May 2025 — Financial Crime - ML/TF Dashboard United Arab Emirates

"The overall threat from ML [and from TF are each] assessed as "**medium-high**". The UAE is exposed to ML threats from various predicate offences, both domestic and international, necessitating a comprehensive and robust AML/CFT framework"….[As a result] "(1) *the UAE has demonstrated a strong commitment to combating ML/TF, as evidenced by its robust legal framework, effective national cooperation mechanisms, and strong supervisory, law enforcement and judicial systems. (2) there is room for enhancement in some areas to further enhance the country's capabilities and contribute to the global fight against financial crime". The UAE's ability to combat ML/TF is assessed as "high", characterised by high-level political commitment, robust legal framework, rigorous law enforcement with LEAs of high capability and integrity, effective use of financial intelligence, strong domestic coordination among public sector and partnership with private sector, fair and efficient prosecution and judicial process, and robust international cooperation mechanisms".* - **UAE ML/TF Threat Assessment 2024**

Key Harms & Effects

56% of UAE persons surveyed received a scam attempt at least 1 per month - with 43% reporting an increase in scams in **2024**	**85,127** people suffering with drug disorders (2019) representing **0.7%** of population and **1,008** drug related deaths in 2019	**132,000** estimated victims of modern slavery crimes in the UAE, with a **13.4** incidence in 100,000 people.	One of the world's largest trading/ transit hubs for **illicit gold, diamonds & illegal fishing** & transit of **illegal wildlife**	One of the world's **global international financial centres** and so vulnerable to laundering domestic and foreign proceeds of crime

Key Money Laundering / Terrorist Financing Threats Identified by UAE (NRA 2024)

"**High Risk Threats** - Fraud & drug trafficking are significant ML threats in the UAE. Criminals use sophisticated methods, including social media, dark web markets, & innovative smuggling techniques, to launder proceeds through cash & bank accounts of associates**. Medium-High Threats**: Counterfeiting & piracy of products remain significant international threats. Smuggling, particularly of cash and precious metals, is another major concern. Also, Tax Evasion and foreign corruption, & currency counterfeiting pose medium-high threats. Foreign corruption remains a significant ML threat".
- **UAE ML/TF Threat Assessment 2024**

Drug Trafficking	**Fraud**	**Goods Piracy**	**Cash/Gold Smuggling**	**Foreign Corruption**
Tax Evasion	**Human Trafficking**	**Environmental Crime**	**Theft & Robbery**	**Currency Counterfeiting & Forgery**

Additional Threats Threats Identified By Third Parties

Human Trafficking (See 16 & 17 below)	**Proliferation (See 10 Below)**	**Illegal Drug Use (See 6, 7, 11 & 30 Below)**	**Financial Crimes (See 12 & 34 Below)**	**Environmental Crimes (See 20-22 & 33 Below)**

Sanctioned (Material Sanctions including for Financial Crimes related activities and WMD Proliferation) - By

