

1. This report summarises the anti-money laundering and counter-terrorist financing (AML/CFT) measures in place in Qatar as at the date of the on-site visit from 19 June to 7 July 2022. It analyses the level of compliance with the FATF 40 Recommendations and the level of effectiveness of Qatar's AML/CFT system and provides recommendations on how the system could be strengthened.

Key Findings

- a) Qatar has a good overall understanding of its money laundering and terrorism (ML/TF) risks at a national level. Qatar's national risk assessment (NRA) assesses the major proceeds-generating crimes and ML/TF channels using a well-established methodology. Understanding of certain threats is still developing, with a need to deepen Qatar's understanding of more complex forms of ML/TF. Financial institutions (FIs), designated non-financial businesses and professions (DNFBPs) and non-profit organisations (NPOs) demonstrate strong awareness of the main results of the NRA. Qatar's national AML/CFT policies and activities largely address its major ML/TF risks identified in its NRA. Qatar has implemented an ambitious series of reforms across its legal framework, law enforcement and supervisory approach. Nonetheless, further work is necessary to ensure that law enforcement and supervisors are implementing these reforms, particularly in relation to Qatar's judicial system. Qatari authorities have strong interagency coordination on ML/TF and proliferation financing (PF) through formal and informal means.
- b) Qatar's authorities use financial intelligence in their pursuit of ML, and the Qatar Financial Intelligence Unit (QFIU) is well-equipped to provide analysis and intelligence products to relevant authorities. However, Qatar's sophisticated analysis capabilities are not used to their fullest extent as authorities identify too few cases of ML using financial intelligence, preferring instead to pursue predicate offences. In relation to TF, financial intelligence is not used in an adequate manner and there are no cases of TF identification using financial intelligence.
- c) Qatar is conducting an increasing number of ML investigations and prosecutions, although the total number of ML cases prosecuted remains low overall and somewhat in-line with risks. Authorities are investigating a

range of ML offences; however, case studies suggest that authorities can continue improving their investigations to identify the role Qatar may play in broader, complex or professional ML schemes and networks. Nevertheless, authorities are well-equipped and aware of the current ML risks and are continually improving their abilities to pursue ML.

- d) Qatar is effectively confiscating large sums, including proceeds and instrumentalities of crime, and property of equivalent value. Qatar has a national strategy to confiscate all proceeds of crime and assets are identified and recovered for its higher-risk offences. Qatar has made some requests to identify and seize proceeds of crime moved abroad but has not yet repatriated such proceeds. Qatar has implemented a new declaration system at the border for currency, precious metals and stones and BNIs. However, cases of seizures at the border are infrequent and sanctions are not effective nor dissuasive.
- e) There are major inconsistencies between the type and extent of TF activity prosecuted and convicted and Qatar's TF risk profile. Qatar has secured only a small number of TF convictions and prosecutions. These convictions do not target the type of TF activity and potential channels identified as higher risk by Qatar. Prosecutorial authorities face challenges when attempting to effectively prosecute and achieve convictions on TF. This has led to many TF cases being acquitted or overturned on appeal. When Qatar identifies and investigates TF activities, cases typically relate to the exploitation of fairly unsophisticated channels. In general, authorities have investigated and identified TF activity in a singular dimension of unlicensed financial services. These results raise concerns, given the range of inherent threats and vulnerabilities identified by Qatar.
- f) Qatar demonstrated a robust framework to implement TFS related to TF United Nations Security Council Resolutions (UNSCRs) without delay and a capacity to deprive assets and instrumentalities of terrorists, terrorist organizations and terrorist financiers through different criminal and administrative processes. All natural and legal persons are required to immediately implement the relevant UNSCRs related to TFS within 24 hours. Qatar has frozen a significant volume of assets and other funds pursuant to its TF TFS program (QAR 4.26 billion (USD 1.17 billion)). A high proportion (QAR 3.66 billion (USD one billion)) is related to those designated domestically through UNSCR 1373. Qatar has implemented measures to address the risks of abuse of NPOs for TF purposes. The Regulatory Authority for Charitable Activities (RACA) provides substantial guidance on risks and has also tailored its supervisory approach to assist NPOs in developing a culture of compliance for AML/CFT. However, it is unclear if RACA implements a proportionate regulatory burden on the NPO sector.
- g) Qatar's framework allows for the effective implementation of TFS related to PF UNSCRs without delay. Designations by the UNSC immediately trigger the obligation for all natural and legal persons to freeze the funds of the person or entity designated without delay. However, Qatar has not frozen

