إيه إم آر جي
جلوبال

INDIA | UAE

ANTI-MONEY LAUNDERING (AML)

UAE AML/CFT Compliance Awareness

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About us

Founded in 1984, the firm has grown consistently over four decades to become a recognized tax advisory practice

Professional Team of over 150 members.

Presence in UAE (Dubai) & India (Delhi, Mumbai, Dehradun)

100+ customers across the globe.

MISSION

"We grow with the growth of our clients"

VISION

“To provide solutions with Honesty and Customer Satisfaction”

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Money Laundering & Terrorist Financing

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CORE CONCEPTS

Money Laundering

The process of concealing or disguising the illicit origin of proceeds derived from criminal activities so they appear to originate from legitimate sources.

Terrorist Financing

Providing, collecting, or making financial resources and funds available to support terrorist organizations, individuals, or acts.

Industries Covered under UAE AML Law

Financial Institutions

Examples include:

- Private banking services
- Credit facilities of all types
- Cash brokerage services
- Currency exchange and money transfer services

Designated Non-Financial Businesses & Professions

Key categories include:

- Real estate agents
- Dealers in precious metals and stones
- Lawyers, notaries and independent legal professionals
- Independent accountants
- Corporate and trust service providers

Virtual Asset Service Provider

Covered activities include:

- Exchange between virtual assets and fiat currencies
- Exchange between virtual assets
- Transfer of virtual assets
- Custody and administration of virtual assets

UAE National Legislative Framework

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01

Federal Decree-Law No. 10 of 2025

Anti-Money Laundering, Combating the Financing of Terrorism and Illegal Organizations.

02

Cabinet Decision No. 134 of 2025

Implementing Regulation for Federal Decree-Law No. 10 of 2025.

03

MOE Supervision & Guidelines

The Ministry of Economy supervises DNFBPs and issues AML/CFT guidance covering CDD, reporting and compliance.

04

goAML Registration

Reporting entities are required to register on the UAE FIU goAML platform for regulatory reporting.

Know Your Customer (KYC)

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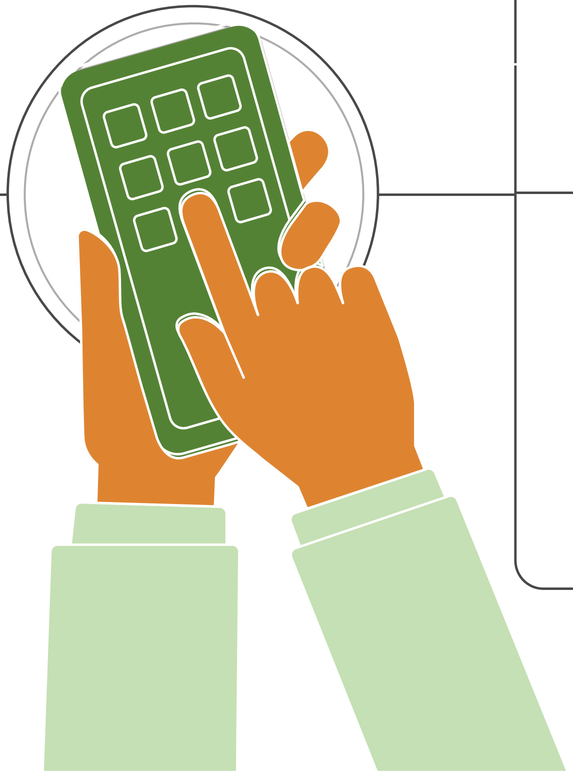
A structured onboarding journey from identification to risk-based acceptance

Customer Onboarding
Obtain mandatory KYC information.

Verification
Verify document authenticity and information.

Risk Assessment
Assign low, medium or high risk.



Identification
Collect ID and UBO details.

Screening
Conduct sanctions and PEP screening.

Onboarding Complete
Establish the relationship after KYC requirements are met.

KYC should be completed before establishing a business relationship, subject to applicable UAE AML requirements.

Customer Due Diligence (CDD)

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Applying proportionate measures based on the customer risk profile

Examples of Lower-risk Customers

- Government organisations
- Publicly listed companies
- Entities with transparent ownership available from reliable sources
- Other customers assessed as low risk

CDD Approach

- CDD may be applied in accordance with applicable requirements where there is a demonstrably low ML/TF risk.
- Verification should be completed in a timely manner.
- The reason for any permitted delay should not obstruct the normal course of business.
- Beneficial ownership information may be sourced from reliable and independent sources where adequate transparency exists.

