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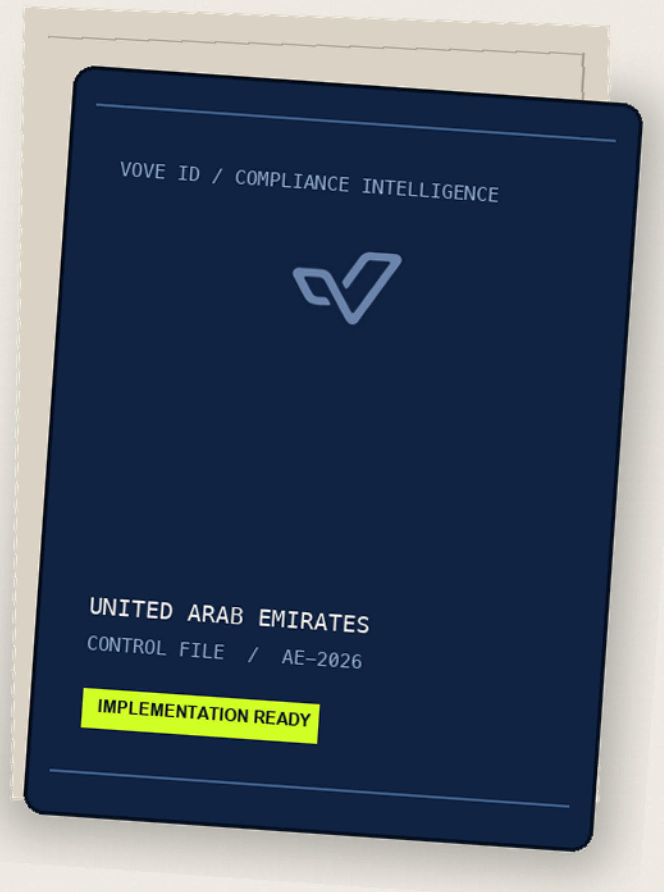

KYC / KYB / AML

COMPLIANCE CHECKLIST

2026 EDITION

IMPLEMENTATION CHECKLIST / NOT LEGAL ADVICE

READ THIS FIRST

United Arab Emirates KYC, KYB & AML Compliance Checklist

An implementation checklist for customer identity, corporate ownership, suspicious reporting, sanctions, payments, virtual assets and data protection under the UAE federal framework and scoped supervisory overlays.

FIU	**UAE Financial Intelligence Unit; suspicious reports use the FIU's approved forms and goAML service**
Primary AML rules	**Federal Decree-Law 10/2025 and Cabinet Resolution 134/2025**
FI occasional CDD	**AED 55,000, single or linked transactions**
Wire and VASP CDD	**AED 3,500 under Cabinet Resolution 134/2025**
AML ownership test	**25% or more, then other control, then senior management**
National KYC platform	**Federal Decree-Law 30/2024 and Cabinet Resolution 55/2026 are active**
Suspicion reporting	**Without delay, including attempts and regardless of value**
Core retention	**At least 5 years, using the latest applicable trigger**
FATF public lists	**Not listed at 19 June 2026; removed from increased monitoring in February 2024**

Scope and legal framework

Federal Decree-Law No. 10 of 2025 and Cabinet Resolution No. 134 of 2025 form the current federal AML/CFT/CPF baseline. Federal Decree-Law No. 30 of 2024 and Cabinet Resolution No. 55 of 2026 govern the national KYC Digital Platform. Cabinet Decision No. 109 of 2023 governs beneficial-owner procedures outside the financial free zones. CBUAE, SCA, Ministry of Economy and Tourism, Ministry of Justice, VARA, DFSA and FSRA requirements apply according to activity and location.

FATF context

The UAE was removed from FATF increased monitoring on 23 February 2024 and was not named on the FATF call-for-action or increased-monitoring lists dated 19 June 2026. Its assessment bodies are FATF and MENAFATF. Absence from a public list does not make a customer, product or transaction low risk.

IMPORTANT	General regulatory information, not legal advice or a licence determination. Reviewed as applicable on 14 September 2026. Confirm official Arabic text, later amendments, supervisory circulars, goAML report types, company-registrar procedures, data-protection executive regulations and the exact CBUAE, SCA, VARA, DFSA or FSRA perimeter with the competent authority and qualified UAE counsel before launch.

