

QATAR



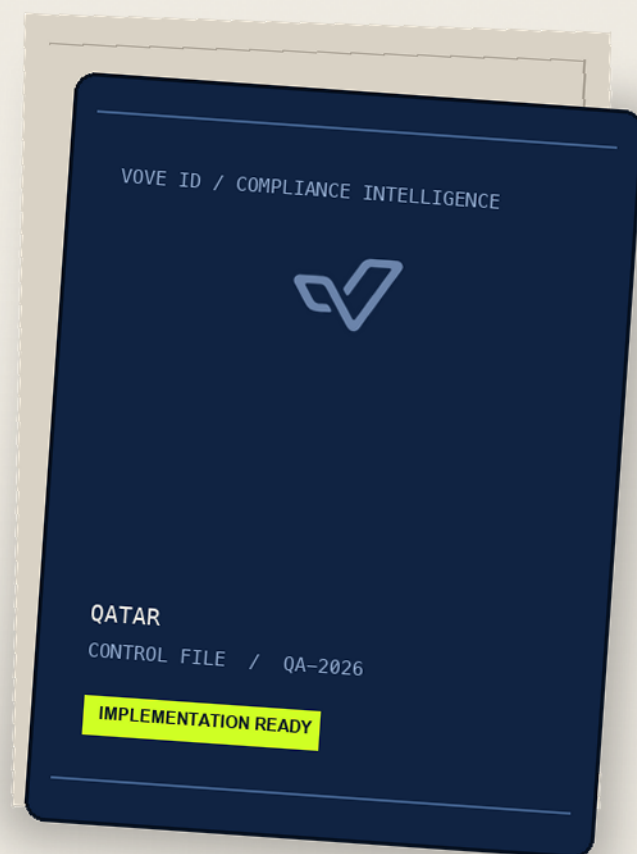
QATAR / QA

KYC / KYB / AML

COMPLIANCE CHECKLIST

2026 EDITION

IMPLEMENTATION CHECKLIST / NOT LEGAL ADVICE



Qatar KYC, KYB & AML Compliance Checklist

An implementation checklist for Qatar customer due diligence, beneficial ownership, suspicious transaction reporting, sanctions, privacy, payments and virtual-asset controls.

Primary framework	Law No. 20 of 2019, as amended; Decision No. 41 of 2019
FIU and reporting	QFIU; ESTR for connected entities, approved manual route otherwise or for urgent cases
STR timing	Promptly once there are grounds to suspect; follow current QFIU and sector instructions
CDD occasional-transaction threshold	QAR 50,000 or more, including linked operations; lower wire-transfer rules may apply
AML retention	At least 10 years, with the statutory start event depending on record class
Company BO declaration	20% ownership or voting control test, then effective/legal control, then legal representative fallback
Privacy	Law No. 13 of 2016 on Protecting Personal Data Privacy
FATF public lists	Not listed at 19 June 2026

Scope and legal framework

Law No. 20 of 2019 on Combating Money Laundering and Terrorism Financing, as amended by Decree-Law No. 19 of 2021, and Council of Ministers Decision No. 41 of 2019 establish the national framework. Sector rules issued by QCB, QFCRA, QFMA, the Ministry of Commerce and Industry and the Ministry of Justice apply according to the regulated activity.

FATF context

Qatar was absent from the FATF increased-monitoring and call-for-action lists dated 19 June 2026. The FATF-MENAFATF 2023 mutual evaluation found strong technical compliance but identified effectiveness improvements, including for terrorist-financing prosecutions and proliferation-financing sanctions. Absence from a public list is not a low-risk classification.

IMPORTANT

General regulatory information, not legal advice or a licence determination. Reviewed as applicable on 30 September 2026. Confirm the regulated perimeter, current supervisory instructions, filing channel, sanctions designation, privacy position and any Qatar Financial Centre overlay with the competent authority and qualified Qatar counsel before launch.

Turn each requirement into owned evidence

For every row, assign an owner, confirm whether the control applies, link the evidence, record gaps, and set a remediation date. A checked box is not evidence by itself.

01 / SCOPE	02 / DESIGN	03 / EVIDENCE	04 / REVIEW
Confirm institution, supervisor, product, customer and risk scope.	Map each obligation to a policy, system control or human review.	Retain the document, decision, timestamp, owner and rationale.	Test the control and update it when rules or risks change.