United Nations - No	**USA - No**	**- No**	**- No**	**- No**

Threat Metrics KPIs By Third Parties - Stable

18/45 - RED	**12/45 - AMBER**	**12/45 - GREEN**	**3/45 - N/A**	**Mostly MIXED**

1	WB GDP - Economic Size (US$514 billion - GDP - 2023 est -28th largest)	A	16	Global Slavery Index 2023 Est numbers of modern day slaves - 132,000 in 2021	R	31	OC Index 2023 Arms Trafficking 7/10	R
2	WB GDP per Capita (US$49,000 per capita - (2023 est)	R	17	Global Slavery Index 2023 Modern Slavery Incidence - 13.4 per 1,000 people in 2021	R	32	OC Index 2023 Illicit Trade in Excisable Goods 5.5/10	A
3	World Economic Forum 2019 Security 92.8 - 7/141 Countries (OC, Terrorism, Homicides, Policing) (85.1/100/100/86.1)	G	18	US Dept of Labor Child Labour 2021 Not included	N/A	33	OC Index 2023 Fauna - Wildlife 7.5/10, Flora - Timber Trafficking 5.5/10, Illegal Mining 7.5/10	R
4	World Economic Forum 2019 OC 85.1- 7/141 Countries (2019) Trend - Improving	G	19	IOM Migration 2020 8.7 million migrants	N/A	34	OC Index 2023 Financial Crimes 9.5/10	R
5	Numbeo Crime Survey 2023 14.6 - 143/144 - second lowest	G	20	IUU Fishing Index 2023 IUU Score 2.46 - 31/152 Countries	R	35	OC Index 2023 Cyber Dependent Crime 8/10	R
6	Illegal Drug Dependency Disorders Number US Inst Health Metrics & Evaluation 2019 - 85,127 (1990 -2019 +677%)	G	21	EU Listing of Countries for Illegal Fishing 2022 Not Included	G	36	OC Index 2023 Extortion & Protection Racketeering 5/10	A
7	Illegal Drug Dependency Disorders Share US Inst Health Metrics & Evaluation 2019 0.7% (1990 - 2019 +49%)	G	22	US DoS - Wildlife Trafficking 2024 Focus / Countries of Concern - Not Included - Improving	G	37	OC Index 2023 Human Trafficking 8.5/10	G
8	TI CPI 2024 68/100 23/180 Countries (67/ 100 - 27/180 in 2022)	G	23	UNODC Thefts 2016 Not Included	N/A	38	OC Index 2023 People Smuggling 6.5/10	G
9	Trace Bribery Risk Matrix 2024 Score 45/100 78/194 Countries up from 46/100 (2023)	A	24	Global Financial Integrity Illicit Financial Flows 2017 21.95% (2017)	R	39	OC Index 2023 Criminal Actors 5.7/10 (4.75/10 - 2021)	A
10	Proliferation Index - PPI 2021/2022 Threat Tier 2 Medium Threat Level	A	25	EUIPO & OECD Counterfeit Goods 2019 Propensity of Exports 0.995% (2016)/ OC Index 2023 Illicit Trade in Counterfeit Goods 7/10	R	40	OC Index 2023 Criminal Networks 6.5/10, Mafia-Style 1/10, Foreign Actors 7/10, State Embedded Actors 6.5/10, Public Sector Actors 7.5/10	R
11	US Dept of State 2024 INCSR Vol 1 Drug Control - Not Included (pre-curser only)	G	26	EU List of None Co operative Jurisdictions for Tax purposes 2023 - Not Included	G	41	Estimated Corruption Proceeds 1% of GDP as per EU Assessment US$5.14 Billion	A
12	US Dept of State 2024 INCSR Vol 2 Financial Crime - Included - Improving	R	27	Tax Justice Network - Financial Secrecy Index 2022 8/141 Countries Secrecy Score 79/100 & 1.91% FSI Share	R	42	Estimated Fraud Losses 2019 6.05% of Global GDP - US$31 Billion	A
13	US Dept of State 2023 Country Reports on Terrorism - Included	R	28	Tax Justice Network - Corp Tax Haven Index 2024 17/70 Countries - CTHI 82 (98 in 2021) & 2.2% (3.8% in 2021) CTHI Share	R	43	Estimated Money Laundering 2.7% of GDP US$13.8 Billion	A
14	Global Terrorism Index 2024 0.233 (=79/163) - Improving	G	29	OC Index 2023 Criminality 6.37/10 (5.75/10 - 2021) Overall 33/193; 14/46 Asia; 7/14 Western Asia	A	44	Estimated Organised Crime (POC) 41% of POC (45 below) is US$7.5 Billion	A
15	Sanctioned by UN, USA, EU, UK or Others (Canada, Japan or Switzerland) - Not Included	G	30	OC Index 2023 Drugs - Synthetics 7.5/10, Cocaine 6/10, Heroin 7/10, Cannabis 6.5/10	R	45	Estimated Financial Crime - Proceeds of Crime (POC) 3.6% of GDP US$18.5 Billion	A

Key Sector Risks & Vulnerabilities 🇦🇪 Identified by UAE (NRA 2024)

