

# Guidance on completing the Q27 AML/CFT Return for DNFBPs

November 2023 (V.1)

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## Structure of this guidance

1. This guidance is for QFC DNFBPs. You are advised to read the introductory sections from paragraphs 2 to 31 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

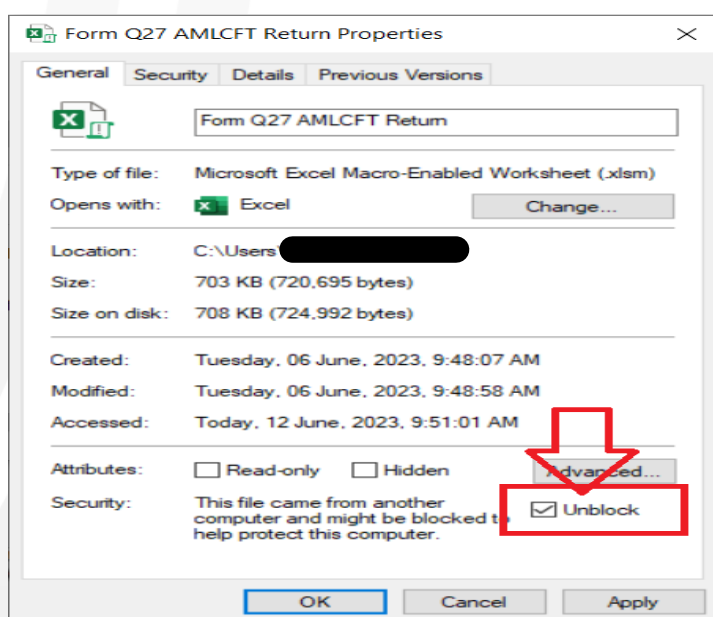
2. The purpose of the Q27 AML/CFT Return (Q27) is to provide the Qatar Financial Centre Regulatory Authority (QFCRA) and National Anti-Money Laundering and Terrorism Financing Committee (NAMLC) with all relevant data in connection to the business activities of the firm, including customers, products, interface and jurisdictional Money Laundering (ML) and Terrorism Financing (TF) risks of the Firm.
3. The Q27 must be submitted by 31 January each year, covering the previous calendar year. The first submission is due on 31 January 2024.
4. The Q27 replaces the Q25 AML/CFT Return (Q25) and Q26 NAMLC Data Collection Form (Q26). The Q27 combines the data from the Q25 and Q26 and eliminates duplication between those returns. 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 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 also additional data points in the Q27 e.g., on the Products sheet, firms are now 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 new 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](#).

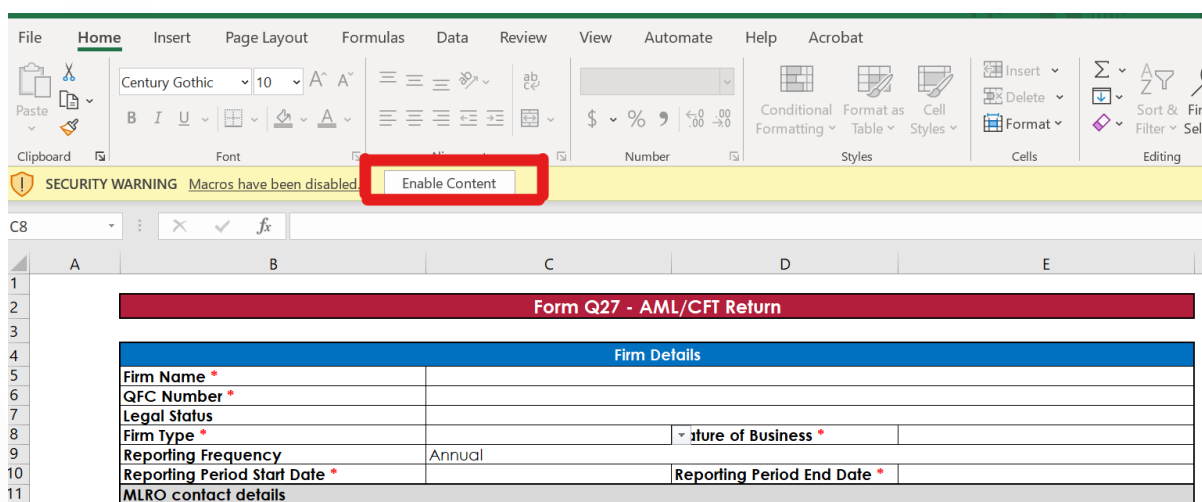
## How to create a tailored Q27 according to the firm's type of business

### 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 Law Firm 2023 Q27 AML Return is the file name for the return submitted by XYZ Law Firm on 31 January 2024 covering the period 1 January to 31 December 2023.
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., Legal Services) – note paragraph 13 below;
  - c. Did the firm file any STRs during reporting period; and
  - d. Country of residence of MLRO.
13. When choosing the Nature of Business in paragraph 12 b above, Trust and Company Service Providers should choose “Trust Services” from the drop-down list. If a DNFBP undertakes Trust and Company Services activities (see AML/CFTR rule 1.3.3(1)(d)), in addition to other services (e.g., Audit and Accounting), then choose “Trust Services” as the nature of business.
14. Complete all the other information on the Front Sheet and Declaration. Items marked \* are mandatory.
15. Where items marked \* cannot be completed then respond not applicable or provide an explanation depending on the context.
16. After you complete the front sheet, a tailored Q27 form will be created for your firm, depending on the type of its business. All the sheets relevant to your firm will be created as separate tabs at the bottom of the screen.