Checklist legend

CONTROL tells you what outcome to cover. IMPLEMENTATION ACTION translates that outcome into operational work. EVIDENCE suggests what an auditor or reviewer should be able to inspect. SOURCE points back to the primary rule or regulator guidance.

Minimum review record

Keep a compact decision record for each checklist row so a later reviewer can reconstruct what applied, who decided, and what evidence was inspected.

APPLICABILITY	OWNERSHIP	TRACEABILITY
Applicable, not applicable, or pending legal confirmation, with a short rationale.	Named control owner, reviewer, approval date and next review date.	Evidence link, source version, test result, gap status and remediation ticket.

1. SCOPE, AUTHORITIES, AND LICENSING

Scope, authorities, and licensing

Classify the entity, activity and geographic regime before assigning controls.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Determine whether each activity is a financial institution, DNFBP or other reporting entity.	Map services, customer flows and Qatar nexus to Law No. 20 of 2019, Decision No. 41 of 2019 and the sector rules for QCB, QFCRA, QFMA, MoCI or Ministry of Justice supervision.	Perimeter memo, service and funds-flow maps, legal analysis and authority confirmation.	Law No. 20 of 2019, article 1; Decision No. 41 of 2019; applicable supervisory rules
Obtain the required licence or registration before regulated activity.	Identify the competent authority and secure each activity-specific licence, registration or approval; record conditions and territorial limits.	Licence matrix, approvals, conditions register and renewal calendar.	Law No. 13 of 2012; applicable QCB, QFCRA, QFMA and MoCI frameworks
Separate onshore and Qatar Financial Centre requirements.	Apply the national law and the correct sector overlay; use QFCRA AML/CFT Rules for an authorised QFC firm and do not transpose QFC mechanics to an onshore entity.	Entity-location analysis, rule mapping and documented supervisory contacts.	QFCRA Anti-Money Laundering and Combating the Financing of Terrorism Rules 2019

Governance and ML/TF risk assessment

Governance must be risk-based, documented and demonstrably effective.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain an enterprise ML/TF risk assessment.	Assess customers, countries, products, delivery channels, transactions, technology and emerging risks; update for material change and national or supervisory findings.	Methodology, current assessment, data sources, approvals and change log.	Law No. 20 of 2019, articles 8 and 15; Decision No. 41 of 2019
Maintain proportionate policies, systems and internal controls.	Document CDD, monitoring, reporting, recordkeeping, sanctions, employee screening, training, independent review and escalation controls.	Approved programme, control map, procedures, training and issue register.	Law No. 20 of 2019, article 18; applicable supervisory instructions
Appoint an empowered compliance officer and deputy where required.	Document independence, authority, access, competence, reporting lines and coverage; obtain or notify supervisory approval where the applicable sector rules require it.	Appointment, fit-and-proper file, authority matrix, minutes and regulatory correspondence.	Law No. 20 of 2019, article 18; applicable sector rules
Independently test the AML/CFT framework.	Use a suitably qualified, independent function to test design and operation at a frequency proportionate to risk and track remediation to closure.	Review plan, independence assessment, report, management response and closure testing.	Law No. 20 of 2019, article 18; applicable supervisory rules

3. NATURAL-PERSON IDENTIFICATION

Natural-person identification

CDD covers the customer, beneficial owner and any person acting for the customer.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Apply CDD when a business relationship begins or a statutory trigger arises.	Identify and verify before establishment, or under a documented lawful timing exception, and apply CDD to occasional transactions of QAR 50,000 or more, linked operations, qualifying wire transfers, suspicion and doubts about prior data.	Trigger analysis, identity record, verification result, relationship purpose and completion timestamp.	Law No. 20 of 2019, articles 9-12; Decision No. 41 of 2019, preventive-measures provisions
Verify identity from reliable and independent sources.	Obtain official identity attributes and validate authenticity, expiry and person-to-document linkage using methods proportionate to impersonation and fraud risk.	Identity attributes, source provenance, validation results, fraud checks and exception rationale.	Law No. 20 of 2019, articles 9-11; QCB AML/CFT Instructions 2020
Identify representatives and verify authority.	Identify the person acting for the customer, verify identity and validate the legal mandate before accepting instructions.	Representative KYC, mandate, authority checks and instruction limits.	Law No. 20 of 2019, article 10; Decision No. 41 of 2019
Do not proceed when required CDD cannot be completed.	Decline or terminate the relationship or transaction as required and consider an STR without disclosing the assessment to the customer.	CDD failure record, restriction or exit decision, STR assessment and communications review.	Law No. 20 of 2019, articles 11, 16 and 21