any funds or assets in Qatar and has not yet proposed a listing to the UN under UNSCRs related to PF. In addition, there was no evidence of enforcement actions related to PF TFS. Qatar does not have any notable links to the Democratic People's Republic of Korea (DPRK) but maintains a trade relationship with Iran. This relationship increases Qatar's exposure to PF, particularly with shortcomings on the access to accurate and up-to-date beneficial ownership (BO) information and DNFBPs unequal awareness of PF obligations. This may hinder authorities' ability to identify funds related to designated persons.

- h) Qatar's framework for preventive measures is robust and mostly complies with the FATF Standards. Preventive measures are applicable to all FIs, and DNFBPs, while virtual asset service providers (VASPs) are prohibited in Qatar. Overall, larger FIs and DNFBPs have a generally good understanding of ML/TF risks and implementation of their obligations. Smaller FIs and DNFBPs, particularly DNFBPs in the State, are still in the process of developing their understanding of ML/TF risks and implementation of their AML/CFT obligations. While the reporting of STRs has been increasing in recent years, reporting by some sectors remains low in light of the risks.
- i) The Qatar Central Bank (QCB) applies a risk-based approach in its AML/CFT supervision of the financial sector, implementing updated risk-based supervision procedures in 2021. QCB reviews significant offsite information that informs onsite inspections and uses other supervisory tools to address risk. The Qatar Financial Centre Regulatory Authority (QFCRA) and the Qatar Financial Markets Authority (QFMA) also demonstrate a well-established capacity to conduct risk-based AML/CFT supervision. Supervision of DNFBPs by the Ministry of Commerce and Industry (MOCI) and the Ministry of Justice (MOJ) is improving, but it is still not sufficiently developed. MOCI and MOJ have risk rated their supervised DNFBPs and started inspection of some sectors in mid-2020. However, COVID-19 restrictions affected the full implementation of the risk-based supervisory plans.
- j) Qatar recently enacted new regulations and procedures to secure that competent authorities, legal persons and arrangements, FIs and DNFBPs, gather and maintain accurate basic and BO information. Qatar has also implemented measures that discourage the creation of shell companies and the abuse of nominee directors and shareholders. Although Qatari authorities and the Qatar Financial Centre Authority (QFCA) are implementing a multi-pronged approach to secure the collection of BO information, there are still not sufficient controls to secure that the information collected remains accurate and up-to-date after the establishment of the legal persons and arrangements. In addition, law enforcement authorities (LEAs) can obtain basic and BO information, but LEAs do not have direct access to all registries and information which can lead to delays
- k) The authorities prioritise international co-operation but further progress is necessary to improve Qatar's overall system for mutual legal assistance (MLA) and extradition. Qatar can and does respond to international co-operation requests for mutual legal assistance, but some partners report

challenges in providing timely or effective co-operation. Qatar is seeking MLA and extradition, but its requests are not targeted and the response rates are low. In addition, Qatar does not sufficiently seek (or receive) MLA for TF. Nevertheless, Qatar demonstrates that it co-operates informally with counterparts to a strong degree (particularly for financial intelligence), and authorities receive and send information on cases.

