



Checklist for Detecting Terrorist Financing Typologies for Strengthened AML/CFT Compliance

1. Introduction

With ever evolving world, Terrorist Financing has become a complex and pressing issue. Terrorist Financing typologies refer to the methods, techniques, and patterns used by individuals or groups to generate, move and store funds for terrorist activities. In recent times, the perpetrators make use of more sophisticated and well-thought techniques to carry out financing for the activities propagating terror. These tactics often make it challenging for Regulated Entities in UAE to recognize the transaction patterns indicating financing of terrorism.

This checklist supports Financial Institutions (FIs), Designated Non-Financial Businesses and Professions (DNFBPs) and Virtual Service Assets Providers (VASPs) in UAE to understand and detect unfamiliar and unique typologies associated with Terrorist Financing for strong AML/CFT Compliance.

Also known as: TF typologies, Terrorism Financing patterns, Terrorist Financing Techniques

Used for: Disrupting financial support to terrorism by identifying various typologies that are used to carry out such cowardice.

Abuse in ML/TF/PF: Wrongdoers may exploit Charitable or Non-Profit Organizations, front companies, informal value transfer systems, and digital currencies to move funds covertly.

2. Applicability

Financial Institutions (FIs):

- Retail and Commercial Banks
- Money Service Businesses (MSBs)
- Securities and investment firms
- Insurance companies
- FinTech and digital banking platforms

Designated Non-Financial Businesses and Professions (DNFBPs):

- Lawyers, notaries, and legal professionals
- Accountants and Auditors
- Real estate agents and Brokers
- Dealers in precious metals and stones
- Trust and company service providers

Virtual Assets Service Providers (VASPs)

3. How to Use This Checklist

Use this checklist,

- To flag and monitor red flags associated with Terrorist Financing and detect evolving typologies.
- To ensure ongoing monitoring of business relationships with the emerging trends of Terrorism Financing.
- **Frontline Team:** To guide front-line employees in identifying suspicious behaviors or transaction patterns.
- **Compliance Team:** To enable Compliance officers to validate controls around identified typologies.
- **Transaction Monitoring Analysts:** To ensure Analysts co-relate activities with terrorism financing risk indicators and escalate alerts.
- To Strengthen transaction monitoring rules and alerts by matching them with listed patterns.

Run a TF Controls Health Check that is fast and evidence based.

We sample alerts, test rules, and score case files against regulator expectations.

Book a TF Controls Health Check

4. Identify Terrorist Financing Typologies: Checklist for Robust Regulatory Compliance

Customer Profiling

	Yes	No
Has the customer declared the source of funds and wealth?	<input type="checkbox"/>	<input type="checkbox"/>
Are customer profiles updated with information on jurisdictional risk?	<input type="checkbox"/>	<input type="checkbox"/>
Is the customer associated with high-risk sectors (e.g., NGOs, NPOs)?	<input type="checkbox"/>	<input type="checkbox"/>
Is there mechanism to screen Customers against various Sanction list? (e.g., UAE Local Terrorist List, UNSC Consolidated list or any other relevant Sanction list)	<input type="checkbox"/>	<input type="checkbox"/>

Transaction Patterns

	Yes	No
Are there frequent small-value international transfers to high-risk regions?	<input type="checkbox"/>	<input type="checkbox"/>
Do transactions lack an apparent economic or lawful purpose?	<input type="checkbox"/>	<input type="checkbox"/>
Are there multiple transfers just under the reporting threshold?	<input type="checkbox"/>	<input type="checkbox"/>
Are there frequent transfers to or from high-risk jurisdiction?	<input type="checkbox"/>	<input type="checkbox"/>
Are there any transfers involving accounts acting as a front for Individual on the Sanctioned list?	<input type="checkbox"/>	<input type="checkbox"/>