Enhanced Due Diligence (EDD)

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Additional controls for customers presenting higher ML/TF risk

HIGH-RISK CUSTOMER INDICATORS

When EDD may be required

- UBO or senior management are PEPs.
- High-risk sectors or cash-intensive businesses.
- Links to high-risk jurisdictions.
- Charities, non-profit organizations and similar entities.
- Any customer presenting heightened ML/TF risk.

Typical EDD measures

- Verify the entity, UBOs, directors and authorized signatories.
- Establish source of funds and source of wealth.
- Understand the nature and purpose of the relationship
- Perform adverse media checks.
- Obtain senior management approval where required.
- Apply enhanced ongoing monitoring.

Risk-Based Approach (RBA) – Ongoing Customer Monitoring

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Risk classification determines the intensity of due diligence and monitoring

01) Customer Onboarding
KYC

02) Risk Categorization
Risk Rating

03) Due Diligence
CDD / EDD

04) Ongoing Monitoring
Periodic Review

RISK RATING CATEGORIZATION

High Risk
Score: 5 and above

Medium Risk
Score: 3–4

Low Risk
Score: 1–2

DUE DILIGENCE BY RISK LEVEL

High Risk – EDD

Medium Risk – CDD

Low Risk – CDD

AML Red Flags – Real Estate Transactions

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KEY RISK INDICATORS – REAL ESTATE SECTOR

- High-value cash transactions (≥ AED 55,000)
- Third-party payments without a clear rationale
- Transaction activity inconsistent with the customer profile
- Reluctance or refusal to provide KYC documentation
- Involvement of high-risk jurisdictions

Sanctions Screening

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Screening customers and related parties against applicable sanctions lists

Core Requirements

- Screen at onboarding and on an ongoing basis
- Screen customers, UBOs and authorized signatories
- Escalate confirmed matches immediately
- Apply required measures, including asset freeze where applicable
- Do not establish or continue a prohibited relationship

EXAMPLES OF APPLICABLE LISTS

UAE Local Terrorist List	UN Sanctions List	OFAC List
EU List	FATF-related information	Central Bank of UAE lists

Confirmed sanctions matches must be escalated to the MLRO without notifying the customer, in line with applicable requirements.

Enhanced Due Diligence (EDD)

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Additional controls for customers presenting higher ML/TF risk

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- Apply enhanced ongoing monitoring.

Politically Exposed Persons (PEPs)

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Identification, escalation and enhanced controls for PEP relationships

Who is a PEP?

A natural person who is or has been entrusted with a prominent public function in the UAE or another country, including senior political, government, judicial, military and state-owned enterprise officials, and senior officials of political parties or international organizations.

The concept also extends to relevant family members and close associates.

PEP procedures

- Screen the customer and UBOs against reliable PEP databases.
- Escalate identified PEPs to the supervisor / MLRO.
- Obtain senior management approval before establishing or continuing the relationship, where required.
- Establish source of funds and source of wealth as appropriate.
- Apply enhanced ongoing monitoring.

Suspicious Transaction Reporting (STR)

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Recognising suspicion, escalating internally and documenting the 5Ws

COMMON GROUNDS FOR SUSPICION

- **Customer refuses or fails to provide required KYC information**
- **Suspected criminal activity or fraud**
- **Adverse media involving the customer or related parties**
- **Inconsistency with the customer profile**
- **Unnecessarily complex transactions**
- **Inability to identify the bank account owner**

THE 5Ws FOR AN EFFECTIVE INTERNAL STR (ISTR)

WHO
Parties involved

WHEN
Timing of the activity

WHERE
Place of the activity

WHAT
Details of the transaction / activity

WHY
Reason for raising the ISTR

Reporting in the goAML Portal

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Key regulatory report types used by reporting entities

STR **Suspicious Transaction Report**

Used where a transaction is suspected to be linked to money laundering, terrorist financing or other criminal activity.

SAR **Suspicious Activity Report**

Used where suspicious behaviour or activity is identified, even if no transaction has occurred.

CNMR **Confirmed Name Match Report**

Used for a confirmed match against applicable sanctions lists, with escalation and reporting as required.

