduced to the firm by a third party, such as an introducer or intermediary, select "Indirect Parties".

116. **Column H – Cash or Non–Cash? –** Cash means physical currency, i.e., notes and coins. For all other payment methods, e.g., wire transfer, select "Non–Cash".

117. **Column I – AML/CFT Risk Rating of Account Holder** – this column must specify the firm's overall AML/CFT risk rating of the business relationship with the account holder (i.e., the firm's customer) using the options provided in the drop–down list (low, medium, or high). If your firm uses a different rating scale, for the purposes of this return, select the risk rating in the drop–down list that most closely matches the firm's internal risk rating.

118. **Column J – Total Number of Transactions during reporting period –** this column must specify the total number of transactions during the reporting period that meet the same criteria across columns B to I.

119. **Column K – Total Value of Transactions during reporting period, in QAR –** this column must specify the total value of transactions during the reporting period that meet the same criteria across columns B to I. This is the gross value of transactions, i.e., do not nett out credits and debits.

120. **Column L – Number of Transaction Attempts Subject to TF Targeted Financial Sanctions during reporting period –** this column must specify the total number of transaction attempts during the reporting period that meet the same criteria across columns B to I **AND** were subject to TF Targeted Financial Sanctions. Include both completed and rejected transactions.

121. **Column M – Value of Transaction Attempts Subject to TF Targeted Financial Sanctions during reporting period, in QAR –** this column must specify the value of transaction attempts during the reporting period that meet the same criteria across columns B to I **AND** were subject to TF Targeted Financial Sanctions. Include both completed and rejected transactions.

122. **Column N – Number of Transactions Rejected for TF Targeted Financial Sanctions during reporting period –** this column must specify how many transactions reported in column L were rejected.

123. **Column O – Number of Transaction Attempts Subject to PMWD Targeted Financial Sanctions during reporting period –** this column must specify the total number of transaction attempts during the reporting period that meet

the same criteria across columns B to I **AND** were subject to PMWD Targeted Financial Sanctions. Include both completed and rejected transactions.

124. **Column P – Value of Transaction Attempts Subject to PMWD Targeted Financial Sanctions during reporting period, in QAR –** this column must specify the value of transaction attempts during the reporting period that meet the same criteria across columns B to I **AND** were subject to PMWD Targeted Financial Sanctions. Include both completed and rejected transactions.

125. **Column Q – Number of Transactions Rejected for PMWD Targeted Financial Sanctions during reporting period –** this column must specify how many of the transactions reported in column O were rejected.

126. **Column R – Number of Transactions discontinued/rejected due to customer due diligence concerns during reporting period –** this column must specify the total number of transaction attempts during the reporting period that meet the same criteria across columns B to I **AND** were discontinued/rejected due to customer due diligence concerns.

127. **Column S – Value of Transactions discontinued/rejected due to customer due diligence concerns during reporting period, in QAR –** this column must specify the value of transaction attempts during the reporting period that meet the same criteria across columns B to I **AND** were discontinued/rejected due to customer due diligence concerns.

Banks and Investment Managers – completing the AML Return – FI sheet

		AML/CFT Return - Bank, Investment Manager or Advisor
	Structural Information	
1	Total Assets **in QAR**	
		1000000000000.00
1.1	Total Assets under Management (for business booked in Qatar) **in QAR**	
		1000000.00
	Jurisdictions	
2	Has your Parent Entity been subject to AML/CFT sanctions related disciplinary action during the reporting period	
	No	
2.1	Do these sanctions have an impact on the QFC entity	
	Not Applicable	
	AML Programme and Framework	
3	Provide the residual AML/CFT risk rating of the Firm as stated in the business risk assessment.	
	Low	

129. **General instructions:**

a. Use the drop–down lists provided. Firms can type or paste data into a cell, however, if this data does not match an item in the drop–down list, an error will be generated when the return is uploaded to ESS.

130. **Question Number 1**: report the total assets as reflected in BR100.

130. **Question Number 1.1**: report the total assets under management as reflected in BR110.

131. **Question Number 2:** if the QFC entity is a subsidiary or a branch, state whether your parent entity or main office has been subject to AML/CFT related disciplinary action during the reporting period. If the answer to 2 is "Yes", then report in 2.1 whether the sanctions have an impact on the QFC entity. If the answer to 2 is "No", then choose "N/A" for 2.1.

132. **Question Number 3:** provide AML/CFT risk rating after the application of controls, as reflected in the firm's Business Risk Assessment conducted in accordance with Rule 3.1.1 of the AML/CFT Rules.

Banks and Investment Managers – completing the Jurisdictions sheet

	A	B	C	
1				
2		**Jurisdiction Information**		
3				
4		Jurisdiction (should include the nationality or country of incorporation and geographic location of the Firm's customers, and all jurisdictions with which the Firm has transactions)	Inherent Jurisdiction Risk	
5		Qatar	Low	
6		Syrian Arab Republic	High	
7				

133. **General instructions:**

a. Use the drop–down lists provided. Firms can type or paste data into a cell, however, if this data does not match an item in the drop–down list, an error will be generated when the return is uploaded to ESS.

134. **Column B – Jurisdiction –** this column must list all the jurisdictions that appear in any other sheet in the Q27, i.e., in the Customers, Account/Policies/Engagements, Transactions/Detailed Transactions, STRs and General sheets.

135. **Column C – Inherent Jurisdiction Risk** – this column must specify the firm's inherent AML/CFT risk rating of the Jurisdiction using the options provided in the drop–down list (low, medium, or high). If your firm uses a different rating

scale, for the purposes of this return, select the risk rating in the drop–down list that most closely matches the firm's internal risk rating.

Banks and Investment Managers – completing the STRs sheet

	Date (in DD–MON–YYYY format) on which the STR was filed with QFIU	Aggregate value of Transaction(s) reported in the STR, in QAR	Nationality (Individual) or Country of Incorporation (Entity) of Customer	Country of Residence (Individual) or Country of operation (Entity)	Country where Account referenced to in the STR is held	Country where Transaction originated	Ultimate destination Country of the Transaction	Was the STR related to customer due diligence obligations?
	21-Jun-2023	10000.00	United Kingdom	Qatar	Qatar	Qatar	United Arab Emirates	Yes
	20-Dec-2023	50000.00	Iran, Islamic Republic Of	Qatar	Qatar	Qatar	Virgin Islands, British	No

Was the STR related to record keeping obligations?	Was the STR related to beneficial owner identification?	Was the STR related to an attempted transaction that was not completed?	Was the STR related to a local PEP?	Was the STR related to a foreign PEP?	Was the STR related to correspondent banking?	Was the STR related to new technologies?	Was the STR related to a wire transfer?	Was the STR related to TF targeted financial sanctions?	Was the STR related to PWMD targeted financial sanctions?	Was the STR related to misuse of legal persons or legal arrangements?	Was the STR related to any other AML/CFT/PWMD concerns?
No	No	No	No	No	No	No	Yes	No	No	No	No
No	Yes	Yes	No	Yes	No	No	Yes	Yes	No	No	No

136.   **General instructions:**

  a. The STRs Sheet will only be created if the firm answers "Yes" to the question "Did the firm file any STRs during the reporting period" on the Front Sheet and Declaration.

  b. Use the drop–down lists provided. Firms can type or paste data into a cell, however, if this data does not match an item in the drop–down list, an error will be generated when the return is uploaded to ESS.

  c. Complete a new row for each STR filed with the QFIU by the firm, during the reporting period.

137.   **Column B – Date (in DD–MON–YYYY format) on which the STR was filed with the QFIU –** this column must specify the date the STR was **filed** with the QFIU, **NOT** the date of the STR, or the date of the transaction or incident.

138.   **Column C – Aggregate value of Transaction(s) reported in the STR, in QAR –** this column must specify the total of all transactions reported in the STR.

139.   **Column D – Nationality (Individual) or Country of Incorporation (Entity) of Customer –** this column must specify the nationality (for natural persons) or country of incorporation/establishment (for legal persons or legal arrangements) of the customer.

140. **Column E – Country of Residence (Individual) or Country of operation (Entity) –** this column must specify the country of residence (for natural persons) or the geographic location of the customer's operations (for legal persons or legal arrangements). Where the customer has operations in multiple geographic locations, select the primary geographic location, e.g., the head office location.

141. **Column F – Country where Account referenced to in the STR is held** – this column must specify the country where the account is held, which may be different to the country of residence or operation of the customer.

142. **Column G – Country where transaction originated –** this is the country where transaction was initiated, e.g., the location of the ordering customer or remitter for a wire transfer.

143. **Column H – Ultimate destination Country of the Transaction –** this is the country where the transaction ended, e.g., the location of the beneficiary customer for a wire transfer.

144. **Columns H to U –** Respond "Yes" or "No" to each question, as appropriate. A response must be provided in every column H to U – do not leave any columns in a completed row blank.