KYB, registries, and beneficial ownership

Registry evidence supports, but does not replace, natural-person ownership and control analysis.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Verify the legal person or arrangement and its powers.	Collect current legal name, form, registration number, address, governing documents, directors, partners or trustees and validate them through reliable official sources.	UER or commercial-register evidence, constitutional documents, officer list and discrepancy resolution.	Law No. 20 of 2019, articles 9-11; Law No. 1 of 2020
Identify the AML beneficial owner through ultimate ownership and effective control.	Trace layered, nominee and legal-arrangement structures to the natural persons who ultimately own or control the customer or on whose behalf activity occurs; do not rely on a percentage alone.	Ownership chart, control analysis, declarations, source documents and verified identities.	Law No. 20 of 2019, article 1 and articles 9-11
Apply the company-register declaration cascade correctly.	For commercial-company UER purposes identify natural persons with at least 20% direct or indirect capital or voting control; if none, identify effective or legal controllers; if none, identify the legal representative.	BO register, calculation, control analysis, fallback rationale and filing receipt.	Law No. 1 of 2020; Decision No. 12 of 2020; MoCI Beneficial Owner Guide
Maintain and update mandatory company records.	Keep basic, beneficial-owner and partner or shareholder registers current; designate the required Qatar-resident information contact and file changes through the competent route.	Registers, supporting documents, designation, update log and submissions.	Law No. 1 of 2020; Decision No. 12 of 2020; MoCI business-services guidance

PEPs, EDD, and remote onboarding

Enhanced measures attach to high-risk and specified circumstances.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Identify politically exposed persons and related persons.	Screen customers and beneficial owners for domestic, foreign and international-organisation PEP status and applicable family or close-associate relationships; apply approval, source and monitoring measures required by risk and sector rules.	Screening, relationship map, senior approval, source corroboration and review history.	Law No. 20 of 2019, articles 15 and 17; Decision No. 41 of 2019
Apply enhanced due diligence to higher-risk relationships.	Obtain additional information on customer, ownership, purpose, source of wealth and source of funds; increase monitoring and obtain senior approval where required.	Risk trigger, additional CDD, source evidence, approval and monitoring plan.	Law No. 20 of 2019, articles 13 and 15; Decision No. 41 of 2019
Control non-face-to-face and technology risk.	Validate documents and liveness, prevent impersonation, test vendors, establish fallback review and apply enhanced measures where risk remains elevated.	Method assessment, vendor diligence, test results, exceptions and fraud cases.	Decision No. 41 of 2019; applicable supervisory instructions

Monitoring and suspicious transaction reporting

Ongoing scrutiny and prompt escalation support reporting to QFIU.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Keep CDD current and monitor activity continuously.	Review customer and beneficial-owner information, examine transactions against purpose, profile, risk and expected source of funds, and document unusual-activity outcomes.	Monitoring scenarios, alerts, case decisions, refresh records and quality testing.	Law No. 20 of 2019, article 14
Escalate suspicion without waiting for proof.	Assess completed, attempted and proposed activity promptly; record the facts, grounds and time at which suspicion was formed.	Alert chronology, information reviewed, suspicion decision and decision-maker.	Law No. 20 of 2019, article 21; QFIU STR Guidance 2024
Report suspicious transactions promptly to QFIU.	Use ESTR when electronically connected; otherwise or for urgent cases use the current approved manual route and form. Follow current QFIU and sector timing instructions rather than inventing a fixed universal deadline.	Suspicion timestamp, STR, submission receipt, route rationale and corrections.	Law No. 20 of 2019, article 21; QFIU Reporting Entities page; QFIU STR Guidance 2024
Prevent tipping off and protect report information.	Restrict knowledge of STRs and related requests, control communications and disclose only where legally permitted.	Access controls, disclosure register, legal review, training and incident log.	Law No. 20 of 2019, article 22

