# DgTx AML AWARENESS TRAINING MANUAL

## For Real Estate Brokers & Jewellery Sector


**Prepared by DgTx – Your Trusted Tax Partner in UAE**

# TRAINING OBJECTIVE:

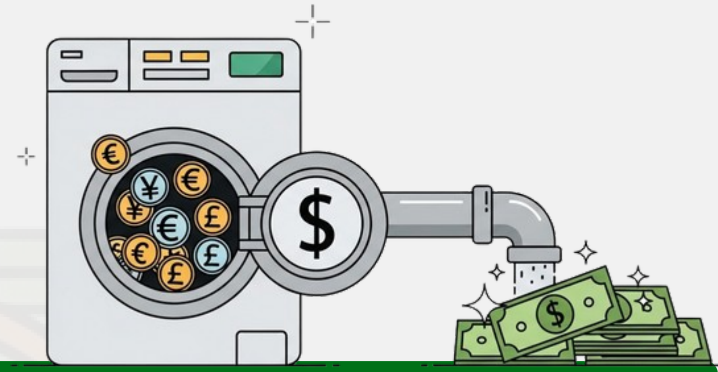

This training equips participants with practical knowledge to comply with UAE’s **Anti-Money Laundering (AML)** and **Counter Financing of Terrorism (CFT)** regulations.

## By The End, The Trainees Should Be Able To:

- **Understand what AML means and why it is important.**
- **Know how to register on the goAML portal.**
- **Conduct Know Your Customer (KYC) checks accurately.**
- **Identify and report suspicious transactions.**
- **Implement internal AML policies and ensure compliance.**
- **Understand the role of AMLRO (Anti-Money Laundering Reporting Officer) and Ministry of Economy audits.**

# WHAT IS MONEY LAUNDERING (ML):

Money Laundering is the process of converting money obtained through illegal activities into apparently legitimate funds.



## THE THREE STAGES

### 01. PLACEMENT:

Introducing illegal funds into the financial system (e.g., cash deposit, real estate purchase)

### 02. LAYERING:

Concealing the source through complex transactions or transfers.

### 03. INTEGRATION:

The money re-enters the economy appearing legitimate

**Example:**

A criminal buys property with

***illicit cash → resells it later → receives payment via bank → now the money appears "clean".***

# UAE AML/CFT LEGAL FRAMEWORK

**Key Laws:**

- Federal Decree-Law No. (20) of 2018 on AML & CFT
- Cabinet Decision No. (10) of 2019 (Implementing Regulation)
- MOE AML Guidelines for DNFBPs (Designated Non-Financial Businesses and Professions)

**Supervisory & Regulatory Bodies:**

- Ministry of Economy (MOE) – Regulates DNFBPs (Real Estate, Jewellers, Auditors, etc)
- Financial Intelligence Unit (FIU) – Receives and analyzes AML reports.
- Central Bank of the UAE – Oversees financial institutions.

# WHO NEEDS AML COMPLIANCE?

**All DNFBPs must comply, including:**

- Dealers in precious metals and stones
- Real estate brokers and agents
- Corporate service providers
- Accountants and auditors


**DgTx provides full AML registration and compliance support for all DNFBPs**

# WHAT IS goAML?

**goAML** is an online system managed by the **UAE Financial Intelligence Unit (FIU)** for:

| Reporting Suspicious Transactions (STR/SAR) | Reporting Real Estate Activity Reports and Cash Transactions |
| --- | --- |

**When to Register:**

- Every DNFBP must register on goAML portal as soon as the business starts operating.
- Registration must be completed before any STR or REAR submission.

# HOW TO REGISTER:

- Visit [https://services.moe.gov.ae/](https://services.moe.gov.ae/)
- Create account under goAML Registration section.
- Upload documents:
    - **Valid Trade License**
    - **Emirates ID of owner/manager**
    - **Establishment Card**
    - **Contact details of AMLRO (owner or manager)**
- Await approval email from MOE/FIU


**DgTx assists clients step-by-step in goAML registration and profile setup.**

# AMLRO – THE AML REPORTING OFFICER:

- AMLRO is responsible for ensuring AML compliance.
- Typically, the company owner or manager acts as AMLRO.