[Banks and Investment Managers – completing the General – FI sheet](#)

General Questions

Sl. No.	General Question	Response
1	Number of cases where "tipping off" has occurred during the reporting period	0
2	Were there any updates/revisions to AML/CFT policies and procedures during the reporting period	Yes
3	Number of AML/CFT risk assessments conducted during the reporting period	1
4	Number of AML/CFT audits conducted during the reporting period	1
5	Number of AML/CFT staff working for the entity as at the end of the reporting period	2
6	Number of AML/CFT training programmes conducted during the reporting period	4

Sl. No.	Total Value Question	Response, in QAR
7	Total value of transactions involving high risk products	100000.00
8	Total value of transactions with high risk locations	500000.00
9	Total value of transactions involving indirect parties	0.00
10	Total value of transactions involving new products	1000000.00
11	Total value of transactions involving Private Banking transactions	1000000.00
12	Total value of cash-based transactions	0.00
13	Total value of loans and advances extended	1000000000000000.00
14	Total value of prepaid loans and advances	0.00
15	Total value of cash-secured loans and advances	1000000.00
16	Total value of incoming wire transfers	200000000000000.00
17	Total value of outgoing wire transfers	50000000000000.00

145. **Question 1 –** Tipping off is defined in rule 5.2.1 of the AML/CFT Rules

146. **Question 2 –** Specify the number of updates/revisions to the firm's AML/CFT policies and procedures during the reporting period.

147. **Question 3 –** Specify only risk assessments conducted by the firm itself, e.g., business risk assessment or MLRO self–assessments.

148. **Question 4 –** Specify audits conducted by the firm, e.g., Internal Audits or reviews and any external audits or reviews.

149. **Question 5 –** Specify the number of AML/CFT staff working for the QFC entity only and not the group. This should include staff who provide services to the QFC entity such as non-resident approval individuals and outsourced functions.

150. **Question 6 –** Specify both internal and external training programmes.

151. **Question 7 –** Specify the total value of all transactions involving product assessed as high risk by the firm.

152. **Question 8 –** Specify the total value of all transactions with jurisdictions assessed as high risk by the firm.

153. **Question 9 –** Specify the total value of all transactions involving indirect parties, e.g., an intermediary.

154. **Question 10 –** Specify the total value of all transactions involving new products introduced during the reporting period.

155. **Question 11 –** Specify the total value of all transactions related to Private Banking during the reporting period.

156. **Question 12 –** Specify the total value of cash transactions during the reporting period. For the purpose of this question, cash means physical currency, i.e., notes and coins.

157. **Question 13 –** Specify the total value of loans and advances extended during the reporting period.

158. **Question 14 –** Specify the total value of loans and advances that were settled during the reporting period, before the official due date.

159. **Question 15 –** Specify the total value of cash–secured loans and advances during the reporting period. For the purpose of this question, cash is **NOT** limited to physical currency and can include funds received by other methods, e.g., wire transfer.

160. **Question 16 –** Specify the total value of incoming wire transfers during the reporting period.

161. **Question 17 –** Specify the total value of outgoing wire transfers during the reporting period.

Banks and Investment Managers – completing the Non–resident MLRO Sheet

		Non-resident Money Laundering Reporting Officer (MLRO) Report
		Firm's AML/CFT oversight arrangements
	1	Explain how the MLRO and Deputy MLRO functions operate, including reporting lines and how the QFC office is supervised and monitored for AML/CFT purposes.
		Free-form text answering the question.
	2	Provide an outline of the systems in place to allow the MLRO to access the Firm's QFC records, monitor AML/CFT issues and to respond in a timely manner to questions and concerns of QFC staff.
		Free-form text answering the question.
	3	How many times did the MLRO (and Deputy MLRO if non-resident) visit Qatar during the reporting period? For each visit, how long did he or she spend in Qatar?
		Free-form text answering the question.
	4	What activities were undertaken during those visits? (Give details separately for the MLRO and the Deputy MLRO).
		Free-form text answering the question.

162.   The Non–resident MLRO Sheet will only be created if the firm specifies a country other than Qatar in response to the question "Country of residence of MLRO" on the Front Sheet and Declaration.

163.   A response is required for all questions 1 – 4. Free–form text is permitted.

Insurers – guidance on completing the required Q27 Sheets

<u>Insurers – required sheets</u>

163. Insurers must complete the following sheets:

   a. <u>Front Sheet and Declaration</u>;

   b. <u>Products – INS</u>;

   c. <u>Customers – INS</u>;

   d. <u>Policies – INS</u>;

   e. <u>Transactions – INS</u>;

   f. <u>AML Return – INS</u>;

   g. <u>Jurisdictions</u>;

   h. <u>STRs</u> (if applicable);

   i. <u>General</u>; and

   j. <u>Non–resident MLRO Report</u> (if applicable).

<u>Insurers – completing the Products – INS sheet</u>

	Specified Product	Product or Service offered	If Other Product or Service offered, please specify	Inherent AML Risk Rating of Product or Service offered in column C	Product introduced during the Reporting Period?	Total number of customers using Product or Service offered in column C during the Reporting Period
			Product Information - Insurer			
5	General Insurance	Motor		Low	No	10
6	Long Term Insurance	Investment Linked		High	No	20
7	General Insurance	Other	Injury by falling coconut insurance	Low	Yes	1

165. **General instructions:**

   a. Use the drop–down lists provided. Firms can type or paste data into a cell, however, if this data does not match an item in the drop–down list, an error will be generated when the return is uploaded to ESS.

   b. The variables in columns C to F describe the details of the specified activity or product listed in column B.

   c. Each time any of the variables across columns B to F changes, start a new line. See the example above.

   d. Only report active products (i.e., products in use during the reporting period by an active customer.

   e.

166. **Column B – Specified Activity or Product** – this column must specify the specified activities or products that the firm offered during the reporting period as listed in its scope of authorisation.

167. **Column C – Product or service offered** – this column must set out a particular product or service offered that falls under the category of the specified activity or product listed in column B. If the firm provides multiple products or services under the same specified activity or product, list each product or service as a separate line item.

168. **Column D – If Other Product or Service offered, please specify –** this column should only be used if the product or service cannot be found in the drop–down list for column C. Provide details of the "other" product or service in column D (free–form text).

169. **Column E – Inherent AML Risk Rating of Product or Service offered in column C** – this column must specify the firm's inherent AML/CFT risk rating of the product or service using the options provided in the drop–down list (low, medium, or high). If your firm uses a different rating scale, for the purposes of this return, select the risk rating in the drop–down list that most closely matches the firm's internal risk rating.

170. **Column F – Product introduced during the Reporting Period?** – if the product was introduced during the reporting period, select "Yes" from the drop–down menu, otherwise select "No".

171. **Column G – Total number of customers using Product or Service offered in column C during the Reporting Period** – provide the total number of customers with same variables in columns B to F. Note that a customer may use for than one product or service.

Insurers – completing the Customers – INS sheet

Type of Customer	Nationality or Country of Incorporation of Customer	Country of Residence (Individual) or Country of operation (Entity)	PEP?	AML/CFT Risk Rating of Customer	Total Number of New Customers Onboarded during the Reporting Period	Total Number of New and Exising Customers during the Reporting Period	Total value of GWP for Customers in Column H during the Reporting Period	Number of Customers subject to TF-targeted financial sanctions during the Reporting Period	Number of Customers subject to PWMD targeted financial sanctions during the Reporting Period
Corporate	gentina	United Arab Emirates	No	Medium		3	4	120000.00	0	0
Opted Up Business	Syrian Arab Republic	Qatar	Yes	High		1	1	50000.00	0	0

172. **General instructions:**

a. Use the drop–down lists provided. Firms can type or paste data into a cell, however, if this data does not match an item in the drop–down list, an error will be generated when the return is uploaded to ESS.

b. The variables in columns B to F describe the details of the customers listed in columns G and H.

c. Each time any of the variables across columns B to F changes, start a new line. See the example above.

d. Only report active customers (i.e., customers that the firm had a business relationship with during the reporting period). For example, where the customer has an open account with the firm, this customer should be reported, even if there was no activity on the account during the reporting period.

173. <u>**Column B – Type of Customer**</u> – this column must specify the type of customer, e.g., retail, corporate, financial institution, etc. If the customer type is a counterparty, e.g., Market Counterparty, select "Eligible Counterparty" from the drop–down list.

174. <u>**Column C – Nationality or Country of Incorporation of Customer –**</u> this column must specify the nationality (for natural persons) or country of incorporation/establishment (for legal persons or legal arrangements) of the customer.

175. <u>**Column D – Country of Residence (Individual) or Country of operation (Entity)**</u> – this column must specify the country of residence (for natural persons) or the geographic location of the customer's operations (for legal persons or legal arrangements). Where the customer has operations in multiple geographic locations, select the primary geographic location, e.g., the head office location.

176. <u>**Column E – PEP? –**</u> This column must specify if the customer is a Politically Exposed Person (PEP). If the customer is a PEP, select "Yes" from the drop–down list, otherwise select "No".

AML/CFTR rule 1.3.6 defines a PEP, their family members and associates, as follows:

A ***politically exposed person (PEP)*** means an individual who is, or has been, entrusted with prominent public functions. Unless the context requires otherwise, a reference to a PEP in these rules includes a family member of the PEP or a close associate of the PEP.

