



**QNB Group  
Financial Crime Statement**

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## Summary Profile

Scope / Coverage	QNB Group
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## 1. Introduction

QNB is unwavering in its commitment to uphold the highest standards of integrity and compliance across all its operations. This Financial Crime Statement delineates our comprehensive approach to preventing and mitigating financial crime, encompassing money laundering, terrorist financing, fraud, bribery, and corruption. Our policies are designed to safeguard the bank, its customers, shareholders, employees, and the communities we serve.

## 2. Scope

This policy is applicable to all QNB employees, contractors, and third parties acting on behalf of the bank. It encompasses all business activities and transactions conducted by QNB globally, ensuring a unified and robust approach to financial crime prevention.

## 3. Standards and Principles Framework

### A. Compliance with Laws and Regulations

QNB strictly adheres to all applicable financial crime laws and regulations in the jurisdictions where we operate, including the Qatar Law No 2019 ON Combatting Money Laundering and Terrorist Financing. This includes compliance with Anti-Money Laundering (AML), Counter Terrorist Financing (CTF), Sanctions, Proliferation of Weapons of Mass Destruction (WMD), and Anti-Bribery and Corruption (ABC) laws. Our commitment to legal compliance is unwavering, and we continuously monitor regulatory evolving requirements to ensure our policies remain effective and up to date.

### B. Governance

QNB's Board of Directors and senior management are committed to the effective implementation of this policy. They provide oversight and ensure that adequate resources are allocated to financial crime prevention efforts. Moreover, as delegated by the board, prior approval of Group Compliance and Senior Management is mandatory for PEP customers or other customers from countries, businesses, and products with the greatest risk of money-laundering/terrorism financing. Our governance structure includes regular reviews of our financial crime policies and procedures, as well as ongoing monitoring of our compliance with regulatory requirements.

### C. Risk Management

We have implemented a robust risk management framework to identify, assess, mitigate, and monitor financial crime risks. This framework includes conducting regular risk assessments, updating our policies and procedures accordingly, and ensuring that all risk management activities are aligned with our strategic objectives. By proactively managing risks, we aim to prevent financial crime before it occurs.

### D. Customer Due Diligence (CDD)

QNB conducts Customer Due Diligence (CDD) on all customers, in accordance with the requirements set forth in our policies and procedures. This process ensures that customer verification is based on reliable, independent source documents, data, and information, so that the beneficial owner is identified. Additionally, ongoing due diligence is conducted on businesses. Moreover, formal policies and procedures are in place for no-face-to-face customers (non-face-to-face CDD), including among others certification of documents presented and independent contact with the customer by the bank. The objective of our CDD processes is to ensure that we have a comprehensive understanding of our customers and their activities, thereby reducing the risk of financial crime.

### E. Enhanced Due Diligence for High-Risk customers.

QNB applies Enhanced Due Diligence (EDD) measures specifically tailored to clients operating in high-risk jurisdictions. These measures include: Country risk scoring based on FATF and other International authorities lists, internal intelligence, and geopolitical risk indicators; Senior Management approval for onboarding clients from high-risk countries; source of wealth and source of funds verification using independent documentation; Periodic reviews at increased frequency for clients in high-risk jurisdictions; and transaction monitoring rules customized to detect jurisdiction-specific typologies (e.g., trade-based money laundering, sanctions evasion). This aligns with ESG expectations for transparency and governance in high-risk geographies.

## **F. Transaction Monitoring**

We have established advanced systems and processes to monitor customer transactions for suspicious activity. These systems are designed to detect unusual patterns and behaviors that may indicate financial crime. Any suspicious transactions are promptly investigated and reported to the relevant regulatory authorities, ensuring that we take swift and decisive action against potential threats.

## **G. Training and Awareness**

QNB provides regular training to all employees on financial crime prevention, ensuring they understand their responsibilities and the importance of compliance. Our training programs are designed to keep employees informed about the latest trends and techniques in financial crime, as well as the specific policies and procedures they must follow.

## **H. Internal Controls and Procedures**

We maintain strong internal controls and procedures to detect and prevent financial crime. This includes segregation of duties, regular audits, and independent testing of our financial crime controls. Our internal controls are designed to create multiple layers of defense against financial crime, ensuring that no single point of failure can compromise our security.

## **I. Reporting and Escalation of Suspicious Transactions**

All employees are required to report any suspected financial crime activity. QNB has established clear reporting lines and escalation procedures to ensure timely and effective response to potential financial crime incidents. Our reporting mechanisms are designed to facilitate the swift identification and resolution of issues, minimizing the impact of financial crime on our operations. QNB's operating guidelines for reporting suspicious transactions include: a centralized Financial Crime Compliance unit responsible for triaging alerts; use of automated transaction monitoring systems with rule-based and machine learning models; defined thresholds and red flags for escalation (e.g., structuring, rapid movement of funds, unusual cross-border activity); a documented escalation matrix from front-line staff to FCC and ultimately to the Money Laundering Reporting Officer (MLRO); and clearly defined reporting timelines and audit trails for all STRs filed to the Qatar FIU.

## **J. Continuous Improvement**

QNB is dedicated to continuously improving its financial crime prevention measures. We regularly review and update our policies, procedures, systems, and controls to adapt to emerging risks and regulatory changes. Our commitment to continuous improvement ensures that we remain at the forefront of financial crime prevention, leveraging the latest technologies and best practices to protect our stakeholders.

