



Checklist for Identifying Inconsistencies in AML/CFT Policy Implementation

1. Introduction

Inconsistent AML/CFT implementation happens when the same rule is interpreted differently by branches, teams, or systems. That creates exploit-ready gaps. In the UAE, your baseline is Federal Decree-Law 20/2018 and Cabinet Decision 10/2019; but the practical backbone of consistency is an explicit risk-based policy plus the companion procedures and controls that make the words behave the same way in every unit. Policies must cover core elements—risk assessment, customer acceptance/exit, group oversight, STR/SAR reporting (goAML), confidentiality/tipping-off, staff screening and training, governance, record-keeping, and sanctions compliance—so front line, compliance, and audit are reading from one script

Also known as: AML policy fragmentation, uneven AML application

Used for: Finding procedural gaps, comparing enforcement, improving enterprise wide AML integrity

Abuse in ML, TF, PF: Criminals target the weakest location or team to bypass controls.

2. Applicability in the UAE

Financial Institutions: Banks, exchange houses and remittance businesses, finance and leasing companies, insurers and intermediaries for life and investment products, securities and capital markets firms supervised by SCA, DFSA, or FSRA, payment service providers and e-money operators, virtual asset service providers where licensed.

Designated Non-Financial Businesses and Professions: Auditors and accountants, lawyers and notaries when conducting specified activities, company or corporate service providers, real estate brokers and agents, and dealers in precious metals and stones.

3. How to Use This Checklist

- ▶ **Front line teams:** Spot differences in onboarding or alert handling, raise gaps, and record evidence.
- ▶ **Compliance officers:** Compare regions and units, standardise procedures, confirm adoption, and keep logs.
- ▶ **Transaction monitoring teams:** Confirm that thresholds and typologies are applied the same way on all systems.
- ▶ **Internal audit or quality assurance:** Test for consistency, confirm remediation, and report results to senior management.

4. Yes or No Style Checklist for Identifying Inconsistencies During the Implementation of AML/CFT Policy

A. Policy Framework

	Yes	No
Are AML policies identical across business units and geographies	<input type="checkbox"/>	<input type="checkbox"/>
Are policy updates adopted everywhere within the required time	<input type="checkbox"/>	<input type="checkbox"/>
Are legacy systems aligned to current enforcement rules and controls	<input type="checkbox"/>	<input type="checkbox"/>

B. Risk Assessment

	Yes	No
Are customer risk ratings applied the same way across teams	<input type="checkbox"/>	<input type="checkbox"/>
Are periodic reviews done at the same frequency for each risk class	<input type="checkbox"/>	<input type="checkbox"/>

C. Onboarding and KYC

	Yes	No
Are document standards and approvals enforced the same way across all units	<input type="checkbox"/>	<input type="checkbox"/>
Are any deviations documented, justified, and approved	<input type="checkbox"/>	<input type="checkbox"/>

D. Transaction Monitoring

	Yes	No
Are alert thresholds standardised across platforms and branches	<input type="checkbox"/>	<input type="checkbox"/>
Is typology logic applied the same way for detection and for STR or SAR decisions	<input type="checkbox"/>	<input type="checkbox"/>

E. Investigation and Escalation

Yes No

Are escalation protocols identical across departments

Is every team trained on one escalation matrix and one set of follow up timelines

F. goAML and Reporting

Yes No

Is goAML registration, user access, and submission workflow the same across units

Are CNMR, PNMR, STR, and SAR filings consistent in content, timeliness, and evidence, as required by UAE FIU guidance.

G. Audit and Feedback Loops

Yes No

Are internal audit findings on enforcement closed consistently

Are regulator feedback points implemented equally across units

H. Training and Oversight

Yes No

Is AML training frequency and content consistent across departments

Are enforcement lapses tracked, assigned to an owner, and followed to closure

Turn Checks into Action

We convert your answers into owners, due dates, and a short plan you can run.

[Get My Action Plan](#)

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

What RACI is, and why it helps:

RACI means Responsible, Accountable, Consulted, and Informed. It shows who does the work, who signs off, who advises, and who is kept in the loop. For implementation consistency, RACI removes grey areas, speeds decisions, and makes audit expectations explicit.

Governance anchors for DNFBPs in the UAE

- **Senior Management and the Board** set risk appetite, approve policies, ensure an independent audit function, receive management information, and are accountable for the overall AML and CFT framework.
- **The AML Compliance Officer (CO)** is appointed with prior consent of the Supervisory Authority, is independent and suitably senior, manages the AML and CFT programme, reviews and files STR or SAR through goAML, reports to Senior Management, and drives training and quality assurance.
- **Staff screening and training** are risk based and ongoing, group wide controls apply to branches and subsidiaries, record keeping meets statutory periods, and conflicts of interest are identified and managed.

R = Responsible, A = Accountable, C = Consulted, I = Informed

RACI Matrix for Identifying Inconsistencies During AML/CFT Policy Implementation					
Task Area	Senior Management and Board	AML Compliance Officer (CO)	Compliance Team	Operations	Internal Audit
Appoint CO, confirm independence, obtain Supervisory Authority consent	A	C	I	I	I
Approve AML and CFT policy, risk appetite, and change management	A	R	C	I	I
Policy standardisation across units, and dissemination log	A	R	R	C	I
KYC enforcement consistency, and approval levels	C	A	R	R	I
Alert threshold alignment and typology application	C	A	R	R	I
Escalation process enforcement, and timelines	C	A	R	R	I
goAML operations standardisation, access control, and evidence	C	A	R	C	I
STR or SAR, CNMR, PNMR quality and timeliness	I	A+R	C	C	I

Training programme consistency, and staff screening	A	R	R	C	I
Remediation tracking and closure of audit or regulatory findings	A	R	R	C	C
Management information to the Board, including metrics and exceptions	A	R	C	I	I
Group oversight for branches and subsidiaries, and host country gaps	A	R	C	I	I
Record keeping completeness, retention, and retrieval on request	A	R	R	C	C
Conflict of interest management for CO and key roles	A	R	C	I	C

How to use this chart:

Name an owner for each box, set due dates, and keep evidence on file. If roles are combined in smaller firms, record the combination, state the compensating control, and arrange an independent review.

7. Action Items for Regulated Entities to Ensure Consistent AML/CFT Policy Implementation

- ▶ Create a single change log for AML policy updates with issue date, required adoption date, local owner, and evidence of roll out, in line with UAE supervisory expectations.
- ▶ Standardise goAML operating procedures, user roles, and submission evidence across all units.
- ▶ Add a monthly consistency test for one onboarding rule, one monitoring rule, and one escalation rule, and keep screenshots and decision notes on file.
- ▶ Ensure sanctions, watchlists, and high-risk country settings are updated and applied uniformly as required by SCA, DFSA, and FSRA rulebooks.
- ▶ Codify screening & red-flag methodology tools, APIs, alerting, investigation steps) in the policy/procedure set.
- ▶ Record-keeping by aligning retention periods and assigning named custodians for registers/logs
- ▶ Implementing risk-based proportionate controls to avoid both over- and under-compliance; document rationale.

8. Best Practices

- Use a central policy tracker with version control, unit owners, due dates, and status by location.
- Link KYC rules and monitoring rules so both change together after a policy update.
- Publish unit scorecards using audit based metrics, and discuss them at the Board or senior committee.
- Review regulator feedback for regional gaps, assign fixes, and record evidence.
- Add automated alerts for non enforcement, such as missing approvals, disabled rules, or overdue reviews.

From Policy to Proof

We implement the tracker, tests, and evidence so you are audit ready.

Launch Implementation

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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 info@amluae.com