Use of Charities and NPOs

	Yes	No
Are Charitable entities monitored for legitimacy of operations?	<input type="checkbox"/>	<input type="checkbox"/>
Are donations unusually large or structured?	<input type="checkbox"/>	<input type="checkbox"/>
Is there evidence of funding being sent to conflict zones?	<input type="checkbox"/>	<input type="checkbox"/>
Are Multiple large cash deposits in the accounts of Non-Profit Organizations reviewed?	<input type="checkbox"/>	<input type="checkbox"/>

Informal Value Transfer Systems (IVTS)

	Yes	No
Are hawala-like transactions detected and flagged?	<input type="checkbox"/>	<input type="checkbox"/>
Are transactions consistent with formal financial system behavior?	<input type="checkbox"/>	<input type="checkbox"/>

Digital and Emerging Payment Methods

	Yes	No
Are crypto-related transactions or virtual assets monitored for links to Terrorism Financing?	<input type="checkbox"/>	<input type="checkbox"/>
Are prepaid cards or e-wallets being used to obscure fund origins?	<input type="checkbox"/>	<input type="checkbox"/>
Are digital accounts accessed from multiple IP addresses and geographies inconsistent with Customer's profile?	<input type="checkbox"/>	<input type="checkbox"/>

Geographic Indicators

	Yes	No
Are transactions routed through or sent to jurisdictions with TF concerns?	<input type="checkbox"/>	<input type="checkbox"/>
Is there transfer activity involving Sanctioned Countries or Regions?	<input type="checkbox"/>	<input type="checkbox"/>
Are funds directed towards relief activities in Terrorist-prone zones monitored and examined?	<input type="checkbox"/>	<input type="checkbox"/>
Are funds routed through countries with weak AML/CFT obligations inspected?	<input type="checkbox"/>	<input type="checkbox"/>

Training and Oversight

	Yes	No
Are front-line staff trained on Terrorist Financing typologies?	<input type="checkbox"/>	<input type="checkbox"/>
Are transaction monitoring rules updated to reflect emerging patterns?	<input type="checkbox"/>	<input type="checkbox"/>

5. How a RACI Matrix Elucidates Task Delegation and Role Clarity

How RACI Framework Works?

What is RACI?

RACI denotes a responsibility framework that defines who is responsible, accountable, consulted and informed for the organizational operations. It Prevents accountability gaps in TF risk detection. Aligns training and alert systems to specific team responsibilities. Encourages proactive identification of new typologies.

Purpose of this RACI:

- Clarifies accountability for detecting and escalating TF-related red flags.
- Ensures coordination between compliance, operations, and investigative teams.
- Reduces duplication and ensures that typology-related indicators are embedded in monitoring systems with periodic updates.

Roles

- Frontline/Sales Team (FL)
- KYC Analyst (KYC)
- Screening Analyst (SA)
- Transaction Monitoring Analyst (TMA)
- AML Compliance Officer (CO)
- Senior Management (SM)

Legend: R = Responsible (does the work) | A = Accountable (final decision/approval) | C = Consulted | I = Informed

RACI Chart for Detecting Terrorism Financing Typologies for Regulated Entities						
Activity	FL	KYC	SA	TMA	CO	SM
Spot & raise TF red flags during onboarding/servicing	R	C	C	I	A	I
Perform KYC/CDD incl. risk rating, SoF/SoW	I	R	I	I	A	I
Sanctions/TF list screening (onboarding & ongoing)	I	C	R	C	A	I
PNMR/CNMR handling (suspend/continue, decide & report via goAML)	I	C	R	C	A	I
TM scenario design/tuning for TF typologies	I	C	C	R	A	I
Investigate alerts & escalate TF suspicions	I	C	C	R	A	I
STR decisioning & filing to FIU (quality assured)	I	C	C	C	R/A	I
High-risk/PEP onboarding & EDD plan approval	I	C	C	C	R	A
Policies, procedures & controls (incl. confidentiality/tipping-off)	I	I	I	I	R	A
AML/CFT training plan & delivery (typologies, PNMR/CNMR/STR)	I	I	I	I	R	A
MI/board reporting (alerts, cases, STRs; semi-annual to SA)	I	C	C	C	R	A
Independent testing/audit & remediation tracking	I	C	C	C	R	A

Get an escalation workflow that works under pressure.

