



# Guidance on Targeted Financial Sanctions

For Financial Institutions (FIs), Designated Non-Financial Businesses and Professions (DNFBPs) and Virtual Assets Service Providers (VASPs)

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# Acronyms and Definitions

## Acronyms

<b>AML/CFT</b>	Anti-Money Laundering / Counter Financing of Terrorism
<b>CNMR</b>	Confirmed Name Match Report (Previously known as Funds Freeze Report – FFR)
<b>CPF</b>	Counter Proliferation Financing
<b>CSPs</b>	Company Service Providers
<b>DNFBPs</b>	Designated Non-Financial Businesses and Professions
<b>DOB</b>	Date of Birth
<b>DPMS</b>	Dealer in Precious Metals & Stones
<b>EDD</b>	Enhanced Due Diligence
<b>EOCN</b>	The Executive Office for Control & Non-Proliferation
<b>FATF</b>	Financial Action Task Force
<b>FIs</b>	Financial Institutions
<b>FIU</b>	Financial Intelligence Unit
<b>KYC</b>	Know Your Customer
<b>NAS</b>	Notification Alert System
<b>PF</b>	Proliferation Financing
<b>PNMR</b>	Partial Name Match Report
<b>POB</b>	Place of Birth
<b>RFR</b>	Reasons for Reporting
<b>SA</b>	Supervisory Authority
<b>STR/SAR</b>	Suspicious Transaction Report / Suspicious Activity Report
<b>TF</b>	Terrorist Financing
<b>TFS</b>	Targeted Financial Sanctions
<b>UAE</b>	United Arab Emirates
<b>UBO</b>	Ultimate Beneficial Owner
<b>UN</b>	United Nations

<b>UNSC</b>	United Nations Security Council
<b>UNSCR</b>	United Nations Security Council Resolution
<b>VASPs</b>	Virtual Assets Service Providers
<b>WMD</b>	Weapons of Mass Destruction

## Definitions

Freezing	To prohibit the transfer, conversion, disposition or movement of any funds or other assets that are owned or controlled by individuals, entities, or groups designated on the UAE Local Terrorist List or United Nations Consolidated List
Local Terrorist List	National terrorist list issued by the UAE Cabinet
Person	All natural and legal persons
Reporting Entities	These comprise FIs, DNFBPs, and VASPs that are obligated to comply with the AML/CTF/CPF laws of the UAE
Sanctions Committee	United Nations Security Council Sanctions Committee that oversees compliance of United Nations Security Council Resolutions. Please note that all current United Nations sanctions regimes have their own Sanctions Committee
Sanctions Lists	UAE Local Terrorist List and UNSC Consolidated List
Supervisory Authority	Federal and local authorities which are entrusted by legislation to supervise FIs, DNFBPs, VASPs or the authority in charge of approving the pursuit of an activity or a profession in case a supervisory authority is not assigned by legislation
UNSC Consolidated List	United Nations Security Council Consolidated List pursuant to the relevant United Nations Security Council Resolutions
Without Delay	Immediately or in any case within 24 hours upon designation of an individual, entity, or group on the UAE Local Terrorist List or UNSC Consolidated List.

## Introduction

1. In today's global financial landscape, compliance with Targeted Financial Sanctions (TFS) is a crucial obligation for Financial Institutions (FIs,) Designated Non-Financial Businesses and Professions (DNFBPs) and Virtual Assets Service Providers (VASPs), collectively referred to as "Reporting Entities", operating in the United Arab Emirates (UAE) and across the world. TFS implementation aims to prevent the misuse of financial systems for illicit activities, including Terrorism Financing (TF), Proliferation Financing (PF) and sanctions evasion.
2. Given the role the private sector plays in the UAE, the effectiveness of TFS implementation, robustness of compliance measures and adherence to the UAE's legal requirements is essential.
3. This guideline aims to clarify Reporting Entities' obligations under the UAE's TFS legal framework and seeks to define the meaning and scope of TFS measures applicable in the UAE. In addition, it aims to set out the specific key obligations, which are 1) registering in the EOCN's Notification Alert System (NAS); 2) screening the UAE Local Terrorist List and United Nations Security Council Consolidated List (Sanctions Lists); 3) freezing funds or other assets without delay and prohibition of making them available for designated Persons, and 4) reporting TFS measures taken. The guideline also explains key concepts of ownership and control as related to TFS implementation, and the enforcement measures that might be applied in cases of non-compliance. Finally, the document provides guidance regarding obligations of sanctions implementation in relation to unilateral or multilateral sanctions.
4. This guidance is an update on the previous version of the Guidance on Targeted Financial Sanctions (amended in September 2022). The main changes in this guideline relate to the reporting obligations as set out in [Section 4](#). Specifically, the naming convention of the previously known Funds Freeze Report (FFR), which was used to report Confirmed Name Matches, has been updated to Confirmed Name Match Report (CNMR). In addition, further clarification and examples have been added relating to the procedures of reporting Partial Name Match Reports. The update also provides guidance on the obligations to screen and implement freezing measures during weekends and public holidays. Finally, the sections explaining the procedures for submitting a grievance request have been removed from this guideline and published separately as a standalone [Guideline on Grievance Procedures](#).



## Overview of Targeted Financial Sanctions

5. The United Nations Security Council (UNSC) is one of the six principal organs of the United Nations (UN) and has primary responsibility for the maintenance of international peace and security. It has 15 member countries, and each member has one vote. Under the Charter of the United Nations, all Member States of the UN are obligated to comply with the Security Council's decisions.
6. The UNSC holds the capacity to take any action to maintain or restore international peace and security under Article 41 of Chapter VII of the Charter of the UN by imposing sanctioning measures. These measures encompass a broad range of enforcement options that do not involve the authorisation of the use of armed force, including interruption of economic relations, international communications, and diplomatic relations.
7. The Security Council sanctions regimes focus mainly on supporting the settlement of political conflicts, nuclear non-proliferation, and counterterrorism. These regimes include measures ranging from comprehensive economic and trade sanctions to more targeted measures such as arms embargoes, travel bans, and restrictions on dealing with certain financial or commodity transactions.
8. In addition, the Financial Action Task Force (FATF), an inter-governmental body responsible for setting international standards on Anti-Money Laundering (AML) and Countering the Financing of Terrorism (CFT) and Countering Proliferation Financing (CPF), under Recommendations 6 and 7 (R6/R7) of the FATF Standards, requires the implementation of TFS to comply with the United Nations Security Council Resolutions (UNSCRs) relating to the prevention and suppression of terrorism, TF, and PF.
9. The UAE, as a member of the UN, is committed to implementing UNSCRs, including those related to the UN's sanctions regimes. Consequently, through Cabinet Decision No. 74 of 2020, the UAE implements relevant UNSCRs on the suppression and combating of terrorism, TF and PF, in particular relating to TFS. Persons should note that, in accordance with the laws of the UAE, the UAE Government also applies TFS by publishing a UAE Local Terrorist List in accordance with UNSCR 1373 (2001), which calls for Member States to publish their own national terrorist lists.

## Section 1: Legal Framework

10. The following list comprises the legislations issued for the purpose of implementing TFS in the UAE.

Table 1 - UAE TFS Legislations

Title	Issued
Federal Law No. 20 for 2018 on Anti-Money Laundering and Combating the Financing of Terrorism and Illegal Organizations and its amendments	Issued: 2018 Amended: 2021 (Federal Law No. 26)
Cabinet Decision No. 10 of 2019 Concerning the Implementing Regulation of Federal Law No. 20 of 2018 on Anti-Money Laundering and Combating the Financing of Terrorism and Illegal Organizations and its amendments	Issued: 2019 Amended: 2022 (Cabinet Decision No. 24)
Cabinet Decision No. 74 of 2020 concerning the UAE Local Terrorist List of terrorists and implementation of UN Security Council decisions relating to preventing and countering financing terrorism and leveraging non-proliferation of Weapons of Mass Destruction, and the relevant resolutions.	2020

## Section 2: Targeted Financial Sanctions Definition and Scope

### TFS Definition

11. The term TFS refers to **asset freezing** and **prohibition from making funds or other assets or services available** either directly or indirectly, for the benefit of designated individuals, entities, or groups listed in the Sanctions Lists.
- Asset freezing without delay: Freezing is the prohibition to transfer, convert, dispose, or move any funds or other assets that are owned or controlled by designated individuals, entities, or groups in the Sanctions Lists, immediately (within 24 hours) upon designation. It includes:
    - o The freezing of funds and other financial assets and economic resources, and includes preventing their use, alteration, movement, transfer, or access.
    - o The freezing of economic resources also includes preventing their use to obtain funds or other assets or services in any way, including, but not limited to, by selling or mortgaging them.

#### Example:

**Fls**: a freezing measure can be blocking access to bank accounts or transactions.

**DNFBPs**: a freezing measure can be stopping the facilitation of or blocking the transfer of ownership of immovable (real estate) or movable assets (gold).

**VASPs**: a freezing measure can be blocking services to trade and transfer virtual assets, as well as suspending/restricting access to accounts.

- Prohibition from making funds or other assets or services available: This means the prohibition to provide funds or other assets or financial services to, any designated individuals, entities, or groups listed in the Sanctions Lists.

### Example:

**FIs**: offering banking or transactional services.

**DNFBPs**: the provision of any services, such as legal services to transfer asset ownership, buying or selling real estate, precious metals, natural resources, etc.

**VASPs**: the provision of any virtual asset services, including but not limited to providing advisory, brokerage, custody, exchange, lending, borrowing, management, investment, transfer, and settlement.

## Funds or Other Assets

12. The term **Funds or Other Assets** means: any assets, including, but not limited to, financial assets, economic resources (including oil and other natural resources), property of every kind, whether tangible or intangible, movable or immovable, however acquired, and legal documents or instruments in any form, including electronic or digital, evidencing title to, or interest in, such funds or other assets, including, but not limited to, bank credits, travellers cheques, bank cheques, money orders, shares, securities, bonds, drafts, or letters of credit, and any interest, dividends or other income on or value accruing from or generated by such funds or other assets, and any other assets which potentially may be used to obtain funds, goods or services.

13. **Categories of Funds or Other Assets**: All types of funds or other assets are subject to freezing measures. The funds or other assets can be categorised into the following types:

### i. Financial Assets

14. Funds and other financial assets subject to sanctions are, for example, the following:

- a. Cash, cheques, claims on money, drafts, money orders, bearer instruments.
- b. Deposits with FIs or other entities and balances on accounts, including but not limited to: (1) fixed or term deposit accounts, (2) balances on share trading accounts with banks, brokerage firms, or other investment trading accounts.
- c. Debts and debt obligations, including trade debts.
- d. Accounts receivable, notes receivable, and other claims of money.

- e. Equity and other financial interest in a sole trader or partnership.
- f. Publicly and privately traded securities and debt instruments, including stocks and shares, certificates representing securities, bonds, notes, warrants, debentures, and derivatives contracts.
- g. Interest, dividends, or other income on or value accruing from or generated by assets.
- h. Credit, right of set-off, guarantees, performance bonds or other financial commitments.
- i. Letters of credit, bills of lading, bills of sale, notes receivable and other documents evidencing an interest in funds or financial resources and any other instruments of export-financing.
- j. Insurance and reinsurance.

## ii. **Economic Resources**

15. Economic resources subject to sanctions include assets of any kind, whether tangible or intangible, movable or immovable, actual or potential, which potentially may be used to obtain funds, goods, or services, such as:

- a. Land, buildings, or other real estate.
- b. Equipment, including computers, computer software, tools, and machinery.
- c. Office furniture, fittings and fixtures and other items of a fixed nature.
- d. Vessels, aircraft, and motor vehicles.
- e. Inventories of goods.
- f. Works of art, cultural property, precious stones, jewellery, or gold.
- g. Commodities, including oil, minerals, or timber.
- h. Arms and related material, including all items mentioned in the arms embargo, included but not limited to weapons and ammunition, military vehicles and equipment, paramilitary equipment, and spare parts for the aforementioned, and technical advice, assistance, or training related to military activities.

- i. Raw materials and components that can be used to manufacture improvised explosive devices or unconventional weapons, including but not limited to chemical components, detonating cord, or poisons.

iii. **Any other assets.**

- a. Other intangible assets subject to sanctions include assets of any kind, which potentially may be used to obtain funds, goods, or services, such as patents, trademarks, copyrights, trade names, franchises, goodwill, and other forms of intellectual property, internet hosting or related services.
- b. Internet-based and other electronic or digital payment instruments, including virtual assets.

