

18 December 2025

Notice No: FCCP-Notice No. 183 of 2025

To: Senior Executive Officers (SEO) and Money Laundering Reporting Officers (MLRO)

Dear SEO/MLRO,

Reminder: Reminder on the Expiry of UN Security Council Resolution 2231 (2015) and the Re-Imposition of UN Targeted Financial Sanctions Pursuant to Resolution 1737 (2006) and Subsequent Resolutions

The FSRA would like to remind all ADGM Relevant Persons (RPs), consisting of Financial Institutions (FIs), Virtual Assets Service Providers (VASPs) and Designated Non-Financial Businesses and Professions (DNFBPs), of their ongoing obligations to implement United Nations (UN) Targeted Financial Sanctions (TFS) related to Proliferation Financing (PF) without delay, in line with the Cabinet Resolution No. (74) of 2020, as well as with the AML Rulebook and FATF Recommendation 7.

Following the expiry of United Nations Security Council Resolution (UNSCR) No. 2231 (2015), the UN has announced the re-imposition of sanctions pursuant to UNSCRs No. 1696 (2006), 1737 (2006), 1747 (2007), 1803 (2008), 1835 (2008), and 1929 (2010), through the snapback mechanism, leading to the re-establishment of these resolutions. For the details, please access the following [link](#).

Accordingly, the FSRA requires and expects all RPs to take immediate action to ensure full compliance with their TFS (TF & PF) regulatory obligations including but not limited to the following:

- 1. Update Internal Policies and Procedures:** Revise internal manuals and relevant policies and procedures to ensure compliance with TFS obligations and alignment of staff training and practices accordingly.
- 2. Sanctions List Updates:** Regularly update sanctions screening and verification systems to incorporate the most recent version and information from the United Nations Consolidated Sanctions List.
- 3. Immediate Re-Screening:** Conduct immediate re-screening of all customers, beneficial owners, and transaction counterparties against the updated sanctions list to identify any confirmed or potential matches.
- 4. Implementation of TFS:** Apply asset freezing measures without delay and ensure that no funds or other assets are made available, directly or indirectly, to or for the benefit of designated persons or entities, in accordance with Cabinet Resolution No. (74) of 2020 concerning the Terrorist Lists Regime and the implementation of United Nations Security Council resolutions relating to the prevention of terrorism, terrorism financing, proliferation of weapons of mass destruction and proliferation financing.

- 5. Reporting Obligations:** Promptly report of Confirmed Name Matches (CNMRs) and Partial Name Matches (PNMRs) to the Executive Office for Control and Non-Proliferation through the GoAML system, in accordance with the TFS Guidance.

The FSRA will take appropriate action in response to any contraventions of applicable TFS (TF & PF) legislation, regulation or obligations. The FSRA appreciates the ongoing commitment of all RPs to comply with TFS and other applicable Sanctions requirements as well as the FSRA AML Rules.

Sincerely,
Financial & Cyber Crime Prevention