

**The list Annexed to Cabinet Resolution No. (71) of 2024
Concerning the Unified List of Violations and Administrative Fines Imposed on
Violators of Measures for Confronting Money Laundering and Combating the
Financing of Terrorism Subject to the Control of the Ministry of Justice and Ministry of Economy**

No.	Legal Reference	Violation	Administrative Fine Amount (AED)	
			Minimum	Maximum
1	Article (20) of the Executive Regulation.	Failure to set policies, measures and internal controls approved by the top management with the aim to combat committing crimes.	100,000	200,000
2	Article (20) of the Executive Regulation.	Internal policies and procedures are not consistent with the crime risks and the nature and size of the facility, or failure to update them continuously.	50,000	100,000
3	Article (20) of the Executive Regulation.	Failure to apply internal policies, procedures, and controls to a branch of the facility or a subsidiary company in which facility holds a majority stake.	50,000	100,000
4	Article (20) of the Executive Regulation.	Failure to include any of the provisions listed in Article (20) of the Executive Regulation in the internal policies, procedures, and controls.	50,000	200,000
5	Article (4) Para (1/B) of the Executive Regulation.	Failure of the facility to take necessary measures and procedures to identify, assess, understand, document, and continuously update crime risks in its field, as well as to provide such information upon request.	50,000	500,000
6	Article (4) Para (1/A) of the Executive Regulation.	Failure of the facility to consider all relevant risk factors, such as risks of customer. States, geographical regions, products and services, operations, and delivery channels of services and products before determining the overall risk level and the appropriate level of risk mitigation measures that will be applied.	50,000	500,000

7	Article (4), Clause (2) of the Executive Regulation.	Failure of the facility to undertake the actions and procedures necessary to mitigate the risks identified based on the results of the National Risk Assessment or the self-assessment process given the nature and scale of the violator's business.	50,000	1,000,000
8	Article (23) of the Executive Regulation.	Failure of the facility to identify and assess the risks that may arise in the violator's field of work when developing the services that the violator offers or when conducting new professional practices through its facility.	50,000	500,000
9	Article (6), Clauses (1, 2, 3, 4 and 5) of the Executive Regulation.	Failure to undertake the necessary customer due diligence measures before establishing the business relationship or performing a casual transaction in favour of the customer that is equal to or more than (AED 55,000), whether it is a sole or multiple transactions that seem connected, or upon making casual transactions in the form of telegraph transfers equal to or more than (AED 3,500) or when suspicion exists about the crime, data validity or sufficiency to identify the identity of the customer that was previously obtained.	50,000	200,000
10	Article (5), Clause (2) of the Executive Regulation.	Failure of the facility to conduct risk management procedures with respect to circumstances where a customer would benefit from the business relationship before the verification process.	100,000	500,000
11	Article (8), Clauses (1) and (2) of the Executive Regulation.	Failure to verify - using documents or data from a reliable and independent source - of the customer identity and the real beneficiary or his deputy before or during the establishment of the business relationship or the account opening, or before conducting a transaction for a customer with whom he has no existing business relationship.	50,000	200,000
12	Article (8), Clauses (3, 4) of the Executive Regulation.	Failure to take necessary measures to understand the purpose, their nature, and nature of the business relationship of the customer and the structure of ownership as well as controlling the customer, or failure to obtain information related to such purpose whenever needed.	50,000	200,000
13	Article (9) of the Executive Regulation.	Failure to take reasonable measures to address crime risks arising from customer and the business relationship to identify and validate the beneficial owner of legal persons and legal arrangements.	50,000	200,000
14	Article (16) of the Decree-Law.	Failure of the facility to keep the information obtained through the execution of due diligence measures.	50,000	200,000

15	Article (4), Clause (2/B) of the Executive Regulation.	Failure to take enhanced due diligence measures to manage high-risk when identified.	100,000	500,000
16	Article (22), Clause (1) of the Executive Regulation.	Failure to apply enhanced due diligence measures proportionate to the level of risk arising from business relationships or transactions with natural or legal person from the States designated by the committee as high-risk or with weak or deficient antimoney laundering and combating terrorism financing systems.	100,000	500,000
17	Article (22), Clause (2) of the Executive Regulation.	Failure to apply countermeasures or other measures required by the supervisory authorities on their own or as specified by the committee with respect to high-risk States or those with weak or deficient anti-money laundering and combating terrorism financing systems.	100,000	500,000
18	Article (15) of the Executive Regulation.	Failure of the facility to set systems or take appropriate measures to manage risks or determine whether the customer or the beneficial owner is foreign or citizen, a politically exposed person or an individual who has previously held a prominent position in an international organization.	50,000	200,000
19	Article (7) of the Executive Regulation.	Failure of the facility to conduct ongoing auditing and monitoring of the continuing business relationship to ensure that documents, data, or information obtained under customer due diligence measures are up-to-date and relevant. This occurs through reviewing the registers and books, especially the registers and books of high-risk customer categories.	50,000	500,000
20	Article (19) of the Executive Regulation	Failure to abide by measures and procedures when relying on a third party to conduct customer due diligence measures.	50,000	200,000
21	Article (16) of the Executive Regulation	Failure of the facility to develop indicators to detect potential	50,000	500,000
24	Article (21) of the Executive Regulation.	Failure of the facility to appoint a compliance officer who has the appropriate competence and expertise to perform his duties.	50,000	200,000