## **Scope of TFS measures**

- 16. TFS measures as per UAE legislation apply **exclusively** on individuals, entities, and groups that are listed on the **UAE Local Terrorist List**, pursuant to a UAE Cabinet Decision, or the **UNSC Consolidated List**, pursuant to a decision by the relevant UNSC Sanctions Committee.
- 17. Asset freezing and prohibition measures have **no time limit**: the funds or other assets should remain frozen, and the prohibition from making funds or other assets or services available remains until the individual, entity, or group is **delisted (removed)** from the UAE Local Terrorist List or the UNSC Consolidated List or until there is a **freezing cancellation decision** communicated by the EOCN.
- 18. For designations on other unilateral / multilateral sanctions lists (e.g. OFAC, UKHMT, EU, etc.), contact your Supervisory Authority (SA) on the appropriate course of action for dealing with matches on other sanctions lists.

## Section 3: The Purpose of TFS

19. The purpose of TFS is to deny certain individuals, entities, or groups the means to violate international peace and security, support terrorism or finance proliferation. To achieve this, it seeks to ensure that no funds or other assets or services of any kind are made available to designated Persons for as long as they remain subject to the TFS measures.

20. TFS are implemented in the UAE pursuant to UNSCRs in relation to:

a. Terrorism and TF:

Table 2 - Terrorism and TF TFS related UNSCRs

1. Islamic State in Iraq and the Levant (Da'esh), Al-Qaida, and associated individuals, groups, undertakings, and entities.	<a href="#">UNSCR 1267 (1999)</a> , <a href="#">1989 (2011)</a> and its successor resolutions
2. The Taliban, and associated individuals, groups, undertakings, and entities.	<a href="#">UNSCR 1988 (2011)</a> and its successor resolutions
3. Any individual or entity included in the Local Terrorist List, pursuant to UNSCR 1373 (2001)	<a href="#">UNSCR 1373 (2001)</a>
4. Al-Shabaab Sanctions Committee	<a href="#">UNSCR 2713 (2023)</a>

b. The Proliferation of Weapons of Mass Destruction (WMD)<sup>1</sup>:

Table 3 - PF TFS related UNSCRs

1. Democratic People's Republic of Korea (DPRK): nuclear-related, other weapons of mass destruction-related and ballistic missile-related programs.	<a href="#">UNSCR 1718 (2006)</a> and its successor resolutions
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<sup>1</sup> As of October 18, 2023, the targeted financial sanctions set out in UNSCR 2231 on Iran are no longer in effect. Despite updates to the resolution, the FATF continues to consider Iran under the [High Risk Jurisdictions Subject to a Call for Action](#), also referred to as the “Black List”, and “calls on all members and urges all jurisdictions to apply enhanced due diligence, and, in the most serious cases, countries are called upon to apply countermeasures”.

c. Other UN sanctions regimes with TFS:

Table 4 - Other TFS related UNSCRs

1. Iraq	<a href="#">UNSCR 1518 (2003)</a>
2. The Democratic Republic of Congo (DRC)	<a href="#">UNSCR 1533 (2004)</a>
3. Sudan	<a href="#">UNSCR 1591(2005)</a>
4. Lebanon	<a href="#">UNSCR 1636 (2005)</a>
5. Libya	<a href="#">UNSCR 1970 (2011)</a>
6. Guinea-Bissau	<a href="#">UNSCR 2048 (2012)</a>
7. Yemen	<a href="#">UNSCR 2140 (2014)</a>
8. South Sudan	<a href="#">UNSCR 2206 (2015)</a>
9. Haiti	<a href="#">UNSCR 2653 (2022)</a>
10. Central African Republic (CAR)	<a href="#">UNSCR 2745 (2024)</a>

## TFS Targets

21. The freezing measures, including the prohibition of making funds or other assets or services available, apply to the following targets:
- Any individual, entity, or group **designated** in the **UAE Local Terrorist List** issued by the UAE Federal Cabinet or in the **UN Consolidated List** issued by the UNSC.
  - Any entity directly or indirectly **owned or controlled** by an individual, entity, or group designated under (a).
  - Any individual or entity **acting on behalf of or at the direction of** any individual, entity, or group designated under (a) & (b).



Application of TFS measures on different ownership structures is explained in detail in [Section 5: Ownership, Control, and Acting on Behalf of or at the Direction of Designated Individuals or Entities](#).

## Sanctions Lists Updates

22. The information on designated individuals, entities, or groups in the Sanctions Lists is subject to change. **The most recently updated information can be found in the following links:**

- The UAE has a **Local Terrorist List** of all the sanctioned individuals, entities, or groups designated by the UAE Cabinet. The link to the UAE Local Terrorist List can be found at the bottom of the Sanctions Implementation webpage on the EOCN website (scroll to the bottom of the page) and is available in both PDF and Excel format. [\(Click Here\)](#)
  - The UNSC has a **UNSC Consolidated List** of all the sanctioned individuals, entities, or groups designated by the United Nations Sanctions Committees or directly by the UNSC. [\(Click Here\)](#)
23. The EOCN has created a subscription-based notification system, known as the **EOCN Notification Alert System (NAS)**, which automatically sends out any updates to the Sanctions Lists to all subscribed entities. Additional details are provided in [Section 4: TFS Obligations](#).

## Section 4: TFS Obligations

24. Article 21 of Cabinet Decision 74 of 2020 has set the main TFS obligations on Reporting Entities. The four main obligations are listed below:

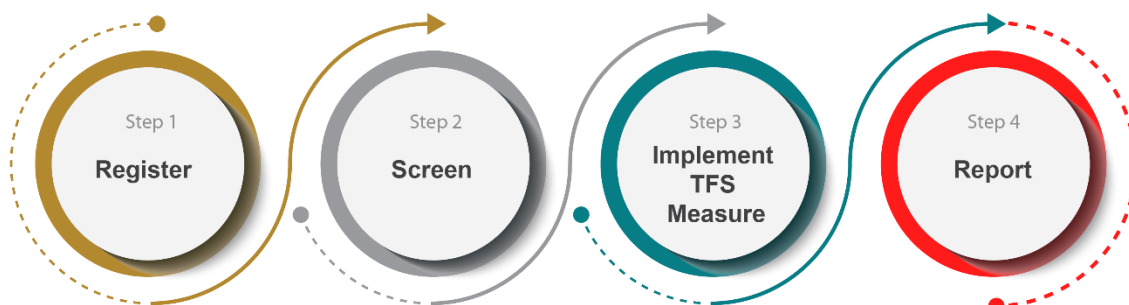


Figure 1 - Steps of TFS Implementation

### Step 1 – Register

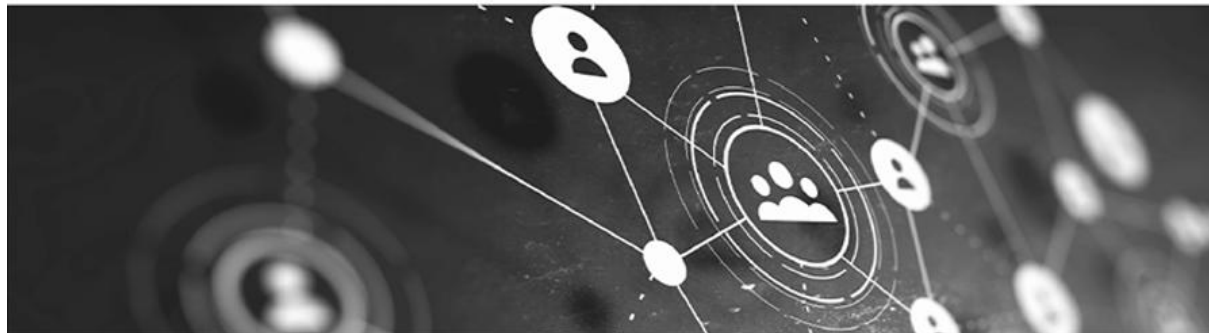
25. Reporting Entities are required to register to the Notification Alert System on the EOCN’s website to receive automated email notifications on any updates to the Sanctions Lists: [\(Click Here\)](#)

26. This registration is aimed to help Reporting Entities receive updated and timely information about the designation, de-listing, or amendments of individuals, entities, or groups designated in the Sanctions Lists.

27. For guidance on how to register, refer to [Annex I: EOCN Notification Alert System Subscription Guide](#).

#### “Follow TFS Instructions” Feature

28. The NAS includes a “Follow TFS Instructions” feature which provides a step-by-step guide for Reporting Entities on their obligations to implement TFS as per Cabinet Decision No. 74 of 2020, including screening, freezing, and reporting.



## Adding One Entry from ISIL Daesh and AlQaida Sanctions Committee

Dear Mohammad

For details of the sanctions list updates please [click here](#).

As per [Cabinet Decision 74 of 2020](#), all Persons should implement Targeted Financial Sanctions (TFS) and report all findings and measures taken by following the TFS instructions below.

[Follow TFS Instructions](#)

For details on Target Financial Sanctions implementation, please [download](#) copy of the guideline.

Best regards.

## إضافة اسم على قائمة لجنة جزاءات داعش والقاعدة

عزيزي محمد

لنرصد التحديث على قائمة العقوبات ، يرجى [المسح هنا](#).

وفقاً لقرار مجلس الوزراء رقم 74 لسنة 2020 ، يجب على جميع الأشخاص تطبيق العقوبات المالية المستهدفة والإبلاغ عن نتائج المسح والتحقق والتدابير المتخذة من خلال اتباع إجراءات تطبيق العقوبات المالية المستهدفة الموضحة أدناه:

[اتبع إجراءات تطبيق العقوبات المالية المستهدفة](#)

للحصول على تفاصيل حول تطبيق "العقوبات المالية المستهدفة" ، يرجى [تحميل](#) نسخة من الدليل الإرشادي.

تحياتنا.

Figure 2 - Email Notification of Sanctions Lists Updates sent through the Notification Alert System

## Step 2 – Screen

29. Reporting Entities must undertake regular and ongoing screening on the latest Sanctions Lists. In addition to registering on the EOCN NAS to receive alert updates, Reporting Entities should also check the UN website for press releases regularly or daily (depending on business model) to remain vigilant on any updates to UN Sanctions Lists.

30. Screening must be undertaken in the following circumstances:

- Upon any updates to the Sanctions Lists. In such cases, screening must be conducted immediately to ensure compliance with implementing freezing measures without delay (within 24 hours).
- Prior to onboarding new customers.

- c. Upon periodic KYC reviews or if there is a material change in the nature or ownership of the customer.
- d. Daily screening of customer's databases.
- e. Before processing any transaction of a counterparty.

31. The following databases must be included in the screening process:

- a. Existing customer databases. If the Reporting Entity uses an automated screening system, all systems containing customer data and transactions need to be mapped to the screening system to ensure full compliance. Alternatively, in the case of manual screening, the Reporting Entity should ensure that their manual screening is done accurately and as per the key screening identifiers mentioned below.
- b. Potential customers before conducting any transactions or entering a business relationship with any Person.
- c. Previous customers with no current active accounts/relationship up to a period of 5 years.
- d. Names of parties to any transactions (e.g., buyer, seller, agent, freight forwarder, etc.) Ultimate beneficial owners (UBOs), both natural and legal.
- e. Names of Persons with direct or indirect relationships with designated individuals, entities or groups.
- f. Directors and/or agents acting on behalf of customers (including individuals with power of attorney).

32. The Sanctions Lists contain a range of information to aid the identification of designated individuals, entities, or groups during the screening process. It is essential to ensure that the screening is done on the **key identifiers** first prior to considering any other identifiers (such as "a.k.a – also known as"). If none of the key identifiers match, then the screening result is considered a "**Negative Match**".