FFR **Funds Freeze Report**

Used where a confirmed sanctions match requires immediate freezing of funds or assets and reporting through goAML.

PNMR **Partial Name Match Report**

Used for a potential / partial name match requiring reporting in accordance with applicable requirements.

HRC **High-Risk Country Report**

Used for transactions involving high-risk countries where reporting is required.

HRCA **High-Risk Country Activity Report**

Used for high-risk-country activity identified during establishment of a customer relationship.

REAR **Real Estate Activity Report**

Applicable to qualifying freehold real estate purchase/sale transactions involving physical cash of AED 55,000 or more or virtual assets.

End-to-End AML Reporting Process

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From identifying a red flag to regulatory reporting and record retention

01
IDENTIFY
Red flag / unusual activity

›

02
STR
Submit complete details to MLRO

›

03
MLRO REVIEW
Assess the case

›

04
REPORT TYPE
Select STR / SAR / FFR / PNMR / CNMR / other applicable report

›

05
FILE goAML
Submit to the relevant authority

›

06
RECORD-KEEP
Maintain records and audit trail

Records must be retained for a minimum of 5 years after completion of the transaction or termination of the business relationship.

Record Keeping

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Maintaining complete, accurate and retrievable AML records

01

Maintain

Soft and hard copies of relevant records and supporting documents.

02

Organise

Keep transaction records together with supporting documentation and maintain date-wise files.

03

Retrieve

Ensure records can be produced efficiently for audits, regulators, law enforcement or correspondent banks.

04

Retain

Retain records for a minimum of 5 years after completion of the transaction or termination of the relationship.

AML Compliance Process Flow

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An integrated lifecycle of prevention, detection, escalation and reporting

01 Policies & Procedures

Define the AML control framework

02 Client Onboarding

Complete KYC and establish the relationship

03 Risk Assessment

Classify the customer and apply CDD / EDD

04 Screening & Monitoring

Sanctions / PEP screening and ongoing monitoring

05 Suspicion & Reporting

Escalate and report STRs / SARs and other applicable reports

06 Management & Records

Management reporting, regulatory records and 5-year retention

ABOUT AMRG

- AMRG Global is an international tax and regulatory advisory firm based in the United Arab Emirates, focused on assisting multinational businesses, investors, and cross-border enterprises in navigating complex tax and regulatory environments.

- The firm provides specialized advisory in UAE Corporate Tax, VAT, transfer pricing, cross-border structuring, and tax controversy matters. Our approach combines deep technical expertise with practical commercial insight to help businesses operate efficiently while maintaining regulatory compliance.

- AMRG Global operates in strategic collaboration with **AMRG & Associates (India)**, a well-established tax advisory and litigation firm with over four decades of professional experience. This integrated platform enables seamless advisory support for businesses operating between the **Middle East, India, and global markets**.

- Through this cross-border network, AMRG Global supports multinational clients with international tax planning, regulatory compliance, and dispute resolution across jurisdictions.

