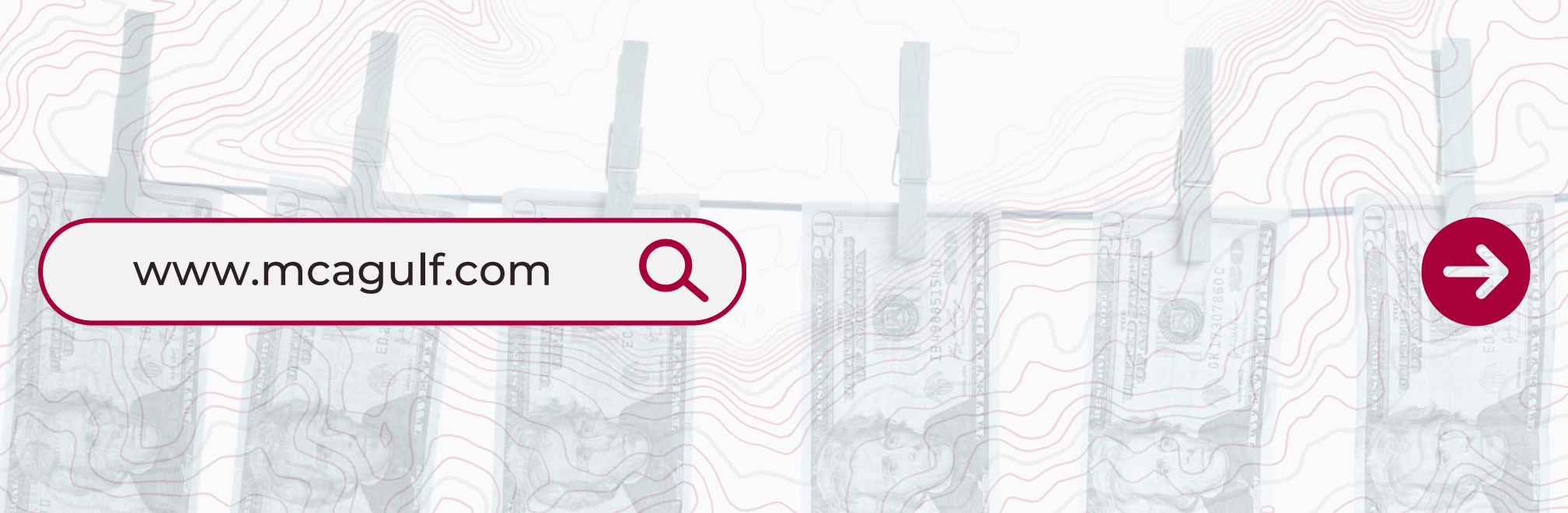




AML Compliance for DNFBPs in the UAE

A Practical Compliance Guide for Real Estate,
Jewellery Businesses and Professionals

MCA Gulf | Experts in AML Advisory



www.mcagulf.com



Why This Matters

Enforcement is the New Norm

- The UAE has significantly stepped up its Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) enforcement in recent years.
- Designated Non-Financial Businesses and Professions (DNFBPs) are a major focus area.
- Real estate brokers, gold dealers, auditors, and legal firms must implement full AML compliance frameworks.



Compliance is not optional;
enforcement action is already underway.



Who Are DNFBPs?

DNFBPs in the UAE include:



They are subject to AML regulations when they handle:

- Cash transactions
- High-risk clientele
- Cross-border ownership structures



Your Compliance Journey

01

Registration & Licensing

- Register on Ministry of Economy (MoE) portal
- Create an account on goAML
- Secure your Economic Register Number (ERN) and Financial Intelligence Unit ID (FIU ID)

02

Enterprise-Wide Risk Assessment (EWRA)

- Classify clients based on risk levels: Low, Medium, or High.
- Identify red-flag transaction types.

03

Customer Due Diligence (CDD)

- Apply CDD to all customers
- Enhanced Due Diligence (EDD) for high-risk customers
- Identify Ultimate Beneficial Owners (UBOs)
- Retain copies of IDs and verification documents