17. 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.
18. 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

19. 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. All currency amounts must be in Qatari Riyals.
  - e. Currency is reported in actual amounts, **NOT** thousands, e.g., one hundred thousand riyals should be reported as 100,000.
  - f. Do not use the currency symbol 'QAR' – just enter an amount.
  - g. In number cells, insert only numbers.
  - h. Express decimal places to 2 decimal places.
  - i. If there is no activity to be recorded, insert "0" for number cells and "N/A" for text cells.
  - j. 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

20. The Q27 must be submitted via ESS. Here is a link to the ESS User Guide: [QFCRA Electronic Submission System User Guide.pdf](#)
21. The link to submit the Q27 Return will be published in the Firm's Reporting Schedule in ESS in early January of each year.
22. 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.

23. The validation process has two parts: front-end validation and back-end validation.
24. 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.
25. 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.
26. Once the front-end validation is completed without errors, back-end validation will commence.
27. Back-end validation checks the information in all other sheets is valid, consistent and error free.
28. Because of the complexity of the back-end validation, including cross checks between Sheets, the validation process may take some time.
29. 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.
30. Firms will receive an email once both front-end and back-end 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.
31. One of the following individuals **must** electronically sign the declaration section of the Return:
  - c. Senior Executive Function;
  - d. Money Laundering Reporting Officer; or
  - e. Deputy Money Laundering Reporting Officer.



## Links to guidance according to the nature of business

32. [Guidance for Audit and Accounting, Legal Services and Professional Services](#)
33. [Guidance for Trust and Company Service Providers](#)
34. [Guidance for Single Family Offices](#)

## Audit and Accounting, Legal Services and Professional Services – guidance on completing the required Q27 Sheets

### Audit and Accounting, Legal Services and Professional Services – required sheets

35. Audit and Accounting, Legal Services and Professional Services must complete the following sheets:
- [Front Sheet and Declaration](#);
  - [Products – DNFBP](#);
  - [Customers – DNFBP](#);
  - [Engagements – DNFBP](#);
  - [Detailed Transactions - DNFBP](#);
  - [Total Transactions – DNFBP](#);
  - [AML Return – DNFBP](#);
  - [Jurisdictions](#);
  - [STRs](#) (if applicable);
  - [General](#); and
  - [Non-resident MLRO Report](#) (if applicable).

### Audit and Accounting, Legal Services and Professional Services - completing the Products – DNFBP sheet

Product Information - DNFBP					
Specified Product	Product or Service offered	If Other Product or Service offered, please specify	Inherent AML Risk Rating of Product or Service offered in <b>column C</b>	Product introduced during the Reporting Period?	Total number of customers using Product or Service offered in <b>column C</b> during the Reporting Period
DNFBP Services	Buying and selling of real estate		High	No	10
Non-DNFBP Services	Audit and Accounting Services				70

36. **General instructions:**
- 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.
  - The variables in columns C to F describe the details of the specified activity or product listed in column B.
  - Each time any of the variables across columns B to F changes, start a new line. See the example above.
37. **Column B - Specified Product** - this column must specify the specified products the firm offered during the reporting period. If the activity meets

the definition in AML/CFTR rule 1.3.3(1)(c) select "DNFBP Services". If the activity meets the definition in AML/CFTR rule 1.3.3(1)(d) select "Trust Services". For all other activities, select "Non-DNFBP Services."

38. **Column C - Product or Service offered** - 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. Where "Non-DNFBP Services" are selected in Column B, the only options in Column C will be "Audit and Accounting Services," "Legal Services", "Professional Services" or "Other". Choose the option most appropriate to your firm, e.g., a law firm would list its non-DNFBP legal activities as "Legal Services."
39. **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).
40. **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.
41. **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."
42. **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.

## Audit and Accounting, Legal Services and Professional Services - completing the Customers – DNFBP sheet

Customer Information - DNFBP										
Type of Customer	Nationality or Country of Incorporation of Customer	Country of Residence (Individual) or Country of operation (Entity)	DNFBP Customer?	PEP?	AML/CFR 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	Gross Fee Income generated from Customers in Column I during the Reporting Period	Number of customers subject to TF targeted financial sanctions during reporting period	Number of customers subject to PWMF targeted financial sanctions during reporting period
Corporate	Argentina	United Arab Emirates	Yes	No	Medium	3	4	120000.00	0	0
Retail Customer	Syrian Arab Republic	Qatar	No	Yes	High	1	1	50000.00	0	0

### 43. General instructions:

- 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.
- The variables in columns B to G describe the details of the customers listed in columns H and I.
- Each time any of the variables across columns B to G changes, start a new line. See the example above.

44. **Column B - Type of Customer** - this column must specify the type of customer, e.g., retail (i.e., individual), corporate, financial institution, etc.

45. **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.

46. **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.

47. **Column E - DNFBP Customer?** - If the service provided to the customer meets the definitions in AML/CFTR rule 1.3.3(1) (c) or (d), select "Yes" from the drop-down list, otherwise select "No". If the firm provides both DNFBP and non-DNFBP services to a customer, then the customer should be classified as a DNFBP customer.

