

Date: 08 July 2025

Notice No.: FSRA/FCCP/84/2025.

To: Senior Executive Officers (SEO), Money Laundering Reporting Officers (MLRO) and Principal Representatives (PR)

Dear SEO/MLRO/PR,

Subject: Reminder on key AML / TFS Obligation, Registration and Reporting through goAML portal

Pursuant to Notice No. FSRA/FCCP/14/2023, the Financial & Cyber Crime Prevention department (FCCP) would like to remind Relevant Persons (RPs) of their obligations under the Anti Money Laundering and Sanctions Rulebook ("AML Rules") as well as the applicable Federal AML/CFT legislation. RPs are required to promptly report any suspicious activities, transactions, and related information that may indicate criminal activities or attempts to use funds for illegal purposes.

This notice is issued to raise awareness and support ongoing compliance. It does not set out all the obligations of Relevant Persons in relation to this subject. Relevant Persons should always refer to relevant legislation and guidance to ensure full compliance.

Legal Framework

The following federal legislation applies in ADGM, and Relevant Persons must comply:

- 1) Decree Federal Law No. (20) of 2018 on Anti-Money Laundering and Combating the Financing of Terrorism and Illegal Organizations.
- 2) Cabinet Decision No. (10) of 2019 concerning the Implementing Regulation of Decree Federal Law No. (20) of 2018.
- 3) Cabinet Resolution No. (74) of 2020 concerning the 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 Relevant Resolution (Cabinet Decision No. 74).
- 4) Decision by the National Committee for Combating Money Laundering and Financing Terrorism and Illegal Organisations (the Committee) regarding High-Risk Jurisdictions

Relevant Persons must comply with the AML Rulebook, and as set out in the AML Rules, Relevant Persons should also ensure they are aware of, and take into account, all notices issued by the Regulator as well as relevant guidance and guidelines issued by governmental authorities in the UAE.

Aims and Objectives

This notice aims to highlight three (3) main requirements, as follows:

- A. Complying with the relevant AML/CFT Regulations; and
- B. Subscription to the goAML System.
- C. Raise the relevant report through the goAML Portal.

A. Complying with the relevant AML/CFT Regulations

In line with our ongoing efforts to enhance awareness among RPs, RPs are reminded to adhere to the following obligations:

1. Establish policies, procedures and maintain effective systems and controls to detect and monitor suspicious activities and transactions related to money laundering, terrorist financing and proliferation financing.
2. Conduct tailored trainings for your employees to improve the knowledge and the quality of investigations enabling them to determine any suspicion, or reasonable grounds for suspicion of criminal activities.
3. Establish and document the roles and responsibilities of all employees, including implementing an adequate three-line of defence tailored to the nature and size of the business, and ensure that reporting procedures of suspicions to the Senior Management and/or Board of Directors are in place.
4. Conduct an annual risk assessment to determine potential typologies of suspicious activities and transactions tailored to the nature of the business, including identifying specific red flags and indicators.
5. Review and update the red flags and indicators on an ongoing basis in accordance with the development and diversity of the methods used for committing such crimes, and reflect the findings in your risk assessment, policies and procedures.
6. Establish a detailed process to identify, analyse, investigate and escalate to MLRO the reporting / filing of unusual or suspicious activities, in addition to accurately documenting the details of the escalation, the review and the actions taken during all stages of the STR/SAR reporting process.
7. Review the FIU's quarterly quality assurance report, which highlights areas of possible improvement. Accordingly, all RPs are encouraged to continuously enhance the quality of STRs/SARs to be filed by providing accurate, adequate and clear details covering the matter with supporting evidence.
8. Make sure not to disclose, directly or indirectly, to the customer or any other person(s) that you are reporting or are intending to report a STR/SAR, nor disclose the information or data contained therein, or that an investigation is being conducted in that regard.

9. Obtain identification documents (Emirates ID or Passport), register and report the information through the FIU's goAML platform.
10. Distinguish between the Suspicious Transactions / Activities Reporting obligation and the other types of reporting on the FIU's goAML platform as highlighted in **Section "C"**.
11. Maintain records of all reports submitted, along with any supporting documents, for the required retention period of six years, as specified in the AML rules.
12. Be prepared to provide additional information or clarification if requested by the FIU. RPs should also monitor any feedback or updates related to their submitted reports.