<u>Examples of persons who can be PEPs</u>

15 Heads of State or of government
16 senior politicians

17 senior government, judicial or military officials

18 members of Parliament

19 important political party officials

20 senior executives of state–owned companies

21 members of senior management (directors, deputy directors and members of the board or equivalent functions) in international organisations.

A **family member** of a PEP means an individual related to the PEP by blood, or by marriage, up to the second degree

Examples of individuals related to a PEP in the first or second degree

19 the PEP's father and mother

20 the PEP's husband or wife

21 the PEP's father–in–law or mother–in law

22 the PEP's son or daughter

23 the PEP's stepson or stepdaughter

24 the PEP's grandfather and grandmother

25 the PEP's brother or sister

26 the PEP's brother–in–law or sister–in–law

27 the PEP's grandson or granddaughter

A person is a ***close associate of a PEP*** if the person:

a) is in partnership with the PEP in a legal person or legal arrangement;

b) is associated with the PEP through a business or social relationship; or

c) is a beneficial owner of a legal person or legal arrangement owned, or effectively controlled, by the PEP.

177. **Column F – AML/CFT Risk Rating of Customer** – this column must specify the firm's overall AML/CFT risk rating of the business relationship with the customer using the options provided in the drop–down list (low, medium, or high). If your firm uses a different rating scale, for the purposes of this return, select the risk rating in the drop–down list that most closely matches the firm's internal risk rating.

178. **Column G – Total number of new customers onboarded during the reporting period** – this column must specify the total number of customers onboarded during the reporting period, that meet the same criteria across columns B to F. Where a policy has been renewed or a new policy has been issued to an

existing customer, that customer must **not** be considered a "new" customer (they will be counted as an existing customer in Column H).

179. **Column H – Total number of new and existing customers during the reporting period** – this column must specify the total number of new customers onboarded during the reporting period **AND** the number of existing customers onboarded before the reporting period that were active during the reporting period, and that meet the same criteria across columns B to F.

180. **Column I – Total value of GWP for customers in column H during the reporting period** – this column must specify the total value of Gross Written Premium (GWP) received during the Reporting Period from the total new and existing customers recorded in column H that meet the same criteria across columns B to F.

181. **Column J – Number of customers subject to TF–targeted financial sanctions during the reporting period** – this column must specify the number of new and existing customers that meet the same criteria across columns B to F and were subject to Terrorism Financing sanctions during the reporting period.

182. **Column K – Number of customers subject to PWMD–targeted financial sanctions during the reporting period** – this column must specify the number of new and existing customers that meet the same criteria across columns B to F and were subject to Proliferation of Weapons of Mass Destruction (PWMD) sanctions during the reporting period.

Insurers – completing the Policies – INS sheet

Type of Customer	Nationality or Country of Incorporation of Customer	Country of Residence (Individual) or Country of operation (Entity)	Country where Insurance policy is issued	Total Number of Insurance policies issued during the Reporting Period	Total value of GWP collected for Insurance policies issued during the Reporting Period, in QAR	Number of Insurance policies terminated due to customer due diligence concerns during the Reporting Period	Number of Insurance policies issued that were subject to TF-targeted financial sanctions during the Reporting Period	Total GWP collected for Insurance policies issued that were subject to TF targeted financial sanctions during the Reporting Period, in QAR	Number of Insurance policies issued that were subject to PWMD targeted financial sanctions during the Reporting Period	Total GWP collected for Insurance policies issued that were subject to PWMD targeted financial sanctions during the Reporting Period, in QAR
Corporate	Argentina	United Arab Emirates	Qatar	3	100000.00	0	0	0.00	0	0.00
Opted Up Business	United Kingdom	Qatar	Qatar	8	500000.00	0	0	0.00	0	0.00

183. The focus of this sheet relates to policies issued to customers, noting that a customer may have more than one policy.

184. **General instructions:**

    a. Use the drop–down lists provided. Firms can type or paste data into a cell, however, if this data does not match an item in the drop–down list, an error will be generated when the return is uploaded to ESS.

b. The variables in columns B to E describe the details of the customers holding policies. Columns G to L provide information about the number of policies held by those customers; and

c. Each time any of the variables across columns B to E changes, start a new line. See the example above.

d. While there is some repetition of information from the Customers – INS sheet, this is necessary to allow analysis of the policies data.

185. **Column B – Type of customer** – this column must specify the type of customer, e.g., retail, corporate, financial institution, etc. If the customer type is a counterparty, e.g., Market Counterparty, select "Eligible Counterparty" from the drop–down list.

186. **Column C – Nationality or country of incorporation of customer –** this column must specify the nationality of the customer (for natural persons) or country of incorporation/establishment (for legal persons or legal arrangements) of the customer.

187. **Column D – Country of residence (Individual) or country of operation (entity)** – this column must specify the country of residence (for natural persons) or the geographic location of the customer's operations (for legal persons or legal arrangements). Where the customer has operations in multiple geographic locations, select the primary geographic location, e.g., the head office location.

188. **Column E – Country where insurance policy is issued** – this column must specify the country where the policy is issued, which may be different to the country of residence or operation of the customer.

189. **Column F – Total number of insurance policies issued during the reporting period** – this column must specify the number of policies issued during the reporting period that meet the same criteria across columns B to E. This includes policies that were issued and concluded within the reporting period (i.e., short term policies).

190. **Column G – Total value of GWP collected for insurance policies issued during the reporting period** – this column must specify the total value of Gross Written Premium (GWP) for all insurance policies that meet the same criteria

across columns B to E during the reporting period. This includes policies that were issued and expired within the reporting period (i.e., short term policies).

191. **Column H – Number of insurance policies issued terminated due to customer due diligence concerns during the reporting period** – this column must specify the number of policies that meet the same criteria across columns B to E, which were terminated due to CDD concerns during the reporting period.

192. **Column I – Number of insurance policies issued subject to TF targeted financial sanctions during the reporting period** – this column must specify the number of policies that meet the same criteria across columns B to E and were subject to Terrorism Financing sanctions during the reporting period.

193. **Column J – Total GWP collected for insurance policies issued subject to TF targeted financial sanctions during the reporting period** – this column must specify the total GWP collected for the policies set out in column I, i.e., the total GWP collected for the policies that meet the same criteria across columns B to E and were subject to Terrorism Financing sanctions during the reporting period.

194. **Column K – Number of insurance policies issued subject to PWMD targeted financial sanctions during the reporting period** – this column must specify the number of accounts that meet the same criteria across columns B to E and were subject to Proliferation of Weapons of Mass Destruction (PWMD) sanctions during the reporting period.

195. **Column L – Total GWP collected for insurance policies issued subject to PWMD targeted financial sanctions during the reporting period** – this column must specify the total GWP collected for the policies set out in column K, i.e., the total value of accounts that meet the same criteria across columns B to E and were subject to Proliferation of Weapons of Mass Destruction (PWMD) sanctions during the reporting period.

Insurers – completing the Transactions – INS sheet

	Transaction Information - Insurer										
Specified Product	Product or Service offered	If Other Product or Service offered, please specify	Geographic location of Policy Holder	Nationality or Country of Incorporation of Policy Holder	Country where transaction originated	Ultimate destination country of the transaction	Interface	Cash or Non-Cash?	AML/CFT Risk Rating of Policy Holder	Total Number of Transactions during the reporting period	Total Value of Transactions during reporting period, in QAR
Long Term Insurance	Investment Linked		Qatar	United States of America	Qatar	United Kingdom	Face to Face	Non-Cash	High	10	100000.00
General Insurance	Travel		Qatar	Pakistan	Qatar	Qatar	Non-Face to Face	Cash	Low	5	1000.00

	Transactions Subject to TF Targeted Financial Sanctions			Number of Transactions Rejected for PWMD Targeted Financial Sanctions during			CDD Concerns	
Total Number of Policies Surrendered during the Reporting Period	Number of Transaction Attempts Subject to TF Targeted Financial Sanctions during reporting period	Value of Transaction Attempts Subject to TF Targeted Financial Sanctions during reporting period, in QAR	Number of Transactions Rejected for TF Targeted Financial Sanctions during reporting period	Number of Transaction Attempts Subject to PWMD Targeted Financial Sanctions during reporting period	Value of Transaction Attempts Subject to PWMD Targeted Financial Sanctions during reporting period, in QAR	Number of Transactions Rejected for PWMD Targeted Financial Sanctions during reporting period	Number of Transactions discontinued/rejected due to customer due diligence concerns during reporting period	Value of Transactions discontinued/rejected due to customer due diligence concerns during reporting period, in QAR
1	0	0.00	0	0	0.00	0	1	10000.00
0	0	0.00	0	0	0.00	0	0	0.00

196. **General instructions:**

a. Use the drop–down lists provided. Firms can type or paste data into a cell, however, if this data does not match an item in the drop–down list, an error will be generated when the return is uploaded to ESS.

b. Only report customer related transactions. Do not include the firm's own transactions, e.g., treasury transactions or payments of the firm's own expenses.

c. While the AML/CFT Rules define "transaction" broadly, for the purpose of the Q27, **only monetary transactions are to be reported**. All non–monetary transactions must be excluded (e.g., the giving of advice should not be included in the Transactions – INS sheet).

d. The variables in columns B to K describe the details of the transactions. Columns L and M provide information about the number and value of the transactions that meet the same criteria across columns B to K.

e. Each time any of the variables across columns B to I changes, start a new line. See the example above.

f. If any of the transactions with the same criteria across columns B to I were subject to Targeted Financial Sanctions or CDD concerns, report this in columns L to S.

g. In Columns L and M all transactions during the reporting period should be reported, including transactions related to policies issued during the reporting period **AND** transactions related to policies which were issued before the reporting period, e.g., an instalment payment on a multi–year policy.

h. Do not report attempted transactions, except where a transaction attempt was subject to Terrorist Financing (TF) Targeted Financial

Sanctions (columns O and P) and Proliferation of Weapons of Mass Destruction (PWMD) Targeted Financial Sanctions (columns R and S).

i. Transactions are primarily grouped by product or service (columns B to D). While there is some repetition of information from the Products – INS and the Customers – INS sheets, this is necessary to allow analysis of the transactions data.