48. **Column F – 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

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

- 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. **Column G – 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.
50. **Column H – 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 G. Where an account/mandate/engagement/matter 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 G).
51. **Column I – 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 G.
52. **Column J – Gross Fee Income generated from Customers in Column I during the Reporting Period** – this column must specify the gross fee income for the total new and existing customers recorded in column I that meet the same criteria across columns B to G.
53. **Column K - 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 G and were subject to Terrorism Financing sanctions during the reporting period.
54. **Column L - 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 G and were subject to Proliferation of Weapons of Mass Destruction sanctions during the reporting period.

### Audit and Accounting, Legal Services and Professional Services - completing the Engagements – DNFBP sheet

	B	C	D	E	F	G	H	I	J	K	L
1	Engagement Information - DNFBP										
2	Type of Customer	Nationality or Country of Incorporation of Customer	Country of Residence (Individual) or Country of operation (Entity)	Country where Engagement is established	Total Number of Engagements Opened during the Reporting Period	Total value of Engagements (Fee Income) during the Reporting Period	Number of Engagements terminated due to customer due diligence concerns during the Reporting Period	Number of Engagements that were subject to IF targeted financial sanctions during the Reporting Period	Total value of Engagements that were subject to IF targeted financial sanctions during the Reporting Period	Number of Engagements that were subject to FPMO targeted financial sanctions during the Reporting Period	Total value of Engagements that were subject to FPMO targeted financial sanctions during the Reporting Period
3						QAR			QAR		QAR
4	Corporate	Austria	United Arab Emirates	Qatar	3	1000000.00	0	0	0.00	0	0.00
5	Retail Customer	United Kingdom	Qatar	Qatar	2	80000.00	0	0	0.00	0	0.00

#### 55. **General instructions:**

- "Engagement" is an agreement with a customer to provide a service or product. Firms may use different terms such as Account, Mandate or Matter. Note that Business Relationship is defined in AML/CFTR rule 4.2.4. A firm may have more than one engagement with a customer during the reporting period. In that case, the firm would report one customer in the Customers Sheet, but multiple engagements in the Engagements Sheet.
- 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.
- The variables in columns B to E describe the details of the customers holding accounts. Columns F and G provide information about the number of engagements with those customers and the total value by fee income.
- Each time any of the variables across columns B to E changes, start a new line. See the example above.
- While there is some repetition of information in the Customers – DNFBP sheet, this repetition is necessary to allow analysis of the engagements data.

56. **Column B - Type of Customer** - this column must specify the type of customer, e.g., retail (i.e., individual), corporate, financial institution, etc.

57. **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.

58. **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.
59. **Column E - Country where the Engagement is established** – this column must specify the country where the engagement was established, which may be different to the country of residence or operation of the customer.
60. **Column F - Total number of Engagements Opened during the reporting period** – this column must specify the total number of all engagements opened during the reporting period that meet the same criteria across columns B to E. This includes engagements that were opened and then closed within the reporting period.
61. **Column G - Total value of Engagements (Fee Income) during the reporting period** – this column must specify the total value of engagements that meet the same criteria across columns B to E during the reporting period. Value is the fee income earned by the firm from the engagements.
62. **Column H - Number of Engagements terminated due to customer due diligence concerns during the reporting period** - this column must specify the number of engagements that meet the same criteria across columns B to E, which were terminated due to CDD concerns during the reporting period.
63. **Column I - Number of Engagements subject to TF targeted financial sanctions during the reporting period** - this column must specify the number of engagements that meet the same criteria across columns B to E and were subject to Terrorism Financing sanctions during the reporting period.
64. **Column J – Total value of Engagements subject to TF targeted financial sanctions during the reporting period** - this column must specify the total value of the engagements set out in column I, i.e., the total value of engagements that meet the same criteria across columns B to E and were subject to Terrorism Financing sanctions during the reporting period.



65. **Column K - Number of Engagements subject to PWMD targeted financial sanctions during the reporting period** - this column must specify the number of engagements that meet the same criteria across columns B to E and were subject to Proliferation of Weapons of Mass Destruction sanctions during the reporting period.
66. **Column L – Total value of Engagements subject to PWMD targeted financial sanctions during the reporting period** - this column must specify the total value of the engagements set out in column K, i.e., the total value of engagements that meet the same criteria across columns B to E and were subject to Proliferation of Weapons of Mass Destruction sanctions during the reporting period.

Audit and Accounting, Legal Services and Professional Services - completing the Detailed Transactions - DNFBP sheet

	A	B	C	D	E	F	G	H	I	J
1		Transactions								
2		Specified 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/CFTR Risk Rating of Customer	Total Number of Transactions during reporting period
3										
4		DNFBP services	Buying and selling of real estate		Qatar	United States of America	Face to Face	Non-Cash	High	10
5					China	Qatar	Non-Face to Face	Non-Cash	Medium	5
6										
7										

	K	L	M	N	O	P	Q	R	S
1		Transactions Subject to TF Targeted Financial Sanctions			Transactions Subject to PWMD Targeted Financial Sanctions			CDD Concerns	
2		Total Value of Transactions during reporting period, in QAR	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
3									Value of Transactions discontinued/rejected due to customer due diligence concerns during reporting period, in QAR
4									
5		100000.00	0	0.00	0	0	0.00	0	0
6		50000.00	0	0.00	0	0	0.00	0	10000.00
7									