OUR SERVICES

UAE VAT Advisory

Cross-border Structuring

Risk Advisory & Internal Audit

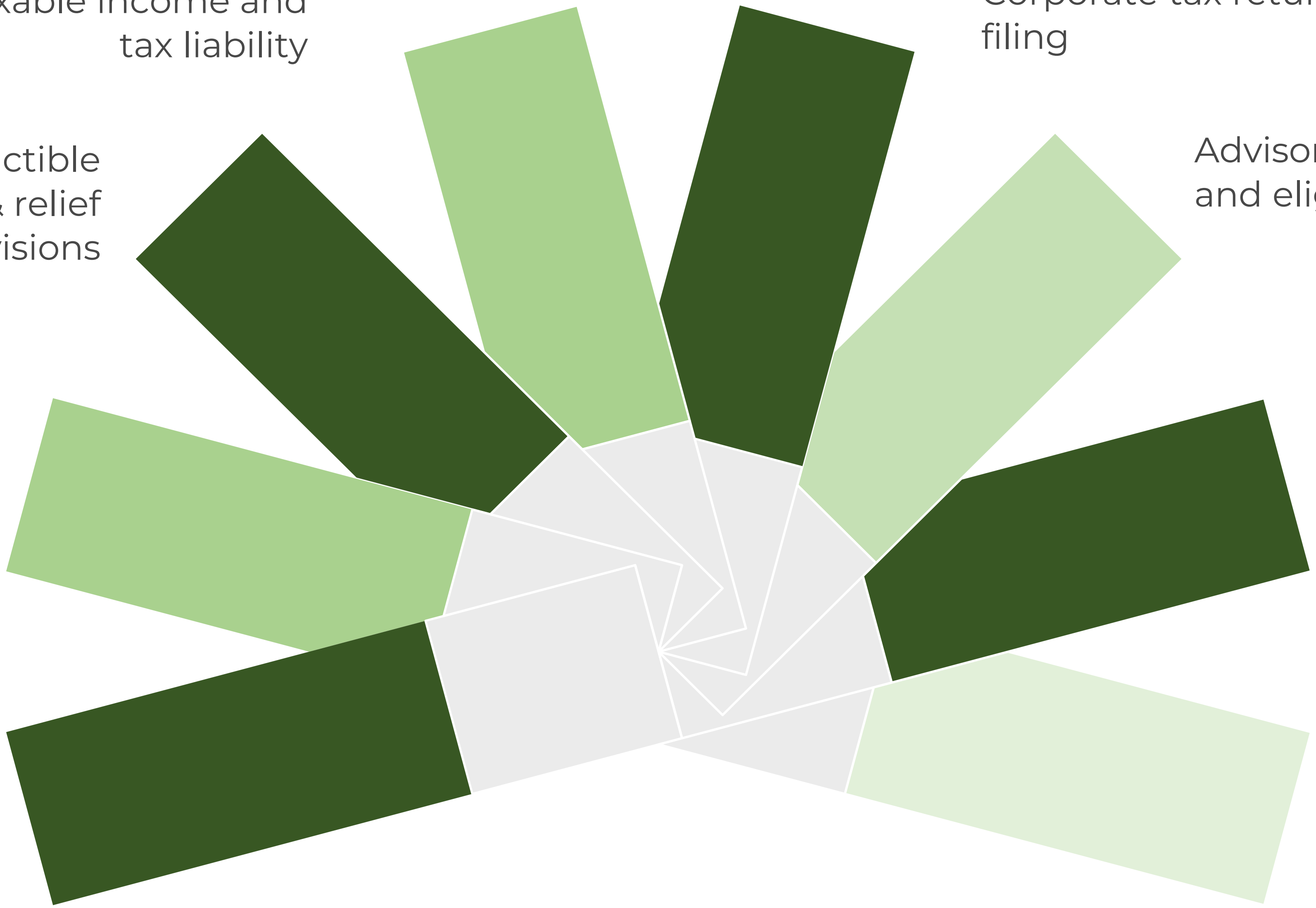
Corporate Tax Advisory

Transfer Pricing & International Tax

Tax Controversy & Dispute Resolution

AML / CFT & Regulatory Compliance

Corporate Tax



- Computation of taxable income and tax liability
- Corporate tax return preparation & filing
- Advisory on deductible expenses, exemptions & relief provisions
- Advisory on tax group structuring and eligibility
- Strategic tax planning aligned with UAE Corporate Tax Law
- Corporate tax health checks and tax risk assessments
- Corporate tax registration and deregistration
- Support during corporate tax audits and regulatory reviews

VAT Consultancy Service

VAT Registration
VAT registration and deregistration

Compliance Services
VAT return preparation and filing

POS Advisory
Place-of-supply analysis for domestic and cross-border transactions

Correspondence with FTA
Voluntary disclosures and regulatory correspondence with the FTA

Structuring for International Transactions
VAT structuring for exports and international services

Health Checks
VAT health checks and compliance reviews

FTA Audit & Assessment Support
Assistance during FTA audits and assessments

Transfer Pricing & International Tax

TP Documentation — Related party transaction documentation

Transfer Pricing Policy — Transfer pricing policy design and implementation

TP Risk Review — Transfer pricing risk reviews

Benchmarking Analysis — Benchmarking studies and arm's length analysis

Cross-Border Structuring — Cross-border tax structuring and planning

Master & Local File — Master File and Local File preparation

International Tax Advisory — Advisory on international tax regulations impacting multinational enterprises

Cross-border Structuring

International holding company structures

Structuring cross-border investments, holding structures and operations

Structuring intercompany transactions and global supply chains

Tax-efficient repatriation of profits

Advisory on cross-border financing structures

Strategic tax planning for multinational groups

Tax Controversy & Dispute Resolution

AMRG Global represents clients in tax disputes and regulatory proceedings, providing strategic defense and structured dispute resolution support.