33. The following are examples of the key identifiers:

Table 5 - Key Identifiers for Natural Persons and Legal Persons

For Natural Persons	For Legal Persons
Individual's Name	Entity or Company's Name
Date of Birth	Trade License Number
Nationality	Address of Registration
ID or Passport Number	Address of Branches
Last Known Address	

34. There are four possible results following the screening process, as listed below:

Table 6 - Screening Results

Screening Result	Definition	Examples
<b>Confirmed Name Match</b>	A Confirmed Name Match is when an individual, entity, or group <b>matches all the key identifiers</b> published on the UAE Local Terrorist List or UNSC Consolidated List.	Your customer's name, nationality, and DOB fully match with the identifiers of a designated Person in the UAE Local Terrorist List or UNSC Consolidated List.
<b>Partial Name Match</b>	A Partial Name Match is when there is a <b>partial match between the key identifiers</b> in the UAE Local Terrorist List or UNSC Consolidated List and a customer's information in your database, <b>and you are unable to conclude a False Positive or a Confirmed Name Match.</b>	Your customer's name and DOB match with the identifiers of a designated Person in the UAE Local Terrorist List or UNSC Consolidated List, but the nationality is different and there is a slight difference in the name spelling.
<b>False Positive</b>	A False Positive is a match to listed individuals, entities, or groups, <b>which upon examination of key identifiers</b> , such as full name, DOB, and nationality, <b>proves not to be the designated individuals, entities, or groups.</b>	Your customer's name matches with a designated Person who is 40 years old according to the DOB identifier in the UAE Local Terrorist List or UNSC Consolidated List, but your customer is a 16-year-old high school student.
<b>Negative Match</b>	A Negative Match is when <b>no match is identified</b> upon conducting screening.	You have conducted screening following a designation on the UAE Local Terrorist or UNSC Consolidated

		List and neither a Confirmed nor a Partial Name Match was identified.
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35. If the individual, entity, or group matches all the key identifiers published on the Sanctions Lists, then the result is considered a **‘Confirmed Name Match’**. In case the Confirmed Name Match is an **existing customer**, you must freeze immediately without delay, refrain from offering any funds or other assets or services and submit a Confirmed Name Match Report (CNMR) detailing the freezing measures to the EOCN and the relevant SA through the goAML platform within five business days from taking any freezing measure. In case the Confirmed Name Match is a **potential customer** (a prospective client), you must reject the transaction immediately and submit a CNMR. Reporting procedures on freezing measures due to a Confirmed Name Match are further explained in [Step 4 – Report TFS Measures](#).
36. If you identify a partial match between the identifiers in the UAE Local Terrorist List or UNSC Consolidated List and a customer’s information in your database, and you are unable to verify the match (Confirmed Name Match or False Positive), then the result is considered a **‘Partial Name Match’**. In this case, you must either suspend the transaction immediately without delay, refrain from offering any funds or other assets or services or reject the transaction and submit a PNMR to the EOCN and the relevant SA through the goAML platform within five business days from rejecting the transaction or any suspension measure taken. The PNMR reporting procedures clarifying when to suspend the transaction as opposed to rejecting it are further detailed in [Step 4: Report TFS Measures](#).
37. In case a match is identified, and upon examination of key identifiers, you’re able to conclude that the match is not the designated individual, entity, or group, then the result is considered a **‘False Positive’**. In this case, no reporting is required; however, internal documentation on the False Positive result should be maintained.
38. In cases of **weekends and public holidays**, Reporting Entities should have appropriate internal procedures to effectively screen against the UAE Local List and the UNSC Consolidated List and prevent access or use of funds or other assets that may be subject to freezing measures. If the Reporting Entity is not conducting any business activities or transactions and where customers do not have access to any assets or accounts during weekends or holidays, then the screening obligation starts from the first minute of commencement of business and freezing measures must be

applied immediately. In any case, Reporting Entities should ensure that funds or other assets subject to TFS measures are prevented from being accessed or used.

### Step 3 – Implement TFS Measures

39. The following are the TFS measures that must be implemented if a Confirmed Name Match with the Sanctions Lists is identified:

- i. **Freeze all funds or other assets without delay:** freeze without delay (within 24 hours) and without prior notice to the designated individual, entity, or group, all the funds or other assets:
  - a. Owned or controlled, wholly or jointly, directly, or indirectly, by an individual, entity, or group designated in the Sanctions Lists.
  - b. Derived or generated from funds or other assets under item (a); or
  - c. Any individual or entity acting on behalf of or at the direction of any designated individual, entity, or group.

40. The obligations to freeze without delay shall not prevent additions to frozen accounts of:

- a. Interest, profits, or other earnings due on the account; or
  - b. Payments due under contracts, agreements or obligations agreed upon prior to the date on which the account has become subject to freezing, provided such additions are immediately frozen.
- ii. **Prohibition from making funds or other assets or services available:** Reporting Entities are prohibited from providing funds or other assets to or rendering financial or other services related to, whether in whole or in part, directly or indirectly, for the benefit of any designated individual, entity, or group on the Sanctions Lists.

#### Lifting of Freezing Measures

41. Freezing applied as a result of TFS measures have **no time limits**. Asset freezes remain valid until one of the following occurs:

- a. The designated Person is **delisted (removed)** from the Sanctions Lists. Upon delisting, all TFS measures are to be lifted immediately without prior approval from EOCN or the relevant SA, unless there is an active Freeze Order related

to the delisted Person issued by a Competent Authority (FIU, Public Prosecution, etc.)

- b. A **freezing cancellation decision** by EOCN is communicated to the Reporting Entity through goAML.



## Step 4 – Report

42. The mechanism to report any TFS measures taken upon identifying a Confirmed or Partial Name Match is through submitting one of the following two reports via goAML:  
1) Confirmed Name Match Report (CNMR); or 2) Partial Name Match Report (PNMR).

### i. Confirmed Name Match Report (CNMR)

#### ***Existing Customer***

43. In case a **Confirmed Name Match** is identified on an **existing customer**, the Reporting Entity must freeze without delay (within 24 hours) and prohibit making funds or other assets or services available and submit a CNMR through goAML within five business days of implementing the freezing measures.

#### ***Potential Customer / Counterparty***

44. In case a **Confirmed Name Match** is identified on a **potential customer** (a prospective client) or **counterparty of an existing customer in a transaction**, the Reporting Entity must reject the transaction and refrain from dealing with or providing any funds or other assets or services to the Confirmed Name Match and submit a CNMR through goAML within five business days of rejecting the transaction. The report should clarify the actions taken by the Reporting Entity (rejected business relation or transaction), as well as any funds or other assets frozen in the process.

#### ***Obligatory Information***

45. The following information is obligatory and must be provided (attached) when submitting a CNMR:
- **The full name of the ‘Confirmed Name Match’.** Attach ID documents of the ‘Confirmed Name Match’, such as passport or ID card for individuals, and trade licenses and articles of association for entities. *In cases of a Confirmed Name Match, it is assumed that the Reporting Entity possesses the ID documents of the confirmed match, since verifying the confirmed match result without an ID is improbable and unlikely.*

- **Amount of funds or other assets frozen** – (e.g., value of funds in bank accounts, value of transactions, value of securities, value of real estate, etc.). Attach documentary proof as bank statements, transaction receipts, securities portfolio summary, title deeds, insurance policy, etc.
- **Description of rejected transaction or service** – (e.g. in case no funds are being held, and the transaction is service based, provide a description of the transaction / service rejected.)

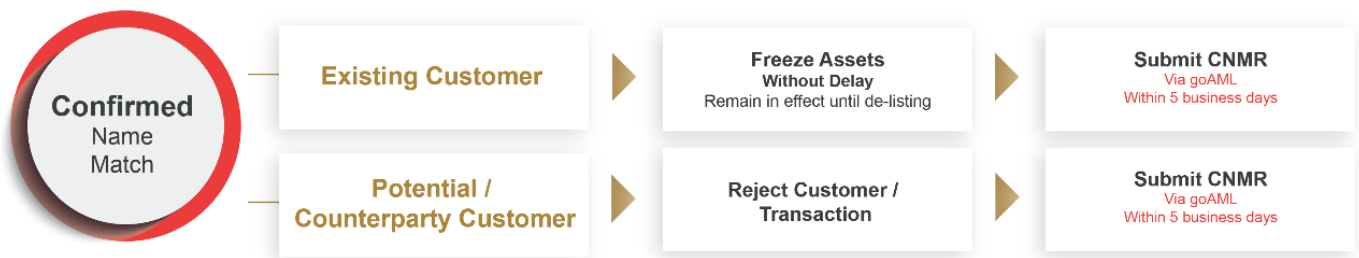


Figure 3 - Confirmed Name Match Process Map

### ***Previous Business Relationships / Transactions and Record Keeping***

46. Reporting Entities are required to maintain records of all screening results (Confirmed Name Match, Partial Name Match, and False Positives) for at least five years.
47. CNMRs should also be reported on previous business relationships and transactions occurring and accounts held **prior to the designation**, covering a timeframe of five years. CNMRs should be submitted even if no current funds or other assets are held by the Reporting Entity and includes closed accounts. In this case, the Reporting Entity is required to clarify in the description of the CNMR that no funds or other assets are currently being held, and there is no current business relationship with the Confirmed Name Match, and the status of the accounts (closed) if applicable.

### ***Examples of CNMR Reporting***

48. The examples below demonstrate when Reporting Entities are required to submit CNMRs and the type of information that should be included.

#### **Financial Institutions**

##### **Example 1: Bank**

During the screening process, a bank identifies a full match between a customer in its database (Person A) and a designated individual. Person A's nationality and DOB also match with the designated individual. Person A has an active current & savings accounts, a credit card, and a loan facility with the bank. In this case, Person A is considered a Confirmed Name Match.

**Action:** The bank must freeze without delay the current and savings accounts, credit card, and loan facility of Person A and submit a CNMR in goAML within five business days from implementing the freeze measures. The CNMR must include attachments that clarify:

- Amount of funds frozen in each account. Include supporting documents such as account summary.
- Amount of funds frozen in the credit card (e.g., limit on the credit card and the remaining balance).
- Amount of funds frozen in the loan facility (e.g., total sum of the loan facility and the remaining balance).
- ID documents of the Confirmed Name Match, such as ID card, passports, trade licenses, etc.

### **Example 2: Exchange House**

An exchange house identifies a Confirmed Name Match (Person A) when screening the name of a walk-in customer. Person A is attempting to make a transfer to a non-designated individual (Person B).

**Action:** The exchange house must reject the transaction and submit a CNMR in goAML within five business days from rejecting the transaction. The CNMR must include attachments that clarify:

- The transaction amount rejected.
- ID documents of the Confirmed Name Match (Person A), such as ID card, passports, trade licenses, etc.
- ID documents of the recipient (Person B), if available.

### **Example 3: Insurance**

An insurance company identifies a Confirmed Name Match (Person A) when screening its customer database. Person A is the beneficiary of a life insurance policy.

**Action:** The insurance company must freeze the policy, including future premiums upon receipt and any interest due to the account, and seek approval from the EOCN before making any payments under the policy. The insurance company must also submit a CNMR in goAML within five business days from implementing the freeze measures, with details of the insurance agreement (including policyholder, beneficiary, premiums, etc.)

#### **Example 4: Securities Brokerage**

A brokerage company identifies a Confirmed Name Match (Person A) when screening its customer database. Person A owns a stock portfolio with the brokerage firm. Person A also receives dividends from the stocks owned.

**Action:** The brokerage company must freeze the stock portfolio without delay and submit a CNMR in goAML within five business days from implementing the freeze measures. The CNMR must include attachments that clarify:

- The quantity of the stocks frozen and their value. Include supporting documents such as portfolio summary.
- ID documents of the Confirmed Name Match, such as ID card, passports, trade licenses, etc.

The brokerage company should credit any dividends due to Person A's account; however, the account must remain frozen, and the brokerage company must ensure that Person A is unable to sell his stocks or avail the dividends received.

### **Designated Non-Financial Businesses & Professions**

#### **Example 1: Real Estate Brokers**

A real estate broker identifies a Confirmed Name Match (Person A) when screening the parties to a property sale transaction. Person A is the prospective seller of real estate.

**Action:** The real estate broker must block the transaction immediately, refrain from offering any services to Person A, and submit a CNMR in goAML within five business days from identifying the Confirmed Name Match. The CNMR must include attachments that clarify:

- The type, value, and location of the real estate being sold. Include supporting documents such as title deeds. In case the transaction involves off plan real estate (which may not have a title deed), other supporting documents may be submitted (e.g. Sales and Purchase Agreement).
- ID documents of the Confirmed Name Match, such as ID card, passports, trade licenses, etc.

### **Example 2: Dealer in Precious Metals & Stones (DPMS)**

A DPMS identifies a Confirmed Name Match (Person A) when screening a prospective customer. Person A is attempting to sell high-value gold bars to the DPMS.

**Action:** The DPMS must immediately refrain from offering any services, including the sale or purchase of gold bars, to Person A and submit a CNMR in goAML within five business days from identifying the Confirmed Name Match. The CNMR must include attachments that clarify:

- Details of the attempted transaction, including the specifications and value of the gold bars attempted for sale.
- ID documents of the Confirmed Name Match, such as ID card, passports, trade licenses, etc.

### **Example 3: Company Service Providers (CSPs)**

A CSP identifies a Confirmed Name Match (Entity A) when screening its client database. Entity A is engaging the CSP for services to act as a formation agent.

**Action:** The CSP must immediately refrain from offering any services to Person A and submit a CNMR in goAML within five business days from identifying the Confirmed Name Match. The CNMR must include attachments that clarify:

- Details of the attempted transaction and formation agreement.
- ID documents of the Confirmed Name Match, such as ID card, passports, trade licenses, etc.