B. Subscribe to the goAML System

RPs are required to register and adhere to the followings steps to successfully register to the goAML system:

1. **Pre-registration (stage 1):** Register on the Service Access Control Manager ([SACM](#)) system of the UAE FIU to get the username and secret key for accessing the Google Authenticator.¹
2. **Registration (stage 2):** Register on the UAE FIU's goAML [Portal](#)².

Note: Completion of both stages is mandatory for RPs and their users, including new or additional users, whether registering as new organization or as a new person. **Please Refer to Annex A for the detailed instructions in the goAML Registration Guide.**

C. Type of reports required to raise/submit through the goAML Portal

The RPs are required to submit reports that must be brought to the attention of the UAE Financial Intelligence Unit (FIU). This includes, but is not limited to reporting of ³:

Report Type	Description	Trigger/Deadline
Suspicious Transaction Report (STR)	Submitted where a transaction (executed or attempted) is suspected to be linked to ML/TF or criminal activity.	As soon as practicable and without delay following the determination of suspicion by the MLRO.
Suspicious Activity Report (SAR)	Submitted when suspicious activity is identified and is suspected to be linked to ML/TF or criminal activity or when transactions appearing unusual in	As soon as practicable and without delay following the determination of suspicion by the MLRO

¹ [goAML Pre-registration Guide - Service Access Control Manager \(SACM\)](#)

² [goAML Registration Guide](#)

³ [goAML web submission guide](#)

	terms of source, amount, or destination, to monitor potential illegal activities	
Real Estate Activity Report (REAR)⁴	Required when there are real estate transactions involving cash ≥ AED 55,000 (or foreign currency equivalent) virtual assets or funds converted from virtual asset for purchase/sale or on behalf of third parties.	Reported as per occurrence.
Dealers in Precious Metals and Stones Report (DPMSR)⁵	Required for transactions involving individuals (resident or non-resident) or entities that ≥ AED 55,000 (or foreign currency equivalent) whether in cash or via wire transfer.	Within (2) weeks of the transaction.
Partial Name Match Report (PNMR)⁶	Submitted upon identifying a potential or partial name match against the UN or UAE Local Terrorist List and the relationship is suspended/cancelled.	Without delay (within 24 hours) upon identifying a potential or partial name match.
Funds Freeze Report (FFR)⁷	Reporting of any frozen funds related to sanctioned entities or individuals per Cabinet Decision 74 of 2020 after identifying a confirmed match to the Local Terrorist List or UN Consolidated List.	Freeze all associated assets within 24 hours and submit FFR within five (5) calendar days of taking freezing measures.
High Risk Country Activity Report (HRCA)	Engagement with clients or entities in high-risk jurisdictions per the Decision from the National Anti-Money Laundering and Combating the Financing of Terrorism and financing of Illegal Organizations Committee (“NAMLCFTC”).	Must be submitted at least three (3) calendar days prior to engagement. Note: Such reported transaction(s) may only be executed three working days after reporting such to the FIU, and if the FIU does not object to conducting the transaction within the set period.
High Risk Country Transaction Report (HRC)	Required for financial transactions to/from designated high-risk countries per the Decision from the NAMLCFTC	Must be submitted at least three (3) calendar days prior to execution of the activity or transaction. Note: Such reported transaction(s) may only be executed three working days after reporting such to the FIU, and if the FIU does not object to conducting the transaction within the set period.

⁴ [goAML Web Submission Guide – Real Estate Activity Report](#)

⁵ [goAML Web Submission Guide Dealers in Precious Metals and Stones Report](#)

⁶ [goAML Web Submission Guide – Partial Name Match Report & Funds Freeze Report](#)

Additional Information File (AIF)	Filed to provide supplementary data, without specific transactions, to a previously submitted STR/SAR.	Upon request by FIU or internal reassessment.
AIF with Transactions (AIFT)	As above but includes additional transaction details.	Upon request by FIU or internal reassessment.
Request for Information (FIU-triggered) (RFI / RFIT)	Responses to formal FIU inquiries or follow-up requests for information when no transactions are involved or Request for information related to specific transactions	Upon request by FIU or internal reassessment.