- **Duties of AMLRO:**
  - Ensure KYC is completed for all customers.
  - Review and file STRs/SARs.
  - Maintain AML policy and training logs.
  - Coordinate with DgTx for updates and compliance audit.

DgTx supports AMLROs with guidance and documentation review.

# WHAT IS KYC (KNOW YOUR CUSTOMER)?

**KYC is a mandatory process to verify customer identity before any transaction.**

**Purpose:**

- Ensure the customer's money is legitimate.
- Understand the purpose and nature of the transaction.
- Detect and prevent suspicious activity.

# STEPS IN KYC (KNOW YOUR CUSTOMER):

1

**Identify the customer:**
Name, nationality, ID/passport copy, trade license (if company).

3

**Understand purpose of transaction:**
Source of funds, reason for purchase or deal.

4

**Ongoing monitoring:**
Review customer's activities and update records regularly

2

**Verify the information:**
Confirm authenticity using official documents/Screening Software. (Ask DgTx team for Screening Software).

# VERIFYING KYC USING ZAPPIT SOFTWARE

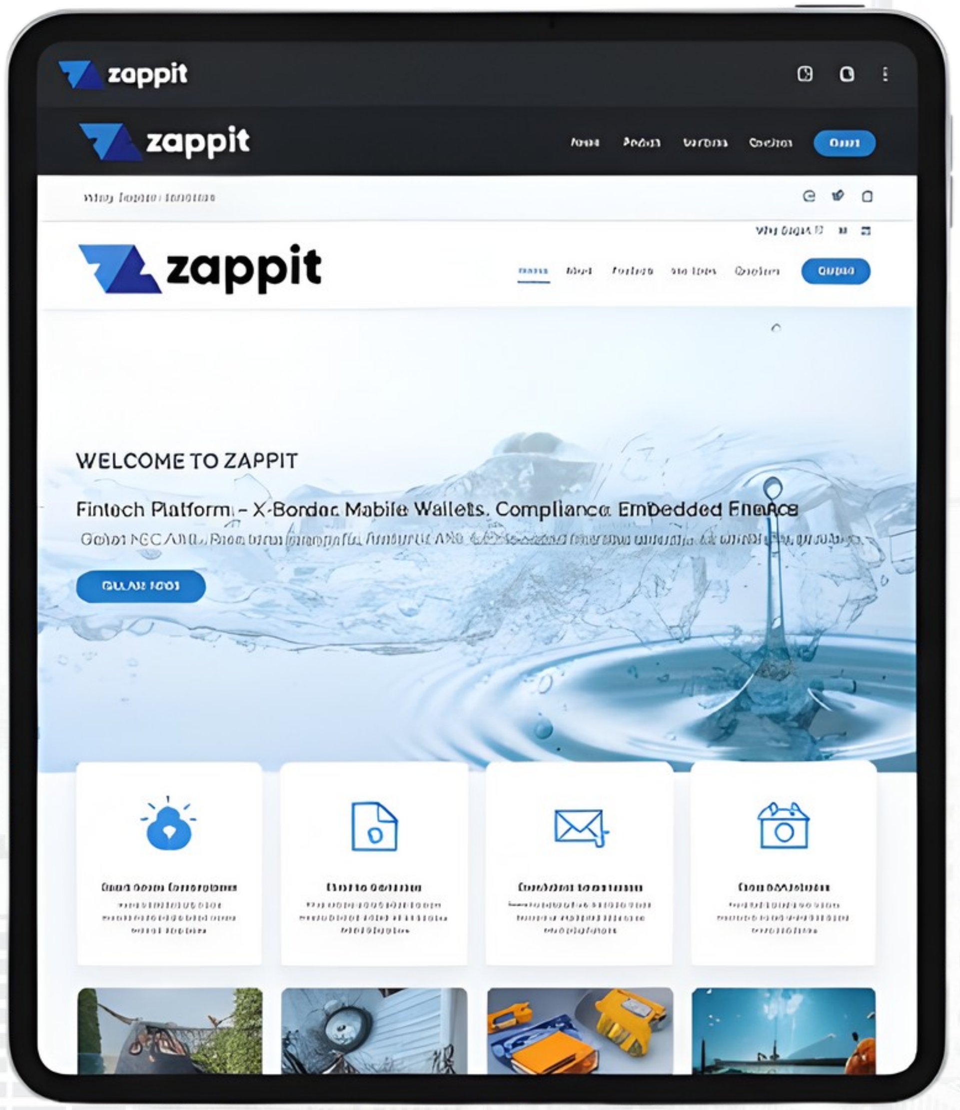
Simplify and automate your customer verification process