The sectors considered those sectors most vulnerable to ML, after assessing the vulnerability and then the level of control effectiveness to mitigate t are Banks, MSBs & Se risks. The sectors most vulnerable are Registered Hawala, Virtual Assets & Real Estate rated "**High**" risk - **UAE ML/TF Threat Assessment 2024**

"High" Risk	"Med High" Risk	"Medium/Med High" Risk	"Medium" Risk	"Low - Med" or "Low Risk"
Registered Hawala, Virtual Assets & Real Estate	Banks, Exchange Houses, DPMS, Legal Persons/Arrangements ADGM - MVTS & Dealer/Brokers	Securities	Insurance, Finance Companies, Co Service Providers, NPOs (TF). ADGM - Banks, Securities & Custodians. DFSA - Banks, MVTS, Custodians	Auditors, Accountants, Lawyer's, Notaries. ADGM - Insurance. DFSA - Insurance.

Response Metrics KPIs 🇦🇪 By Third Parties - Improving

8/45 - RED	16/45 - AMBER	16/45 - GREEN	5/45 - N/A	Mostly MIXED

1	OECD - Global Forum on Transparency & Exchange Info for Tax Purposes 2019 - Largely Compliant	G	16	OC Index 2023 - Resilience 5.13/10; Overall 84/193 countries, 16/46 Asia & 7/14 Western Asia	A	31	European Union Third Country Grey List Included since March 2023	R
2	Global Slavery Index 2023 Country Response Rating 50/100	A	17	OC Index 2023 National Policies & Laws 5.5/10	A	32	FATF Reports by Date of Publication Reports 2020 & FUR 2021 & 2023	G
3	US DoS Trafficking in Persons 2024 Tier 2 - 2024)	A	18	OC Index 2023 AML 3.5/10	R	33	FATF Grey List - Strategic AML Deficiencies 2023 (Including Suspensions) - Removed February 2024	G
4	Proliferation Index - PPI 2021/2022 Controls 847/1300 High Controls score	G	19	OC Index 2023 International Co Operation 5/10	A	34	FATF Black List - Call for Counter Measures 2023 Not Included	G
5	Global Cybersecurity Index 2020 98.06 (5/182)	G	20	OC Index 2023 Political Leadership & Governance 5/10	A	35	Gov Spending on Public Order / Law & Order Knoema 2016	N/A
6	PWC Crypto AML Regulation 2025 Crypto Regulated for AML/CTF - Included	G	21	OC Index 2023 Prevention 4.5/10	R	36	UAE National ML/TF Risk Assessment 2024	G
7	Open Ownership BO Transparency - Registers 2023 Central/Public Register Not Committed/Not Implemented	N/A	22	OC Index 2023 Justice System & Detention 5.5/10	A	37	Financial Information Sharing Partnership UAE AML/CFT PPP since 2021 (Nb: No P2P info sharing)	G
8	Freedom House 2024 Freedom Index 18/100 "Not Free"	R	23	OC Index 2023 Law Enforcement 6/10	A	38	FIU FTF 2021 54 staff	A
9	Heritage Foundation 2025 Economic Freedom Index - 76 "Mostly Free"	G	24	OC Index 2023 Government Transparency & Accountability 4.5/10	R	39	STRs/SARs filed 2021 - 20,070 in 2021 & 38,912 in 2022 - 7,000 Jan/Feb 2023 up 17% in Q2/2023)	A
10	Basel AML Index 2024 6.18/10 - 38/152 (1 being the worst)	R	25	OC Index 2023 Territorial Integrity 5.5/10	A	40	STRs/SAR/Other Conversion Rate (CR) -1,212 reports sent to LEA - 5.8% CR 2021 / 2,543 reports - 6.5% CR 2022	A
11	World Bank Regulatory Quality (2021) from WB Global Gov Indicators 1.01 - 33/191 (1 the best)	G	26	OC Index 2023 Economic Regulatory Capacity 5.5/10	A	41	ML Convictions - 220 (2019-21), 92 in 2022/2022 & 76 from March - Mid July 2023 at 92.1% conviction rate	R
12	Institute for Crime & Justice Policy Research 2021 Imprisonment 104/100,000	NA	27	OC Index 2023 Victim & Witness Support 6/10	A	42	HT Convictions - US TIP 2022 23 convictions (1st for 1 for forced labour) versus 15 in 2020 and 67 in 2019	R
13	Environment Performance Index 2022 Score 52.49 (39/180)	A	28	OC Index 2023 Non State Actors 3/10	R	43	TI - Exporting Corruption Enforcement of the OECD Anti-Bribery Convention 2022 - Not Included	N/A
14	World Justice Project Rule of Law Index 2022 Score 0.63/Rank 37/140	A	29	FIU Egmont Member 2023 Yes since June 2022	G	44	Assets Seized AED2.54B (US$694M seized in 2022) or 3.8% of POC	G
15	Open Budget Index 2021 Budget Transparency Scores - Not Included	N/A	30	Interpol Member Yes since 1973	G	45	Assets Confiscated AED2.3B (US$625M) in 2021 & AED2.19B (US$600M in 2022) AED5.4B (US$1.5B) 2023 8.3% POC	G