Submission Process: For each report type, RPs need to:

- **Gather Information:** Collect all relevant details concerning the suspicious activity or transaction.
- **Access goAML:** Log in to the goAML platform using authorized access.
- **Complete the Report:** Fill out the required fields for the selected report type, ensuring accuracy and completeness.
- **Review and Submit:** Review the report before submission and submit it through the platform.

It is important that RPs are familiar with the different types of reports and the specific circumstances under which they should be submitted to ensure compliance with UAE regulations regarding AML and CFT. It is important to note that a quality report must be structured, chronological, and intelligible to an independent reviewer unfamiliar with the case.

RPs must without delay, submit a STR/SAR to the FIU using the goAML platform and notify FCCP of the submission by email to FCCP@adgm.com.

The FSRA will take appropriate action against Relevant Persons for contraventions of applicable legislation. We appreciate the ongoing commitment of Relevant Persons to comply with Federal AML/CFT Legislations, National Directives and the AML Rules

Sincerely,
 Financial & Cyber Crime Prevention

Annex (A)

Stage 1– Pre-registration on SACM and Obtaining the Secret Key

1. The following documents and information are required for completing both stages of the goAML Registration: Annex A

- Valid ADGM Financial Services Permission or Commercial License.
- ADGM MLRO approval (copy of the email)
- Supporting evidence of the current MLRO and deputy MLRO copies, including
 - Passport
 - Emirates ID (front and back) o UAE Resident Visa
 - Valid and unique UAE Mobile number
 - Valid and unique email address

Note:

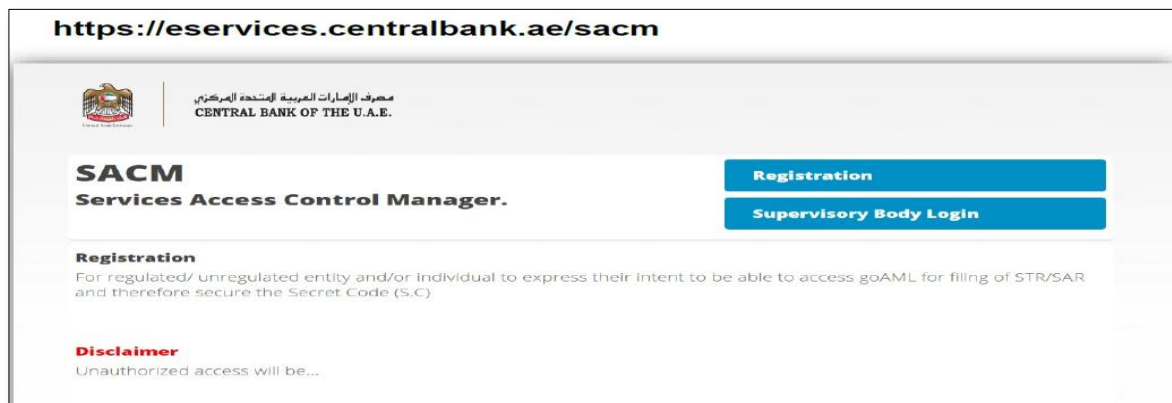
- All mandatory documents must be saved and consolidated in **one** PDF file.
- Mobile numbers and email addresses must be operational and cannot be used for multiple pre-registration requests.