## **K. Independent Review**

QNB commissions periodic independent reviews of its AML/CFT framework, conducted by qualified external audit firm, as well as ongoing reviews and inspections conducted by the Qatar Central Bank, as the primary regulator of the bank. The assessment covers effectiveness of rule sets and detection logic, calibration of thresholds and alert volumes, false positive rates and tuning recommendations, staff training adequacy and escalation protocols, and benchmarking against industry standards and regulatory expectations.

## **L. Records Retention**

QNB retains all AML/CFT-related documentation—including customer identification records, transaction data, and STRs—for a minimum of 10 years, in line with the Qatar Central Bank (QCB) regulatory requirements and international standards (e.g., FATF). This ensures traceability and supports retrospective investigations. This also aligns with ESG expectations for data governance and regulatory compliance.

## **4. Money-Laundering and Terrorism Financing**

QNB is dedicated to preventing money laundering and terrorism financing. We understand the severe impact these activities can have on the financial system and society. Therefore, we have implemented robust policies, procedures, systems, and controls to identify, prevent, and report any suspicious activities related to money laundering or terrorism financing. These principles are in line with Qatar AML/CFT Laws and Regulations, FATF recommendations and Wolfsberg principles, focusing on risk-based customer due diligence; transaction monitoring and escalation; governance oversight by senior management; and transparency in ownership and control structures. Key commitments are:

## **A. Commitment to Identify Unusual or Suspicious Transactions**

QNB is committed to proactively identifying unusual or suspicious transactions through a combination of automated monitoring systems and manual review protocols. Suspicious activity is defined as any transaction that lacks economic or lawful purpose; is inconsistent with the customer's known profile or business; involves jurisdictions or counterparties flagged for elevated risk (e.g., FATF-listed countries); and exhibits red flags such as structuring, rapid movement of funds, or use of shell entities. Examples include large cash deposits followed by immediate wire transfers; transactions involving high-risk sectors (e.g., arms trade, crypto exchanges); and use of third-party accounts without clear justification. These definitions are embedded in our transaction monitoring rules and are periodically updated based on typology reports from the FIU and international bodies.

## **B. Commitment to Identify Clients or Beneficial Owners of Unusual Transactions**

QNB applies rigorous due diligence to identify clients and beneficial owners involved in suspicious transactions. This includes verification of identity using reliable, independent documentation; enhanced due diligence (EDD) for high-risk clients, including PEPs, HNWIs, and NPOs; use of country-specific AML risk assessments to tailor safeguards; beneficial ownership thresholds aligned with local and international standards. All beneficial ownership data is maintained in accordance with QCB regulations and is subject to periodic review.

## **C. Commitment to Take Measures Against Clients Who Use Services to Finance Criminal Conduct**

QNB enforces a zero-tolerance policy toward clients who misuse banking services for criminal purposes. Measures include immediate escalation to the Money Laundering Reporting Officer (MLRO); filing of STRs with the Qatar FIU; termination of business relationships where criminal conduct is confirmed; and cooperation with law enforcement and regulatory authorities for investigation and prosecution. These actions are supported by internal guidelines and training programs that ensure staff are equipped to detect and respond to financial crime risks.

## **5. Sanctions and Proliferation of Weapons of Mass Destruction**

QNB is committed to complying with all applicable sanctions laws and regulations, including those related to the proliferation of weapons of mass destruction (WMD). We have established a comprehensive sanctions compliance program that includes screening customers and transactions against relevant sanctions lists, such as those maintained by the United Nations Security Council (UNSC), the United Kingdom (UK), the European Union (EU), the United States Office of Foreign Assets Control (OFAC), and Qatar National Counter Terrorism Committee (QANCTC), among others. Our program is designed to prevent the bank from engaging in business with sanctioned individuals, entities, and countries, thereby mitigating the risk of financial crime, and protecting our reputation.

## **6. Fraud**

QNB takes a proactive approach to preventing and detecting fraud. Our fraud prevention framework includes robust internal controls, employee training, and advanced technology to identify and mitigate fraudulent activities. We conduct regular audits and independent testing of our fraud controls to ensure their effectiveness. Employees are encouraged to report any suspected fraud through established reporting channels, and all reports are thoroughly investigated. By maintaining a strong anti-fraud culture, we aim to protect our customers and the integrity of our financial systems.

## **7. Bribery and Corruption**

QNB has a zero-tolerance policy towards bribery and corruption. We are committed to conducting business ethically and in compliance with all applicable Anti-Bribery and Corruption (ABC) laws. Our policy includes clear guidelines on acceptable business practices, employee training on recognizing and preventing bribery and corruption, and stringent internal controls to detect and prevent such activities. We also require all third parties acting on our behalf to adhere to the same high standards of conduct. Any suspected bribery or corruption is promptly investigated, and appropriate disciplinary actions are taken.

## **8. Conclusion**

QNB's Financial Crime Statement reflects our unwavering commitment to maintaining a safe and secure banking environment. By adhering to this policy statement, we aim to protect our stakeholders and uphold the integrity of the financial system. Our comprehensive approach to financial crime prevention ensures that we are well equipped to address the challenges of an ever-evolving threat landscape, safeguarding the trust and confidence of our customers and partners.

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