Risks and General Situation

2. Qatar is a small country but is among the wealthiest nations in the world. In addition to the State of Qatar, Qatar hosts an onshore financial centre (the Qatar Financial Centre (QFC)). Qatar is generally perceived as a safe and law-abiding country, with low domestic crime risks. Although not a major financial centre, Qatar is positioning itself as a regional financial centre of growing importance. It is not a major source country for proceeds of crime or a major centre for laundering the proceeds of crimes committed in other countries. Nevertheless, it is exposed to a range of ML risks. While Qatar has a very limited threat from domestic acts of terrorism, the country faces a distinct risk from TF related to terrorist acts and terrorist groups operating outside of the country.

3. Qatar produced an NRA on ML/TF at the end of 2019 based on a process that started in 2015. The NRA assessed that Qatar has an overall residual ML risk of medium-high. Qatar's primary domestic ML risks emanate from smuggling crimes, fraud, drug crimes and corruption. The NRA identifies banks, exchange houses, dealers in precious metals or stones (DPMSs) and trust and company service providers (TCSPs) as the highest risk sectors for ML. The abuse of cash and bearer negotiable instruments (BNIs) and cash-intensive businesses is also identified as a high ML risk, as is the provision of financial services without a license.

4. Regarding TF, the NRA characterises the residual TF risk as medium-high. Foreign terrorist organizations have targeted both Qatari citizens and foreign residents in Qatar to raise funds for their overseas operations. The NRA considers that the abuse of charities and NPOs, exchange houses, cross-border transfer services, and the transfer of funds through banks, cash, BNIs and precious metals or stones as all to be medium-high risk channels for TF in Qatar. It has also considered the presence of designated terrorists, terrorist financiers and controversial groups in Qatar as a serious source of TF threat.

Overall Level of Compliance and Effectiveness

5. Qatar has implemented an AML/CFT system that is effective in some respects. Strong results are being achieved in relation to Qatar's understanding of its risks, supervision of FIs and DNFBPs, the confiscation of proceeds of crime and the implementation of TFS related to TF. Major improvements are needed in relation to international cooperation, implementation of preventive measures by FIs and DNFBPs, measures to improve the transparency of legal persons and arrangements, its use of financial intelligence, the investigation and prosecution of ML activity and TFS related to PF. Fundamental improvements are needed in relation to Qatar's investigation and prosecution of TF activity.

6. In terms of Qatar's technical compliance with the FATF Standards, Qatar has fundamentally overhauled its AML/CFT regime since its last evaluation. Qatar introduced a new AML/CFT law in 2019 and has introduced a range of other reforms to improve Qatar's institutional and legislative framework and ensure adequate skills and resourcing of competent authorities. Accordingly, Qatar has a very strong level of compliance with the FATF Standards, with only minor improvements needed in relation to risk understanding, implementation of TFS and NPO preventive measures, VAs and VASPs, wire transfers, transparency for legal persons and arrangements and cross-border movements of cash and BNIs.

Assessment of risk, coordination and policy setting (Chapter 2; 10.1, R.1, 2, 33 & 34)

7. Qatar has a good overall understanding of its major ML/TF risks at a national level. The NRA assesses the major proceeds-generating crimes and ML/TF channels using a well-established methodology. However, there is scope for moderate improvements in Qatar's understanding of certain threats, such as in relation to ML associated with human trafficking, and certain sectors such as DPMSs, as well as the various ways NPOs can be abused, outside of fundraising by individuals falsely claiming NPO affiliation. Nevertheless, Qatari authorities demonstrate an awareness of the changing risk landscape since the NRA was completed.

8. Qatar's national AML/CFT policies and activities largely address its identified ML/TF risks. Qatar has implemented an ambitious series of reforms across its legal framework, law enforcement and supervisory approach. Further work is necessary to ensure that the actions of law enforcement, supervisors and judicial system are implementing these reforms and delivering the expected outcomes.

9. Qatari authorities have strong interagency coordination on ML/TF/PF through formal and informal means, with policy and operational cooperation happening frequently and smoothly. FIs, DNFBPs and NPOs demonstrate strong awareness of the main results of the NRA.

