

AML Policy

ANTI-MONEY LAUNDERING (AML) POLICY

²⁸²Regulations on Anti-Money Laundering (AML) And Combating Financing of Terrorism (CFT)

First: Regulations:

1- Legal Basis for the regulations

Having perused QCB Law and Law 4 of 2010 on Anti-Money Laundering and Combating Financing of Terrorism, Qatar Central Bank has decided to issue the following regulations to the financial institutions as defined under Article 1 of QCB Law in order that the financial institutions make these regulations an integral part of their systems and procedures aimed at controlling, detecting, preventing and reporting of ML/FT activities. These regulations are issued under the provisions of Article 121 read with Articles, (7-8) and para (9) of article (33) QCB Law and Article 41 of Law (4) of 2010 of Anti-Money Laundering and Combating Financing of Terrorism.

Any contravention of the regulations shall attract the provisions of Law (4) of 2010.

2- Objectives of the Regulations

1. To ensure that the financial institutions functioning in the State of Qatar comply with the provisions of Law (4) of 2010 on Anti-Money Laundering and Combating the Financing of Terrorism and provisions of these regulations.
2. All financial institutions are under statutory obligation of Law 4 of 2010 in addition to the specific requirements contained in these regulations.
3. To ensure implementation of policies, procedures, systems and controls for prevention, detection, control and reporting of money laundering and terrorist financing in accordance with the FATF 40+9 Recommendations on AML/CFT.
4. To protect financial institutions operating in the State of Qatar from being exploited as channels for passing illegal transactions arising from money laundering, terrorist financing and any other illicit activities.
5. To maintain, enhance and protect the credibility, integrity and reputation of financial institutions in the State of Qatar

Refer to circular no. (59/2010) dated 15/6/2010, to all banks. All articles are amended as per QCB Law

1.1 Money Laundering

Any of the following acts:

- 1) The conversion or transfer of funds, by any person who knows, should have known or suspects that such funds are the proceeds of crime, for the purpose of concealing or disguising the illicit origin of such funds or of assisting any person who is involved in the commission of the predicate offence to evade the legal consequences of his actions.
- 2) The concealment or disguise of the true nature, source, location, disposition, movement or ownership of or rights with respect to funds by any person who knows, should have known or suspects that such funds are the proceeds of crime.
- 3) The possession, acquisition, or use of funds by any person who knows, should have known or suspects that such funds are the proceeds of crime.

1.2 BASIC PRINCIPLES TO COMBAT MONEY LAUNDERING

Cwallet endeavors to apply the following principles in order to detect, prevent and oppose the use of the Company's services for money laundering and terrorist financing:

Established and duly appointed Compliance Office

Know-Your-Customer (CDD and EDD)

Reporting to AMLC (Board of the FI)

Ongoing Employee Training

Ongoing monitoring and Compliance Testing

Record Keeping and Data retention in accordance with AML laws and regulations

Internal Audit Function

Coordination with Qatar Financial Regulatory Authority (QFCRA)

1.2.2 COMPLIANCE WITH LAWS

Cwallet ensures that its business is conducted in conformity with the height of ethical standards, that laws and regulations are respected and complied with whenever possible, and that service is not provided where there is good reason to believe that transactions are associated with money laundering activities.

1.2.3 COOPERATION WITH LAW ENFORCEMENT AGENCIES

Within the legal constraints relative to client confidentiality, cwallet cooperates with law enforcement agencies. This includes taking appropriate measures within the law if there are reasonable grounds for suspecting money laundering. Any disclosure made in conjunction with the Act shall be made to the Board of the Anti-Money Laundering Council of the Central Bank of the State of Qatar.