

3 March 2025

**Notice No.: FSRA/FCCP/26/2025**

**To: Senior Executive Officers (SEO), Money Laundering Reporting Officers (MLRO) and ADGM Licensed Person (LP)**

Dear SEO/MLRO/LP,

**RE: Updating the annual AML Return form.**

As part of the Financial & Cyber Crime Prevention ("FCCP") department ongoing commitment to strengthening the FSRA's Anti-Money Laundering ("AML") and Targeted Financial Sanctions ("TFS") regulatory oversight and compliance monitoring, the FCCP has undertaken a review and update of the annual AML Return form. This initiative is part of the FCCP ongoing efforts to keep pace with local regulatory developments, evolving international standards set by the Financial Action Task Force ("FATF") and other global standard-setting bodies, as well as industry best practices.

The updated AML Return form includes enhanced sections and additional questions aimed at capturing more detailed insights into Relevant Persons' and Representative Offices' AML-TFS monitoring frameworks and measures.

The digital AML Return form remains accessible via the **FSRA Connect** portal at <https://fsraconnect.adgm.com/s/aml-returns> and its timely and accurate completion and submission by the end of April of each year is essential to meet regulatory obligations.

To support a smooth and efficient submission, FCCP would like to remind you of the following key considerations as referenced in FCCP's previous Notice FSRA/FCCP/07/2024.

**1. General Guidance while completing the AML Return form:**

Pursuant to the provisions of the Anti-Money Laundering and Sanctions Rules and Guidance (AML), Relevant Persons and Representative Offices are reminded of the following:

- i. In completing this AML Return, Relevant Persons and Representative Offices should refer to the Anti-Money Laundering and Sanctions Rules and Guidance.
- ii. A Glossary of defined terms is provided in AML Chapter 3.
- iii. A reference in the AML Return to "Money Laundering" includes a reference to Terrorist Financing (TF), Proliferation Financing (PF), the financing of unlawful organizations and sanctions non-compliance unless the context provides or implies otherwise.
- iv. All Relevant Persons and Representative Offices must complete and submit this AML Return by the end of April each year in accordance with AML 4.6.1. The AML Return must cover the period from 1 January to 31 December of the preceding year (*unless previously authorised by the FSRA*).
- v. Relevant Persons and Representative Offices must retain a signed copy of the completed AML Return along with all supporting materials (*refer to the above-mentioned Guidance 6*).

- vi. Separately, a Relevant Person and Representative Office must also report at least semi-annually to its Governing Body or Senior Management on the matters set out in AML 12.4.1. In accordance with AML 12.4.3, copies of these reports and the records made under AML 12.4.2(c) must be submitted to the Relevant Person's or Representative Office's ADGM Regulator.
- vii. Under ADGM's:
  - Financial Services and Markets Regulations 2015, section 219, it is an offence to mislead the Regulator by knowingly or recklessly providing to the FSRA any information which is false, misleading, or deceptive or to conceal information where the concealment of such information is likely to mislead or deceive the FSRA; and
  - Commercial Licensing regulations 2015, section 39(4), it is a contravention of the Regulations to knowingly or recklessly provide false or misleading information to the Registrar, in a material particular.

## **2. Technical Guidance prior to start filling out and submitting the online AML Return form:**

- i. Relevant Persons and Representative Offices are reminded that all answers are mandatory. The system will not allow any submission in case of any mandatory question marked with an asterisk remaining unanswered.
- ii. Relevant Persons and Representative Offices have the option to save their work in progress at any stage of filling the AML Return form. The related saved file can be accessed for review and amendment prior to submission.
- iii. **Relevant Persons and Representative Offices are reminded that a signed copy of the filled AML Return form is required to be uploaded under 'Signed AML Return' prior to submission.**
- iv. **Once the AML Return form is fully completed, Relevant Persons and Representative Offices should ensure saving the form to allow the 'Download Report' button to appear after the form is saved. Once downloaded, the AML Return form can be printed, signed, and uploaded (refer to point 3 above). If the 'Download Report' button does not appear, it is an indication that there are unpopulated mandatory fields, which once completed and the report is saved, the said button should be visible.**
- v. **The AML Return form cannot be edited after submission. Any resubmission will require completing all the questions again.**
- vi. Text fields allow a maximum of 20K characters, where additional space is needed, Relevant Persons and Representative Offices are required to upload the detailed answers separately highlighting for each answer the related question and its number.
- vii. Relevant Persons and Representative Offices should receive a notification on their mailbox confirming that the AML Return for the relevant year was successfully submitted on the date of such submission.

For any queries or clarifications, Relevant Persons and Representative Offices are required to reach out to FCCP by email at [amlreturn@adgm.com](mailto:amlreturn@adgm.com), ensuring that their relevant supervisory authority is copied in all correspondence.

Sincerely,

**Financial & Cyber Crime Prevention**