#### **Example 4: Law Firms**

A law firm is conducting ownership transfer services for their client to complete the sale of his company and transfer the ownership to a beneficiary who resides in a high-risk jurisdiction. While conducting KYC/EDD measures, the law firm identified that the UBO of the beneficiary in residing in the high-risk jurisdiction is a Confirmed Name Match.

**Action:** The law firm must immediately refrain from providing any services in relation to the transaction and freeze any funds or other assets within their possession and report a CNMR in goAML within five business days from identifying the Confirmed Name Match. The law firm must attach:

- Funds or other assets frozen. These may include ownership transfer documents, sale agreements, etc.
- ID documents of the Confirmed Name Match, such as ID card, passports, trade licenses, etc.

### **Virtual Asset Service Providers**

#### **Example 1: Cryptocurrency Exchange**

A cryptocurrency exchange identifies a Confirmed Name Match (Person A) when screening its customer database. Person A owns multiple cryptocurrencies (Bitcoin, Ethereum, Ripple, etc.) in his exchange wallet.

**Action:** The cryptocurrency exchange must freeze the cryptocurrency assets in Person A's exchange wallet without delay and submit an CNMR in goAML within five business days from implementing the freeze measures. The CNMR must include attachments that clarify:

- The quantity of the cryptocurrency assets frozen and their value. Include supporting documents such as a portfolio summary.
- ID documents of the Confirmed Name Match, such as ID card, passports, trade licenses, etc.
- The details of any known or linked bank account of Person A, or other source of fiat funding.

## ii. Partial Name Match Report (PNMR)

### *Existing Customer*

49. In case a **Partial Name Match** is identified on an **existing customer**, it is assumed that the Reporting Entity already possesses the identification documents of the customer and, after reviewing the ID documents, is unable to conclude whether the match is a Confirmed Name Match or False Positive. In this case, the Reporting Entity must suspend without delay any transaction, refrain from offering any funds, other assets or services, and submit a PNMR through goAML within five business days from suspension measures. The Reporting Entity must ensure that all necessary information and documents regarding the Partial Name Match are submitted and maintain suspension measures until further instructions are received from EOCN via goAML on whether to cancel the suspension ('False Positive') or implement freezing measures ('Confirmed Name Match').

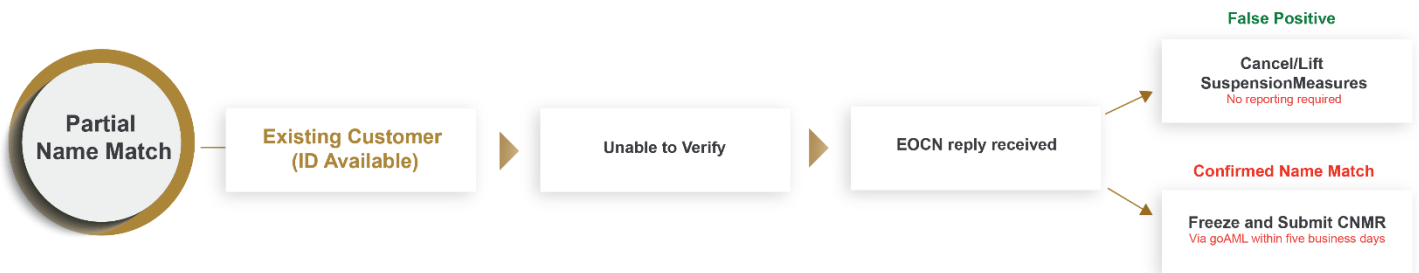


Figure 4 - Partial Name Match on Existing Customer (ID Available) Process Map

### *Potential Customer / Counterparty*

50. In case a **Partial Name Match** is identified on a **potential customer** (a prospective client) or a **counterparty** (such as the counterparty in a bank or exchange transaction), the Reporting Entity must first make necessary efforts to obtain identification documents of the potential customer or counterparty to conclude whether the match is a Confirmed Name Match or False Positive. If, after obtaining the ID documents, the Reporting Entity is able to conclude the result as a False Positive, then it may establish the business relation or allow the transaction to proceed without the need to report a



PNMR; however, internal documentation of the False Positive result should be maintained.

51. If the Reporting Entity is **unable to obtain the identification documents within a reasonable time (10 business days)** of identifying the Partial Name Match, then the transaction or service should be rejected (cancelled) and a PNMR submitted through goAML within five business days from rejection of the transaction or service, specifying that the transaction has been rejected due to lack of ID documents of the Partial Name Match.
52. If the Reporting Entity receives the ID document of the potential customer or counterparty after the transaction has been rejected due to lack of ID document (i.e. reasonable period has passed – 10 business days) and the PNMR reported, it must conduct screening based on the newly obtained ID documents and take the necessary steps required depending on the screening result (Confirmed Name Match, False Positive, or unable to verify based on the provided ID documents). In this case, the Reporting Entity may treat the case as a new transaction and submit a new report based on the screening results.

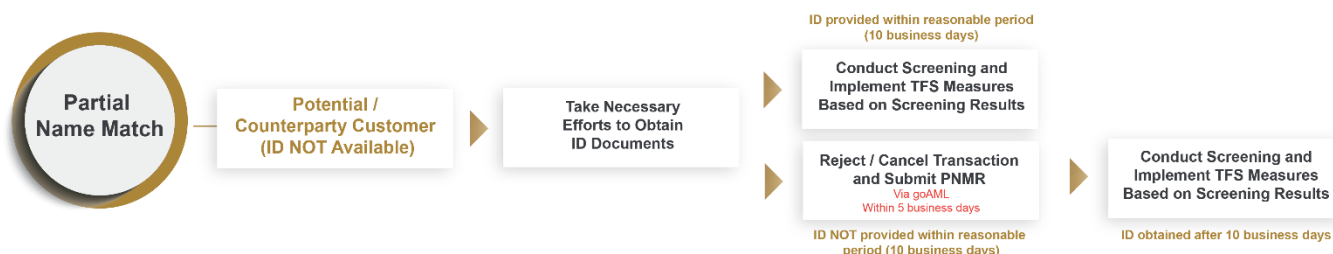


Figure 5 - Partial Name Match on Potential / Counterparty Customer (ID NOT Available) Process Map

### ***Obligatory Information***

53. The following information is obligatory and must be provided (attached) when submitting a PNMR:
- **The full name of the 'Partial Name Match'.** Attach ID documents (if and when available) of the 'Partial Name Match', such as passport or ID card for individuals, and trade licenses and articles of association for entities. Note that the EOCN will not be

able to verify the result of a Partial Name Match (Confirmed Match or False Positive) in the event of lack of ID documents.

- **Amount of funds or other assets suspended** (e.g., value of funds in bank accounts, value of transactions, value of securities, value of real estate, etc.). Attach documentary proof such as bank statements, transaction receipts, securities portfolio summary, title deeds, etc.
- **Description of rejected transaction or service** – (e.g. in case no funds are being held, and the transaction is service based, provide a description of the transaction / service rejected.)

***Previous Business Relationships / Transactions and Record Keeping***

54. The same procedures as CNMRs apply when reporting previous business relationships, accounts, and transactions.

### ***Examples of PNMR Reporting***

#### **Example 1(A) – Existing Customer | ID Status: Available | Screening Result: Unable to Verify | Action: Suspension Measures + Report PNMR**

Following a designation by the UNSC, a Reporting Entity identifies a Partial Name Match between one of their existing customers and the designated Person. After reviewing the customer's ID documents, the Reporting Entity notices the customer's first and middle name, as well as the nationality matches with the designated entry; however, the DOB is slightly different (one year gap – 1965 v 1966). As a result, the reporting entity is unable to verify whether the Partial Name Match is a Confirmed Match or False Positive due to the only difference being the minor age gap.

##### **Customer – Details Available:**

Full Name	Mohammad	Yaqoub	Salem	
Date of Birth	1965	March	2	
Nationality	Afghanistan			

##### **Designated Person – Details Available:**

**TAi.052 Name:** 1: MOHAMMAD YAQOUB

**Name (original script):** محمد يعقوب **DOB:** Approximately 1966 **Nationality:** Afghanistan

**Action:** Since the Reporting Entity is unable to verify the Partial Name Match after reviewing the ID documents, it must suspend without delay any transaction, refrain from offering any funds, other assets or services, and submit a PNMR through goAML within five business days from implementing the suspension measures. The Reporting Entity should attach the ID documents and details of the suspended funds or other assets, and suspension measures must remain in place until a notification is received from the EOCN on the result of the Partial Name Match (either Confirmed Name Match or False Positive).

**Example 1(B) – Existing Customer | ID Status: Available | Screening Result: Unable to Verify + Response from EOCN verifies Confirmed Name Match | Action: Freezing Measures + Report CNMR**

Assume the same facts as Example 1(A); however, the Reporting Entity has now received a response from the EOCN validating the Partial Name Match as a Confirmed Name Match.

**Action:** Even though the Reporting Entity has already taken suspension measures and reported a PNMR, it should now freeze the funds or other assets and refrain from providing any services to the client and report a CNMR, providing details of the frozen funds and other assets.

**Example 1(C) – Existing Customer | ID Status: Available | Screening Result: Unable to Verify + Response from EOCN verifies False Positive | Action: Cancel Suspension Measures**

Assume the same facts as Example 1(A); however, the Reporting Entity has now received a response from the EOCN validating the Partial Name Match as a False Positive.

**Action:** The Reporting Entity should cancel the suspension measures taken and maintain internal documentation of the False Positive result. No additional reporting is required.

**Example 2(A) – Potential Customer | ID Status: Unavailable** (more than 10 business days passed since ID request made) | **Screening Result: Unable to Verify due to lack of ID | Action: Reject Business Relationship + Report PNMR**

A Reporting Entity is onboarding a potential customer (a prospective client) – which is a company. The company’s representative provides most of the required documents to open an account (trade license, articles of association, etc.); however, he fails to provide the owner’s ID documents and mentions to the Reporting Entity that the IDs will be provided shortly. He also requests the Reporting Entity to open the account in the meantime to speed up the process.

However, while screening the names on the trade license, the Reporting Entity identifies a Partial Name Match. Specifically, one of the owner’s full name matches with the designated individual on the UN List and the nationality matches with the Place of Birth (POB); however, the reporting entity noticed there is a slight spelling difference and is unable to verify the DOB due to lack of ID documents.

The Reporting Entity conducts multiple attempts to contact the company’s representative to provide the ID documents but receives no response. **More than 10 business days have passed since the request was made.**

○ Customer – Details Available (based on trade license):

<b>Full Name</b>	Muhammad	Omar	Muhammad	
<b>Date of Birth</b>	Not Available			
<b>Nationality</b>	Somalia			

○ Designated Person – Details Available:

**SOi.025 Name:** 1: MOHAMED 2: OMAR 3: MOHAMED  
**DOB:** 1976 **POB:** Somalia **Nationality:** NA

**Action:** Since the Reporting Entity was unable to discount the Partial Name Match as a “False Positive” from the information available and the company’s representative did not respond to the request to provide ID documents within a reasonable period (10 business days), the Reporting Entity should refrain from providing any services to the company and reject the account opening request, and report a PNMR via goAML within five business days from the transaction rejection date, informing the EOCN of the rejected transaction.

**Example 2(B) – Potential Customer | ID Status: Available (provided after 10 business days) | Screening Result: False Positive | Action: Proceed with Business Relation + No Reporting Required**

Assume the same facts as Example 2(A); however, the company representative has provided the ID documents after 10 business days from the initial request. The ID shows that the potential customer's DOB is 1990 and POB is Kenya, which is different to the DOB (1976) and POB (Somalia) identifiers in the UN List. As such, the Reporting Entity concludes the result as a False Positive.

**Action:** The reporting entity may proceed with the business relationship and re-establish the account opening procedures without seeking written approval from EOCN. No reporting is required.

**Example 2(C) – Potential Customer | ID Status: Available (provided after 10 business days) | Review Status: Unable to Verify | Action: Suspension Measures + Report PNMR**

Assume the same facts as Example 2(B); however, in this case, the ID document shows an identical POB (Somalia), but a slightly different DOB (1977) – a one-year age gap when compared with the identifiers in the UN List. As such, the Reporting Entity is still unable to verify the Partial Name Match even after the ID documents have been provided.

**Action:** Since the Reporting Entity is unable to verify the Partial Name Match after reviewing the ID documents, it should suspend the account opening request and submit a PNMR through goAML within five business days from implementing the suspension measures. The Reporting Entity should attach the ID documents and details of the suspended account opening request, and suspension measures must remain in place until a notification is received from the EOCN on the result of the Partial Name Match (either Confirmed Name Match or False Positive).