67. **General instructions:**
- 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.
  - Only report customer related transactions. Do not include the firm's own transactions, e.g., payments of the firm's own expenses.
  - While the AML/CFTR defines "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 Detailed Transactions - DNFBP sheet).
  - 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) Target 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 – DNFBP 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 target financial sanctions or CDD concerns, report this in columns L to S.
  - i. While there is some duplication with the Products sheet, this is necessary to allow analysis of the transactions data.
68. **Column B - Specified Product** - this column must specify the specified products the firm offered during the reporting period. If the activity meets the definition in AML/CFTR rule 1.3.3(1)(c) select "DNFBP Services". If the activity meets the definition in AML/CFTR rule 1.3.3(1)(d) select "Trust Services". For all other activities, select "Non-DNFBP Services".
  69. **Column C - Product or Service offered** - 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. Where "Non-DNFBP Services" are selected in Column B, the only options in Column C will be "Audit and Accounting Services", "Legal Services", "Professional Services" or "Other". Choose the option most appropriate to your firm, e.g., a law firm would list its non-DNFBP legal activities as "Legal Services".
  70. **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).

71. **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.
72. **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.
73. **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".
74. **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".
75. **Column I – AML/CFT Risk Rating of Customer** - this column must specify the firm's overall AML/CFT risk rating of the business relationship with 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.
76. **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.
77. **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.
78. **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.
79. **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.

80. **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.
81. **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.
82. **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.
83. **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.
84. **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.
85. **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.

## Audit and Accounting, Legal Services and Professional Services - completing the Total Transactions - DNFBP sheet

	A	B	C	D	E
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					

Transaction Information - DNFBP		
Structural information		
<b>Fee base</b>		
1	Gross fee income, in QAR for the reporting period	2000000.00
1.1	Income derived from DNFBP activities, in QAR	1000000.00
1.2	Income derived from non- DNFBP activities, in QAR	1000000.00
2	Did you hold client money during the reporting period?	No
2.1	Amount of client money, in QAR received or held during the reporting period?	0.00
<b>Information to be completed by DNFBPs other than trust and company service providers</b>		
3	Income, in QAR derived from transactions relating to buying and selling of real estate	1000000.00
4	Income, in QAR derived from managing client money, securities or other assets	0.00
5	Income, in QAR derived from managing bank, savings or securities account	0.00
6	Income, in QAR derived from preparing, executing or conducting transactions for clients in relation to organising contributions for the creation, operation or management of companies or entities	0.00
7	Income, in QAR derived from preparing, executing or conducting transactions for clients in relation to creation, operation or management of legal persons or legal arrangement	0.00
8	Income, in QAR derived from preparing, executing or conducting transactions buying or selling business entities	0.00

### 86. General instructions:

- This sheet requires firms to breakdown its total fee income from DNFBP activities and non-DNFBP activities. Total fee income from DNFBP activities is further broken down by the activities specified in AML/CFTR rule 1.3.3.
- All fields must be completed – insert “0” if there was no fee income for a particular activity.

87. **Question 1** - specify the total gross fee income from both DNFBP and Non-DNFBP activities. Then break down this amount in 1.1 and 1.2. The sum of 1.1 and 1.2 must be the same as the amount in 1.

88. **Question 2** – If the firm held client money during the reporting period select ‘Yes’, otherwise select “No”. If the firm did not hold client money, insert “0” in 2.1.

89. **Question 3 to 8** – insert the total fee income from each activity. If the firm did not provide services for a particular activity, insert “0” for that activity. The sum of questions 3 to 8 must be the same as the amount in 1.1.

## Audit and Accounting, Legal Services and Professional Services - completing the AML Return – DNFBP sheet

A	B	C	D
1			
2		<b>AML/CFT Return - DNFBP</b>	
3			
4		<b>Jurisdictions</b>	
5	1	Has your Parent Entity been subject to AML/CFT sanctions related disciplinary action during the reporting period	
6		No	
7	1.1	Do these sanctions have an impact on the QFC entity	
8		Not Applicable	
9		<b>AML Program and framework</b>	
10	2	Please provide the residual AML/CFT risk rating of the Firm.	
11		Medium	
12			

90. **Question Number 1:** if the QFC entity is a subsidiary or a branch or a member of a group, 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 1.1 whether the sanctions have an impact on the QFC entity. If the answer to 2 is "No", then choose "N/A" for 1.1.
91. **Question Number 2:** 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.

## Audit and Accounting, Legal Services and Professional Services - completing the Jurisdictions sheet

A	B	C
1		
2		<b>Jurisdiction Information</b>
3		
4		<b>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)</b>
5		<b>Inherent Jurisdiction Risk</b>
6	Qatar	Low
7	Syrian Arab Republic	High

92. **General instructions:**
- 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.
93. **Column B – Jurisdiction** – this column must list all the jurisdictions that appear in any other sheet in the Q27, i.e., in the Customers, Engagements, Detailed Transactions, STRs and General sheets.
94. **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.

## Audit and Accounting, Legal Services and Professional Services - completing the STRs sheet

Suspicious Transaction Rep							
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

Reports											
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

### 95. General instructions:

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

96. **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.

97. **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.

98. **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.