197. **Column B – Specified Activity or Product** – this column must specify the specified activities or products that the firm offered during the reporting period as listed in its scope of authorisation.

198. **Column C – Product or Service offered** – this column must set out a particular product or service offered that falls under the category of the specified activity or product listed in column B. If the firm provides multiple products or services under the same specified activity or product, list each product or service as a separate line item.

199. **Column D – If Other Product or Service offered, please specify –** this column should only be used if the product or service cannot be found in the drop–down list for column C. Provide details of the "other" product or service in column D (free–form text).

200. **Column E – Geographic location of Policy Holder** – this column must specify the country of residence (for natural persons) or the geographic location of the customers' operations (for legal persons or legal arrangements) of the customer.

201. **Column F – Nationality or Country of Incorporation of Policy Holder –** this column must specify the nationality of the customer (for natural persons) or country of incorporation/establishment (for legal persons or legal arrangements) of the customer.

202. **Column G – Country where transaction originated –** this is the country where transaction was initiated, e.g., the location of the ordering customer or remitter for a wire transfer.

203. **Column H – Ultimate destination country of the transaction –** this is the country where the transaction ended, e.g., the location of the beneficiary customer for a wire transfer.

204. **Column I – Interface –** this is the way the firm deals with its customer. If the firm has met the customer in person choose "Face to Face", otherwise choose "Non–Face to Face". Where the customer was introduced to the firm by a third party, such as an introducer or intermediary, select "Indirect Parties".

205. **Column J – Cash or Non–Cash? –** Cash means physical currency, i.e., notes and coins. For all other payment methods, e.g., wire transfer, select "Non–Cash".

206. **Column K – AML/CFT Risk Rating of Policy Holder** – this column must specify the firm's overall AML/CFT risk rating of the business relationship with the policy holder (i.e., the firm's customer) using the options provided in the drop–down list (low, medium, or high). If your firm uses a different rating scale, for the purposes of this return, select the risk rating in the drop–down list that most closely matches the firm's internal risk rating.

207. **Column L – Total Number of Transactions during the Reporting Period –** this column must specify the total number of transactions during the reporting period that meet the same criteria across columns B to K. **Include all transactions made during the reporting period,** for policies issued during the reporting period **AND** for policies which were issued before the reporting period, e.g., an instalment payment on a multi–year policy.

208. **Column M – Total Value of Transactions during the Reporting Period, in QAR –** this column must specify the total value of transactions during the reporting period, that meet the same criteria across columns B to K. **Include all transactions made during the reporting period,** for policies issued during the reporting period **AND** for policies which were issued before the reporting period, e.g., an instalment payment on a multi–year policy.

209. **Column N – Total Number of Policies Surrendered during the Reporting Period –** this column must specify the number of policies which were surrendered during the reporting period that are connected to the transactions reported in column L.

210. **Column O – Number of Transaction Attempts Subject to TF Targeted Financial Sanctions during reporting period –** this column must specify the total number of transaction attempts during the reporting period that meet

the same criteria across columns B to K **AND** were subject to TF Targeted Financial Sanctions. Include both completed and rejected transactions.

211. **Column P – Value of Transaction Attempts Subject to TF Targeted Financial Sanctions during reporting period, in QAR –** this column must specify the value of transaction attempts during the reporting period that meet the same criteria across columns B to K **AND** were subject to TF Targeted Financial Sanctions. Include both completed and rejected transactions.

212. **Column Q – Number of Transactions Rejected for TF Targeted Financial Sanctions during reporting period –** this column must specify how many transactions reported in column L were rejected.

213. **Column R – Number of Transaction Attempts Subject to PMWD Targeted Financial Sanctions during reporting period –** this column must specify the total number of transaction attempts during the reporting period that meet the same criteria across columns B to K **AND** were subject to PMWD Targeted Financial Sanctions. Include both completed and rejected transactions.

214. **Column S – Value of Transaction Attempts Subject to PMWD Targeted Financial Sanctions during reporting period, in QAR –** this column must specify the value of transaction attempts during the reporting period that meet the same criteria across columns B to K **AND** were subject to PMWD Targeted Financial Sanctions. Include both completed and rejected transactions.

215. **Column T – Number of Transactions Rejected for PMWD Targeted Financial Sanctions during reporting period –** this column must specify how many of the transactions reported in column R were rejected.

216. **Column U – Number of Transactions discontinued/rejected due to customer due diligence concerns during reporting period –** this column must specify the total number of transaction attempts during the reporting period that meet the same criteria across columns B to K **AND** were discontinued/rejected due to customer due diligence concerns.

217. **Column V – Value of Transactions discontinued/rejected due to customer due diligence concerns during reporting period, in QAR –** this column must specify the value of transaction attempts during the reporting period that

meet the same criteria across columns B to I **AND** were discontinued/rejected due to customer due diligence concerns.

Insurers – completing the AML Return – INS sheet

	A	B	C
1			
2			**AML/CFT Return - Insurer**
3			
4			**Structural Information**
5		1	Total Gross Written Premium,**in QAR**
6			100000000.00
7			**Jurisdictions**
8		2	Has your Parent Entity been subject to AML/CFT sanctions related disciplinary action during the reporting period
9			Yes
10		2.1	Do these sanctions have an impact on the QFC entity
11			No
12			**AML Programme and framework**
13		3	Provide the residual AML/CFT risk rating of the Firm as stated in the business risk assessment.
14			Medium
15			

217. **Question Number 1:** report the total GWP payment received by the firm during the reporting period. Include GWP received for policies issued during the reporting period AND GWP received during the reporting period for policies which were issued before the reporting period, e.g., an instalment payment on a multi–year policy. The amount reported in Question Number 1 should equal the sum of all rows in Column M of the Transactions sheet.

218. **Question Number 2:** if the QFC entity is a subsidiary or a branch, state whether your parent entity or main office has been subject to AML/CFT related disciplinary action during the reporting period. If the answer to 2 is "Yes", then report in 2.1 whether the sanctions have an impact on the QFC entity. If the answer to 2 is "No", then choose "N/A" for 2.1.

219. **Question Number 3:** provide AML/CFT risk rating after the application of controls, as reflected in the firm's Business Risk Assessment conducted in accordance with Rule 3.1.1 of the AML/CFT Rules.

Insurers – completing the Jurisdictions sheet

	A	B	C	
1				
2		**Jurisdiction Information**		
3				
4		**Jurisdiction (should include the nationality or country of incorporation and geographic location of the Firm's customers, and all jurisdictions with which the Firm has transactions)**	**Inherent Jurisdiction Risk**	
5		Qatar	Low	
6		Syrian Arab Republic	High	
7				

220. **General instructions:**

a. Use the drop–down lists provided. Firms can type or paste data into a cell, however, if this data does not match an item in the drop–down list, an error will be generated when the return is uploaded to ESS.

221. **Column B – Jurisdiction –** this column must list all the jurisdictions that appear in any other sheet in the Q27, i.e., in the Customers, Account/Policies/Engagements, Transactions/Detailed Transactions, STRs and General sheets.

222. **Column C – Inherent Jurisdiction Risk** – this column must specify the firm's inherent AML/CFT risk rating of the Jurisdiction using the options provided in the drop–down list (low, medium, or high). If your firm uses a different rating scale, for the purposes of this return, select the risk rating in the drop–down list that most closely matches the firm's internal risk rating.