## Why Use Zappit?

- Fully compliant with UAE AML/KYC regulations
- Integrates with goAML reporting framework
- Reduces manual error and improves efficiency

## Key Features:

- Instant ID & Passport Verification (Emirates ID, Passport, Trade License)
- Name Screening against global watch lists & sanctions lists
- PEP (Politically Exposed Person) and Adverse Media checks
- Secure digital storage of KYC records (5-year retention compliant)
- Audit trail for every verification done by staff



# WHAT IS CDD?

Customer Due Diligence means verifying your client's identity and understanding their business before doing any transaction. You must ensure that the customer's funds come from legitimate sources.

## When to Apply CDD:

- Every new customer
- Every transaction ≥ AED 55,000 (cash or equivalent)
- When there is doubt about customer identity

# WHAT IS EDD?

Enhanced Due Diligence means extra checks and verification for customers who pose a higher risk of money laundering.

**When to Apply EDD:**

- Politically Exposed Persons (PEPs)
- High-value or complex transactions
- Offshore or foreign clients
- When KYC information seems incomplete or suspicious

**EDD Steps:**

- Obtain senior management approval before proceeding.
- Collect proof of source of funds and wealth.
- Conduct Zappit screening for sanctions, PEP, and adverse media.
- Monitor the transaction more frequently.
- Keep all EDD records for minimum 5 years.

# WHO IS A PEP?

A Politically Exposed Person (PEP) is someone who holds or has held a prominent public position — and may pose a higher risk of money laundering or corruption due to their influence or access to funds. Examples of PEPs:

- Heads of state or government officials
- Members of parliament
- Senior military or judicial officers
- Executives of state-owned companies
- Close family members or associates of the above

**Your Responsibility:**

- Apply Enhanced Due Diligence (EDD) for all PEP clients.
- Verify the source of funds and wealth.
- Get senior management approval before proceeding.
- Monitor the account or transactions more frequently.

# WHAT TO DO IF A CUSTOMER IS FLAGGED AS A PEP AFTER SERVICE

## What Does It Mean?

A PEP (Politically Exposed Person) is a person who holds or has held a prominent public position (e.g., government official, minister, military leader, or a close relative/associate of one).
Such clients are considered high-risk because of their access to public funds and potential for misuse of influence.

## What If You Find Out After the Transaction?

Sometimes, systems like Zappit flag the customer after payment or service has already been completed. You must treat this as a “post-transaction alert” and follow Enhanced Due Diligence (EDD).

# IMMEDIATE ACTIONS TO TAKE

**Notify Your AMLRO (Owner or Compliance Officer):**

- Report the alert immediately in writing (email or internal form).
- Do not contact the client about the alert.
- The AMLRO will assess whether the case is suspicious.

**Conduct Post-Transaction Review (EDD):**

- Review all KYC documents submitted.
- Obtain **proof of source of funds/wealth** (salary slips, bank statements, declaration, etc.).
- Review the **purpose and nature of transaction** (why the property or gold purchase was made).
- Document all findings in a **PEP Review Form**.

DgTx can assist in evaluating risk level and preparing any necessary goAML reporting.

# DECIDE ON REPORTING

**If the review finds:**

- Unclear or suspicious source of funds,
- The client refuses to provide documents,
- The transaction seems unusual,
- The value or structure looks intentionally hidden

then the **AMLRO** must file a **Suspicious Transaction Report (STR)** to the **UAE FIU** via **goAML**.