99. **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.
100. **Column F - Country where Account referenced to in the STR is held** – this column must specify the country where the account is held, or the engagement/mandate/matter was opened, which may be different to the country of residence or operation of the customer.
101. **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.
102. **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.
103. **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.

Audit and Accounting, Legal Services and Professional Services - completing the General sheet

	A	B	C	D
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				

General Questions		
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

104. **Question 1** – Tipping off is defined in rule 5.2.1 of the AML/CFTR.
105. **Question 2** – Specify the number of updates/revisions to the firm's AML/CFT policies and procedures during the reporting period.



106. **Question 3** – Specify only risk assessments conducted by the firm itself, e.g., business risk assessment or MLRO self-assessments.
107. **Question 4** – Specify audits conducted by the firm, e.g., Internal Audits and any external audits.
108. **Question 5** – Specify the number of AML/CFT staff working for the QFC entity only and not the group.
109. **Question 6** - Specify both internal and external training programmes.

Audit and Accounting, Legal Services and Professional Services - completing the Non-resident MLRO Sheet

A	B	C
1	<b>Non-resident Money Laundering Reporting Officer (MLRO) Report</b>	
2		
3		
4	<b>Firm's AML/CFT oversight arrangements</b>	
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. Free-form text answering the question.
6		
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. Free-form text answering the question.
8		
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? Free-form text answering the question.
10		
11	4	What activities were undertaken during those visits? (Give details separately for the MLRO and the Deputy MLRO). Free-form text answering the question.
12		

110. 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.
111. A response is required for all questions 1 – 4. Free-form text is permitted.

## Trust and Company Service Providers – guidance on completing the required Q27 Sheets

### Trust and Company Service Providers – required sheets

112. Trust and Company Service Providers must complete the following sheets:

- [Front Sheet and Declaration](#);
- [Products – DNFBP](#);
- [Customers – DNFBP](#);
- [Engagements – DNFBP](#);
- [Detailed Transactions - DNFBP](#);
- [Total Transactions – Trust](#);
- [AML Return – DNFBP](#);
- [Jurisdictions](#);
- [STRs](#) (if applicable);
- [General](#); and
- [Non-resident MLRO Report](#) (if applicable).

### Trust and Company Service Providers - completing the Products – DNFBP sheet

Product Information - DNFBP					
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
DNFBP Services	Buying and selling of real estate		High	No	10
Non-DNFBP Services	Audit and Accounting Services				70

113. **General instructions:**

- 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.
- The variables in columns C to F describe the details of the specified activity or product listed in column B.
- Each time any of the variables across columns B to F changes, start a new line. See the example above.

114. **Column B - Specified Product** - this column must specify the specified products the firm offered during the reporting period. If the activity meets the definition in AML/CFTR rule 1.3.3(1)(c) select "DNFBP Services". If the

activity meets the definition in AML/CFTR rule 1.3.3(1)(d) select "Trust Services". For all other activities, select "Non-DNFBP Services".

115. **Column C - Product or Service offered** - 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. Where "Non-DNFBP Services" are selected in Column B, the only options in Column C will be "Audit and Accounting Services", "Legal Services", "Professional Services" or "Other". Choose the option most appropriate to your firm, e.g., a professional services firm would list its non-DNFBP activities as "Professional Services".
116. **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).
117. **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.
118. **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".
119. **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.

## Trust and Company Service Providers - completing the Customers – DNFBP sheet

	A	B	C	D	E	F	G	H	I	J	K	L
1	Customer Information - DNFBP											
2												
3												
	Type of Customer	Nationality or Country of Incorporation of Customer	Country of Residence (Individual) or Country of operation (Entity)	DNFBP Customer?	PEP?	AML/CFT Risk Rating of Customer	Total Number of New Customers Onboarded during the Reporting Period	Total Number of <b>New and Existing</b> Customers during the Reporting Period	Gross Fee Income generated from Customers in <b>Column J</b> during the Reporting Period	Number of customers subject to TF targeted financial sanctions during reporting period	Number of customers subject to PWMG targeted financial sanctions during reporting period	
4	Corporate	Argentina	United Arab Emirates	Yes	No	Medium	3	4	120000.00	0	0	
5	Retail Customer	Syrian Arab Republic	Qatar	No	Yes	High	1	1	50000.00	0	0	

120. **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 G describe the details of the customers listed in columns H and I.
- c. Each time any of the variables across columns B to G changes, start a new line. See the example above.

121. **Column B - Type of Customer** - this column must specify the type of customer, e.g., retail (i.e., individual), corporate, financial institution, etc.

122. **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.

123. **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.

124. **Column E – DNFBP Customer?** – If the service provided to the customer meets the definitions in AML/CFTR rule 1.3.3(1) (c) or (d), select "Yes" from the drop-down list, otherwise select "No". If the firm provides both DNFBP and non-DNFBP services to a customer, then the customer should be classified as a DNFBP customer.

125. **Column F – 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

- 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

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

- 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:

- d) is in partnership with the PEP in a legal person or legal arrangement;
- e) is associated with the PEP through a business or social relationship;
- or
- f) is a beneficial owner of a legal person or legal arrangement owned, or effectively controlled, by the PEP.

126. **Column G – 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.