Insurers – completing the STRs sheet

Date (in DD-MON-YYYY format) on which the STR was filed with QFIU	Aggregate value of Transaction(s) reported in the STR, in QAR	Nationality (Individual) or Country of Incorporation (Entity) of Customer	Country of Residence (Individual) or Country of operation (Entity)	Country where Account referenced to in the STR is held	Country where Transaction originated	Ultimate destination Country of the Transaction	Was the STR related to customer due diligence obligations?
21-Jun-2023	10000.00	United Kingdom	Qatar	Qatar	Qatar	United Arab Emirates	Yes
20-Dec-2023	50000.00	Iran, Islamic Republic Of	Qatar	Qatar	Qatar	Virgin Islands, British	No

Was the STR related to record keeping obligations?	Was the STR related to beneficial owner identification?	Was the STR related to an attempted transaction that was not completed?	Was the STR related to a local PEP?	Was the STR related to a foreign PEP?	Was the STR related to correspondent banking?	Was the STR related to new technologies?	Was the STR related to a wire transfer?	Was the STR related to TF targeted financial sanctions?	Was the STR related to PWMD targeted financial sanctions?	Was the STR related to misuse of legal persons or legal arrangements?	Was the STR related to any other AML/CFT/PWMD concerns?
No	No	No	No	No	No	No	Yes	No	No	No	No
No	Yes	Yes	No	Yes	No	No	Yes	Yes	No	No	No

223. **General instructions:**

a. The STRs Sheet will only be created if the firm answers "Yes" to the question "Did the firm file any STRs during the reporting period" on the Front Sheet and Declaration.

b. Use the drop–down lists provided. Firms can type or paste data into a cell, however, if this data does not match an item in the drop–down list, an error will be generated when the return is uploaded to ESS.

c. Complete a new row for each STR filed with the QFIU by the firm, during the reporting period.

224. **Column B – Date (in DD–MON–YYYY format) on which the STR was filed with the QFIU –** this column must specify the date the STR was **filed** with the QFIU, **NOT** the date of the STR, or the date of the transaction or incident.

225. **Column C – Aggregate value of Transaction(s) reported in the STR, in QAR –** this column must specify the total of all transactions reported in the STR.

226. **Column D – Nationality (Individual) or Country of Incorporation (Entity) of Customer –** this column must specify the nationality (for natural persons) or country of incorporation/establishment (for legal persons or legal arrangements) of the customer.

227. **Column E – Country of Residence (Individual) or Country of operation (Entity) –** this column must specify the country of residence (for natural persons) or the geographic location of the customer's operations (for legal persons or legal arrangements). Where the customer has operations in multiple geographic locations, select the primary geographic location, e.g., the head office location.

228. **Column F – Country where Account referenced to in the STR is held** – this column must specify the country where the account is held, which may be different to the country of residence or operation of the customer.

229. **Column G – Country where transaction originated –** this is the country where transaction was initiated, e.g., the location of the ordering customer or remitter for a wire transfer.

230. **Column H – Ultimate destination Country of the Transaction –** this is the country where the transaction ended, e.g., the location of the beneficiary customer for a wire transfer.

231. **Columns H to U –** Respond "Yes" or "No" to each question, as appropriate. A response must be provided in every column H to U – do not leave any columns in a completed row blank.

Insurers – completing the General sheet

Sl. No.	Question	Response
1	Number of cases where "tipping off" has occurred during the reporting period	0
2	Were there any updates/revisions to AML/CFT policies and procedures during the reporting period	Yes
3	Number of AML/CFT risk assessments conducted during the reporting period	1
4	Number of AML/CFT audits conducted during the reporting period	1
5	Number of AML/CFT staff working for the entity as at the end of the reporting period	2
6	Number of AML/CFT training programmes conducted during the reporting period	4

General Questions

232. **Question 1 –** Tipping off is defined in rule 5.2.1 of the AML/CFT Rules.

233. **Question 2 –** Specify the number of updates/revisions to the firm's AML/CFT policies and procedures during the reporting period.

234. **Question 3 –** Specify only risk assessments conducted by the firm itself, e.g., business risk assessment or MLRO self–assessments.

235. **Question 4 –** Specify audits conducted by the firm, e.g., Internal Audits or reviews and any external audits or reviews.

236. **Question 5** – Specify the number of AML/CFT staff working for the QFC entity only and not the group. This should include staff who provide services to the QFC entity such as non-resident approval individuals and outsourced functions.

237. **Question 6 –** Specify both internal and external training programmes.

Insurers – completing the Non–resident MLRO Sheet

Non-resident Money Laundering Reporting Officer (MLRO) Report

Firm's AML/CFT oversight arrangements

1	Explain how the MLRO and Deputy MLRO functions operate, including reporting lines and how the QFC office is supervised and monitored for AML/CFT purposes.
	Free-form text answering the question.
2	Provide an outline of the systems in place to allow the MLRO to access the Firm's QFC records, monitor AML/CFT issues and to respond in a timely manner to questions and concerns of QFC staff.
	Free-form text answering the question.
3	How many times did the MLRO (and Deputy MLRO if non-resident) visit Qatar during the reporting period? For each visit, how long did he or she spend in Qatar?
	Free-form text answering the question.
4	What activities were undertaken during those visits? (Give details separately for the MLRO and the Deputy MLRO).
	Free-form text answering the question.

238. The Non–resident MLRO Sheet will only be created if the firm specifies a country other than Qatar in response to the question "Country of residence of MLRO" on the Front Sheet and Declaration.

239. A response is required for all questions 1 – 4. Free–form text is permitted.

Insurance Intermediaries – guidance on completing the required Q27 Sheets

Insurance Intermediaries – required sheets

240. Insurance Intermediaries must complete the following sheets:

    a. Front Sheet and Declaration;

    b. Products – IMB;

    c. Customers – IMB;

    d. Policies – IMB;

    e. Transactions – IMB;

    f. AML Return – IMB;

    g. Jurisdictions;

    h. STRs (if applicable);

    i. General; and

    j. Non–resident MLRO Report (if applicable).

Insurance Intermediaries – completing the Products – IMB sheet

Specified Product	Product or Service offered	If Other Product or Service offered, please specify	Inherent AML Risk Rating of Product or Service offered in column C	Product introduced during the Reporting Period?	Total number of customers using Product or Service offered in column C during the Reporting Period
General Insurance	Motor		Low	No	10
Long Term Insurance	Investment Linked		High	No	20
General Insurance	Other	Injury by falling coconut insurance	Low	Yes	1

Product Information - Insurance Intermediary

241. **General instructions:**

    a. Use the drop–down lists provided. Firms can type or paste data into a cell, however, if this data does not match an item in the drop–down list, an error will be generated when the return is uploaded to ESS.

    b. The variables in columns C to F describe the details of the product listed in column F.

    c. Each time any of the variables across columns B to F changes, start a new line. See the example above.

    d. Only report active products (i.e., products in use during the reporting period by an active customer.

242. **Column B – Specified Activity or Product** – this column must specify the specified activities or products that the firm offered during the reporting period as listed in its scope of authorisation.

243. **Column C – Product or service offered** – this column must set out a particular product or service offered that falls under the category of the specified activity or product listed in column B. If the firm provides multiple products or services under the same specified activity or product, list each product or service as a separate line item.

244. **Column D – If Other Product or Service offered, please specify –** this column should only be used if the product or service cannot be found in the drop–down list for column C. Provide details of the "other" product or service in column D (free–form text).

245. **Column E – Inherent AML Risk Rating of Product or Service offered in column C** – this column must specify the firm's inherent AML/CFT risk rating of the product or service using the options provided in the drop–down list (low, medium, or high). If your firm uses a different rating scale, for the purposes of this return, select the risk rating in the drop–down list that most closely matches the firm's internal risk rating.

246. **Column F – Product introduced during the reporting period?** – if the product was introduced during the reporting period, select "yes" from the drop–down menu, otherwise select "no".

247. **Column G – Total number of customers using Product or Service offered in column C during the Reporting Period** – provide the total number of customers with same variables in columns B to F. Note that a customer may use for than one product or service.

Insurance Intermediaries – completing the Customers – IMB sheet

Type of Customer	Nationality or Country of Incorporation of Customer	Country of Residence (Individual) or Country of operation (Entity)	PEP?	AML/CFT Risk Rating of Customer	Total Number of New Customers Onboarded during the Reporting Period	Total Number of New and Existing Customers during the Reporting Period	Total Fee and Commission Income for Customers in Column H during the Reporting Period	Number of Customers subject to TF-targeted financial sanctions during the Reporting Period	Number of Customers subject to PWMD targeted financial sanctions during the Reporting Period
Corporate	Argentina	United Arab Emirates	No	Medium	3	4	120000.00	0	0
Opted Up Business	Syrian Arab Republic	Qatar	Yes	High	1	1	50000.00	0	0

248. **General instructions:**

   a. Use the drop–down lists provided. Firms can type or paste data into a cell, however, if this data does not match an item in the drop–down list, an error will be generated when the return is uploaded to ESS.

   b. The variables in columns B to F describe the details of the customers listed in columns G and H.

c. Each time any of the variables across columns B to F changes, start a new line. See the example above.

d. Only report active customers (i.e., customers that the firm had a business relationship with during the reporting period). For example, where the customer has an open account with the firm, this customer should be reported, even if there was no activity on the account during the reporting period.

e.

249. **Column B – Type of Customer** – this column must specify the type of customer, e.g., retail, corporate, financial institution, etc. If the customer type is a counterparty, e.g., Market Counterparty, select "Eligible Counterparty" from the drop–down list.