We design case actions, holds/freezes, and no-tipping-off communications across roles.

Contact Us

6. Action Items for Regulated Entities to Alleviate Terrorism Financing Risk

In-House Compliance Department Setup

- Implement typology-driven TF alert logic in transaction monitoring tools.
- Establish escalation procedures for suspicious TF indicators.
- Assign typology review cycles every quarter to update internal risk understanding.

Role-Specific AML Training

- Conduct TF typology awareness training for front-line and risk teams.
- Develop simulation-based training on TF red flags and reporting triggers.
- Include scenario-based reviews of past TF typologies during onboarding.

7. Best Practices to Mitigate TF Threats: Checklist + RACI-Driven Implementation

- ▶ Integrate emerging TF typologies into monitoring scenarios.
- ▶ Apply high-risk rating to NPOs operating in conflict regions.
- ▶ Enforce declaration of fund source for inbound high-risk wire transfers.
- ▶ Use machine learning for behavior pattern recognition related to TF.
- ▶ Ensure independent testing of TF alert logic against historical cases.
- ▶ Coordinate among compliance, IT, and AML Compliance Officer for typology updates.

Role-based CFT & TFS training with TF-typology scenarios and PNMR/CNMR/STR drills.

Upgrade KYC, screening, EDD & TM to spot, triage, and suspend/freeze TF risks.

Book Training Session Now

8. CFT Terms Glossary

Sr No.	Terms	Meaning
1	AML	Anti Money Laundering. Measures to prevent obscuring criminal proceeds.
2	CFT	Countering the Financing of Terrorism. Measures to prevent the funding to terrorism.
3	TF Typologies	Terrorism Financing Typologies. Various techniques and methods used by Terrorists or their supporters to generate funds for Terrorist Activities.
4	Frontline Team	Staff who collect customer information and start onboarding procedure.
5	KYC Analyst	Know Your Customer Analyst who validates and enriches identity data.
6	Transaction Monitoring Analyst	Transaction Monitoring Analyst, who analyses transaction patterns and validates it.
7	AML Compliance Officer	Independent, Senior role that owns the program regarding compliance and reporting duties.
8	Senior Management	Sets risk appetite, approves policies and procedures, receives management information and oversees compliance.
9	Customer	The Person or Entity being onboarded and entered in business relationship
10	RACI	Role Roadmap that denotes who is Responsible, Accountable, Consulted and Informed.

Refresh your STR/TF Policy & SOPs that are clear, compliant, and audit-ready.

We map decision points, approvals, and wording to UAE TFS & FIU expectations.

[Get in Touch](#)

AML Compliance Simplified!

AML UAE is an Anti-Money Laundering (AML) consulting firm with decades of experience supporting businesses across the UAE.

We have expertise in providing various AML services to DNFBPs, such as Lawyers, Real Estate Agents, Accountants and Auditors, Dealers in Precious Metals and Stones, and Company Service Providers. We also provide AML consultancy services to Virtual Asset Service Providers.

We are equipped to help you register on the goAML portal. We conduct Enterprise-Wide Risk Assessments and align your AML/CFT policies and procedures in line with them. We design customized forms and templates for carrying out KYC, Customer Risk Assessment, and Enhanced Due Diligence for your customers. We help you prepare and submit reports like SAR, STR, CNMR, PNMR, HRC, HRCA, DPMSR, etc. We ensure that your employees are well-trained from an AML perspective.

Not just this, we assist regulated entities with decoding the Remedial Action Plan and effectively implementing the authority's recommendations around the AML program.

AML UAE is your go-to partner for handling all your compliance-related requirements.