HOW TO USE THIS GUIDE

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.

Scope, authorities, and licensing

Resolve the regulated activity, location and supervisor before onboarding or launch.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Map each entity and activity to the federal reporting perimeter.	Classify financial activities, designated non-financial businesses and professions, virtual-asset services and nonprofit activity under the 2025 law and executive regulation; record the applicable supervisor.	Entity map, activity analysis, licence inventory, supervisor confirmation and legal opinion.	Federal Decree-Law 10/2025; Cabinet Resolution 134/2025, Articles 2-5
Separate federal, emirate and financial-free-zone regimes.	Determine whether CBUAE, SCA, Ministry of Economy and Tourism, Ministry of Justice, VARA, DFSA or FSRA rules govern each service; do not extend a mainland or free-zone rule beyond its perimeter.	Jurisdiction decision tree, establishment documents, customer-location rules and regulator correspondence.	Federal Decree-Law 10/2025; joint UAE supervisory guidance; applicable regulator rulebook
Obtain every required financial, payment or virtual-asset permission.	Before promotion or operation, classify retail payment, stored-value, payment-token, remittance, exchange, securities and virtual-asset activity and secure the licence, registration or non-objection required by the competent regulator.	Product analysis, application, licence, conditions, approved agents and renewal calendar.	Federal Decree-Law 6/2025; CBUAE Retail Payment Services Regulation; CBUAE Payment Token Services Regulation; applicable SCA, VARA, DFSA or FSRA rules

Governance and risk assessment

Controls must be risk-based, senior-approved, independently tested and updated.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain a documented enterprise crime-risk assessment.	Assess money-laundering, terrorist-financing and proliferation-financing exposure by customer, country, product, service, transaction, delivery channel and technology and update it when risks change.	Methodology, risk assessment, source inputs, approvals, residual-risk decision and remediation plan.	Cabinet Resolution 134/2025, Articles 4-5 and 24
Maintain senior-approved policies and a management-level compliance officer.	Document CDD, reporting, sanctions, records, employee screening, training and governance procedures proportionate to risk and obtain senior-management approval.	Policy suite, approval minutes, compliance appointment, authority matrix and reporting packs.	Cabinet Resolution 134/2025, Articles 21-22
Independently test the AML/CFT/CPF programme.	Operate risk-based monitoring, staff training and an independent audit function; track findings to verified closure.	Training records, audit plan, test samples, findings, owners and closure evidence.	Cabinet Resolution 134/2025, Article 21

3. NATURAL-PERSON IDENTIFICATION

Natural-person identification

Identify and verify customers and representatives from reliable independent evidence.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Apply CDD at every applicable trigger.	Perform CDD at relationship start, on suspicion or doubtful prior data; for financial institutions also at AED 55,000 occasional transactions and AED 3,500 occasional wires; for VASPs at AED 3,500 occasional transactions, aggregating linked activity where specified.	Trigger matrix, aggregation tests, timestamps, customer file and exception log.	Cabinet Resolution 134/2025, Article 7
Verify natural-person identity using current reliable evidence.	Obtain the official name, nationality, address, date and place of birth and applicable employment information, plus a true copy of a valid identity card or travel document, and corroborate authenticity.	Identity copy, verification results, liveness or presence evidence, discrepancy log and approval.	Cabinet Resolution 134/2025, Article 9(1)(a)
Verify each representative and their authority.	Identify and verify the person acting for a customer and confirm the authenticity and scope of the authorisation before permitting access or instructions.	Representative KYC, power or mandate, authority check, limits and activity log.	Cabinet Resolution 134/2025, Articles 9 and 12
Do not proceed when CDD cannot be completed.	Do not establish or continue the relationship or execute the transaction; consider an STR. If further CDD would alert the customer, stop that step and report the reason to the FIU.	Restriction, exit decision, suspicion assessment, approval and submission receipt.	Cabinet Resolution 134/2025, Article 14