Payments, wires, thresholds, and virtual assets

Threshold and licensing rules depend on the product, sector and transaction type.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Apply the QAR 50,000 occasional-transaction CDD threshold in its proper context.	Aggregate linked operations and apply CDD at or above the threshold; apply CDD regardless of amount where suspicion or identity-data doubt exists.	Aggregation logic, transaction samples, conversion rules and CDD outcomes.	Decision No. 41 of 2019; Law No. 20 of 2019, articles 9-12
Apply sector-specific precious-metals cash restrictions.	For covered precious-metal, stone and jewellery transactions, implement the QAR 50,000 scope and cash prohibition under the applicable MoCI framework; do not generalise it to all sectors.	Product classification, payment controls, aggregation tests and refusal records.	Law No. 4 of 2022; MoCI Circular No. 7 of 2024
Carry and review required wire-transfer information.	Collect, validate, transmit and retain prescribed originator and beneficiary information and establish risk-based procedures for missing or incomplete fields.	Field matrix, message samples, validation rules, repair queue and dispositions.	Law No. 20 of 2019, article 12; Decision No. 41 of 2019; QCB AML/CFT Instructions 2020
Obtain payment-service approval before launch.	Classify wallets, payment aggregation, merchant acquiring, remittance and related services under the current QCB licensing framework and meet safeguarding, governance and technology conditions.	Product memo, QCB approval, conditions, safeguarding records and test results.	Law No. 13 of 2012; QCB Payment Services Regulation
Treat virtual-asset activity as a separately controlled perimeter.	Do not offer or facilitate virtual-asset services from or into Qatar without current written analysis of QCB and, where relevant, QFC restrictions or permissions and explicit regulatory confirmation.	Service and wallet-flow map, legal opinion, authority correspondence, geofencing and monitoring tests.	QCB supervisory instructions; QFCRA virtual-asset notices; FATF-MENAFATF Qatar MER 2023

8. TARGETED FINANCIAL SANCTIONS

Targeted financial sanctions

Targeted financial sanctions apply independently of an STR decision.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Screen UN and national designations and ownership or control.	Screen customers, beneficial owners, controllers, representatives and transactions at onboarding and on list changes; test aliases and controlled entities, not exact names only.	List versions, update logs, configuration tests, match analysis and dispositions.	Law No. 27 of 2019; Decision No. 1 of 2020
Freeze designated assets immediately and without prior notice.	For UN or sanctions-committee designations, freeze immediately and without delay, no later than 24 hours, and follow the competent notification route; apply national designations immediately upon announcement.	Designation receipt, match analysis, freeze timestamp, report and authority correspondence.	Law No. 27 of 2019, article 39; Decision No. 1 of 2020
Do not make funds or related services available to designated persons.	Block direct and indirect provision, including through owned or controlled entities or persons acting on their behalf, unless prior competent authority permission applies.	Ownership analysis, blocked activity, licence or permission and conditions monitoring.	Law No. 27 of 2019, article 39

Records and regulator access

Ten years is the national baseline, but the clock depends on the record.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Retain transaction records for at least ten years.	Keep domestic and international transaction records sufficient to reconstruct activity for at least ten years from completion, subject to longer holds or authority directions.	Retention schedule, transaction sample, trigger calculation, legal hold and deletion log.	Law No. 20 of 2019, article 19
Retain CDD and relationship records for the statutory period.	Keep identity, verification, account, correspondence and analysis records for at least ten years after the relationship ends or occasional transaction completes, as applicable.	End date, archive sample, retrieval test and deletion approval.	Law No. 20 of 2019, article 19
Produce records promptly to competent authorities.	Maintain secure, retrievable and readable records and test authorised production while preserving confidentiality and chain of custody.	Access matrix, retrieval test, production log and chain-of-custody record.	Law No. 20 of 2019, articles 19, 32 and 41