**Example 2(D) – Potential Customer | ID Status: Available** (provided after 10 business days) | **Review Status: Unable to Verify + Response from EOCN verifies Confirmed Name Match | Action: Freezing Measures + Report CNMR**

Assume the same facts as Examples 2(C); however, in this case, the Reporting Entity has now received a response from the EOCN validating the Partial Name Match as a Confirmed Name Match.

**Action:** Even though the Reporting Entity has already taken suspension measures and reported a PNMR, it should now reject the account opening request and refrain from providing any services to the client and report a CNMR. The Reporting Entity should also freeze any other funds or other assets belonging to the Confirmed Name Match.

### iii. Reporting TFS by Email

55. For non goAML users (Persons that do not fall under the definition of Reporting Entities – Fis, DNFBPs, and VASPs – and are therefore not under an obligation to register on goAML – these include all natural and legal persons in the UAE), the reporting of any freezing measures or attempted transaction by a designated individual, entity, or group must be communicated directly by email to the EOCN through [tfs@eocn.gov.ae](mailto:tfs@eocn.gov.ae) within five business days from implementing any freezing measures. The email must include information on the full name of the Confirmed or Partial Name Match, and the value of frozen funds or other assets (attaching ID and documentary proof as listed above).

## Additional Obligations for Reporting Entities

56. In addition to the above, Reporting Entities must fulfil the following obligations:

- i. **Set and implement** policies, procedures, and internal controls to:
  - o **Ensure** compliance with the obligations arising from Cabinet Decision No. 74 of 2020.
  - o **Adopt** reasonable measures to consider beneficial owners, signatories, and powers of attorney with respect to accounts or transactions held by Reporting Entities when searching for activities by designated Persons.
  - o **Prohibit** staff from, directly or indirectly, informing the customer or any third party that freezing action is going to be implemented as per provisions of Cabinet Decision No. 74 of 2020.
  - o **Ensure** having the appropriate human and technical resources to meet the obligations of implementing TFS.
  - o **Conduct** ongoing TFS training and awareness sessions to relevant employees and senior management.
- ii. **Put** appropriate internal controls and procedures to effectively implement TFS measures.
- iii. **Cooperate** with the EOCN and the relevant SA in verifying the accuracy of the information in submitted reports.
- iv. **Implement** the freezing and lifting of freezing measures, upon designation or de-listing respectively, without delay, pursuant to related UNSCRs or decisions of the Cabinet regarding issuance of the UAE Local Terrorist List.



## Section 5: Ownership, Control, and Acting on Behalf or at the Direction of Designated Persons

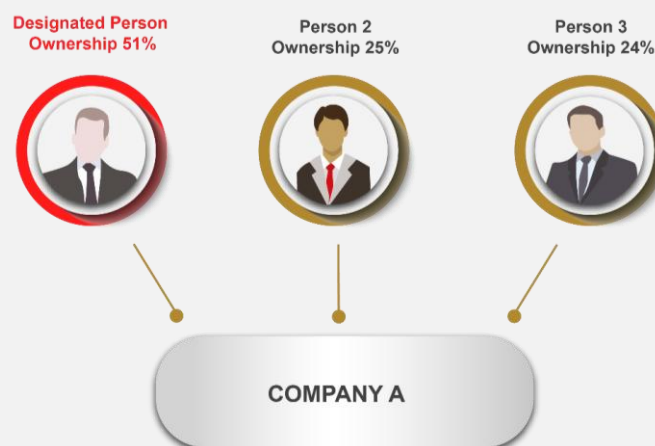
### Majority Interest

57. Reporting Entities are obligated to apply freezing measures on entities which are majority owned by designated individuals or entities.

58. In implementing TFS, the criterion to be taken into account when assessing whether a legal entity is majority owned by a designated individual or entity is the possession of more than 50% of the proprietary rights of the legal entity or having a controlling interest in it. If this criterion is satisfied, it is considered that the legal entity or arrangement is owned by another individual or entity and is subject to freezing measures.

#### Example: Designated Person with Majority Interest

A Designated Person owns 51% of non-designated Company A. Two other owners (Person 2 and 3) own 25% and 24% and are not designated. There is no legal evidence (e.g. power of attorney agreement) to suggest that the two other owners are acting on behalf of the Designated Person. The funds or other assets of non-designated Company A must be frozen without delay since the Designated Person owns more than 50% of non-designated Company A. However, the funds or other assets of the two non-designated owners (Person 2 and 3) must not be frozen since they are not designated and there is no legal evidence to suggest that they are acting on behalf of the Designated Person.

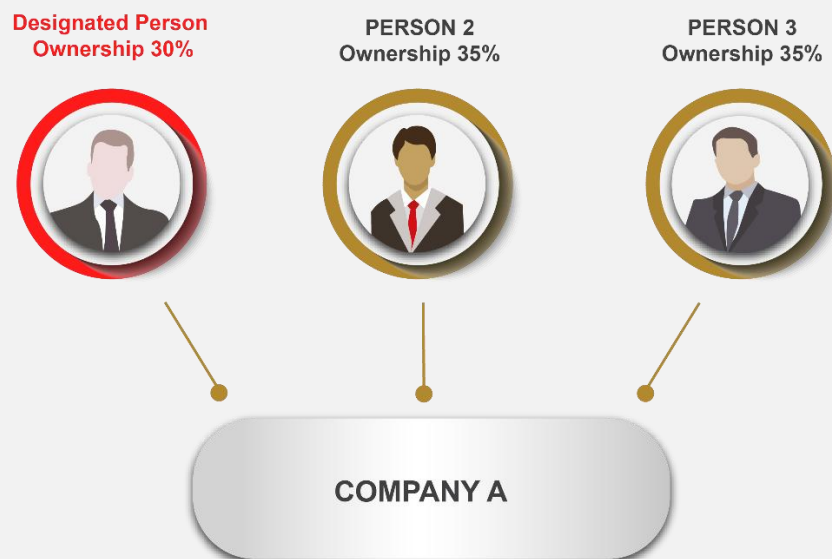


## Minority Interest

59. A designated Person holding 50% or less of the proprietary rights of a legal entity is considered to be holding a minority interest in the legal entity. In that case, the legal entity is not subject to freezing measures. However, Reporting Entities must remain attentive to any changes in the ownership structure of the legal entity whereby the designated Person's stake increases to greater than 50% or if they obtain a controlling interest.
60. Reporting Entities must also ensure that funds or other assets (e.g. profits, proceeds from sale of assets, etc.) due to the designated Person are subject to freezing measures and are not made available under any circumstances.

### Example: Designated Person with Minority Interest

A Designated Person owns 30% of non-designated Company A. Two other owners (Person 2 and 3) own the remaining 70% equally (35% each) and are not designated. There is no legal evidence (e.g. power of attorney agreement) to suggest that the two other owners are acting on behalf of the Designated Person or that he controls the company. The funds or other assets of non-designated Company A must not be frozen since the Designated Person owns less than 50% of non-designated Company A and does not hold a majority interest, and there is no evidence to suggest that he is controlling Company A. However, extreme vigilance is required to monitor any changes in the ownership structure in which the Designated Person's stake in Company A increases to above 50% or if he obtains a majority interest. In addition, any funds or other assets due to the Designated Person as a result of owning 30% of Company A must be subject to freezing measures. The funds or other assets of the two other owners (Person 2 and 3) must not be frozen since they are not designated and there is no legal evidence to suggest that they are acting on behalf of the Designated Person.



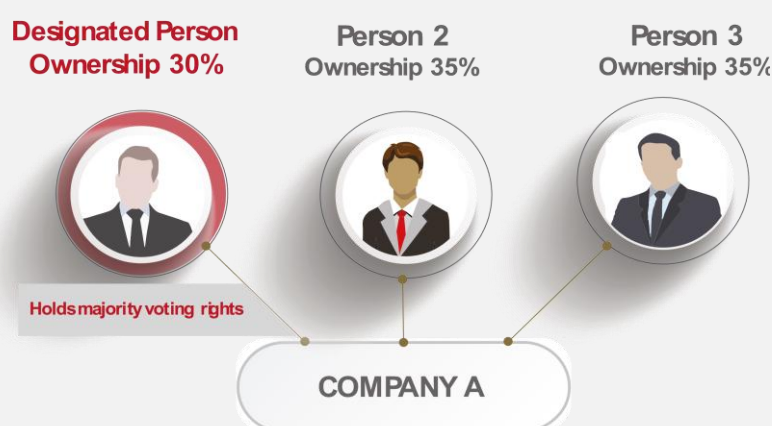
## Control

61. Reporting Entities should apply freezing measures in cases in which a designated Person holds a minority interest, if there is evidence that the designated Person exerts control over the legal entity (despite owning a minority interest). The criteria to be taken into account when assessing whether a legal entity is mainly controlled by another Person, alone or pursuant to an agreement with another shareholder or other third party, could be any of the following:

- a. having the right to appoint or remove a majority of the members of the administrative or management body of such legal person or arrangement;
- b. having appointed solely as a result of the exercise of one's voting rights a majority of the members of the administrative or management body of a legal person or arrangement who have held office during the present and previous financial year;
- c. controlling alone, pursuant to an agreement with other shareholders in or members of a legal person, a majority of shareholders' or members' voting rights in that legal person or arrangement;
- d. having the right to exercise a dominant influence over a legal person or arrangement pursuant to an agreement entered into with that legal person or arrangement, or to a provision in its Memorandum or Articles of Association, where the law governing that legal person or arrangement permits its being subject to such agreement or provision;
- e. having the power to exert the right to exercise a dominant influence referred to in point (d), without being the holder of that right;
- f. having the right to use all or part of the assets of that legal person or arrangement;
- g. managing the business of that legal person or arrangement on a unified basis, while publishing consolidated accounts;
- h. sharing jointly and severally the financial liabilities of legal person or arrangement or guaranteeing them.
- i. Having a power of attorney or authorized signatory arrangement over a legal person or arrangement.

### Example 1: Designated Person with Minority Interest and Control

A Designated Person owns 30% of non-designated Company A. Two other owners (Person 2 and 3) own the remaining 70% equally (35% each) and are not designated. The Designated Person has a signed agreement with the two other owners that gives him majority voting rights in Company A. Despite the Designated Person holding a minority interest, the funds or other assets of Company A must be frozen without delay since the signed agreement between the Designated Person and the other owners proves that the Designated Person exerts control over Company A by holding majority of the voting rights.



### Example 2: Designated Person with Minority Interest and Control

A Designated Person has power of attorney to act on behalf of Person B and is also the authorized signatory. The funds and other assets of Person B must be frozen without delay since the power of attorney and authorized signatory arrangement is evidence that the Designated Person possesses control over the funds or other assets of Person B.

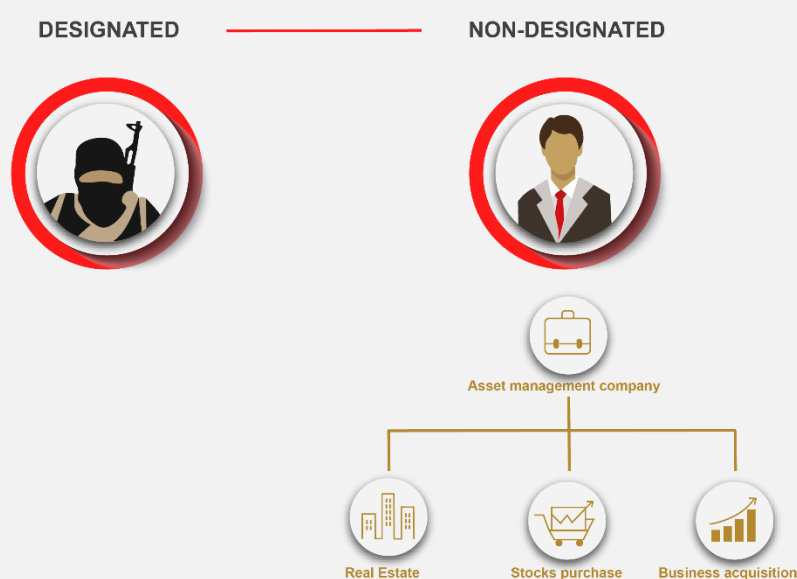
62. Important: If a Reporting Entity implements freezing measures based on the 'control' criteria, it must rely on evidence-based documentation (e.g. legal agreements, guarantor agreement, provision in the Articles of Association, power of attorney or authorized signatory, etc.) that proves that the designated individual, entity, or group exerts control over the legal person or arrangement. Freezing measures must not be applied relying on suspicion only.