Financial intelligence, ML investigations, prosecutions and confiscation (Chapter 3; 10.6, 7, 8; R.1, 3, 4, 29-32)

10. Qatar's LEAs have devoted a significant amount of resource and effort to using financial intelligence for ML and predicate offences and cases numbers suggest that these efforts are beginning to show results. Cooperation among relevant agencies for the exchange of financial intelligence and information is strong, and there are no notable barriers to cooperation. Based on examples provided and discussions with relevant authorities, it is apparent that the QFIU has robust intelligence-gathering capabilities. Broadly, the QFIU helps to shape the outcome of investigations thanks to

its ability to conduct useful analysis using its suite of tools and access to a wide range of systems.

11. The QFIU supports operational authorities involved in ML investigations and the information and analysis performed by the QFIU is often intended to meet the requests of LEAs (e.g., identifying accounts or tracing assets). However, Qatar's LEAs could use the QFIU's financial intelligence and analysis capabilities more often to identify ML and predicate offences that are not already known to authorities.

12. In respect to TF, Qatar is not using financial intelligence in a material way to develop TF cases. Authorities receive financial intelligence from a wide range of sources, including QFIU reports for suspicions of TF. However, this analysis is used only to some extent to develop evidence and trace assets. This is a notable gap in Qatar's AML/CFT framework.

13. Qatar is working to improve the quality of STRs and engages with relevant FIs, DNFBPs and supervisors regularly. The QFIU also produces useful and detailed quality strategic analysis, which it distributes to a wide range of cooperating agencies.

14. LEAs are well resourced and equipped with adequate systems, training, and technologies to tackle ML. Qatar has achieved 20 in-person convictions and 9 absentia convictions of ML in the past 6 years. This figure is somewhat low in comparison to total convictions of predicate offences (with over 8 000 for select predicates in the same time-frame). Nevertheless, investigators and prosecutors are continuously increasing their ML investigation and prosecution figures, underlining the growing extent to which Qatar uses (and intends to use) financial investigation as a tool to disrupt criminal activity and deprive criminals of illicit proceeds.

15. Qatar pursues ML investigations somewhat in line with risk. However, a significant portion of these investigations of suspected ML do not end up charged in court as ML (with prosecutors opting to pursue the predicate offence instead). This suggests that some further development is needed to bring ML cases to fruition. Qatar has a high conviction rate, and sanctions as applied for ML appear effective, dissuasive, and proportionate. However, 38% of all sentenced persons are convicted in absentia and it is not clear whether these sanctions are effective and dissuasive. Authorities are investigating a range of ML offences; however case studies suggest that authorities can continue improving their investigations (including by engaging with international counterparts) to improve their ability to identify the role that Qatar may play in broader, complex or professional ML schemes and networks.

16. Qatar seizes and confiscates proceeds and instrumentalities of crime and property of equivalent value robustly, with important amounts of assets seized and subsequently confiscated. The range of underlying predicate offences for which Qatar is confiscating and seizing funds is broadly in line with the risks.

17. Following recent efforts to bolster its capacities, Qatar has made some requests to identify and seize proceeds of crime moved abroad. However, Qatar has not yet repatriated such proceeds. Nevertheless, Qatar has developed an effective asset management system, managed by the PPO, which prevents dissipation and has substantial authority to manage and dispose of assets.

18. Qatar prioritises confiscation as part of a national strategy on asset recovery. However, Qatar can improve how it monitors the outcomes of its assets recovery efforts, to ensure that it meets its policy objectives.

19. At the border, the General Authority of Customs (GAC) moved to a new declaration system in 2019 and declarations and seizures of cross-border funds are increasing. Continued progress is needed to improve the number of seizures, and sanctions for undeclared currency and BNIs are neither effective nor dissuasive.

Terrorist and proliferation financing (Chapter 4; IO.9, 10, 11; R. 1, 4, 5–8, 30, 31 & 39.)