Never tell or hint to the client that a report is being filed — this is called tipping-off, and it's a legal offense.

# DOCUMENTATION & RETENTION

**Whether or not an STR is filed:**

- Record every step of the review and decision.
- Keep all related documents (KYC, Zappit report, AMLRO notes, email chain, EDD form) **for At Least 5 Years**.
- Store them securely, accessible only to authorized personnel.

This documentation protects your business during **Ministry of Economy Audits**.

**Improve Controls for the Future:**

- Always run **Zappit KYC** verification before accepting payment or closing deals.
- Train staff to identify politically exposed or high-risk clients early.
- Update internal **AML Policy** to include “post-transaction PEP handling.”

# AML POLICIES – THE COMPANY’S GUIDEBOOK

Every DNFBP must maintain a written AML Policy that outlines internal procedures.

**Policy Must Include:**

01 **Customer identification process (KYC)**

02 **Risk assessment framework**

03 **Procedure for suspicious transaction reporting**

04 **Record-keeping and data retention policy**

05 **Staff training plan and frequency**

06 **Compliance officer responsibilities**

# SUSPICIOUS TRANSACTION REPORTING (STR/SAR)

If any transaction appears unusual or suspicious, report it to the FIU via goAML.

**When to Report:**

- **Customer refuses to provide identification.**
- **Source of funds unclear.**
- **Large cash payments or use of third parties.**
- **Rapid buying/selling of property or gold.**

**How to Report:**

- **Log in to goAML portal.**
- **Select "Suspicious Transaction Report" (STR).**
- **Fill in customer details, transaction summary, and reason for suspicion.**
- **Submit to FIU.**

# REAL ESTATE & JEWELLERY REPORTING THRESHOLDS

- Cash Transaction Report (CTR): Any cash transaction ≥ AED 55,000.
- Real Estate Activity Report (REAR): Required for all real estate transactions involving cash or virtual assets.
- Suspicious Transaction Report (STR): Any suspicious or unusual activity, regardless of amount.

**DgTx supports filing REAR, CTR, and STR reports for our clients.**

# RECORD-KEEPING REQUIREMENTS:

- Maintain all AML-related documents (KYC, reports, receipts, policy logs) for minimum 5 years.
- Records may be kept digitally or physically, but must be secure and easily retrievable.

**DgTx assists in setting up compliant record retention systems.**

# STAFF TRAINING & AWARENESS:

**Staff must be trained at least once a year on:**

- Identifying suspicious activities
- Conducting KYC properly
- Internal reporting procedures

**Training records must include:**

- Attendance list
- Date and duration
- Topics covered

**DgTx offers certified AML training programs for employees**

# MINISTRY OF ECONOMY AUDIT:

### WHEN

Conducted periodically or based on risk assessment by MOE.

- May occur if:
- Reports not submitted.
- Suspicious activities detected.
- Random compliance check.

### WHAT THEY CHECK

- goAML registration records.
- KYC files and transaction logs.
- AML policy and staff training records.
- Internal reporting mechanism.

### BE PREPARED

- Keep all documents organized and ready for inspection.
- Respond promptly and transparently to auditors.

DgTx helps clients prepare for and respond to MOE AML audits.

# ROLE OF DgTx:

At DgTx, we provide end-to-end AML support for DNFBPs:

- goAML Registration Assistance
- AML/CFT Policy Development
- KYC Templates and Record Systems (Zappit)
- Staff Training and Certification
- STR/REAR Filing Support
- Risk Assessment from MoE
- Internal and External AML Audit Assistance

# KEY TAKEAWAYS FOR TRAINERS:

- Explain concepts using simple examples **(dirty vs clean money).**
- Emphasize legal responsibility and financial penalties.
- Include interactive **Q&A** and **Real-Life Case Scenarios**.
- Encourage staff to consult **DgTx** for compliance support.
- Reinforce the importance of documentation and timely reporting.

# CONTACT
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