127. **Column H – 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 G. Where an account/mandate/engagement/matter 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 G).
128. **Column I – 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 G.
129. **Column J – Gross Fee Income generated from Customers in Column I during the Reporting Period** – this column must specify the gross fee income for the total new and existing customers recorded in column I that meet the same criteria across columns B to G.
130. **Column K - 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 G and were subject to Terrorism Financing sanctions during the reporting period.
131. **Column L - 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 G and were subject to Proliferation of Weapons of Mass Destruction sanctions during the reporting period.

### Trust and Company Service Providers - completing the Engagements – DNFBP sheet

	B	C	D	E	F	G	H	I	J	K	L
1	Engagement Information - DNFBP										
2											
3	Type of Customer	Nationality or Country of Incorporation of Customer	Country of Residence (Individual) or Country of operation (Entity)	Country where Engagement is established	Total Number of Engagements Opened during the Reporting Period	Total value of Engagements (Fee Income) during the Reporting Period (AED)	Number of Engagements terminated due to customer due diligence concerns during the Reporting Period	Number of Engagements that were subject to TF-targeted financial sanctions during the Reporting Period	Total value of Engagements that were subject to TF-targeted financial sanctions during the Reporting Period (AED)	Number of Engagements that were subject to PWMD-targeted financial sanctions during the Reporting Period	Total value of Engagements that were subject to PWMD-targeted financial sanctions during the Reporting Period (AED)
4	Corporate	Austria	United Arab Emirates	Qatar	3	1000000.00	0	0	0.00	0	0.00
5	Private Customer	United Kingdom	Qatar	Qatar	2	50000.00	0	0	0.00	0	0.00
6											
7											

132. **General instructions:**

- a. "Engagement" is an agreement with a customer to provide a service or product. Firms may use different terms such as Account, Mandate or Matter. Note that Business Relationship is defined in AML/CFTR rule 4.2.4. A firm may have more than one engagement with a customer during the reporting period. In that case, the firm would report one customer in the Customers Sheet, but multiple engagements in the Engagements Sheet.
- 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 and G provide information about the number of engagements with those customers and the total value by fee income.
- 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 – DNFBP sheet, this repetition is necessary to allow analysis of the engagements data.

133. **Column B - Type of Customer** - this column must specify the type of customer, e.g., retail (i.e., individual), corporate, financial institution, etc.

134. **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.

135. **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.



136. **Column E - Country where the Engagement is established** – this column must specify the country where the engagement was established, which may be different to the country of residence or operation of the customer.
137. **Column F - Total number of Engagements Opened during the reporting period** – this column must specify the total number of all engagements opened during the reporting period that meet the same criteria across columns B to E. This includes engagements that were opened and then closed within the reporting period.
138. **Column G - Total value of Engagements (Fee Income) during the reporting period** – this column must specify the total value of engagements that meet the same criteria across columns B to E during the reporting period. Value is the fee income earned by the firm from the engagements.
139. **Column H - Number of Engagements terminated due to customer due diligence concerns during the reporting period** - this column must specify the number of engagements that meet the same criteria across columns B to E, which were terminated due to CDD concerns during the reporting period.
140. **Column I - Number of Engagements subject to TF targeted financial sanctions during the reporting period** - this column must specify the number of engagements that meet the same criteria across columns B to E and were subject to Terrorism Financing sanctions during the reporting period.
141. **Column J – Total value of Engagements subject to TF targeted financial sanctions during the reporting period** - this column must specify the total value of the engagements set out in column I, i.e., the total value of engagements that meet the same criteria across columns B to E and were subject to Terrorism Financing sanctions during the reporting period.
142. **Column K - Number of Engagements subject to PWMD targeted financial sanctions during the reporting period** - this column must specify the number of engagements that meet the same criteria across columns B to E and were subject to Proliferation of Weapons of Mass Destruction sanctions during the reporting period.
143. **Column L – Total value of Engagements subject to PWMD targeted financial sanctions during the reporting period** - this column must specify the total



value of the engagements set out in column K, i.e., the total value of engagements that meet the same criteria across columns B to E and were subject to Proliferation of Weapons of Mass Destruction sanctions during the reporting period.

### Trust and Company Service Providers - completing the Detailed Transactions - DNFBP sheet

Transactions									
Specified 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/CFR Risk Rating of Customer	Total Number of Transactions during reporting period	
DNFBP Services	Buying and selling of real estate		Qatar	United States of America	Face to Face	Non-Cash	High	10	
			China	Qatar	Non-Face to Face	Non-Cash	Medium	5	

Transactions Subject to TF Targeted Financial Sanctions				Transactions Subject to PWMD Targeted Financial Sanctions			CDD Concerns		
Total Value of Transactions during reporting period, in QAR	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	
100000.00	0	0.00	0	0	0.00	0	0	0.00	
50000.00	0	0.00	0	0	0.00	0	1	10000.00	

#### 144. General instructions:

- 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.
- Only report customer related transactions. Do not include the firm's own transactions, e.g., payments of the firm's own expenses.
- While the AML/CFR defines "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 Detailed Transactions - DNFBP sheet).
- 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) Target Financial Sanctions (columns O and P).
- 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 target financial sanctions or CDD concerns, report this in columns L to S.
  - i. While there is some duplication with the Products sheet, this is necessary to allow analysis of the transactions data.
145. **Column B - Specified Product** - this column must specify the specified products the firm offered during the reporting period. If the activity meets the definition in AML/CFTR rule 1.3.3(1)(c) select "DNFBP Services". If the activity meets the definition in AML/CFTR rule 1.3.3(1)(d) select "Trust Services". For all other activities, select "Non-DNFBP Services".
  146. **Column C - Product or Service offered** - 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. Where "Non-DNFBP Services" are selected in Column B, the only options in Column C will be "Audit and Accounting Services", "Legal Services", "Professional Services" or "Other". Choose the option most appropriate to your firm, e.g., a law firm would list its non-DNFBP legal activities as "Legal Services".
  147. **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).
  148. **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.