Once we enter the picture, AML compliance is ensured. With that, you can continue to be a highly reputed business, actively striving to counter money laundering, terrorist financing, and proliferation financing.

Our Team



Pathik Shah

Founder

CAMS, FCA, CISA, CS, DISA (ICAI), FAFP (ICAI)

Pathik is a Chartered Accountant with proven experience in governance, risk, and compliance. He helps companies with end-to-end AML compliance services, from conducting Enterprise-Wide Risk Assessments to implementing robust AML compliance frameworks. He has played a pivotal role as a functional expert in developing and implementing RegTech solutions for streamlined compliance.



Jyoti Maheshwari

Partner

CAMS, ACA

Jyoti is a Chartered Accountant and Certified Anti-Money Laundering Specialist (CAMS), with extensive hands-on experience in regulatory compliance, legal advisory, policy-making, tax consultation, and technology project implementation. Jyoti holds experience with Anti-Money Laundering regulations prevalent across various countries. She helps companies with risk assessment, designing and deploying adequate mitigation measures, and implementing the best international practices to combat money laundering and other financial crimes.

Our Team



Dipali Vora

Partner

CAMS, ACS

Dipali is an Associate member of ICSI and a Certified Anti-Money Laundering Specialist (CAMS). She has a strong background in the compliance domain, including Anti-Money Laundering, due diligence, secretarial audit, and managing scrutiniser functions. She currently assists clients by advising and helping them navigate through all the legal and regulatory challenges of Anti-Money Laundering Law. She helps companies to develop, implement, and maintain effective AML/CFT and sanctions programs.



Purva Buch

Senior Consultant

CAMS, LLB

Purva is a Certified Anti-Money Laundering Specialist (CAMS) and a Lawyer. She has substantial knowledge of Anti-Money Laundering Laws, Rules, Regulations, and AML Compliance Processes. Purva has been instrumental in drafting RegTech processes, corporate policymaking, and fulfilling various legal research and drafting requirements arising from AML laws and regulatory technology.

Service Matrix

Service	Common Drivers							Value Proposition
	Ensure legal compliance	Save time and costs	Need expert support	Automate compliance processes	Implement best practices	Crisis management	Change AML/CFT consultant	
goAML Registration	✓		✓					Streamlines the process of registering with the UAE FIU goAML portal. Ensures compliance and reduces administrative burden.
Enterprise-Wide Risk Assessment	✓	✓	✓		✓		✓	Identifies risk factors, gross risk, controls deployed and their effectiveness, residual risk, and need for additional controls.
AML/CFT Policy Drafting	✓	✓	✓		✓		✓	Provides tailored AML/CFT policy frameworks that are up-to-date with current laws, enhancing regulatory compliance.
In-house Compliance Department Set-up	✓		✓		✓		✓	Establishes a robust internal compliance structure, helps recruit the right resources and ensures ongoing compliance efficiency.
KYC Managed Services	✓	✓	✓		✓	✓		Outsourced KYC processes that speed up customer onboarding and maintain high compliance standards.
Ongoing AML/CFT Consulting	✓	✓	✓	✓	✓	✓	✓	Continuous expert advice tailored to address specific challenges, enhancing overall compliance strategies.
AML/CFT Health Check	✓		✓		✓	✓	✓	Conducts comprehensive reviews and assessments to pinpoint vulnerabilities and recommend improvements.
AML Training	✓	✓	✓		✓		✓	Offers comprehensive training programs that enhance the compliance skills of employees at all levels.
AML Software Selection	✓	✓	✓	✓	✓			Helps choose the best AML software that fits the company's needs, improving efficiency and cost-effectiveness.
Screening Software Validation	✓		✓	✓	✓			Tests and validates screening tools to ensure they meet regulatory requirements and operational needs.
Regulatory Reporting	✓	✓	✓		✓		✓	Streamlines the process of creating and submitting SAR, STR, PNMR, CNMR, DPMSR, REAR, HRC, and HRCA reports accurately and on time.

AMLVerse

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