2. Access the system through <https://services.FIU.gov.ae/sacm/>

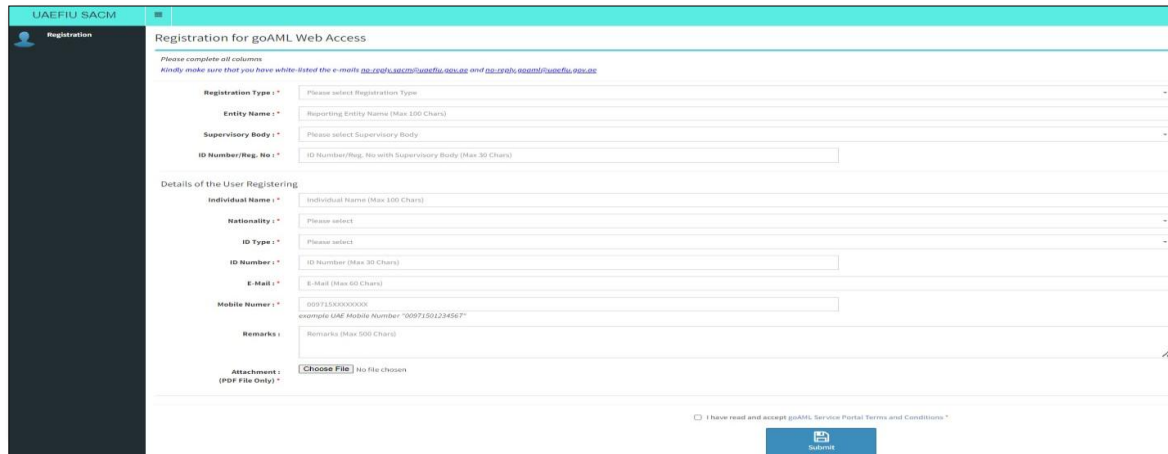
3. Click on **SYSTEMS** > Select '**Security Access Control Manager**'



4. Click on '**Registration**'



5. Complete all mandatory fields marked below with an asterisk (*):



Key Considerations: complete all mandatory fields (*) by following the steps as listed below:

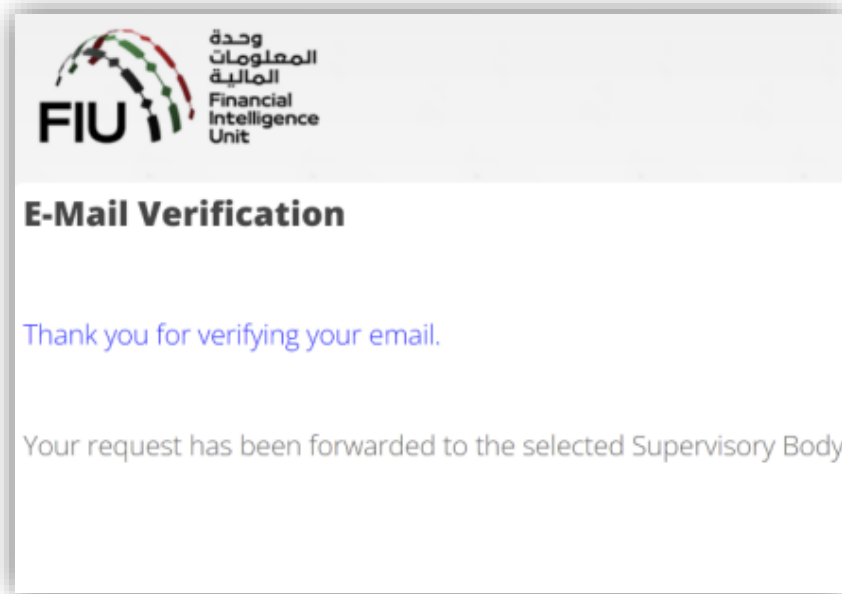
- Select “**Reporting Entity**” as Registration Type
- Enter your entity name as per your **ADGM Commercial Licence**.
- Select “**Abu Dhabi Global Market**” as your Supervisory Body
- Enter your **ADGM Commercial Licence number** under “ID Number/Reg. No”
- Provide an accurate mobile number and e-mail address to receive OTPs
- Type in “**MLRO’s Name**” under Individual Name
- Select your **NATIONALITY** from the drop-down list provided
- Select the ID TYPE from the list of values provided.
- Type in the Emirates ID or Passport number
- Type in a valid and operational “**EMAIL**” address. Ensure that it is operational so that you are able to receive emails. *Please note that you cannot use the same email address for multiple pre-registration requests*
- Type in a valid and operational “**UAE Mobile Number**”. Ensure that it is operational to be able to receive SMS. Please note that you cannot use the same mobile number for multiple pre-registration requests
- Click on “**Choose file**” button and upload the **consolidated** PDF file.
- Review and ensure all details are provided
- Accept the “**Terms & Conditions**” by ticking the box provided
- Finally click on the “**SUBMIT**” button