## Acting on Behalf or at the Direction of

63. Reporting Entities are required to implement targeted financial sanctions on individuals, entities, or groups acting on behalf or at the direction of designated Persons. The relationship to act on behalf or at the direction of designated Persons must be evidenced by legal documentation, such as a power of attorney or authorized signatory.

### Example: Acting on Behalf or at the Direction of a Designated Person

A Non-Designated Person has a power of attorney to act on behalf of a Designated Person and runs an asset management company owned by the Designated Person. The funds and other assets of the Non-Designated Person must be frozen without delay since the power of attorney is evidence that he is acting on behalf or at the direction of a Designated Person.



64. Important: If a Reporting Entity implements freezing measures based on the 'acting on behalf or at the direction of' criteria, it must rely on evidence-based documentation (e.g. power of attorney, authorized signatory, Contracts etc.) that proves that the individual, entity or group is acting on behalf or at the direction of the designated Person. Freezing measures must not be applied relying on suspicion only.

## Section 6: Enforcement Measures

### Consequences for Reporting Entities

65. Any Person, found to violate and/or be in non-compliance with the obligations stated in Cabinet Decision No. 74 of 2020 or failing to implement reasonable procedures to ensure compliance may face imprisonment of no less than one year and no more than seven years and/or a fine of no less than AED 50,000 (fifty thousand dirham) and no more than AED 5,000,000 (five million dirham).

66. In addition, Reporting Entities are subject to supervision, and in the case of identified non-compliance, the SA can apply the enforcement actions set out under Article (14) of Federal Decree No. 26 of 2021 Amending Certain Provisions of Law No. 20 for 2018 on Anti-Money Laundering and Countering the Financing of Terrorism. The SAs of the Reporting Entities have the legal capacity to supervise the implementation of TFS.

### Exemption from Liability in Case of Good Faith TFS Implementation

67. Any Person who, **in good faith**, freeze funds or other assets, or refuses to provide financial services to designated individuals, entities, or groups) in compliance with the provisions of Cabinet Decision No. 74 of 2020 shall be exempt from any damages or claims, resulting from such actions, including penal, civil, and/or administrative liability.

## Section 7: Obligations Regarding Unilateral / Multilateral Sanctions Regimes and Sanctions Evasion

68. Reporting Entities should be able to differentiate between cases that require submitting a CNMR/PNMR, and between suspicious transactions and activities that require submitting a STR/SAR.
69. Any suspicious transactions or activities that might be related to sanctions evasion, and which do not include Confirmed or Partial Name Matches to the Sanctions Lists, should be reported to the FIU by raising a STR/SAR through the goAML platform.
70. Similarly, in case any Confirmed or Partial Name Match is identified to a unilateral / multilateral sanctions list or other criminal lists (i.e. OFAC, EU, HMT, INTERPOL, etc.), the Reporting Entity **should not use the CNMR/PNMR reports in goAML to report such cases**, since CNMRs/PNMRs are used to report matches with the UAE Local Terrorist List and UN List only; however, you should consult with your relevant SA on the appropriate course of action and may consider raising a STR/SAR with the FIU in case a match is identified with other sanctions or criminal lists.
71. Reporting Entities are advised to familiarize themselves with the sanctions evasion related Reasons for Reporting (RFRs) in goAML when submitting a STR/SAR. For the full list of PF and TF related red flags, please refer to the [Terrorist and Proliferation Financing Red Flags Guidance](#).

### Example 1: UN Panel of Experts Report

After conducting screening, you have identified that a customer (Person A) is mentioned in a UN Panel of Experts Report. However, Person A is **not listed** in neither the UNSC Consolidated List nor the UAE Local Terrorist List. In this case, you are not required to implement the TFS requirements since Person A is not listed locally or by the UNSC; however, the fact that Person A is mentioned in a UN Panel of Experts Report may be a cause for suspicion (sanctions evasion) and you should consider raising a STR/SAR to the FIU.



### **Example 2: Unilateral or Other Sanction Regimes**

After conducting screening, you have identified that a customer (Person A) is listed on another country's sanctions list (unilateral sanctions). However, Person A is **not listed** in neither the UAE Local Terrorist List nor UNSC Consolidated List. In this case, you are not required to implement the TFS requirements since Person A is not listed locally or by the UNSC; however, you should consult with your relevant SA on the appropriate course of action and may consider submitting a STR/SAR to the FIU.

## Annex I: EOCN Notification Alert System Subscription Guide

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EXECUTIVE OFFICE FOR  
CONTROL & NON-PROLIFERATION



### Simple Guide to Subscribe to the EOCN Notification Alert System (NAS)

#### Introduction

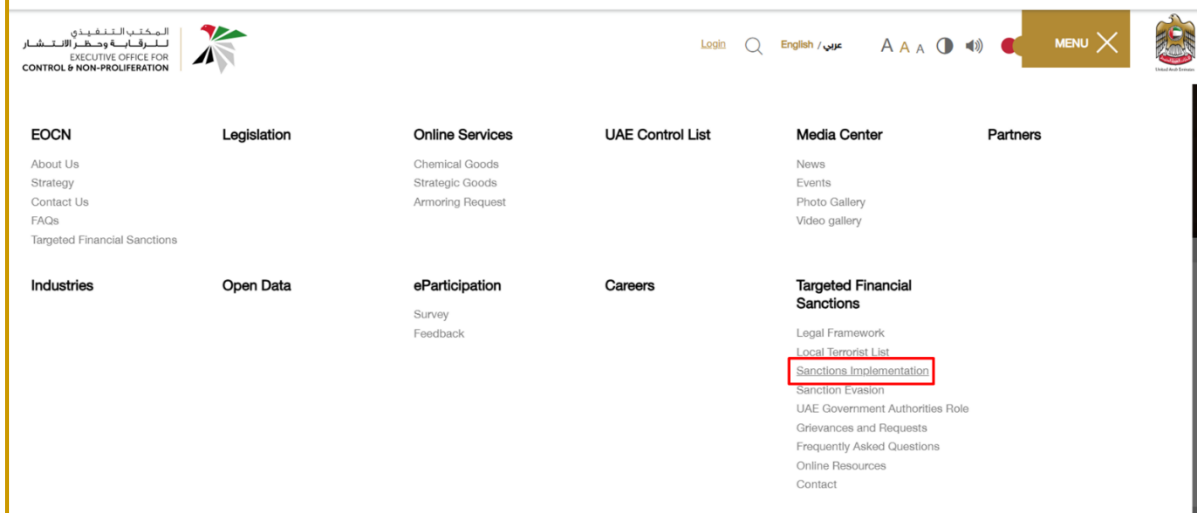
Targeted Financial Sanctions in the UAE are applied based on designations on the following lists (collectively referred to as “Sanctions Lists”):

- ☐ **UAE Local Terrorist List** – Issued by the UAE Cabinet
- ☐ **United Nations Consolidated List** – Issued by the United Nations Security Council

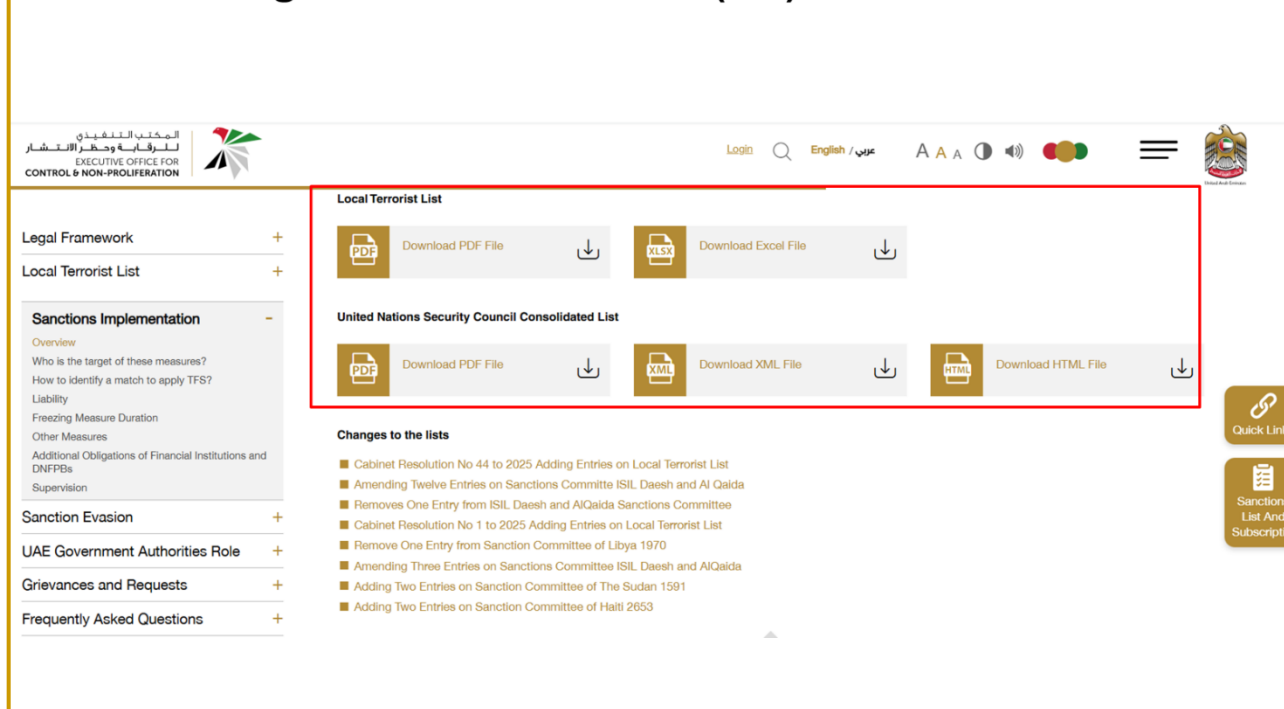
Both lists are updated periodically by the issuing authority

## Accessing the Sanctions Lists (1/2)

The Sanctions Lists can be accessed through the EOCN's website



## Accessing the Sanctions Lists (2/2)




## Subscribing to NAS






Subscribe to NAS to receive the latest updates on the Sanctions Lists:

- ❑ Step 1: Access the Targeted Financial Sanctions webpage in the EOCN's website through the following link: <https://www.uaeiec.gov.ae/en-us/un-page?p=0#>
- ❑ Step 2: Click on the "Sanctions List And Subscription" icon on the right of the page, followed by "Subscribe to Sanction Lists".
- ❑ Step 3: Fill out your details and click subscribe.
- ❑ Step 4: A pop-up message will appear confirming your subscription.
- ❑ Step 5: You will receive a confirmation email on the registered email address.

## Subscribing to NAS (1/5)

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[Login](#)  [English / عربي](#) [A A A](#)    

Targeted Financial Sanctions

Targeted Financial Sanctions

Legal Framework

Local Terrorist List

Sanctions Implementation

Sanction Evasion

UAE Government Authorities Role

Grievances and Requests

Frequently Asked Questions

Online Resources

Legal Framework

United Arab Emirates and United Nations Legal Framework for Economic Sanctions

The United Nations Security Council (UNSC) holds the capacity to take action in seeking to maintain or restore international peace and security under Chapter VII of the United Nations Charter, including by imposing sanctioning measures under Article 41, which encompass a broad range of enforcement options that do not involve the use of armed force. The UNSC has the authority to issue binding resolutions on United Nations (UN) member states.

The United Arab Emirates (UAE), as a member of the UN, is committed to implement the United Nations Security Council Resolutions (UNSCRs), including those related to UN sanctions regimes. Consequently, through the Cabinet Resolution No. 74 of 2020, the UAE is implementing UNSCRs on the suppression and combating of terrorism, terrorist financing & countering the financing of proliferation of weapons of mass destruction, in particular, targeted financial sanctions (TFS) regimes as defined by the UN.

Security Council sanctions have taken several different forms, in pursuit of a variety of goals. The measures have ranged from comprehensive economic and trade sanctions to more targeted measures such as **arms embargoes, travel bans, and financial or commodity restrictions**. The Security Council has applied sanctions to support peaceful transitions, deter non-constitutional changes, constrain terrorism, protect human rights and promote non-proliferation of weapons of mass

Quick Links

Sanctions List And Subscription

## Subscribing to NAS (2/5)

The screenshot shows the NAS website interface. At the top, there is a header with the logo of the Executive Office for Control & Non-Proliferation, navigation links (Login, English / عربي), and a menu icon. The main content area is titled 'Targeted Financial Sanctions' and features a 'Legal Framework' section. This section includes a table of contents with links to 'Local Terrorist List', 'Sanctions Implementation', 'Sanction Evasion', 'UAE Government Authorities Role', 'Grievances and Requests', and 'Frequently Asked Questions'. The 'Legal Framework' section is expanded, showing the 'United Arab Emirates and United Nations Legal Framework for Economic Sanctions'. The text describes the UN Security Council's role in maintaining international peace and security, and the UAE's commitment to implementing UN Security Council Resolutions (UNSCRs) related to UN sanctions regimes. A sidebar on the right, titled 'Sanctions List', contains links to 'Local Terrorist List', 'UN Consolidated List', and a 'Subscribe To Sanction Lists' button, which is highlighted with a red box.