Our services include:

01

Representation before the Federal Tax Authority (FTA)

02

Advisory during tax audits and regulatory investigations

03

Preparation of reconsideration requests before the FTA

04

Strategic defense against tax assessments and penalties

05

Support in dispute resolution proceedings

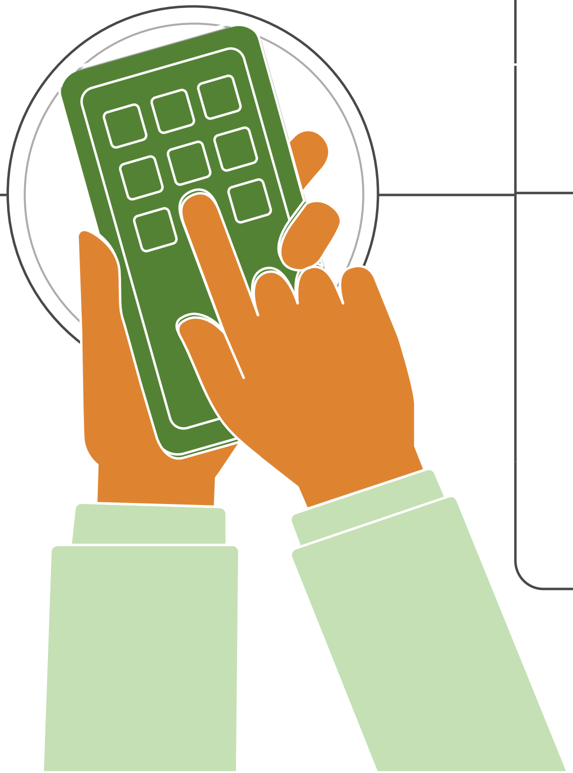
06

Advisory on regulatory compliance and litigation risk management

07

Voluntary disclosure filings before the FTA

Risk Advisory & Internal Audit



- Enterprise risk assessments
- Governance and compliance reviews
- Review and design of internal control frameworks
- IT risk and control assessments
- Co-sourced and fully outsourced internal audit services
- Internal audit capability development and training

AML / CFT & Regulatory Compliance

End-to-end advisory and independent assurance to help organisations manage financial crime risk with confidence.

ASSESS

Understand your financial crime risk

- AML/CFT Business Risk Assessments
- Customer, product, geographic & channel risk profiling
- Risk methodology & scoring review

DESIGN

Build a fit-for-purpose AML/CFT framework

- Policies, procedures & governance
- KYC / CDD / EDD framework
- Transaction monitoring framework

ASSURE

Independently test effectiveness of controls

- AML/CFT compliance health checks
- Control effectiveness testing
- Gap assessment & remediation roadmap

RESPOND

Support regulatory readiness & response

- MLRO framework & support
- STR/SAR reporting & goAML support
- Regulatory remediation support

Seamless Cross-border Network Integration

AMRG Global operates in strategic coordination with **AMRG & Associates (India)**, forming a robust, integrated network that ensures:

- Seamless cross-border tax advisory and structuring.
- Coordinated appellate representation across jurisdictions.
- Harmonised regulatory alignment and compliance.
- Efficient, integrated workflow management for complex engagements.

This integrated structure supports multinational clients engaging in substantial inter-company transactions, cross-border investments, and international expansion between the Middle East and South Asia.

IFZA Authorized Partner

AMRG Global is an **Authorized Partner of IFZA**, delivering end-to-end business setup and support services in Dubai.

IFZA® | AUTHORIZED PARTNER

COMPANY INCORPORATION

TRADE LICENSE RENEWALS

VISA SERVICES

LEASED OFFICE SPACE WITHIN IFZA DUBAI

In-house Technology

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MICROSOFT ONEDRIVE

OneDrive provides secure file storage and easy accessibility, allowing our teams to collaborate seamlessly. With real-time sharing and version control, it enhances productivity and ensures that important documents are always at our fingertips.

ZOHO SERVICES

We utilize Zoho's suite of applications, these tools enhance our operational efficiency and support better communication, allowing us to focus on delivering exceptional service.

IN-HOUSE TAX ASSISTANT

Our In-house AI expert for navigating Goods and Services Tax in India. Gain insights, operational guidance, and compliance support tailored for businesses and tax professionals .