20. Qatar has investigated and prosecuted a limited number of TF cases in relation to the identified level of risk and most of them were connected to attempted cross-border movement of funds through informal channels or fundraising through misrepresentation of being a NPO to raise funds. In the last five years, authorities have not sufficiently advanced TF investigations or prosecutions related to the abuse of licensed NPOs for TF or to individuals' donations for non-charitable purposes. This indicates that Qatar is not adequately investigating and prosecuting TF cases in accordance with the existent level of risks. There have been only a limited number of convictions (3) in 2016-2018 and none since then.

21. Qatar did not demonstrate that it had initiated or critically advanced TF cases from financial intelligence reports from the QFIU or input from agencies such as GAC or RACA, despite the fact that the abuse of banks, NPOs, the smuggling of cash, BNIs and precious metals presenting the highest level of TF risk within Qatar. Prosecutorial authorities face challenges when attempting to effectively prosecute and achieve convictions on TF. These challenges include limitations on the presentation of sufficient and conclusive evidence in accordance with the standards required in court, the difficulty to convert intelligence into formal evidence, barriers posed by the lack of effective international cooperation with certain jurisdictions and the challenges in relation to the understanding by courts of TF.

22. Given the risks identified by Qatar and its geographical location, the efforts undertaken by the authorities in TF investigations, prosecutions and convictions need fundamental improvement.

23. Qatar's legislative framework ensures that all natural and legal persons are legally required to implement TFS immediately upon designation by the UN Security Council or by Qatar's National Counter Terrorism Committee (NCTC). Qatar has a mostly effective system of communication of new designation through its RSS feed and NCTC website. Relevant implementing entities are aware of the NCTC list and most, with the exception of some DNFBPs, subscribe to the free list.

24. Qatar has listed a number of global terrorist organizations and persons on the NCTC internal list. Qatar has communicated the importance of TFS to most supervised entities but could conduct further outreach to the DNFBP sector to enhance TFS implementation. Qatar has effectively frozen assets of designated persons located in Qatar and has processes in place to freeze assets in the future, if needed.

25. Qatar has applied strong measures to ensure NPOs are not abused for TF. Qatari authorities have applied some important measures across the whole NPO sector but have also focused other stringent measures on more at-risk NPOs. However, it is unclear if RACA is balancing the need to apply enhanced supervision to the subset of most at-risk NPOs while implementing a proportionate regulatory burden on the rest of NPO sector.

26. Qatari authorities and supervised entities broadly take action to implement TFS immediately upon designation by the UNSC or the NCTC. Most reporting entities exhibit understanding of TFS, with the exception of some DNFBPs in the State.

27. Qatar has not frozen any funds within its jurisdiction for PF, has not yet proposed a listing to the UN under UNSCRs related to PF and has not implemented enforcement actions related to PF TFS, which may be inconsistent with Qatar's PF exposure from Iran. Qatari authorities work to identify funds or other assets of persons or entities designated for PF and ensure such funds are not used for PF. However, gaps in supervision, shortcomings on the access to accurate and up-to-date BO information, and its system for monitoring trade-finance flows with Iran may hinder authorities' ability to identify funds tied to designated persons and entities.

Preventive measures (Chapter 5; IO.4; R.9–23)

28. Qatar's framework for preventive measures is robust and mostly complies with the FATF Standards. Preventive measures are applicable to all FIs, and DNFBPs, while VASPs are prohibited in Qatar. Overall, larger FIs and DNFBPs have a generally good understanding of ML/TF risks and AML/CFT obligations. Smaller FIs and DNFBPs, particularly DNFBPs in the State, are still in the process of developing their understanding of ML/TF risks and AML/CFT obligations.