## Subscribing to NAS (3/5)

The screenshot shows the NAS website interface with a 'Subscribe to Targeted Financial Sanctions' form overlay. The form is titled 'Subscribe to Targeted Financial Sanctions' and includes a 'Legal Framework' sidebar on the left. The form has two tabs: 'Individual' (selected) and 'Company'. It contains the following fields: 'Personal Name Arabic \*', 'Personal Name English \*', 'Type of Business' (a dropdown menu with '-- Choose --' selected), and 'Subscriber Email \*'. At the bottom of the form, there are two buttons: 'Subscribe' (highlighted with a red box) and 'Close'. The background of the form overlay shows a person working on a laptop.

## Subscribing to NAS (4/5)

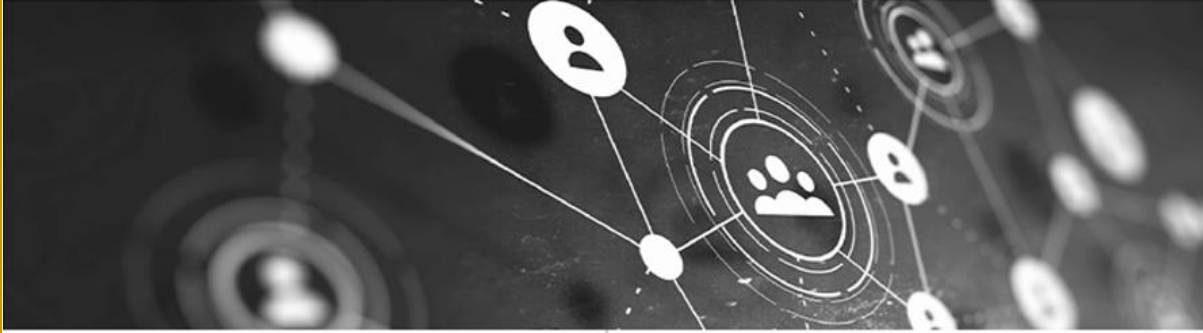
The screenshot shows the EOCN website interface. At the top, there is a header with the EOCN logo, navigation links, and a language selector. The main content area is titled "Targeted Financial Sanctions". A central white box with a green checkmark icon displays the message: "Thanks, you have subscribed successfully. You will receive a confirmation e-mail". Below this message is a "Close" button. To the left, there is a sidebar menu with items like "Legal Framework", "Local Terrorist List", "Sanctions Implementation", "Sanction Evasion", "UAE Government Authorities Role", "Grievances and Requests", and "Frequently Asked Questions". To the right, there is a "Sanctions List" section with a "Subscribe To Sanction Lists" button.

## Subscribing to NAS (5/5)

The screenshot shows an email confirmation from the EOCN. The email is in both Arabic and English. The English text reads: "Subscription To Targeted Financial Sanctions. Dear User, You have successfully subscribed to the Targeted Financial Sanctions list. You will receive the updates whenever a change is applied to the list. If you don't wish to receive these emails Please contact [tfs@eocn.gov.ae](mailto:tfs@eocn.gov.ae) to unsubscribe. Regards". The Arabic text reads: "الاشتراك في روابط العقوبات المالية المستهدفة. عزيزي المستخدم، لقد تم التسجيل بنجاح. سيصلك إخطار عندما يطرأ تحديث على العقوبات المالية المستهدفة. إذا كنت لا ترغب في تلقي رسائل البريد الإلكتروني هذه يرجى التواصل مع [tfs@eocn.gov.ae](mailto:tfs@eocn.gov.ae) مع التحيات". The email footer includes the Government of the UAE logo and social media icons.

## Alert Update

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### Adding One Entry from ISIL Daesh and AlQaida Sanctions Committee

Dear Mohammad

For details of the sanctions list updates please [click here](#).

As per [Cabinet Decision 74 of 2020](#), all Persons should implement Targeted Financial Sanctions (TFS) and report all findings and measures taken by following the TFS instructions below:

[Follow TFS Instructions](#)

For details on Target Financial Sanctions implementation, please [download](#) copy of the guideline.

Best regards.

### إضافة اسم على قائمة لجنة جزاءات داعش والقاعدة

عزيزي محمد

لنحرص التحديث على قائمة العقوبات ، يرجى [المصنف هنا](#).

وفقاً لقرار مجلس الوزراء رقم 74 لسنة 2020 ، يجب على جميع الأشخاص تطبيق العقوبات المالية المستهدفة والإبلاغ عن نتائج المسح والتحقق والتدابير المتخذة من خلال اتباع إجراءات تطبيق العقوبات المالية المستهدفة الموضحة أدناه:

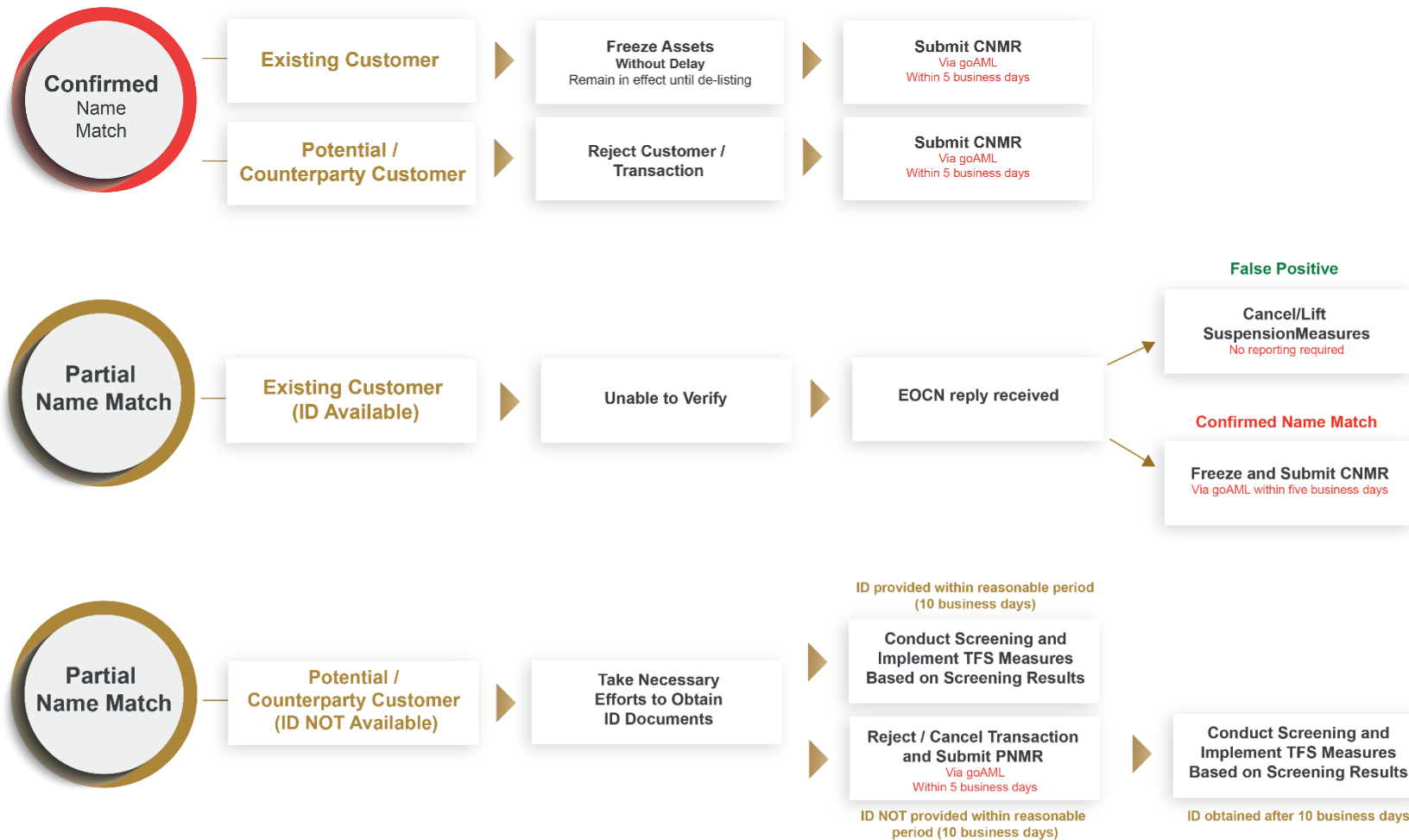
[اتباع إجراءات تطبيق العقوبات المالية المستهدفة](#)

للحصول على تفاصيل حول تطبيق "العقوبات المالية المستهدفة" ، يرجى [تحميل](#) نسخة من الدليل الإرشادي.

تحياتنا.



## Annex II: TFS Reporting Flow Charts





## Annex III: Frequently Asked Questions

### Legislation

**1. What does 'Targeted Financial Sanctions' ("TFS") mean?**

The term targeted sanctions means that such sanctions are imposed against specific individuals, entities, or groups (those designated in the Sanctions Lists). The term TFS includes both asset freezing without delay and prohibition from making funds or other assets or services, directly or indirectly, available for the benefit of sanctioned individuals, entities, or group.

**2. What does 'funds or other assets' mean?**

Any assets, including, but not limited to, financial assets, economic resources (including oil and other natural resources), property of every kind, whether tangible or intangible, movable or immovable, however acquired, and legal documents or instruments in any form, including electronic or digital, evidencing title to, or interest in, such funds or other assets, including, but not limited to, bank credits, travellers cheques, bank cheques, money orders, shares, securities, bonds, drafts, or letters of credit, and any interest, dividends or other income on or value accruing from or generated by such funds or other assets, and any other assets which potentially may be used to obtain funds, goods or services.

**3. What is the legal framework for the implementation of TFS in the UAE?**

Article 16(e) of Federal Law No. 20 of 2018 (amended by Federal Decree No. 26 of 2021) requires the prompt application of the directives when issued by the competent authorities in the state for implementing the decisions issued by the UN Security Council under Chapter (7) of UN Convention for the Prohibition and Suppression of the Financing of Terrorism and Proliferation of Weapons of Mass Destruction, and other related directives.

In addition, Cabinet Decision No. 74 of 2020 established the framework regarding TFS implementation in the UAE, including implementation of TFS on designated Persons in the UAE Local Terrorist List and UNSC Consolidated List.

**4. Who must comply with implementing TFS measures?**

TFS measures must be implemented by any Person (both natural and legal entities), including government authorities and FIs, DNFBPs, and VASPs located in the UAE and operating within the UAE's jurisdiction.

**5. Is my Supervisory Authority going to check compliance with the Cabinet Decision No. 74 of 2020?**

Cabinet Decision No. 74 of 2020 provides that FIs, DNFBPs, and VASPs are under an obligation to have in place adequate processes, policies and procedures, including resourcing thereof, to verify that they are complying with all aspects of the relevant Cabinet Decisions. Supervisory Authorities will verify compliance by FIs, DNFBPs, and VASPs during their supervisory activities. Non-compliance may result in the application of administrative penalties as well as criminal sanctions as stipulated in the Cabinet Decision.

**6. What are the consequences in case of a failure to comply with the obligations set out in Cabinet Decision No. 74 of 2020?**

Any Person, found to violate and/or be in non-compliance with the obligation in the Cabinet Decision No. 74 of 2020 or failing to implement procedures to ensure compliance may face imprisonment of no less than one year and no more than seven years and/or a fine of no less than AED 50,000 (fifty thousand dirham) and no more than AED 5,000,000 (five million dirham).

In addition, Supervisory Authorities can impose appropriate administrative sanctions (e.g., ranging from warning letter to license cancellation) when there is a violation or shortcoming in implementing TFS obligations.

**7. Can I be held liable for freezing funds of a designated Persons based on the Cabinet Decision?**

Any Person who, in good faith, freezes funds or other assets, or refuses to provide financial services to designated individuals, entities, or groups in compliance with the provisions of Cabinet Decision No. 74 of 2020 shall be exempt from any damages or claims, resulting from such actions, including penal, civil, and/or administrative liability.

## Freezing Measures

### 8. What is the difference between 'freezing' and 'suspending'?

Freezing and suspension measures follow the same procedures operationally (both are preventive measures that aim to stop the designated individual, entity, or group from gaining access to funds or other assets).