KYB, registries, and beneficial ownership

Verify legal existence, authority, ownership and actual control, keeping AML and registry tests distinct.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Verify legal-person identity, purpose and authority.	Obtain name, legal form, constitutional documents, tax and unique reference numbers where applicable, registered and principal address, directors and binding authority from reliable independent sources.	Current registrar extract, constitutional pack, licence, officer list, mandates and discrepancy log.	Cabinet Resolution 134/2025, Article 9(1)(b)
Identify AML beneficial owners at 25% or more.	Trace natural persons ultimately owning, alone or jointly, an actual controlling ownership interest or shares of 25% or more; if unresolved, identify control by other means, then the relevant senior-management person or persons.	Layered ownership chart, percentage calculations, control analysis, fallback rationale and verified identities.	Cabinet Resolution 134/2025, Article 10(1)
Identify all controlling parties to legal arrangements.	Identify and verify trustees, settlors, protectors, beneficiaries or classes and every other natural person exercising ultimate effective control, including legal persons within the arrangement.	Trust or arrangement instrument, party register, powers, ownership analysis and verified identities.	Cabinet Resolution 134/2025, Article 10(2)
Maintain the entity-level beneficial-owner record where Decision 109/2023 applies.	Create the record within 60 days of formation, keep adequate and current owner data, record changes within 15 days of knowledge and provide required information to the registrar; apply the decision's 25% or control and senior-manager cascade.	Beneficial-owner, shareholder and nominee registers, notices, filing receipts and change log.	Cabinet Decision 109/2023, Articles 5-10
Apply financial-free-zone ownership rules separately.	For DIFC or ADGM entities use the relevant registrar and free-zone beneficial-ownership rules rather than Cabinet Decision 109/2023; document any government or listed-company exemption before relying on it.	Perimeter decision, free-zone extract, exemption analysis and filing evidence.	Cabinet Decision 109/2023, Articles 2 and 6; applicable DIFC or ADGM regulations

PEPs, EDD, and remote onboarding

Detect public-function exposure and strengthen controls where risk requires.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Identify PEPs, family members and close associates.	Use appropriate risk systems, declarations and reliable sources to determine whether a customer or beneficial owner is a foreign or domestic PEP or holds a prominent international-organisation function.	Declaration, screening result, relationship map, match rationale and refresh history.	Cabinet Resolution 134/2025, Article 16
Apply approval, wealth, funds and enhanced-monitoring measures.	For foreign PEPs obtain senior approval, establish source of wealth and funds and enhance ongoing monitoring; apply the same measures to higher-risk domestic and international-organisation PEPs.	Risk assessment, senior approval, source corroboration, monitoring plan and reviews.	Cabinet Resolution 134/2025, Article 16
Control remote onboarding as a technology risk.	Before use, assess impersonation, synthetic-identity, document and deepfake risks; validate the method, protect evidence and add controls proportionate to residual risk.	Technology risk assessment, validation, liveness results, fraud tests, restrictions and monitoring.	Cabinet Resolution 134/2025, Articles 8, 9 and 24
Map duties under the national KYC Digital Platform.	Determine whether the entity collects, retains, analyses, classifies, uses, exchanges, protects or manages KYC data or issues a KYC report; if in scope, classify its platform role, supply the prescribed natural- or legal-person data and implement the current access, consent, security and update requirements.	Platform-scope analysis, role registration, data-field map, customer authority, transmission logs, security controls and update evidence.	Federal Decree-Law 30/2024; Cabinet Resolution 55/2026, Articles 2-3 and applicable platform provisions

Monitoring and suspicious reporting

Suspicious transactions and attempts are reported without delay and regardless of value.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Monitor relationships and keep indicators current.	Scrutinise activity against customer information, business purpose, risk and source of funds where necessary; update crime indicators with changing methods and supervisory instructions.	Monitoring scenarios, indicator register, alerts, investigations, source data and dispositions.	Cabinet Resolution 134/2025, Articles 8 and 17
Report suspicion and attempted transactions without delay.	When suspicion or reasonable grounds arise, regardless of value, submit the FIU-approved suspicious report with available data and documents through the authorised service; do not wait for proof or a threshold.	Suspicion chronology, analysis, approved report, goAML delivery record and acknowledgement.	Federal Decree-Law 10/2025; Cabinet Resolution 134/2025, Article 18
Register and govern goAML access before operations.	Complete FIU pre-registration under the correct supervisor, establish controlled organisation and user administration and test the current report and supplemental-information process.	Registration, user approvals, role matrix, test evidence and current FIU guidance.	UAE FIU goAML services registration
Prevent tipping off and preserve report confidentiality.	Restrict report and investigation data and do not disclose that a report has been or will be filed or that an investigation is underway, except as lawfully permitted.	Need-to-know matrix, access logs, communication controls, training and incident review.	Cabinet Resolution 134/2025, Article 19