In-house Technology

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REGULATORY AI MONITORING

Our in-house AI solution monitors official tax and regulatory updates, delivering timely insights on new legislation, clarifications and compliance developments to help businesses assess impact and respond efficiently.

COMPLIANCE AUTOMATION TOOL

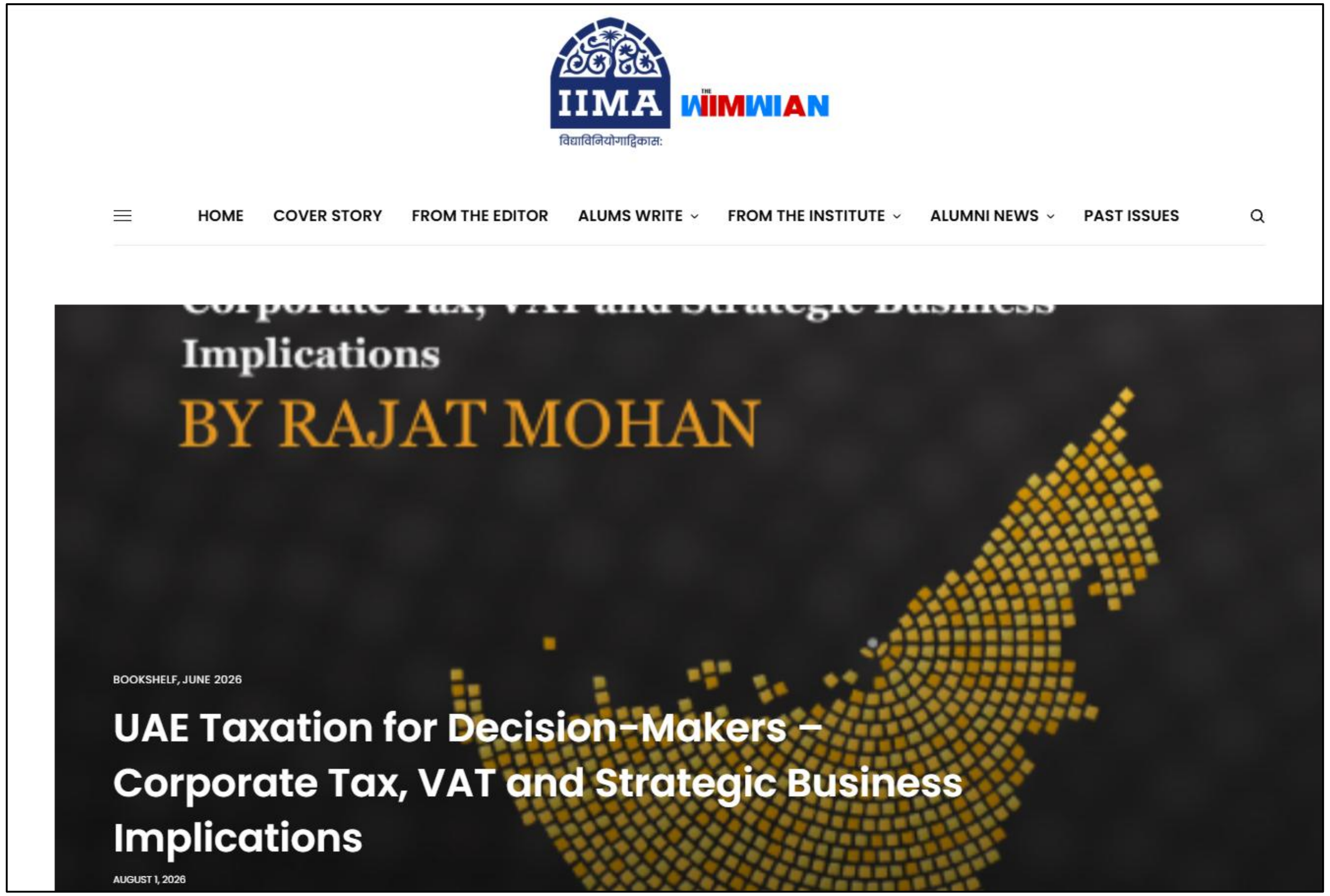
Our in house-RPA automate repetitive compliance workflows, improving accuracy, reducing manual intervention and enhancing operational efficiency.