6. Once submitted – you will receive an email from SACM user, as follows:

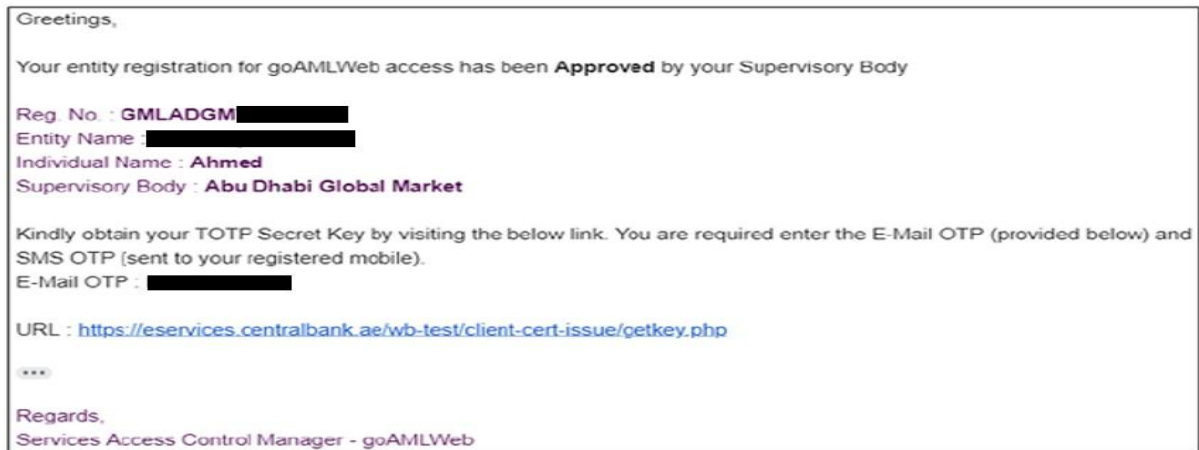
- a. The pre-registration number assigned (which start with **GMLADGMxxxxxxx**) and the “**One Time Password**” (OTP)



- b. Click on the link provided sent to your email to complete the email address **verification process**. The following message will be displayed if the verification process is successful.

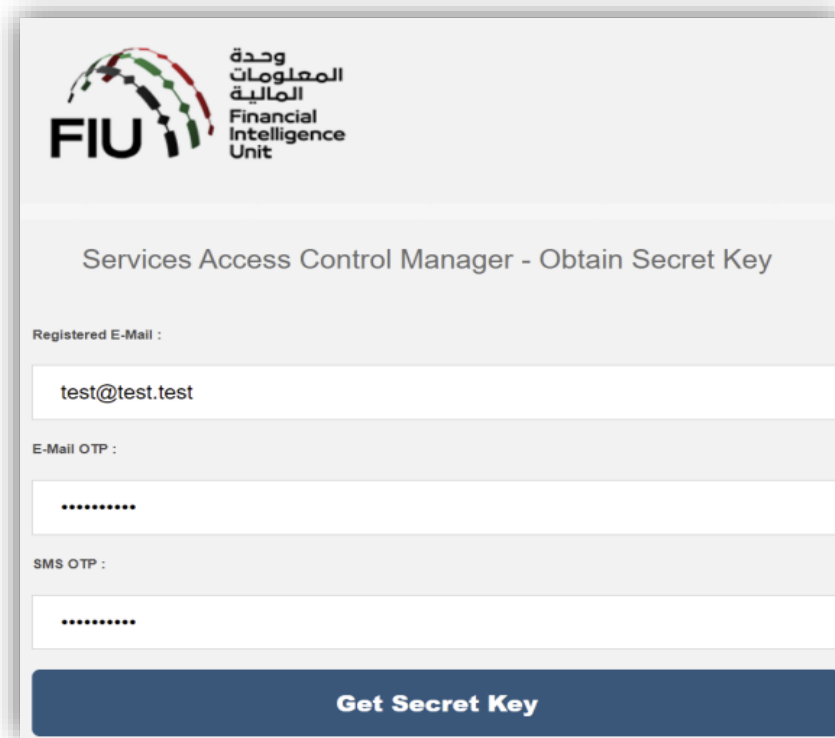



7. Click on the link provided in the email where you will be required to provide the following:
- Email used in the pre-registration (**Stage 1**) request
 - Email OTP (EOTP) sent to your registered email address
 - SMS OTP (MOTP) sent to your registered mobile number



Please note that the EOTP and MOTP **are only valid for 24 hours from the time of issuance**. Therefore, your Registration (**Stage 2**) must be completed within 24 hours.