250. **Column C – Nationality or Country of Incorporation of Customer –** this column must specify the nationality (for natural persons) or country of incorporation/establishment (for legal persons or legal arrangements) of the customer.

251. **Column D – Country of Residence (Individual) or Country of operation (Entity)** – this column must specify the country of residence (for natural persons) or the geographic location of the customer's operations (for legal persons or legal arrangements). Where the customer has operations in multiple geographic locations, select the primary geographic location, e.g., the head office location.

252. **Column E – PEP? –** This column must specify if the customer is a Politically Exposed Person (PEP). If the customer is a PEP, select "Yes" from the drop–down list, otherwise select "No".

AML/CFTR rule 1.3.6 defines a PEP, their family members and associates, as follows:

A *politically exposed person (PEP)* means an individual who is, or has been, entrusted with prominent public functions. Unless the context requires otherwise, a reference to a PEP in these rules includes a family member of the PEP or a close associate of the PEP.

Examples of persons who can be PEPs

22 Heads of State or of government
23 senior politicians

24 senior government, judicial or military officials

25 members of Parliament

26 important political party officials

27 senior executives of state–owned companies

28 members of senior management (directors, deputy directors and members of the board or equivalent functions) in international organisations.

A **family member** of a PEP means an individual related to the PEP by blood, or by marriage, up to the second degree

<u>Examples of individuals related to a PEP in the first or second degree</u>

28 the PEP's father and mother

29 the PEP's husband or wife

30 the PEP's father–in–law or mother–in law

31 the PEP's son or daughter

32 the PEP's stepson or stepdaughter

33 the PEP's grandfather and grandmother

34 the PEP's brother or sister

35 the PEP's brother–in–law or sister–in–law

36 the PEP's grandson or granddaughter

A person is a ***close associate of a PEP*** if the person:

a) is in partnership with the PEP in a legal person or legal arrangement;

b) is associated with the PEP through a business or social relationship; or

c) is a beneficial owner of a legal person or legal arrangement owned, or effectively controlled, by the PEP.

253. <u>**Column F – AML/CFT Risk Rating of Customer**</u> – this column must specify the firm's overall AML/CFT risk rating of the business relationship with the customer using the options provided in the drop–down list (low, medium, or high). If your firm uses a different rating scale, for the purposes of this return, select the risk rating in the drop–down list that most closely matches the firm's internal risk rating.

254. <u>**Column G – Total number of new customers onboarded during the reporting period**</u> – this column must specify the total number of customers onboarded during the reporting period, that meet the same criteria across columns B to F. Where a policy has been renewed or a new policy has been issued to an

existing customer, that customer must **not** be considered a "new" customer (they will be counted as an existing customer in Column H).

255. **Column H – Total number of new and existing customers during the reporting period** – this column must specify the total number of new customers onboarded during the reporting period **AND** the number of existing customers onboarded before the reporting period that were active during the reporting period, and that meet the same criteria across columns B to F.

256. **Column I – Total fee and commission income for customers in column H during the reporting period** – this column must specify the total value of fee and commission income earned by the Insurance Intermediary during the reporting period related to the total new and existing customers recorded in column H that meet the same criteria across columns B to F. Only fee and commission income are to be reported here – do **not** include the premium paid to the insurer.

257. **Column J – Number of customers subject to TF–targeted financial sanctions during the reporting period** – this column must specify the number of new and existing customers that meet the same criteria across columns B to F and were subject to Terrorism Financing sanctions during the reporting period.

258. **Column K – Number of customers subject to PWMD–targeted financial sanctions during the reporting period** – this column must specify the number of new and existing customers that meet the same criteria across columns B to F and were subject to Proliferation of Weapons of Mass Destruction (PWMD) sanctions during the reporting period.

<u>Insurance Intermediaries – completing the Policies – IMB sheet</u>

Type of Customer	Nationality or Country of Incorporation of Customer	Country of Residence (Individual) or Country of operation (Entity)	Country where Insurance policy is intermediated	Total Number of Insurance policies intermediated during the Reporting Period	Total GWP collected for Insurance policies intermediated during the Reporting Period, in QAR	Number of Insurance policies intermediated terminated due to customer due diligence concerns during the Reporting Period	Number of Insurance policies intermediated that were subject to TF-targeted financial sanctions during the Reporting Period	Total GWP collected for Insurance policies intermediated that were subject to TF targeted financial sanctions during the Reporting Period, in QAR	Number of Insurance policies intermediated that were subject to PWMD targeted financial sanctions during the Reporting Period	Total GWP collected for Insurance policies intermediated that were subject to PWMD targeted financial sanctions during the Reporting Period, in QAR
Corporate	Argentina	United Arab Emirates	Qatar	3	100000.00	0	0	0.00	0	0.00
Opted Up Business	United Kingdom	Qatar	Qatar	8	500000.00	0	0	0.00	0	0.00

259. The focus of this sheet relates to policies issued to customers, noting that a customer may have more than one policy.

260. **General instructions:**

a. Use the drop–down lists provided;

b. The variables in columns B to E describe the details of the customers holding policies. Columns G to L provide information about the number of policies held by those customers; and

c. Each time any of the variables across columns B to E changes, start a new line. See the example above.

d. While there is some repetition of information from the Customers – IMB sheet, this is necessary to allow analysis of the policies data.

261. **Column B – Type of customer** – this column must specify the type of customer, e.g., retail, corporate, financial institution etc.

262. **Column C – Nationality or country of incorporation of customer –** this column must specify the nationality of the customer (for natural persons) or country of incorporation/establishment (for legal persons or legal arrangements) of the customer.

263. **Column D – Country of residence (Individual) or country of operation (entity)** – this column must specify the country of residence (for natural persons) or the geographic location of the customers' operations (for legal persons or legal arrangements) of the customer.

264. **Column E – Country where insurance policy is intermediated** – this column must specify the country where the policy is intermediated, which may be different to the country where the policy was issued.

265. **Column F – Total number of insurance policies intermediated during the reporting period** – this column must specify the number of policies intermediated during the reporting period that meet the same criteria across columns B to E. This includes policies that were issued and expired within the reporting period (i.e., short term policies).

266. **Column G – Total value of GWP collected for insurance policies intermediated during the reporting period** – this column must specify the total Gross Written Premium (GWP) for insurance policies that meet the same criteria across columns B to E during the reporting period. Include the value of GWP collected by the intermediary **AND** the value of GWP where the premium is paid directly to the Insurer by the customer.

267. **Column H – Number of insurance policies intermediated terminated due to customer due diligence concerns during the reporting period** – this column

must specify the number of policies that meet the same criteria across columns B to E, which were terminated due to CDD concerns during the reporting period.

268. **Column I – Number of insurance policies intermediated subject to TF targeted financial sanctions during the reporting period** – this column must specify the number of policies that meet the same criteria across columns B to E and were subject to Terrorism Financing sanctions during the reporting period.

269. **Column J – Total GWP collected for insurance policies intermediated subject to TF targeted financial sanctions during the reporting period** – this column must specify the total GWP collected for the policies set out in column I, i.e., the total GWP collected for the policies that meet the same criteria across columns B to E and were subject to Terrorism Financing sanctions during the reporting period. Include the value of GWP collected by the intermediary AND the value of GWP where the premium is paid directly to the Insurer by the customer.

270. **Column K – Number of insurance policies intermediated subject to PWMD targeted financial sanctions during the reporting period** – this column must specify the number of accounts that meet the same criteria across columns B to E and were subject to Proliferation of Weapons of Mass Destruction (PWMD) sanctions during the reporting period.

271. **Column L – Total GWP collected for insurance policies intermediated subject to PWMD targeted financial sanctions during the reporting period** – this column must specify the total GWP collected for the policies set out in column K, i.e., the total value of accounts that meet the same criteria across columns B to E and were subject to Proliferation of Weapons of Mass Destruction (PWMD) sanctions during the reporting period. Include the value of GWP collected by the intermediary AND the value of GWP where the premium is paid directly to the Insurer by the customer.