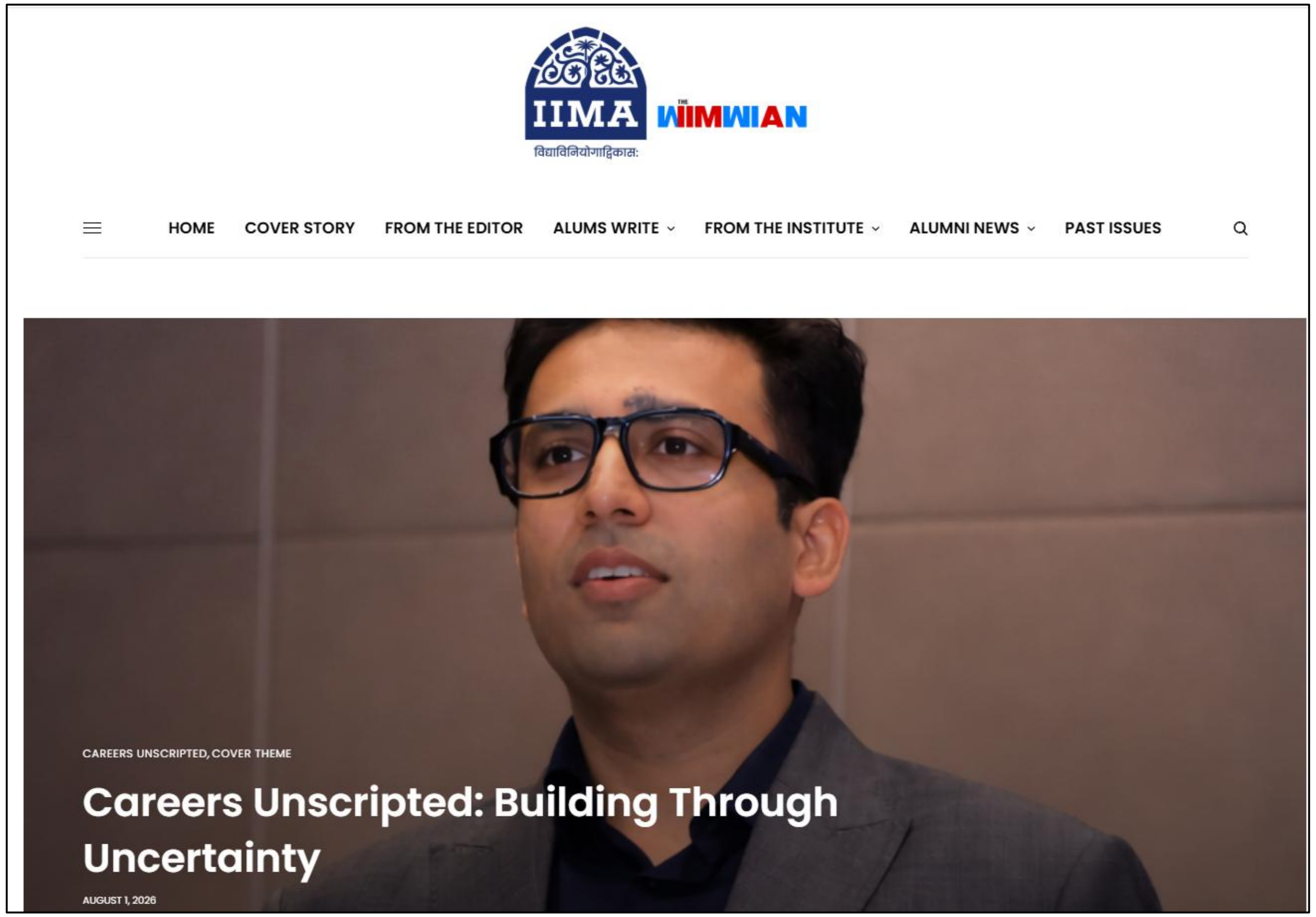
LEGAL MANAGEMENT SYSTEM

A centralized platform for managing legal matters, documents, workflows and sending automated timely reminders—enhancing efficiency, visibility and control.