Payments, wires, thresholds, and agents

Payment permissions, wire data and agent oversight are product- and regulator-specific.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Carry complete originator and beneficiary information.	For international wires of AED 3,500 or more verify originator information and transmit the required names, accounts or unique reference and identifying field; transmit required data below the threshold and verify where suspicion exists.	Field matrix, validation logic, sampled transfers, repair queue and verification results.	Cabinet Resolution 134/2025, Article 28
Control incomplete intermediary and incoming wires.	Detect missing information and apply documented risk rules to execute, suspend or reject; beneficiary institutions verify an unverified beneficiary at AED 3,500 or more.	Detection rules, repair requests, risk decisions, beneficiary checks and escalation records.	Cabinet Resolution 134/2025, Articles 29-30
Govern money-transfer agents within the AML programme.	Maintain the current agent list, make it available to authorities, include agents in the AML/CFT/CPF programme and monitor their compliance.	Agent due diligence, contracts, register, training, monitoring and remediation.	Cabinet Resolution 134/2025, Article 27
Use the correct payment or payment-token licence.	Map the service to retail payment, stored-value or payment-token categories; obtain the CBUAE licence, registration or non-objection and comply with restrictions on promotions, agents and outsourcing.	Regulatory classification, licence, product terms, agent approvals, outsourcing register and launch sign-off.	CBUAE Retail Payment Services and Card Schemes Regulation; Payment Token Services Regulation, Articles 2, 5, 19 and 20

Targeted financial sanctions

UAE and UN list matches require immediate controls under Cabinet Decision 74/2020 and current Executive Office instructions.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Subscribe to updates and screen UAE and UN sanctions lists.	Screen customers, beneficial owners, controllers, representatives, related parties and transactions against the current Local Terrorist List and UN Consolidated List at onboarding, daily and when lists change.	Subscription, list inventory, update logs, screening configuration, tests and dispositions.	Cabinet Decision 74/2020; Executive Office TFS guidance
Freeze confirmed matches without delay and prior notice.	Freeze covered funds and assets immediately, in any event within the official without-delay standard, prevent funds or services being made available and keep restrictions until lawful release.	Match analysis, freeze timestamp, ownership/control analysis, asset inventory and system blocks.	Cabinet Decision 74/2020; Executive Office TFS guidance
Report freezes and attempted transactions through the current route.	For financial institutions and DNFBPs submit the Fund Freeze Report with supporting material through goAML within two business days and notify the relevant supervisor as required.	FFR, attachments, submission receipt, supervisor notice and chronology.	Executive Office TFS guidance and confirmed-match workflow
Govern partial matches, exemptions and release.	Suspend or restrict a possible match according to current guidance, seek Executive Office direction and release or permit access only under verified competent-authority or UN procedure.	Identifier analysis, correspondence, licence or exemption, approval and release log.	Cabinet Decision 74/2020; Executive Office TFS guidance

9. RECORDS AND REGULATOR ACCESS

Records and regulator access

Records must reconstruct transactions and decisions and follow the latest applicable retention trigger.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Retain transaction and relationship records for at least five years.	Keep domestic and international transaction, cash and commercial-dealing records for at least five years after transaction completion or relationship termination, applying the later applicable trigger.	Retention schedule, trigger calculations, archive sample, legal holds and deletion controls.	Cabinet Resolution 134/2025, Article 25(1)
Apply the latest-trigger rule to CDD and investigation records.	Keep CDD, monitoring, account, correspondence, identification, STR, analysis and specified recording evidence for at least five years from the most recent applicable closure, transaction, inspection, investigation or final-judgment event.	Record-class map, linked case files, trigger engine, archive and retrieval test.	Cabinet Resolution 134/2025, Article 25(2)
Make records promptly available to competent authorities.	Organise information to reconstruct individual transactions, authenticate requests and produce responsive customer and monitoring material promptly while protecting report confidentiality.	Request register, authority validation, production index, delivery log and receipt.	Cabinet Resolution 134/2025, Article 25(3)-(4)