Insurance Intermediaries – completing the Transactions – IMB sheet

Specified Product	Product or Service offered	If Other Product or Service offered, please specify	Geographic location of Policy Holder	Nationality or Country of Incorporation of Policy Holder	Country where transaction originated	Ultimate destination country of the transaction	Interface	Cash or Non-Cash?	AML/CFT Risk Rating of Policy Holder	Total Number of Transactions during the reporting period	Total Value of Transactions during reporting period, in QAR
Long Term	Investment Linked		Qatar	United States of	Qatar	United Kingdom	Face to	Non-Cash	High	10	100000.00
General Insurance	Travel		Qatar	Pakistan	Qatar	Qatar	Non-Face	Cash	Low	5	1000.00

	Transactions Subject to TF Targeted Financial Sanctions			Number of Transactions Rejected for PWMD Targeted Financial Sanctions during reporting				CDD Concerns	
Total Number of Policies Surrendered during the Reporting Period	Number of Transaction Attempts Subject to TF Targeted Financial Sanctions during reporting period	Value of Transaction Attempts Subject to TF Targeted Financial Sanctions during reporting	Number of Transactions Rejected for TF Targeted Financial Sanctions during reporting period	Number of Transaction Attempts Subject to PWMD Targeted Financial Sanctions during reporting period	Value of Transaction Attempts Subject to PWMD Targeted Financial Sanctions during reporting period, in QAR	Number of Transactions Rejected for PWMD Targeted Financial Sanctions during reporting period	Number of Transactions discontinued/rejected due to customer due diligence concerns during reporting period	Value of Transactions discontinued/rejected due to customer due diligence concerns during reporting period, in QAR
---	---	---	---	---	---	---	---	---
1	0	0.00	0	0	0.00	0	1	10000.00
0	0	0.00	0	0	0.00	0	0	0.00

272. **General instructions:**

   a. Use the drop–down lists provided. Firms can type or paste data into a cell, however, if this data does not match an item in the drop–down list, an error will be generated when the return is uploaded to ESS.

   b. Only report transactions where funds are received or sent by the firm.

   c. Do not include the firm's own transactions, e.g., treasury transactions or payments of the firm's own expenses.

   d. While the AML/CFT Rules define "transaction" broadly, for the purpose of the Q27, **only monetary transactions are to be reported**. All non–monetary transactions must be excluded (e.g., the giving of advice should not be included in the Transactions – IMB sheet).

   e. The variables in columns B to K describe the details of the transactions. Columns L and M provide information about the number and value of the transactions that meet the same criteria across columns B to K.

   f. Each time any of the variables across columns B to I changes, start a new line. See the example above.

   g. If any of the transactions with the same criteria across columns B to I were subject to targeted financial sanctions or CDD concerns, report this in columns L to S.

   h. In Columns L and M – all transactions during the reporting period should be reported, including transactions related to policies issued during the reporting period **AND** transactions related to policies which were issued before the reporting period, e.g., fee and commission income payments received by the firm for a multi–year policy.

i. Do not report attempted transactions, except where a transaction attempt was subject to Terrorist Financing (TF) Targeted Financial Sanctions (columns O and P) and Proliferation of Weapons of Mass Destruction (PWMD) Targeted Financial Sanctions (columns R and S).

j. Transactions are primarily grouped by product or service (columns B to D). While there is some repetition of information from the Products – IMB and the Customers – IMB sheets, this is necessary to allow analysis of the transactions data.

273. **<u>Column B – Specified Activity or Product</u>** – this column must specify the specified activities or products that the firm offered during the reporting period as listed in its scope of authorisation.

274. **<u>Column C – Product or Service offered</u>** – this column must set out a particular product or service offered that falls under the category of the specified activity or product listed in column B. If the firm provides multiple products or services under the same specified activity or product, list each product or service as a separate line item.

275. **<u>Column D – If Other Product or Service offered, please specify –</u>** this column should only be used if the product or service cannot be found in the drop–down list for column C. Provide details of the "other" product or service in column D (free–form text).

276. **<u>Column E – Geographic location of Policy Holder</u>** – this column must specify the country of residence (for natural persons) or the geographic location of the customers' operations (for legal persons or legal arrangements) of the customer.

277. **<u>Column F – Nationality or Country of Incorporation of Policy Holder –</u>** this column must specify the nationality of the customer (for natural persons) or country of incorporation/establishment (for legal persons or legal arrangements) of the customer.

278. **<u>Column G – Country where transaction originated –</u>** this is the country where transaction was initiated, e.g., the location of the ordering customer or remitter for a wire transfer.

279. **Column H – Ultimate destination country of the transaction –** this is the country where the transaction ended, e.g., the location of the beneficiary customer for a wire transfer.

280. **Column I – Interface –** this is the way the firm deals with its customer. If the firm has met the customer in person choose "Face to Face", otherwise choose "Non–Face to Face". Where the customer was introduced to the firm by a third party, such as an introducer or intermediary, select "Indirect Parties".

281. **Column J – Cash or Non–Cash? –** Cash means physical currency, i.e., notes and coins. For all other payment methods, e.g., wire transfer, select "Non–Cash".

282. **Column K – AML/CFT Risk Rating of Policy Holder** – this column must specify the firm's overall AML/CFT risk rating of the business relationship with the policy holder (i.e., the firm's customer) using the options provided in the drop–down list (low, medium, or high). If your firm uses a different rating scale, for the purposes of this return, select the risk rating in the drop–down list that most closely matches the firm's internal risk rating.

283. **Column L – Total Number of Transactions during the Reporting Period –** this column must specify the total number of transactions during the reporting period that meet the same criteria across columns B to K. **Include all transactions made during the reporting period,** for policies issued during the reporting period **AND** for policies which were issued before the reporting period, e.g., an instalment payment on a multi–year policy.

284. **Column M – Total Value of Transactions during the Reporting Period, in QAR –** this column must specify the total value of transactions during the reporting period, that meet the same criteria across columns B to K. **Include all transactions made during the reporting period,** for policies issued during the reporting period **AND** for policies which were issued before the reporting period, e.g., an instalment payment on a multi–year policy.

285. If during the reporting period the firm received premium payments direct from the customer and/or the firm paid premiums to the Insurer on behalf of the customer, the total value of these transactions should be included in column M.

286. **Column N – Total Number of Policies Surrendered during the Reporting Period –** this column must specify the number of policies which were surrendered during the reporting period that are connected to the transactions reported in column L.

287. **Column O – Number of Transaction Attempts Subject to TF Targeted Financial Sanctions during reporting period –** this column must specify the total number of transaction attempts during the reporting period that meet the same criteria across columns B to K **AND** were subject to TF Targeted Financial Sanctions. Include both completed and rejected transactions.

288. **Column P – Value of Transaction Attempts Subject to TF Targeted Financial Sanctions during reporting period, in QAR –** this column must specify the value of transaction attempts during the reporting period that meet the same criteria across columns B to K **AND** were subject to TF Targeted Financial Sanctions. Include both completed and rejected transactions.

289. **Column Q – Number of Transactions Rejected for TF Targeted Financial Sanctions during reporting period –** this column must specify how many transactions reported in column L were rejected.

290. **Column R – Number of Transaction Attempts Subject to PMWD Targeted Financial Sanctions during reporting period –** this column must specify the total number of transaction attempts during the reporting period that meet the same criteria across columns B to K **AND** were subject to PMWD Targeted Financial Sanctions. Include both completed and rejected transactions.

291. **Column S – Value of Transaction Attempts Subject to PMWD Targeted Financial Sanctions during reporting period, in QAR –** this column must specify the value of transaction attempts during the reporting period that meet the same criteria across columns B to K **AND** were subject to PMWD Targeted Financial Sanctions. Include both completed and rejected transactions.

292. **Column T – Number of Transactions Rejected for PMWD Targeted Financial Sanctions during reporting period –** this column must specify how many of the transactions reported in column R were rejected.

293. **Column U – Number of Transactions discontinued/rejected due to customer due diligence concerns during reporting period –** this column must specify

the total number of transaction attempts during the reporting period that meet the same criteria across columns B to K **AND** were discontinued/rejected due to customer due diligence concerns.

294. **Column V – Value of Transactions discontinued/rejected due to customer due diligence concerns during reporting period, in QAR –** this column must specify the value of transaction attempts during the reporting period that meet the same criteria across columns B to I **AND** were discontinued/rejected due to customer due diligence concerns.

<u>Insurance Intermediaries – completing the AML Return – IMB sheet</u>

	A	B	C
2			**AML/CFT Return - Insurance Intermediary**
3			
4			**Structural Information**
5		1	Total Fee and Commission Income, **in QAR**
6			100000000.00
7			**Jurisdictions**
8		2	Has your Parent Entity been subject to AML/CFT sanctions related disciplinary action during the reporting period
9			Yes
10		2.1	Do these sanctions have an impact on the QFC entity
11			No
12			**AML Programme and framework**
13		3	Provide the residual AML/CFT risk rating of the Firm as stated in the business risk assessment.
14			Medium

295. **Question Number 1:** report the total fee and commission income received by the firm during the reporting period. This includes fee and commission income related to policies issued during the reporting period AND fee and commission income received during the reporting period, but which related to policies which were issued before the reporting period, e.g., fee and commission income payments for a multi–year policy. The amount reported in Question Number 1 should equal the sum of all rows in Column M of the Transactions sheet.

296. **Question Number 2:** if the QFC entity is a subsidiary or a branch, state whether your parent entity or main office has been subject to AML/CFT related disciplinary action during the reporting period. If the answer to 2 is "Yes", then report in 2.1 whether the sanctions have an impact on the QFC entity. If the answer to 2 is "No", then choose "N/A" for 2.1.

297. **Question Number 3:** provide AML/CFT risk rating after the application of controls, as reflected in the firm's Business Risk Assessment conducted in accordance with Rule 3.1.1 of the AML/CFT Rules.