Milestones

IIMA Alumni Magazine Recognition

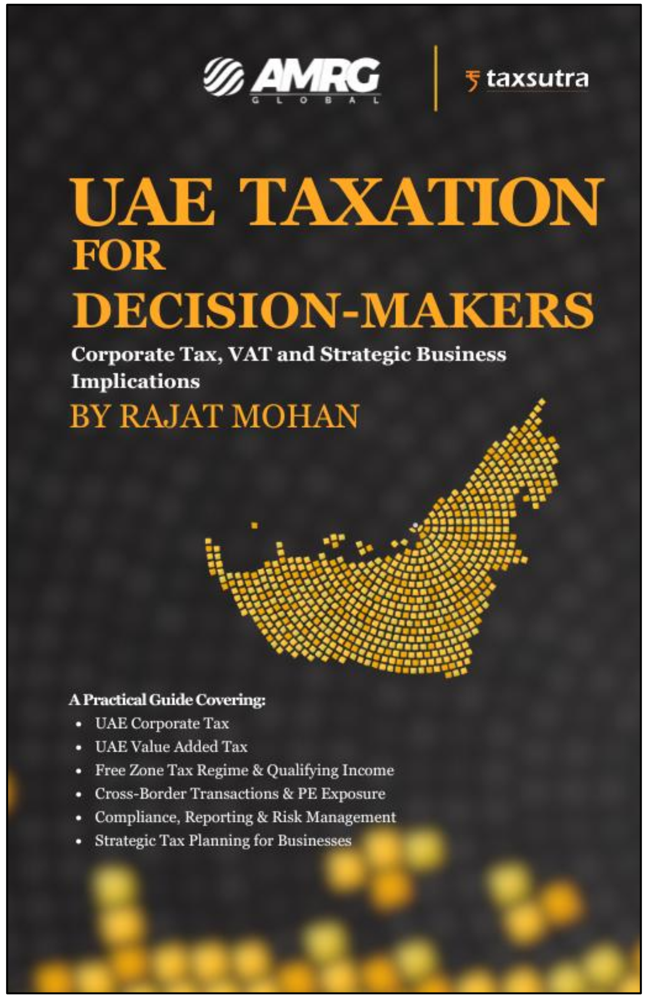




Bookshelf June 2026 Rajat Mohan

Cover Story – Rajat Mohan

Milestones



taxsutra

Latest Publication

This publication offers a practical and structured guide to the UAE's evolving tax landscape, with a focus on its impact on businesses and investors.

- **Understanding UAE Taxation:** Covers the introduction and evolution of **VAT and Corporate Tax** in the UAE.
- **Legal & Regulatory Framework:** Simplifies key **tax laws, provisions, and compliance requirements**.
- **Business Impact:** Examines implications for **corporate structuring, transactions, and business operations**.
- **Cross-Border Perspective:** Highlights considerations for **international businesses, investors, and cross-border transactions**.
- **Strategic Relevance:** Provides insights to help **business leaders and professionals** navigate the UAE's tax environment and make informed decisions.

Milestones

ACCREDITATIONS

Shortlisted by

ITR MIDDLE EAST TAX AWARDS 2026

Indirect Tax Firm of the year 2026

Ranked by

ITR WORLD TAX

Indirect Tax

2022,2023,2024,2025,2026

Ranked by

ITR WORLD TAX

General Corporate Tax

2023,2024,2025,2026

Shortlisted by

ITR WORLD TAX

7 categories – Year 2025

1 categories – Year 2023

Highly Regarded by

ITR WORLD TAX

Tax Practitioner of the Year
2025, 2026

AMRG in the News

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AMRG professionals are regular contributors of expert commentary, articles, and columns in reputed journals, magazines, and national publications.

SAH South Asian Herald — Voice of the Diaspora

GULF TIMES

Khaleej Times

THE TIMES OF INDIA

Business Standard

THE HINDU

Bloomberg

The Indian EXPRESS

THE FINANCIAL EXPRESS

live mint

BusinessLine

hindustantimes

FIRSTPOST.

The Economic Times

The Telegraph

Leadership

Mr. Rajat Mohan
Managing Partner

Partner-Driven Advisory Model

Our practice is led by a partner-driven structure, ensuring a hands-on approach and unparalleled oversight:

- Direct partner involvement in all complex engagements.
- Strategic oversight of cross-border initiatives.
- Coordinated appellate representation across jurisdictions.
- Diligent implementation supervision.
- Commercial alignment balanced with regulatory defensibility.

Regularly featured in leading financial publications such as **Mint, Money control, and The Economic Times – CFO**, for expert commentary on international tax and regulatory developments.

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THANK YOU