Privacy, biometrics, and transfers

AML processing does not remove personal-data obligations.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Process personal data transparently for a lawful purpose.	Define the purpose and legal basis, provide required information to individuals, limit collection and use, maintain accuracy and implement data-subject request procedures.	Data inventory, purpose map, notices, request log and accuracy controls.	Law No. 13 of 2016, articles 3-15
Protect special-nature data and biometrics.	Identify special-nature data, obtain the competent permission where article 16 requires it, document necessity and proportionality, and apply heightened security, access and deletion controls.	Data classification, permission analysis, privacy assessment, access logs and deletion tests.	Law No. 13 of 2016, articles 16-17
Control processors, security and personal-data incidents.	Contract for instructions, confidentiality, security, incident escalation, return and deletion; maintain appropriate technical and organisational safeguards and evidence incident response.	Processor contract, risk review, security tests, incident chronology and remediation.	Law No. 13 of 2016, articles 8-15
Assess cross-border data flows before transfer or remote access.	Document the statutory transfer route, recipient safeguards and any restrictions or competent-authority requirements; preserve access for lawful AML supervision.	Transfer map, legal assessment, contract, recipient diligence and monitoring.	Law No. 13 of 2016, including cross-border data-flow provisions

Practical evidence packs

Evidence should reconstruct onboarding, reporting and launch decisions end to end.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain a reconstructable onboarding pack.	Bundle identity, authority, KYB, beneficial ownership, PEP, sanctions, purpose, risk, privacy, approvals and exceptions under stable identifiers.	Complete sampled onboarding pack and retrieval result.	Operational control supporting Law No. 20 of 2019, articles 8-19
Maintain a reconstructable QFIU and sanctions case pack.	Link activity, alert, suspicion chronology, STR, receipt, confidentiality, asset restrictions and authority communications.	Complete sampled case pack, timeline and controlled-access record.	Operational control supporting Law No. 20 of 2019, articles 19-22 and Law No. 27 of 2019
Maintain a launch and change pack.	Record perimeter, licences, programme approval, reporting connectivity, sanctions, privacy, vendors, testing and controlled uncertainties before launch or material change.	Signed launch pack, source register, tests, approvals and uncertainty log.	Official sources listed below

Verify against current official material

Primary law and regulator guidance control. Contextual VOVE ID reading is included to help teams operationalize the requirements and is not legal authority.

Law No. 20 of 2019 on Combating Money Laundering and Terrorism Financing

Qatar Financial Information Unit · Primary legislation

[Open official source](#)

AML/CFT legislation and amendments library

Qatar Financial Information Unit · Official legislation library

[Open official source](#)

Council of Ministers Decision No. 41 of 2019

Al Meezan Legal Portal · Primary delegated legislation

[Open official source](#)

AML/CFT Instructions for Financial Institutions 2020

Qatar Central Bank · Official supervisor instructions

[Open official source](#)

Instructions to Banks

Qatar Central Bank · Official supervisor library

[Open official source](#)

QFIU reporting entities and filing routes

Qatar Financial Information Unit · Official FIU guidance

[Open official source](#)

Instructions on Suspicious Transaction Reporting Requirements, April 2024

Qatar Financial Information Unit · Official FIU guidance

[Open official source](#)

QFIU role and functions

Qatar Financial Information Unit · Official FIU information

[Open official source](#)

QFCRA AML/CFT Rules 2019

Qatar Financial Centre Regulatory Authority · Official sector rules

[Open official source](#)

Local investor laws and Unified Economic Register materials

Ministry of Commerce and Industry · Official legislation library

[Open official source](#)

Business services, AML/CFT and beneficial ownership

Ministry of Commerce and Industry · Official registry and supervisor guidance

[Open official source](#)

Law No. 27 of 2019 on Combating Terrorism

Al Meezan Legal Portal · Primary legislation

[Open official source](#)

Decision No. 1 of 2020 on targeted financial sanctions

Qatar Financial Information Unit · Primary implementing decision

[Open official source](#)

Law No. 13 of 2016 on Protecting Personal Data Privacy

Al Meezan Legal Portal · Primary legislation

[Open official source](#)

Financial Crimes Enforcement Management

Qatar Central Bank · Official supervisor information

[Open official source](#)

FATF-MENAFATF Mutual Evaluation of Qatar 2023

FATF · Authoritative assessment

[Open official source](#)

FATF jurisdictions under increased monitoring - 19 June 2026

FATF · Authoritative current status

[Open official source](#)

FATF high-risk jurisdictions subject to a call for action - 19 June 2026

FATF · Authoritative current status

[Open official source](#)

Document control

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