04

Reporting Obligations

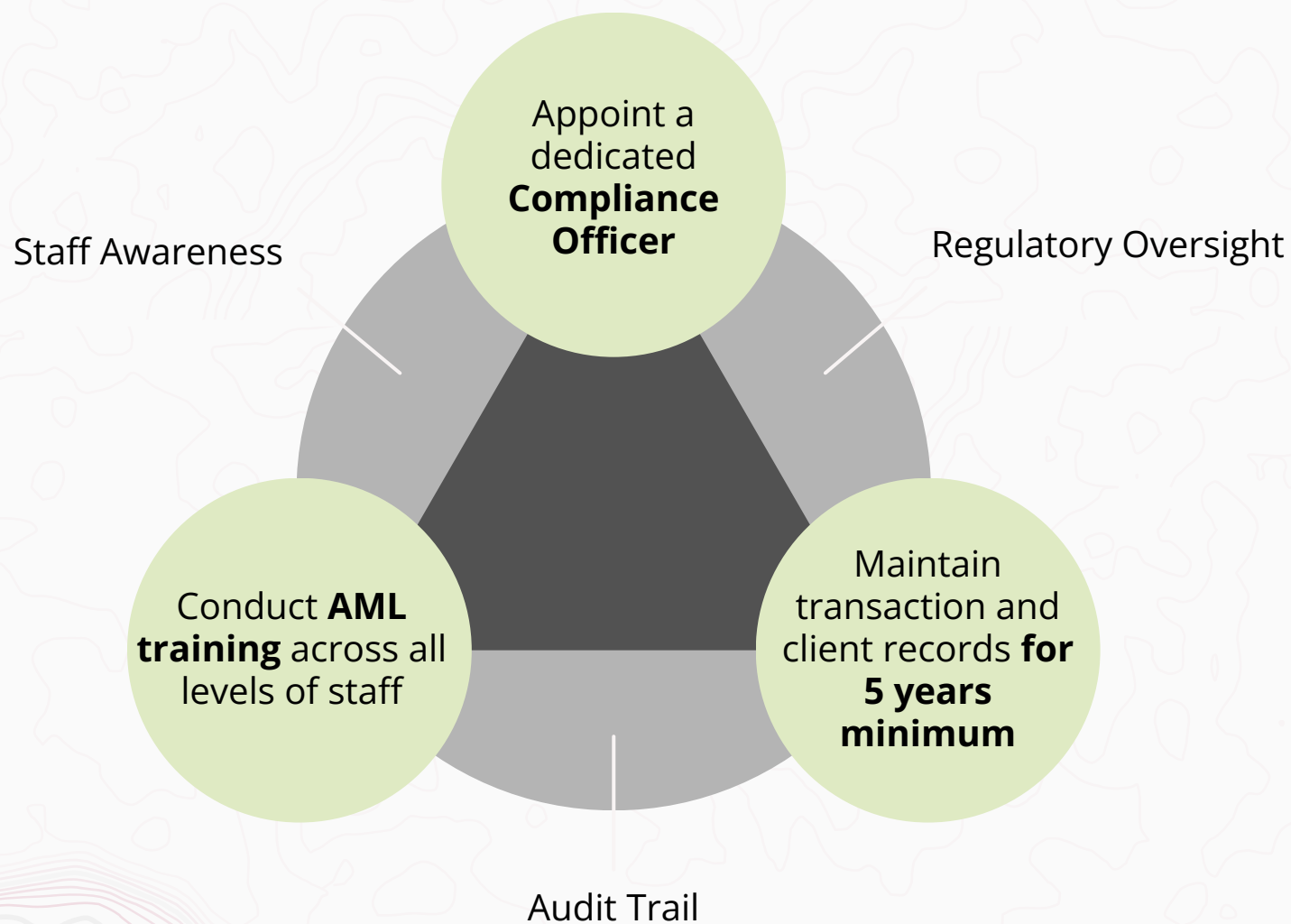
- File Suspicious Transaction Reports (STRs) and Suspicious Activity Reports (SARs)
- Submit Dealers in Precious Metals and Stones Reports (DPMSRs) for cash transactions $\geq$ AED 55,000

www.mcagulf.com



Internal Controls Matter

Strengthen Your Internal Framework



Internal vigilance reduces the risk of regulatory action.

www.mcagulf.com



Penalties for Non-Compliance

Legal, Financial & Reputational Risk



Administrative ***fines up to AED 1 million*** per violation.



Business license ***suspension or revocation***.



Public ***blacklisting*** of entities.



In some cases, ***criminal prosecution***.



Case Study:

In 2024, 32 UAE gold refineries were suspended due to AML breaches, including poor documentation and unreported cash transactions.



Real-World Challenges for DNFBPs

01 Lack of Awareness



Many small firms don't fully understand AML obligations.

02 Resource Constraints



Especially for small firms with no compliance staff.

03 goAML Portal Complexity



Registration & reporting processes are not intuitive.

04 Transaction Structuring



Some clients try to bypass thresholds.

05 Documentation Gaps



Inconsistent record-keeping undermines compliance.



Sector-Specific Notes



Real Estate

- AML applies to agents/brokers, not developers.
- Must file STRs for suspicious property deals (cash buyers, offshore entities)
- Due diligence needed for all clients, even those paying through banks.
- Extra scrutiny for PEPs (Politically Exposed Persons)



Jewellery & Precious Metals

- DPMSR required for cash $\geq$ AED 55,000
- Not required for card sales, but STR mandatory if suspicious.
- All suspicious transactions must be reported regardless of amount.
- **Recent Action:** MoE suspended numerous gold retailers in 2024 due to non-registration and policy failures.



Final Takeaway

Compliance = Trust

- Regulators are now ***enforcing, not educating.***
- DNFBPs must ***act swiftly*** to avoid penalties.
- AML compliance is ***more than legal duty***, it's a strategic asset that protects reputation and builds trust.



Call to Action:

Partner with ***MCA Gulf*** to simplify compliance, reduce risk, and turn regulatory pressure into business advantage.

www.mcagulf.com





How MCA Gulf Helps

Your End-to-End AML Partner



Assistance with goAML registration and MoE onboarding.



Custom Risk Assessment Models and Policies.



Staff Training Workshops and Compliance Manuals.



Ongoing STR Filing and Monitoring Support.



Mock Audits & Regulatory Health Checks.

www.mcagulf.com



LET'S TALK TO OUR

GRC EXPERTS



We go beyond every day to deliver excellence to our Clients.
Please feel free to connect with us



R. SOUNDERRAJAN

Partner – GRC

mcagrc@mcagulf.com | +971 4 3319501 | www.mcagulf.com

MCA Management Consultants
404 -10, Business Cluster Bldg 2
Dubai CommerCity, Ummramool,
Dubai, UAE

Disclaimer: This booklet is intended for general informational purposes only and does not constitute legal, regulatory, or professional advice. While every effort has been made to ensure accuracy, MCA Gulf accepts no liability for any actions taken or not taken based on its contents. Readers are encouraged to seek tailored legal or compliance advice specific to their individual circumstances.