FATF Ratings 🇦🇪 Reports 2020 & FUR 2021 & 2023

4/51 - RED	7/51 - AMBER	40/51 - GREEN	0/51 - N/A	Mostly GREEN

FATF 40 Recommendations

R1	Assessing Risks & Applying a Risk Based Approach	LC (PC)	R18	Internal Controls & Foreign Branches & Subsidiaries	LC	R36	International Instruments	C
R2	National Cooperation & Coordination	LC (PC)	R19	Higher Risk Countries	C (PC)	R37	Mutual Legal Assistance	LC
R3	Money Laundering Offence	LC	R20	Reporting of Suspicious Transactions	C	R38	Mutual Legal Assistance , Freezing & Confiscation	LC
R4	Confiscation & Provisional Measures	LC	R21	Tipping Off & Confidentiality	LC	R39	Extradition	C
R5	Terrorist Finance Offence	LC	R22	DNFBPs CDD	LC	R40	Other Forms of International Cooperation	LC
R6	Targeted Financial Sanctions related to Terrorism & TF	C (PC)	R23	DNFBPs Other Measures	LC			
R7	Targeted Financial Sanctions related to Proliferation	C (PC)	R24	Transparency & BO's of Legal Persons	LC			
R8	Non Profit Organisations	LC	R25	Transparency & BO's of Legal Arrangements	LC (PC)			
R9	FI Secrecy Laws	C	R26	Regulation & Supervision of FI's	C			
R10	Customer Due Diligence	LC	R27	Powers of Supervisors	C			
R11	Record Keeping	LC	R28	Regulation & Supervision of DNFBP's	LC			
R12	Politically Exposed Persons	LC	R29	Financial Intelligence Unit	C (PC)			
R13	Correspondent Banking	C	R30	Responsibilities of LE & Investigative Authorities	C			
R14	Money or Value Transfer Services	LC	R31	Powers of LE & Investigative Authorities	C			
R15	New Technologies	PC	R32	Cash Couriers	C			
R16	Wire Transfers	C	R33	Statistics	LC			
R17	Reliance on Third Parties	LC	R34	Guidance & Feedback	LC			
			R35	Sanctions	LC			

FATF 11 Immediate Outcomes

IO1	Assessment of Risk Co Ordination & Policy Setting	ME
IO2	International Co Operation	LE
IO3	Supervision	ME
IO4	Preventative Measures	ME
IO5	Transparency & Beneficial Ownership	LE
IO6	Financial Intelligence	ME
IO7	ML Investigations & Prosecutions	LE
IO8	ML Confiscations	ME
IO9	TF Investigations & Prosecutions	SE
IO10	Prevention of Terrorism & TF	ME
IO11	Prevention of WMD Proliferation	LE

FATF Reports 2020, 2021, 2023; Key: C = Compliant, LC = Largely Compliant, PC = Partially Compliant, NC = None Compliant. Note ratings in brackets from earlier 2020 Report and upgraded in 2021/2023

Key: HE = Highly Effective, SE = Substantially Effective, ME = Moderately Effective, LE = Low Effective.

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