29. Banks and large FIs in both the State and the QFC implement policies and controls commensurate with the ML/TF risks identified in risk assessments (including NRAs and sectoral risk assessments (SRAs)). These FIs have invested resources to develop mitigating measures to identify areas of higher risk. Most large FIs and DNFBPs in the QFC have a relatively strong implementation of the requirements of customer due diligence, record-keeping, and enhanced due diligence measures, while smaller FIs and DNFBPs in the State remain at an early stage of implementation. FIs have generally appropriate internal controls and group-wide programs. DNFBPs in the QFC have more experience in implementing internal controls.

30. While the reporting of STRs has been increasing in recent years, reporting by some FIs and DNFBPs remains relatively low in light of the risks. The 2019 NRA recognized that the quality of STRs was generally low. The QFIU and AML/CFT supervisors have made substantive efforts to improve the quality of reporting, with the QFIU manually reviewing each STR and conducting thematic reviews. QFCRA-regulated entities and DNFBPs still submit STRs manually and some DNFBPs in the State also appear unclear as to whom they need to report an STR.

Supervision (Chapter 6; IO.3; R.14, R.26–28, 34, 35)

31. All AML/CFT supervisors have a fair overall understanding of Qatar's ML/TF risk but the understanding differs among supervisors related to their sectors' risks. MOCI does not have a sufficient level of understanding of ML/TF risk when considering the DPMS sector and individual institutional level of risks. In addition, there is a room for enhancing the understanding of other supervisory authorities of FIs and DNFBPs.

32. Qatar has implemented a risk-based approach to AML/CFT supervision and ML/TF risk assessments. QCB, QFCRA and QFMA demonstrated the implementation of a risk-based approach for the AML/CFT supervision of the financial sector. MOCI

and MOJ have taken positive steps to conduct AML/CFT supervision of DNFBPs on a risk-basis. The process is at an early stage and although it is improving, it is still not sufficiently developed.

33. Supervision and monitoring to address and mitigate ML/TF risks in the financial sector and DNFBPs have led to the implementation of remedial actions. MOCI and MOJ applied a gradual approach to enforcement and sanctions and no financial sanctions have been paid so far, so it remains too early to assess if the sanctions are proportionate, effective, and dissuasive. The supervisors have consistently provided guidance and other information on AML/CFT obligations, but MOCI's and MOJ's efforts, although commendable, need to be enhanced.

Transparency and beneficial ownership (Chapter 7; IO.5; R.24, 25)

34. There is publicly available information on the creation and types of legal persons and arrangements. Qatar authorities have developed a sufficient understanding of ML/TF risks posed by legal persons and arrangements created in Qatar. However, it is unclear if Qatar sufficiently considered the ML risks posed by the legal persons in the NPO sector.

35. Qatar has implemented several measures to mitigate ML/TF risks, including establishing a central registry for basic and BO information of all registered legal persons and arrangements (the Unified Economic Register (UER)). Qatar has made positive and sustained progress in collecting BO. Qatar has completed over 80% of the UER and will finalize the collection in a short period. However, there are insufficient measures to ensure accurate and up-to-date BO information (particularly from MOCI). In addition, there could be unmitigated risks associated with the use of nominee directors and shareholders within MOCI as the declaration requirements have been put in place recently in 2022.

36. LEAs can obtain basic and BO information; however, LEAs do not have direct access to all registries and information which can lead to delays. It is unclear if the available information is accurate and up-to-date, particularly due to the limitations of relevant authorities in verifying BO information.

37. The QFCA has applied proportionate and dissuasive sanctions for breaching information requirements and publicly published them. MOCI has also applied sanctions related to the absence of basic information from onsite visits. However, MOCI, which holds 90% of legal persons registered, has only restricted the renewal of the license for the companies which failed to submit BO information as their licenses expired, which does not seem fully effective or dissuasive. Furthermore, it is unclear if the rest of the registering authorities have imposed proportionate, dissuasive and effective sanctions to other legal persons and arrangements.