8. After filling up the field with the above information highlighted in point 7 (a, b, c) – click on “**Get Secret Key**”




 وحدة المعلومات المالية
 Financial Intelligence Unit

Services Access Control Manager - Obtain Secret Key

Registered E-Mail :

test@test.test

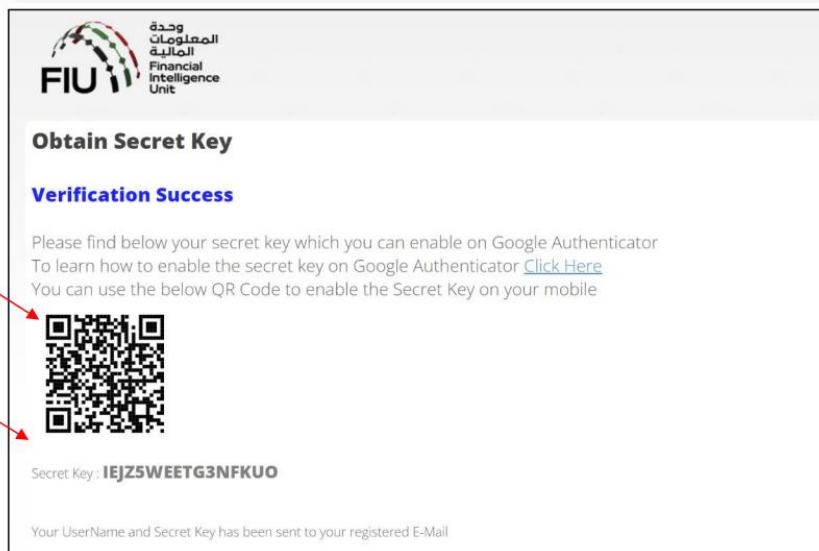
E-Mail OTP :


.....

SMS OTP :

.....

Get Secret Key





 وحدة المعلومات المالية
 Financial Intelligence Unit

Obtain Secret Key

Verification Success

Please find below your secret key which you can enable on Google Authenticator
 To learn how to enable the secret key on Google Authenticator [Click Here](#)
 You can use the below QR Code to enable the Secret Key on your mobile



Secret Key : **IEJZ5WEETG3NFKUO**

Your UserName and Secret Key has been sent to your registered E-Mail

Scan the QR Code with Google Authenticator App

Instead, you can manually enter this key in the App

Note:

- **Install Google Authenticator** on your mobile (IOS or Android)
- Activate your ‘**Google Authenticator**’ by scanning the bar code that was sent to the registered email address.
- ‘Google Authenticator’ will be generating a **6-digit number** which will change every minute.

9. Upon completion of the pre-registration (**Stage 1**) through SCAM, you will receive an email with your login details as shown below

Greetings,

Please find below your User Name and Secret Key for your reference.
Kindly make sure you are keeping the User Name and Secret Key confidentially

Reg. No. : GMLADGM-██████████
 Entity Name : ██████████
 Individual Name : Ahmed
 Supervisory Body : Abu Dhabi Global Market

User Name : ██████████
 Secret Key : ██████████

URL : <https://services.cbuae.gov.ae>

Regards,
 Services Access Control Manager - goAMLWeb

Stage 2 – goAML Portal Registration Guidance

A. Registering a New Organisation ⁷

Note: If you are already registered on the goAML system and wish to add an additional user, please refer to part B of this section and follow the steps.