Insurance Intermediaries – completing the Jurisdictions sheet

	A	B	C	
1				
2		**Jurisdiction Information**		
3				
4		**Jurisdiction (should include the nationality or country of incorporation and geographic location of the Firm's customers, and all jurisdictions with which the Firm has transactions)**	**Inherent Jurisdiction Risk**	
5		Qatar	Low	
6		Syrian Arab Republic	High	
7				

298. **General instructions:**

   a. Use the drop–down lists provided. Firms can type or paste data into a cell, however, if this data does not match an item in the drop–down list, an error will be generated when the return is uploaded to ESS.

299. **Column B – Jurisdiction –** this column must list all the jurisdictions that appear in any other sheet in the Q27, i.e., in the Customers, Account/Policies/Engagements, Transactions/Detailed Transactions, STRs and General sheets.

300. **Column C – Inherent Jurisdiction Risk** – this column must specify the firm's inherent AML/CFT risk rating of the Jurisdiction using the options provided in the drop–down list (low, medium, or high). If your firm uses a different rating scale, for the purposes of this return, select the risk rating in the drop–down list that most closely matches the firm's internal risk rating.

Insurance Intermediaries – completing the STRs sheet

	A	B	C	D	E	F	G	H	I
2								Suspicious Transaction Rep	
3									
4		Date (in DD-MON-YYYY format) on which the STR was filed with QFIU	Aggregate value of Transaction(s) reported in the STR, **in QAR**	Nationality (Individual) or Country of Incorporation (Entity) of Customer	Country of Residence (Individual) or Country of operation (Entity)	Country where Account referenced to in the STR is held	Country where Transaction originated	Ultimate destination Country of the Transaction	Was the STR related to customer due diligence obligations?
5		21-Jun-2023	10000.00	United Kingdom	Qatar	Qatar	Qatar	United Arab Emirates	Yes
6		20-Dec-2023	50000.00	Iran, Islamic Republic Of	Qatar	Qatar	Qatar	Virgin Islands, British	No
7									

	J	K	L	M	N	O	P	Q	R	S	T	U
2	ports											
3												
4	Was the STR related to record keeping obligations?	Was the STR related to beneficial owner identification?	Was the STR related to an attempted transaction that was not completed?	Was the STR related to a local PEP?	Was the STR related to a foreign PEP?	Was the STR related to correspondent banking?	Was the STR related to new technologies?	Was the STR related to a wire transfer?	Was the STR related to TF targeted financial sanctions?	Was the STR related to PWMD targeted financial sanctions?	Was the STR related to misuse of legal persons or legal arrangements?	Was the STR related to any other AML/CFT/PWMD concerns?
5	No	No	No	No	No	No	No	Yes	No	No	No	No
6	No	Yes	Yes	No	Yes	No	No	Yes	Yes	No	No	No
7												

301. **General instructions:**

a. The STRs Sheet will only be created if the firm answers "Yes" to the question "Did the firm file any STRs during the reporting period" on the Front Sheet and Declaration.

b. Use the drop–down lists provided. Firms can type or paste data into a cell, however, if this data does not match an item in the drop–down list, an error will be generated when the return is uploaded to ESS.

c. Complete a new row for each STR filed with the QFIU by the firm, during the reporting period.

302. **Column B – Date (in DD–MON–YYYY format) on which the STR was filed with the QFIU –** this column must specify the date the STR was **filed** with the QFIU, **NOT** the date of the STR, or the date of the transaction or incident.

303. **Column C – Aggregate value of Transaction(s) reported in the STR, in QAR –** this column must specify the total of all transactions reported in the STR.

304. **Column D – Nationality (Individual) or Country of Incorporation (Entity) of Customer –** this column must specify the nationality (for natural persons) or country of incorporation/establishment (for legal persons or legal arrangements) of the customer.

305. **Column E – Country of Residence (Individual) or Country of operation (Entity) –** this column must specify the country of residence (for natural persons) or the geographic location of the customer's operations (for legal persons or legal arrangements). Where the customer has operations in multiple geographic locations, select the primary geographic location, e.g., the head office location.

306. **Column F – Country where Account referenced to in the STR is held** – this column must specify the country where the account is held, which may be different to the country of residence or operation of the customer.

307. **Column G – Country where transaction originated –** this is the country where transaction was initiated, e.g., the location of the ordering customer or remitter for a wire transfer.

308. **Column H – Ultimate destination Country of the Transaction –** this is the country where the transaction ended, e.g., the location of the beneficiary customer for a wire transfer.

309. **Columns H to U –** Respond "Yes" or "No" to each question, as appropriate. A response must be provided in every column H to U – do not leave any columns in a completed row blank.

<u>Insurance Intermediaries – completing the General sheet</u>

Sl. No.	Question	Response
	General Questions	
1	Number of cases where "tipping off" has occurred during the reporting period	0
2	Were there any updates/revisions to AML/CFT policies and procedures during the reporting period	Yes
3	Number of AML/CFT risk assessments conducted during the reporting period	1
4	Number of AML/CFT audits conducted during the reporting period	1
5	Number of AML/CFT staff working for the entity as at the end of the reporting period	2
6	Number of AML/CFT training programmes conducted during the reporting period	4

310. **Question 1 –** Tipping off is defined in rule 5.2.1 of the AML/CFT Rules.

311. **Question 2 –** Specify the number of updates/revisions to the firm's AML/CFT policies and procedures during the reporting period.

312. **Question 3 –** Specify only risk assessments conducted by the firm itself, e.g., business risk assessment or MLRO self–assessments.

313. **Question 4 –** Specify audits conducted by the firm, e.g., Internal Audits or reviews and any external audits or reviews.

314. **Question 5** – Specify the number of AML/CFT staff working for the QFC entity only and not the group. This should include staff who provide services to the QFC entity such as non-resident approval individuals and outsourced functions.

315. **Question 6 –** Specify both internal and external training programmes.

	A	B	C	I
1				
2			**Non-resident Money Laundering Reporting Officer (MLRO) Report**	
3				
4			**Firm's AML/CFT oversight arrangements**	
5		1	Explain how the MLRO and Deputy MLRO functions operate, including reporting lines and how the QFC office is supervised and monitored for AML/CFT purposes.	
6			Free-form text answering the question.	
7		2	Provide an outline of the systems in place to allow the MLRO to access the Firm's QFC records, monitor AML/CFT issues and to respond in a timely manner to questions and concerns of QFC staff.	
8			Free-form text answering the question.	
9		3	How many times did the MLRO (and Deputy MLRO if non-resident) visit Qatar during the reporting period? For each visit, how long did he or she spend in Qatar?	
10			Free-form text answering the question.	
11		4	What activities were undertaken during those visits? (Give details separately for the MLRO and the Deputy MLRO).	
12			Free-form text answering the question.	
13				

316. The Non–resident MLRO Sheet will only be created if the firm specifies a country other than Qatar in response to the question "Country of residence of MLRO" on the Front Sheet and Declaration.

317. A response is required for all questions 1 – 4. Free–form text is permitted.

Representative Offices – guidance on completing the required Q27 Sheets

Representative Offices – required sheets

318. Representative Offices must complete the following sheets:

    a. Front Sheet and Declaration;

    b. AML Return – RO.

Representative Offices – completing the AML Return – RO

|	A	B	C	D
1				
2			**AML/CFT Return - Representative Office (Rep Office)**	
3				
4			**Representative Office activities**	
5		1	Which of the following activities are conducted within your Rep Office business? (Select as many as applicable)	
6			Providing information (but not advice) in relation to financial services or financial products offered by the Rep Offices' head office:	
7		1.1	providing general market information.	Yes
8		1.2	risk study.	No
9		1.3	investment research.	Yes
10		1.4	published prospectus.	No
11		1.5	Other: **Details (if other)**	No
12				
13			On behalf of the Rep Office's head office or a member of the same corporate group, doing any of the following:	
14		1.6	Acting as a channel of communication between the head office or member and actual or potential customers of the head office or member in Qatar.	Yes
15		1.7	Carrying out market research or feasibility studies in relation to financial products or financial services on behalf of the head office or member.	Yes
16		1.8	Reporting to the head office or member on business trends, opportunities and developments in the Qatari market.	Yes
17		1.9	Providing information about, or marketing, a financial product or financial service by the Rep Office.	Yes
18			**AML Program and framework**	
19		2	Has the Rep Office identified and reported any suspicious activity or suspicious transactions in relation to the business of the Representative Office with Qatar Financial Information Unit (QFIU) in the last twelve months? **Number (if Yes):**	Yes
20			On DATE, the following suspicious acitvity was identified: PROVIDE DETAILS. The action taken by the firm was: PROVIDE DETAILS.	
21		3	Does the Rep Office certify that it complies with the AML/CFT requirements of the Representative Office Rules 2020 and relevant provisions of the AML/CFT Law and Implementing Regulations of the State of Qatar? **Details (if No):**	Yes
22				
23				

319. **General instructions:**

    a. Use the drop–down lists provided. Firms can type or paste data into a cell, however, if this data does not match an item in the drop–down list, an error will be generated when the return is uploaded to ESS.

320. Respond "Yes or "No" to each question, as appropriate.

321. Provide free form comments to questions 1.5, 2 and 3, if applicable.