Privacy, biometrics, and transfers

Federal data protection applies subject to statutory exclusions and separate DIFC, ADGM, health and credit-data regimes.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Map the applicable privacy regime and lawful basis.	Determine whether Federal Decree-Law 45/2021, DIFC or ADGM data-protection law or a sector regime applies; document consent or another lawful ground for every identity, screening and monitoring purpose.	Data inventory, perimeter and lawful-basis analysis, notices, consent records and exception register.	Federal Decree-Law 45/2021, Articles 2, 4 and 6; applicable DIFC or ADGM law
Minimise and secure identity and biometric data.	Collect only necessary data, apply purpose limitation, accuracy, retention and security controls and treat biometric data used for unique identification as sensitive personal data requiring heightened safeguards.	Field justification, security design, access reviews, encryption evidence, retention configuration and tests.	Federal Decree-Law 45/2021, Articles 1, 5 and 20
Perform impact assessments and appoint a DPO where required.	Assess high-risk technology and large-scale sensitive processing before use and appoint an appropriately independent data-protection officer when statutory triggers apply.	Impact assessment, risk treatment, DPO analysis and appointment, consultation and approval.	Federal Decree-Law 45/2021, Articles 10 and 22
Control incidents, rights requests and overseas transfers.	Maintain regulator and data-subject notification procedures without inventing an unverified deadline; fulfil applicable rights and transfer data only under an authorised adequacy or safeguard route.	Incident assessment, notifications, rights log, transfer map, contract and adequacy or derogation analysis.	Federal Decree-Law 45/2021, Articles 9, 13-18 and 23-24

11. PRACTICAL EVIDENCE PACKS

Practical evidence packs

Evidence should reproduce onboarding, monitoring and launch decisions across regulator boundaries.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain a reconstructable onboarding pack.	Bundle identity, authority, KYB, beneficial ownership, PEP and sanctions screening, risk, approvals, privacy records and exceptions under stable identifiers.	Complete sampled onboarding pack and retrieval result.	Operational control supporting Cabinet Resolution 134/2025, Articles 7-16 and 25
Maintain a reconstructable reporting and sanctions pack.	Link transactions, alerts, analysis, timing, report, acknowledgement, supplements, freeze actions, authority communications and access logs.	Complete sampled case pack and controlled access log.	Operational control supporting Cabinet Resolution 134/2025, Articles 17-19 and Cabinet Decision 74/2020
Maintain a regulator-scoped launch pack.	Record activity and location classification, every licence, current legal sources, goAML readiness, ownership filing, sanctions subscription, privacy analysis, vendor controls and validation before launch and on material change.	Signed launch pack, source register, regulator map, uncertainty log, tests and approvals.	Official sources listed below

SOURCES AND FURTHER READING

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.

Federal Decree-Law No. 10 of 2025 on AML/CFT/CPF
Central Bank of the UAE Rulebook · Primary legislation
Open official source

Cabinet Resolution No. 134 of 2025 - Executive Regulations
Central Bank of the UAE Rulebook · Official binding regulation
Open official source

UAE FIU goAML services registration
UAE Financial Intelligence Unit · Official reporting service
Open official source

Cabinet Decision No. 109 of 2023 on beneficial-owner procedures
Ministry of Economy and Tourism · Official binding decision
Open official source

Federal AML and beneficial-ownership legislation repository
Ministry of Economy and Tourism · Official legislation repository
Open official source

Targeted financial sanctions implementation
Executive Office for Control and Non-Proliferation · Official sanctions guidance
Open official source

Federal Decree-Law No. 45 of 2021 on personal data protection
UAE Legislation · Primary legislation
Open official source

Cabinet Resolution No. 55 of 2026 - KYC Digital Platform Regulations
UAE Legislation · Official binding regulation
Open official source

Retail Payment Services and Card Schemes Regulation
Central Bank of the UAE Rulebook · Official regulation
Open official source

Payment Token Services Regulation
Central Bank of the UAE Rulebook · Official regulation
Open official source

UAE third enhanced follow-up report
MENAFATF · Authoritative regional assessment
Open official source

FATF February 2024 plenary outcome and UAE removal
FATF · Authoritative status record
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

United Nations Security Council consolidated sanctions list
United Nations · Authoritative sanctions list
Open official source

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