1. Access the system through <https://services.FIU.gov.ae>
2. Select 'Systems' and then select 'goAML'



3. Log into the system using the **Username** sent to your email, which starts with (UADGMXXXXXX) **and input the 6 digits that appear on your 'Google Authenticator' as your password.**

Sign in
<https://services.uaefiu.gov.ae>

Username

Password


Using USERNAME received post – SACM Registration

Google Authenticator's 6-digit code

⁷ Refer to the FIU- goAML Registration Guide for details

4. Select your Registration Type as “Register a New Organization”.




 وحدة المعلومات المالية
 Financial Intelligence Unit

UAE Financial Intelligence Unit

Welcome to goAML - UAE FIU Reporting System

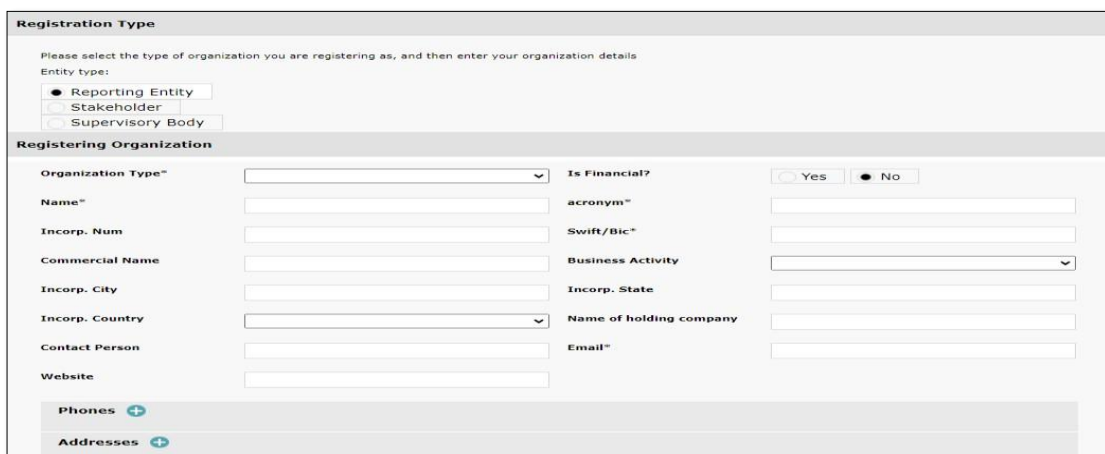
LOGIN >>

Register

Please note that in order to get access to the system, you first need to register as a **Reporting Entity** under “**Register as an Organisation**”. Once the registration process has been successfully completed, you can log in with the credentials you have previously defined.

[Supervisory Bodies Pre-registration Guide](#)
[Reporting Entities Pre-registration Guide](#)
[Registration Guide](#)
[FAQs](#)

5. All mandatory(*) fields must be completed.



Registration Type

Please select the type of organization you are registering as, and then enter your organization details

Entity type:

Reporting Entity
 Stakeholder
 Supervisory Body

Registering Organization

Organization Type* Is Financial? Yes No

Name* acronym*

Incorp. Num Swift/Bic*

Commercial Name Business Activity

Incorp. City Incorp. State

Incorp. Country Name of holding company

Contact Person Email*

Website

Phones

Addresses

Key Considerations:

- Select Reporting Entity
- Choose the **most suitable relevant Organisation Type** according to your licensed activities
- Enter / create a username and password for the individual registering (to be able to login to the portal post approval).
- Ensure the phone and address fields are populated.

6. Press “**Choose file**” to upload/ Select the mandatory documents* to attach from the desired location. After **selecting a file as an attachment, click the Upload button**

*e.g., Valid ADGM Commercial License, ADGM MLRO approval (copy of the email), Supporting evidence of the current MLRO and deputy MLRO copies, including Passport, Emirates ID (front and back), UAE Resident Visa, Mobile number, Valid email address and Supporting evidence of the current MLRO and deputy MLRO copies, including Passport, Emirates ID (front and back), UAE Resident Visa, Mobile number, Valid email address).

7. Before submitting the request, enter the “**Captcha**” (sequence of digits that appears on the screen in this case). Ensure typing in the numbers as they appear in the image and click **Submit Request**.

File Name	File Size	
Passport Copy.pdf	76097	X
Authorization Letter.pdf	76097	X

Choose File No file chosen Upload

Once the registration form is submitted, a “Registration info has been submitted” will appear on your screen with the registration reference number. The reference number is used for any registration related enquiries with the regulator or the goAML support team.