149. **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.
150. **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”.
151. **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”.
152. **Column I – AML/CFT Risk Rating of Customer** - this column must specify the firm’s overall AML/CFT risk rating of the business relationship with 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.
153. **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.
154. **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.
155. **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.
156. **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.

157. **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.
158. **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.
159. **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.
160. **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.
161. **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.
162. **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.

## Trust and Company Service Providers - completing the Total Transactions - Trust sheet

A	B	C	D	E
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Transaction Information - Trust			
Structural information			
<b>Fee base</b>			
1	Gross fee income , in QAR for the reporting period		2000000.00
	Income derived from DNFBP activities , in QAR		1000000.00
	Income derived from non- DNFBP activities , in QAR		1000000.00
2	Did you hold client money during the reporting period?	No	
	Amount of client money , in QAR received or held during the reporting period?		0.00
<b>Information to be completed by a DNFBP that is a trust and company service provider</b>			
3	Income , in QAR derived from the business of acting as a formation agent of legal persons		1000000.00
4	Income , in QAR derived from the business of acting, or arranging for another person to act, as a director or secretary of a company or a partner of a partnership, or having a similar position in relation to other legal persons		0.00
5	Income , in QAR derived from the business of providing a registered office, business address or accommodation, or providing a correspondence or administration address for a company, a partnership or any other legal person or legal arrangement		0.00
6	Income , in QAR derived from the business of acting as, or arranging for another person to act as, a trustee of an express trust		0.00
7	Income , in QAR derived from the business of acting as, or arranging for another person to act as, a nominee shareholder for another entity		0.00
8	Income , in QAR derived from any other business or professional entity prescribed under the definition of a DNFBP (but does not include a financial institution).		0.00
<b>Information to be completed by DNFBPs other than trust and company service providers</b>			
9	Income , in QAR derived from transactions relating to buying and selling of real estate		0.00
10	Income , in QAR derived from managing client money, securities or other assets		0.00
11	Income , in QAR derived from managing bank, savings or securities account		0.00
12	Income , in QAR derived from preparing, executing or conducting transactions for clients in relation to organising contributions for the creation, operation or management of companies or entities		0.00
13	Income , in QAR derived from preparing, executing or conducting transactions for clients in relation to creation, operation or management of legal persons or legal arrangement		0.00
14	Income , in QAR derived from preparing, executing or conducting transactions buying or selling business entities		0.00

### 163. General instructions:

- This sheet requires firms to breakdown its total fee income from DNFBP activities and non-DNFBP activities. Total fee income from DNFBP activities is further broken down by the activities specified in AML/CFTR rule 1.3.3.
- 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.
- All fields must be completed – insert “0” if there was no fee income for a particular activity.

164. **Question 1** - specify the total gross fee income from both DNFBP and Non-DNFBP activities. Then break down this amount in 1.1 and 1.2. The sum of 1.1 and 1.2 must be the same as the amount in 1.

165. **Question 2** – If the firm held client money during the reporting period select ‘Yes’, otherwise select “No”. If the firm did not hold client money, insert “0” in 2.1.

166. **Question 3 to 8** – these questions are in relation to activities as a trust and company service provider. Insert the total fee income from each activity. If the firm did not provide services for a particular activity, insert “0” for that activity. The sum of questions 3 to 8 plus the sum of questions 9 to 14 must be the same as the amount in 1.1.

167. **Question 9 to 8** – these questions are in relation to activities other than as a trust and company service provider, e.g., legal services. Insert the total fee income from each activity. If the firm did not provide services for a particular activity, insert "0" for that activity. The sum of questions 3 to 8 plus the sum of questions 9 to 14 must be the same as the amount in 1.1.

### Trust and Company Service Providers - - completing the AML Return – DNFBP sheet

	A	B	C	D
1				
2		<b>AML/CFT Return - DNFBP</b>		
3				
4		<b>Jurisdictions</b>		
5	1	Has your Parent Entity been subject to AML/CFT sanctions related disciplinary action during the reporting period		
6		No		
7	1.1	Do these sanctions have an impact on the QFC entity		
8		Not Applicable		
9		<b>AML Program and framework</b>		
10	2	Please provide the residual AML/CFT risk rating of the Firm.		
11		Medium		
12				

168. **Question Number 1:** if the QFC entity is a subsidiary or a branch or a member of a group, 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 1.1 whether the sanctions have an impact on the QFC entity. If the answer to 2 is "No", then choose "N/A" for 1.1.
169. **Question Number 2:** 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/CFTR.

### Trust and Company Service Providers - completing the Jurisdictions sheet

	A	B	C
1			
2		<b>Jurisdiction Information</b>	
3			
4		<b>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)</b>	<b>Inherent Jurisdiction Risk</b>
5		Qatar	Low
6		Syrian Arab Republic	High
7			

170. **General instructions:**
- 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.