International cooperation (Chapter 8; IO.2; R.36–40)

38. Qatar responds to incoming requests for MLA and extradition and uses a prioritisation system to keep track of incoming requests. However, there are reported issues with regards to requests in certain high-profile cases involving TF and corruption, involving key strategic partners. Nevertheless, Qatar has demonstrated it is responding to requests.

39. Qatar is not receiving international cooperation in response to its MLA requests in an effective manner, which poses an important challenge to authorities' ability to address ML, TF and predicate offences. Qatar requests a wide range of

formal international co-operation in relation to ML and predicate offences but response rates are low. On extradition, LEAs send out many requests, regardless of how many prior refusals there have already been. As a result, a considerable number of requests are refused or do not receive a response. For TF, LEAs do not pursue MLA in relation to such cases, relying instead on intelligence co-operation with counterparts. This is a gap, as prosecuting authorities often lack sufficient evidence to move forward with prosecutions of TF.

40. Competent authorities appear responsive in regard to informal cooperation. The Ministry of Interior (MOI) and GAC have well-established histories of exchanges through several platforms, but requests (particularly from MOI) are infrequent. The State Security Bureau (SSB) relies heavily on informal cooperation to meet its operational objectives. QFIU conducts regular exchanges with counterparts to trace assets, develop its analysis and share information with counterparts. Exchanges of supervisory information appear adequate and relevant supervisors are responsive to incoming requests.

Priority Actions

- a) Qatar should enhance its ability to detect with greater precision all stages of TF (i.e., raising, moving, using), as well as a wider variety of channels (e.g., banks, exchange houses, NPOs, etc.) and the methods utilised by individuals and entities on behalf of terrorist organisations, to ensure that all types and complexities of TF cases can be identified and pursued.
- b) Qatar should focus in enhancing its intelligence, investigative, and prosecutorial efforts to align these with the country's TF profile, based on identified TF risks related to the abuse of licensed NPOs or individual donations for non-charitable purposes. In addition, Qatar should further target and prioritize investigations and prosecutions on TF designated individuals or entities located in Qatar and/or who hold assets or funds in the jurisdiction.
- c) Qatar should enhance the use of financial intelligence, notably the use of QFIU analytical products (such as spontaneous disseminations) to identify more cases of suspected TF to ensure that financial intelligence plays a more prominent role in the identification of TF. Authorities should use financial intelligence to develop evidence, trace assets and identify suspected cases of TF.
- d) Qatar should continue to focus on achieving more ML prosecutions and convictions, and in a risk-focused manner. This should consist of conducting more outreach with international partners and deepening the complexity of investigations with transnational components to identify Qatar's possible role in complex, professional ML schemes. Qatar should also strengthen the capacities of prosecutors by ensuring continuous training and resourcing of ML and follow-the-money based expertise.
- e) The Public Prosecution Office (PPO) should improve Qatar's use of international co-operation for ML, TF and predicate offences by using the

existing PPO case management system to triage outgoing requests for MLA and extradition and developing a pragmatic approach to focus requests that Qatar sends in order to improve response rates. PPO should use informal cooperation to obtain insights about the likelihood of refusals or barriers to formal cooperation.