Registration info has been submitted Return to main page

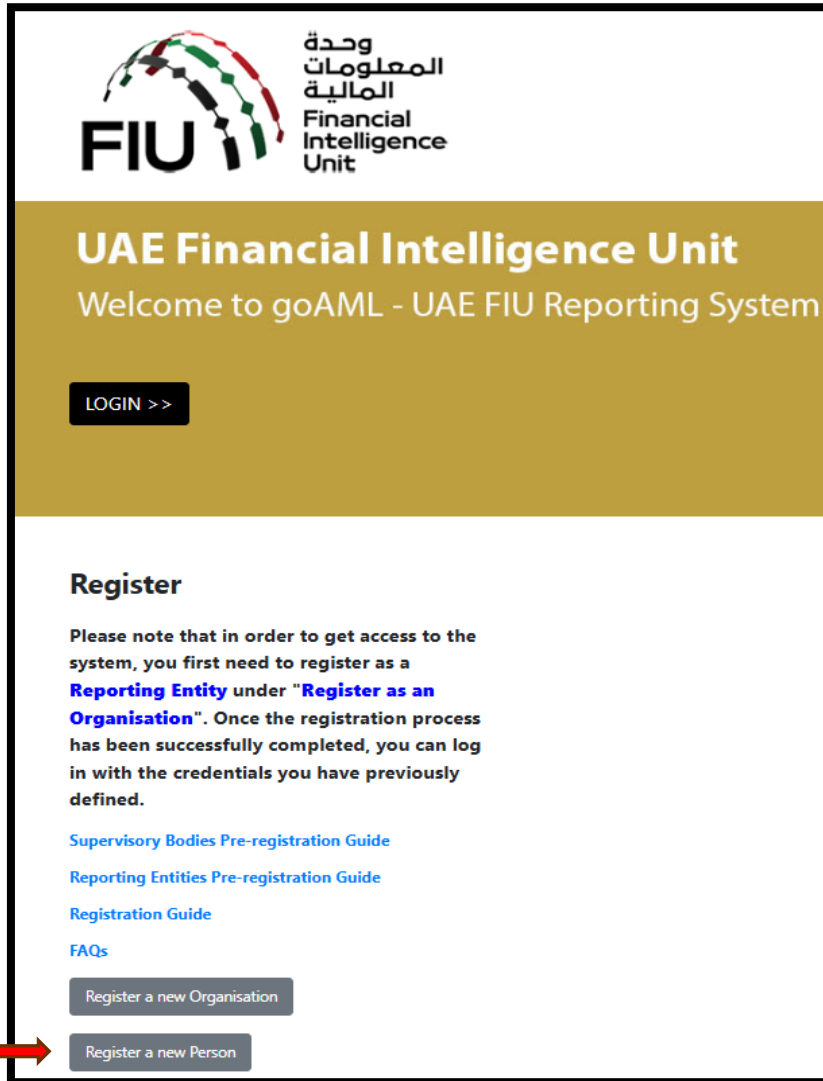
Registration info has been submitted

Please wait for notification of acceptance/rejection by email. Your request has been given the following reference number: RE_RP000011-06 JAN 2019

8. You will receive an e-mail to notify you of the status of your application. In the event your application for Registration (Stage 2) is **rejected**, please refer to the reason for rejection and re-submit once again starting from point 1 of this section.

B. Registering as a New Person (for additional users / change of MLRO)

1. Complete Part 1 of the Pre-Registration (**Stage 1**) – for the details, please refer to **Stage 1–Pre - registration section**
2. Once your Stage 1 request is approved, Register in Stage 2 by Selecting type of registration – “Register a New Person”



9. **Complete** all mandatory (*) fields under Registering Person, phones and attachments sections of stage (2) - for details refer to **Stage 2 – above goAML Portal Registration**. **Note:** For “**Organization ID**” field – the existing MLRO who acts as the admin for your entity should provide the new user with the organization ID from the goAML portal to enable new users to register under the entity’s profile.

Note:

For assistance with technical issues, please direct your queries to the FIU’s goAML Team by email on goAML@FIU.gov.ae.

For other enquiries, please direct these to the ADGM’s Financial and Cyber Crime Prevention (FCCP) Team by email on FCCP@adgm.com.