171. **Column B – Jurisdiction** – this column must list all the jurisdictions that appear in any other sheet in the Q27, i.e., in the Customers, Engagements, Detailed Transactions, STRs and General sheets.
172. **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.

### Trust and Company Service Providers - completing the STRs sheet

Suspicious Transaction Report								
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	N
20-Dec-2023	50000.00	Iran, Islamic Republic Of	Qatar	Qatar	Qatar	Virgin Islands, British	No	N

Reports											
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

173. **General instructions:**
- 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.
  - 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.
  - Complete a new row for each STR filed with the QFIU by the firm, during the reporting period.
174. **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.
175. **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.



176. **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.
177. **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.
178. **Column F - Country where Account referenced to in the STR is held** – this column must specify the country where the account is held, or the engagement/mandate/matter was opened, which may be different to the country of residence or operation of the customer.
179. **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.
180. **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.
181. **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.

### Trust and Company Service Providers - completing the General sheet

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General Questions		
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

182. **Question 1** – Tipping off is defined in rule 5.2.1 of the AML/CFTR.



183. **Question 2** – Specify the number of updates/revisions to the firm's AML/CFT policies and procedures during the reporting period.
184. **Question 3** – Specify only risk assessments conducted by the firm itself, e.g., business risk assessment or MLRO self-assessments.
185. **Question 4** – Specify audits conducted by the firm, e.g., Internal Audits and any external audits.
186. **Question 5** – Specify the number of AML/CFT staff working for the QFC entity only and not the group.
187. **Question 6** - Specify both internal and external training programmes.

### Trust and Company Service Providers - completing the Non-resident MLRO Sheet

Non-resident Money Laundering Reporting Officer (MLRO) Report	
<b>Firm's AML/CFT oversight arrangements</b>	
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.

188. 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.
189. A response is required for all questions 1 – 4. Free-form text is permitted.

## Single Family Offices – guidance on completing the required Q27 Sheets

### Single Family Offices – required sheets

190. Representative Offices must complete the following sheets:
  - a. [Front Sheet and Declaration](#);
  - b. [AML Return – SFO](#);

- c. [STRs](#) (if applicable); and  
d. [General](#).

## Single Family Offices - completing the AML Return – SFO

AML/CFT Return - Single Family Office (SFO)	
<b>Structure and AML Program</b>	
1	How many members are in your SFO?
2	Which of the following services are conducted within your SFO business? (Select as many as applicable)
2.1	Investment and financial activities or services including making arrangements for the acquisition or disposal of assets of any description and the provision of advice relating to the arranging or execution of transactions in investments.
2.2	Management of investments, money and other assets on behalf of the Single Family.
2.3	Arranging or providing custodian or fiduciary services to the Single Family including acting as trustee in relation to investments, money and other assets on behalf of the Single Family or the beneficiaries of trusts or similar arrangements established by the SFO.
2.4	Accounting.
2.5	Acquisition, transfer, disposal or distribution of assets or property of the Single Family for philanthropic and charitable purposes under arrangements made by the SFO.
2.6	The provision, formation, operation and administration of a Family Fiduciary Structure, or a Family Entity.
2.7	Acting as directors, partners or in a similar capacity in relation to Family Fiduciary Structures, Family Entities, or trusts established by the Single Family in question outside the QFC.
2.8	Other services falling within the Permitted Activities specified in Schedule 3, Part 2 to the QFC Law as may be determined by the QFC Authority from time to time and included in the SFO's Licence.
3	Has the SFO identified any Money Laundering or Terrorist Financing risks emanating from its business activities and if so, how have those risks been mitigated? <b>Details (if Yes):</b> Free form text, complete if the answer to question 3 is Yes
4	Has the SFO identified and reported any suspicious activity or suspicious transactions in relation to the business of the SFO with Qatar Financial Information Unit (QFIU) in the last twelve months? <b>Number (if Yes):</b> Free form text, complete if the answer to question 4 is Yes
5	Does the SFO certify that it has complied with the AML/CFT related rules of the QFCRA and relevant provisions of the AML/CFT Law and Implementing Regulations of the State of Qatar? <b>Details (if No):</b> Free form text, complete if the answer to question 5 is No

### 191. 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.

192. In question 1, a number must be inserted, for all other questions respond "Yes or "No" to each question, as appropriate.

193. Provide free form comments to questions 3, 4 or 5 if applicable.

## Single Family Offices - completing the STRs sheet

Suspicious Transaction Report											
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	Yes	No	No	No	No	No
No	Yes	Yes	No	Yes	No	Yes	Yes	Yes	No	No	No

194. **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.
195. **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.
196. **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.
197. **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.
198. **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.
199. **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.
200. **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.
201. **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.

202. **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.

### Single Family Offices - completing the General sheet

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General Questions		
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

203. **Question 1** – Tipping off is defined in rule 5.2.1 of the AML/CFTR.
204. **Question 2** – Specify the number of updates/revisions to the firm's AML/CFT policies and procedures during the reporting period.
205. **Question 3** – Specify only risk assessments conducted by the firm itself, e.g., business risk assessment or MLRO self-assessments.
206. **Question 4** – Specify audits conducted by the firm, e.g., Internal Audits and any external audits.
207. **Question 5** – Specify the number of AML/CFT staff working for the QFC entity only and not the group.
208. **Question 6** - Specify both internal and external training programmes.