25	Article (21) of the Executive Regulation.	Failure of the facility to enable the compliance officer to perform any of the duties stipulated in Article (21) of the Executive Regulation.	50,000	500,000
26	Article (24), Clauses (1), (3) and (4) of the Executive Regulation.	Failure of the facility to keep any of the records, documents and data stated in the DecreeLaw or the Executive Regulation, or to organize them in a manner that allows re-analysis and reconstruction of individual transactions, data analysis, and tracing financial operations according to the specified periods, or the failure to make the same promptly available for relevant entities upon request.	50,000	200,000
27	Article (16) Paragraph (1/E) of the Decree-Law. and Article (60) of the Executive Regulation.	Failure to promptly apply decisions issued by the concerned authority in the State with respect to execution of UN Security Council's resolutions issued under Chapter Seven of the UN Charter to prevent and suppress terrorism and its financing, prevention and suppression of mass destruction weapons proliferation and suspension and its financing and other relevant resolutions.	100,000	1,000,000
28	Article (18) of the Executive Regulation.	Disclosing, directly or indirectly, to the customer or any other person(s) that they have reported or are intending to report suspicious transactions, or the information and data relevant to such transactions, or that there is an investigation thereto.	100,000	500,000
29	Article (39) of the Executive Regulation.	Contacting the customer, whether directly or indirectly, to inform the customer with the procedures that were conducted concerning the latter without a written request from the relevant supervisory entity.	100,000	500,000
30	Article (14) of the Executive Regulation.	Dealing with shell banks in any way, whether through opening bank accounts, or accepting funds or deposits from such banks.	200,000	1,000,000
31	Article (14) of the Executive Regulation.	Open or keep bank accounts under nickname, pseudonym or fake name, or with numbers other than their owners names.	200,000	1,000,000

32	Article (44) of the Executive Regulation.	Failure to comply with the instructions, regulations, and forms concerning crime combating set by supervisory authorities, or failure to respond to request for information regarding the verification of compliance with the provisions of the Decree-Law, the Executive Regulation and the resolutions issued in implementation thereof from the part of the facilities under control.	50,000	1,00,000
33	Article (21) Clause (1) of Cabinet Resolution No. (74) of 2020.	Failure of the facility to register at the website of the Executive Office for Control and Non-Proliferation with the aim of receiving notifications related to the new designation, re-designation as well as updating or de-listing notifications issued by the Security Council, the Sanctions Committee, or the Council of Ministers.	50,000	1,000,000
34	Article (21) Clause (2) of Cabinet Resolution No. (74) of 2020.	Failure to constantly verify databases and transactions and compare them with the names on the lists issued by the Security Council, the Sanctions Committee or the local lists, as well as upon being informed of any changes in any of these lists.	50,000	1,000,000
35	Article (21) Clause (3) of Cabinet Resolution No. (74) of 2020.	Failure of the facility to freeze funds under the local penalties list and the local lists promptly when any match appears and without any prior warning.	500,000	1,000,000
36	Article (21) Clause (4) of Cabinet Resolution No. (74) of 2020.	Failure of the facility to enforce the decision to cancel the freeze, in compliance with the relevant Security Council resolutions or Cabinet decisions regarding the issuance of local lists.	50,000	100,000
37	Article (15) Clause (21) Para (5/1) of Cabinet Resolution No. (74) of 2020.	Failure of the facility to promptly report to the Executive Office for Control and Non-Proliferation with respect to freezing procedures taken.	50,000	100,000
38	Article (15) and Article (21) Para (5/B) of Cabinet Resolution No. (74) of 2020.	Failure of the facility to promptly report to the Executive Office for Control and Non-Proliferation upon determining any match with the designated persons or organizations, details of their data and the actions taken in compliance with the requirements set by the related Security Council Resolutions or Cabinet decisions and the local lists, including transactions that are being attempted.	100,000	1,000,000
39	Article (21) Paragraphs (5/C and D) of Cabinet Resolution No. (74) of 2020.	Failure of the facility to promptly report to the Executive Office for Control and Non-Proliferation if the facility one of its former customers or any occasional customer dealt with is a person or organization included in the Sanctions List or the local lists, or when there is suspicion that a current or former customer, or someone associated with the facility, is listed or has a direct or indirect connection with the listed person.	100,000	1,000,000

40	Article (21) Paragraph (5/E) of Cabinet Resolution No. (74) of 2020.	Failure of the facility to promptly report to the Executive Office for Control and Non-Proliferation upon failure to take any action due to similarity of names and in case removing that similarity has failed through available or accessible information.	50,000	1,000,000
41	Article (21) Clause (6) of Cabinet Resolution No. (74) of 2020.	Failure of the facility to set and apply internal policies, controls and procedures pursuant to provisions of the aforementioned Cabinet Resolution No. (74) of 2020.	100,000	1,000,000