- f) Qatar should improve the quality of basic and BO information available from different sources of information to ensure that it is accurate and up-to-date by creating controls and measures to verify information within each registry and the existent information held by FIs, DNFbps and legal persons and arrangements.
- g) NAMLC should continue to develop its understanding of Qatar's ML/TF risks, including new and emerging risks, by completing its planned update to the 2019 NRA. In particular, the updated NRA should deepen the analysis in relation to more complex forms of ML/TF activity, particularly in areas where Qatar has had limited statistics or where Qatar has not historically pursued investigations and include ML/TF risk rankings for all FI/DNFbp sectors in Qatar and all relevant threats and channels.
- h) MOCI and MOJ should ensure the full implementation of a risk-based approach. In addition, MOJ should ensure the alignment of their supervisory actions with the supervisory plans and MOCI and MOJ should apply a stronger enforcement and implementation approach to incentivise the compliance of obligations by their supervised entities. QCB, MOCI and MOJ should focus on ensuring adequate and sufficient resources and expertise. In particular, QCB should focus on resourcing for new technologies due to the rapid technological changes and developments.
- i) Qatar should continue to pursue confiscations as a matter of course in its criminal justice framework. Qatar should also consider developing more specific policy objectives in relation to recovery strategy, including asset seizure and confiscation targets and periodic reporting on priorities for predicate and ML offences.
- j) MOCI and MOJ should continue their outreach to improve understanding of DNFbp sectors of their AML/CFT obligations. This should include MOCI and MOJ continuing their supervisory activities to improve compliance of DNFbps with their AML/CFT obligations. Qatar should continue its work to improve the quantity and quality of STRs, particularly by DNFbps in the State. In particular, QFIU should ensure that all FIs and DNFbps can report STRs electronically.
- k) Qatar should continue building awareness amongst DNFbps on PF-related TFS to ensure that sanctions obligations are understood and implemented. In addition, Qatar should strengthen its capacity to identify and target funds and other assets of designated persons and entities considering its exposure to PF and sanctions evasion.

Effectiveness & Technical Compliance Ratings

Table 1. Effectiveness Ratings

IO.1 - Risk, policy and co-ordination	IO.2 International co-operation	IO.3 - Supervision	IO.4 - Preventive measures	IO.5 - Legal persons and arrangements	IO.6 - Financial intelligence
Substantial	Moderate	Substantial	Moderate	Moderate	Moderate
IO.7 - ML investigation & prosecution	IO.8 - Confiscation	IO.9 - TF investigation & prosecution	IO.10 - TF preventive measures & financial sanctions	IO.11 - PF financial sanctions	
Moderate	Substantial	Low	Substantial	Moderate	

Note: Effectiveness ratings can be either a High- HE, Substantial- SE, Moderate- ME, or Low – LE, level of effectiveness.

Table 2. Technical Compliance Ratings

R.1 - assessing risk & applying risk-based approach	R.2 - national co-operation and co-ordination	R.3 - money laundering offence	R.4 - confiscation & provisional measures	R.5 - terrorist financing offence	R.6 - targeted financial sanctions – terrorism & terrorist financing
LC	C	C	C	C	LC
R.7 - targeted financial sanctions - proliferation	R.8 - non-profit organisations	R.9 – financial institution secrecy laws	R.10 – Customer due diligence	R.11 – Record keeping	R.12 – Politically exposed persons
LC	LC	C	C	C	C
R.13 – Correspondent banking	R.14 – Money or value transfer services	R.15 –New technologies	R.16 –Wire transfers	R.17 – Reliance on third parties	R.18 – Internal controls and foreign branches and subsidiaries
C	C	LC	LC	C	C
R.19 – Higher-risk countries	R.20 – Reporting of suspicious transactions	R.21 – Tipping-off and confidentiality	R.22 - DNFBPs: Customer due diligence	R.23 – DNFBPs: Other measures	R.24 – Transparency & BO of legal persons
C	C	C	C	C	LC
R.25 - Transparency & BO of legal arrangements	R.26 – Regulation and supervision of financial institutions	R.27 – Powers of supervision	R.28 – Regulation and supervision of DNFBPs	R.29 – Financial intelligence units	R.30 – Responsibilities of law enforcement and investigative authorities
LC	C	C	C	C	C
R.31 – Powers of law enforcement and investigative authorities	R.32 – Cash couriers	R.33 – Statistics	R.34 – Guidance and feedback	R.35 – Sanctions	R.36 – International instruments
C	C	C	C	C	C
R.37 – Mutual legal assistance	R.38 – Mutual legal assistance: freezing and confiscation	R.39 – Extradition	R.40 – Other forms of international co-operation		
C	C	C	C		

Note: Technical compliance ratings can be either a C – compliant, LC – largely compliant, PC – partially compliant or NC – non compliant.