In case the Reporting Entity has come across a 'Confirmed Name Match', the term 'freezing' is used and the Reporting Entity should apply freezing measures, and it must remain in place until the designated individual, entity, or group is de-listed from the Sanctions Lists or upon a freezing cancellation instruction received from the EOCN.

In case the Reporting Entity has come across a 'Partial Name Match' and, **after obtaining the ID documentation**, is still unsure whether the individual, entity, or group is certainly designated, then the term 'suspending' is used and the Reporting Entity should suspend the transaction. Suspension measures should remain in place until further instructions are received from the EOCN on the result of the Partial Name Match (either Confirmed Name Match or False Positive).

### 9. When should a transaction be rejected or cancelled?

If a Confirmed Name Match is identified on a potential customer (prospective client) or counterparty, then the Reporting Entity is required to reject the business relationship / transaction and report a CNMR within five business days from rejecting the transaction.

Similarly, in case a Partial Name Match is identified, and the Reporting Entity is unable to obtain an ID document within a reasonable time period (10 business days) to discount or confirm the match, then the Reporting Entity should reject (cancel) the transaction and report a PNMR within five business days from rejecting the transaction.

### 10. What does 'without delay' mean?

'Without delay' means applying freezing measures **immediately or in any case within 24 hours** upon designation of an individual, entity, or group on the UAE Local Terrorist List or UNSC Consolidated List.

### 11. How long do I have to keep funds frozen / suspended?

Freezing applied as a result of TFS measures have **no time limits**. Asset freezes remain valid until one of the following occurs:

- a. The designated Person is **delisted (removed)** from the Sanctions Lists. Upon delisting, all TFS measures are to be lifted immediately without prior approval from EOCN or the relevant SA, unless there is an active Freeze Order related to the delisted Person issued by a Competent Authority (FIU, Public Prosecution, etc.)
- b. A **freezing cancellation decision** by EOCN is communicated to the Reporting Entity through goAML.

In case of a Partial Name Match in which the Reporting Entity is unable to verify the match after receiving and reviewing the ID documents and suspension measures were taken, the suspension measures remain until a response is received from the EOCN on the results of the Partial Name Match (either Confirmed Name Match or False Positive).

**12. What should I do if one of my customers is affected by a freezing measure?**

You should notify the customer of the [Grievances and Requests](#) procedures as reflected on the EOCN's website. The EOCN has also launched an [online platform](#) to receive grievance requests and a [User Guide](#) on how to submit a request.

**13. Is notifying the customer after implementing freezing measures considered as “tipping off”?**

No.

Reporting Entities may notify their customers **after** the freezing measures have been implemented. As long as the customer is notified after the freezing measures have been taken, it is not considered as tipping off. However, Reporting Entities must not inform their customers prior to taking the freezing measures.

**14. Can permission be obtained to access frozen Funds or Other Assets by the designated individual or entity?**

The EOCN, in certain circumstances, may permit access to frozen funds or other assets based on a grievance request received from the designated Person or his legal representative. Please see the [Guidance on Grievance Procedures](#) for more information.

## Screening

### **15. Can I rely on external service providers to conduct the screening on my behalf?**

Reporting Entities may rely on external / third party service providers to conduct screening services on their behalf. However, it is important to note that while such online services are useful, they should not be viewed as an absolute guarantee of compliance with the obligations under the Cabinet Decision and that the ultimate obligation on ensuring compliance with TFS obligations lies with the Reporting Entity. As such, Reporting Entities are advised to do their own checks on the robustness of the screening processes implemented by third party service providers when deciding to utilize their services.

### **16. Can I use a manual screening process?**

Reporting Entities may use a manual screening process, depending on the size and nature of their business. However, the Reporting Entity should take into consideration factors such as the number of clients, the frequency of transactions, and size of the business when deciding on the appropriate screening process (automated v manual). In any case, the Reporting Entity should ensure that adequate screening measures are set in place to identify and implement TFS measures without delay.

### **17. Should I conduct screening during weekends and public holidays?**

In cases of **weekends and public holidays**, Reporting Entities should have appropriate internal procedures to effectively screen against the UAE Local List and the UNSC Consolidated List and prevent access or use of funds or other assets that may be subject to freezing measures. If the Reporting Entity is not conducting any business activities or transactions and where customers do not have access to any assets or accounts during weekends or holidays, then the screening obligation starts from the first minute of commencement of business and freezing measures must be applied immediately. In any case, Reporting Entities should ensure that funds or other assets subject to TFS measures are prevented from being accessed or used.

## Reporting

### **18. What if my existing customer's name partially matches the name of the designated Person, and I am unable to verify whether it is a Confirmed Match or False Positive?**

In case a Partial Name Match is identified on an existing customer, it is assumed that the Reporting Entity already possesses the identification documents of the customer and, after reviewing the ID documents, is unable to conclude whether the match is a Confirmed Name Match or False Positive.

In this case, the Reporting Entity must suspend without delay any transaction, refrain from offering any funds, other assets or services, and submit a PNMR through goAML within five business days from implementing suspension measures. The Reporting Entity must ensure that all necessary information and documents regarding the Partial Name Match are submitted and maintain suspension measures until further instructions are received from EOCN via goAML on whether to cancel the suspension ('False Positive') or implement freezing measures ('Confirmed Name Match').

### **19. What if a potential customer or counterparty's name partially matches the name of the designated Person, and I am not in possession or unable to obtain the ID documents of the Partial Name Match?**

In such cases, the Reporting Entity must first make necessary efforts to obtain identification documents of the potential customer or counterparty to conclude whether the match is a Confirmed Name Match or False Positive. If, after obtaining the ID documents, the Reporting Entity is able to conclude the result as a False Positive, then it may establish the business relation or allow the transaction to proceed without the need to report a PNMR; however, internal documentation of the False Positive result should be maintained.

If the Reporting Entity is unable to obtain the identification documents within a reasonable time (10 business days) of identifying the Partial Name Match, then the transaction or service should be rejected (cancelled) and a PNMR submitted through goAML within five business days from rejection of the transaction or service, specifying that the transaction has been rejected due to lack of ID documents of the Partial Name Match.

**20. Should I report a False Positive Result?**

Reporting Entities are not required to report a False Positive result and may allow the business transaction to proceed without notifying the EOCN; however, internal documentation of the screening alert and actions taken need to be maintained.

**21. Should I report previous transactions or business dealings with Confirmed or Partial Name Matches?**

CNMRs should also be reported on previous business relationships and transactions occurring and accounts held **prior to the designation, covering a timeframe of five years**. CNMRs should be submitted even if no current funds or other assets are held by the Reporting Entity and includes accounts closed. In this case, the Reporting Entity is required to clarify in the description of the CNMR that no funds or other assets are currently being held, and there is no current business relationship with the Confirmed Name Match, and the status of the account (closed). The same procedure applies to PNMRs.

**22. If I identify that a customer is subject to unilateral or multilateral sanctions, however, the customer is not listed on the UAE Local Terrorist List nor the UNSC Consolidated List. Should I report it by raising an CNMR or PNMR?**

In case any Confirmed or Partial Name Match is identified to a unilateral / multilateral sanctions list or other criminal lists (i.e. OFAC, EU, HMT, INTERPOL, etc.), the Reporting Entity **should not use the CNMR/PNMR reports in goAML to report such cases**, since CNMRs/PNMRs are used to report matches with the UAE Local Terrorist List and UN List only; however, you should consult with your relevant SA on the appropriate course of action and may consider raising an STR/SAR with the FIU in case a match is identified with other sanctions or criminal lists.

**23. Am I under an obligation to register in goAML?**

Any Person (natural or legal) licensed/registered by a SA that performs activities which fall under the definition of FIs, DNFBPs, or VASPs as per UAE legislation has an obligation to register on goAML to be able to submit suspicious transactions/activity reports (STRs/SARs) to the UAE FIU, as well as to submit TFS reports (CNMRs/PNMRs) to the EOCN and the relevant SA.

FIs, DNFBPs and VASPs that are not registered on goAML face the risk of being subject to administrative and/or financial sanctions by the relevant SA for failure to register on goAML.

Please contact your relevant SA and the UAE FIU for instructions on how to register.

**24. How should I report a Confirmed or Partial Name Match if I am not a goAML user?**

If you identify a Confirmed or Partial Name Match, and you are not a goAML user (Persons that do not fall under the definition of FIs, DNFBPs, or VASPs and are therefore not under an obligation to register on goAML), then you must report it by sending an email to the EOCN on [tfs@eocn.gov.ae](mailto:tfs@eocn.gov.ae) with details of the case and attaching all supporting documentation.

## **Notification Alert System**

**25. How can I subscribe to the EOCN Notification Alert System?**

To subscribe to the EOCN Notification Alert System, kindly visit the [Targeted Financial Sanctions](#) webpage and click on the “Sanctions List and Subscription” icon at the right side of the page to complete your subscription. Please see [Annex I: EOCN Notification Alert System Subscription Guide](#) for more details.

**26. What steps should I take if I encounter an error when subscribing?**

Try to register again, ensuring that you remove any numbers, dashes, brackets, commas, or symbols from the entity name in both Arabic and English. If you continue to receive a rejection, kindly contact us at [tfs@eocn.gov.ae](mailto:tfs@eocn.gov.ae).

**27. How can I unsubscribe from the Notification Alert System?**

Please contact [tfs@eocn.gov.ae](mailto:tfs@eocn.gov.ae) and state the following information:

- a. Entity name
- b. Entity subscribed e-mail
- c. Reason for unsubscribing

## **UAE Local Terrorist List and UNSC Consolidated List**

**28. Which Sanctions Lists are covered under Cabinet Decision No. 74 of 2020 in terms of the requirement to implement TFS?**

The scope of Cabinet Decision No. 74 of 2020 in implementing TFS covers the UAE Local Terrorist List and UNSC Consolidated List **only**.



Other unilateral and multilateral sanctions lists are out of the scope of the Cabinet Decision.

**29. How can I find out who is a designated individual, entity, or group?**

You can find out the designated individuals, entities, or groups by checking the updated UAE Local Terrorist List and UNSC Consolidated List in the EOCN website at the links below:

- **Local Terrorist List:** the link to the UAE Local Terrorist List can be found at the bottom of the Sanctions Implementation webpage on the EOCN website (scroll to the bottom of the page) and is available in both PDF and Excel format. ([Click Here](#))
- **UNSC Consolidated List:** The UNSC publishes a list of all the sanctioned individuals, entities, or groups designated by the United Nations Sanctions Committees or directly by the UNSC. ([Click Here](#))

## Document Version Update

Date	Section	Update
<b>November 2021</b>	Full Document	Updated to include Virtual Asset Service Providers (VASPs)
	Section 1	Updated legal framework to include Federal Decree No. 26 of 2021 Amending Certain Provisions of Law No. 20 for 2018 on Anti-Money Laundering and Countering the Financing of Terrorism
	Section 3	Revised definition of “funds or other assets” as per FATF Standards
	Section 4	<ul style="list-style-type: none"> <li>Updated definition on ‘Confirmed Match’, ‘Potential Match’, and ‘False Positive’</li> <li>Updated TFS screening and reporting procedures</li> </ul>
	Section 5	Revised section on ownership, control, and acting on behalf or at the direction of
	Section 6	Enforcement measures updated as per Article 28 of Federal Decree No. 26 of 2021
	Section 10	Updated procedure for submitting de-listing request from UN List
	Annex I	Updated FAQs
	Annex II	Added EO Notification System Subscription Guide
<b>September 2022</b>	Full Document	<ul style="list-style-type: none"> <li>Updated Executive Office for Import Export Committee (EO IEC) to Executive Office for Control &amp; Non-Proliferation (EOCN)</li> <li>Amended terminology of ‘potential match’ to ‘partial name match’</li> </ul>
	Section 4	<ul style="list-style-type: none"> <li>Added definition and example on ‘negative result’</li> <li>Added reference to EOCN’s typologies document and CPF guidance</li> </ul>
<b>July 2025</b>	Full Document	<ul style="list-style-type: none"> <li>Deleted Grievance Procedures (previously Sections 7, 8, 9, 10) and republished as a standalone guide</li> </ul>
	Section 4	<ul style="list-style-type: none"> <li>Fund Freeze Report (FFR) changed to Confirmed Name Match Report (CNMR)</li> <li>Clarified screening during weekends and public holidays</li> <li>Updated procedures related to Partial Name Match reporting</li> <li>Additional examples on PNMR reporting</li> </ul>



## Contact us

To contact us, please send an email to

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[www.eocn.gov.ae](http://www.eocn.gov.ae)