



Annual goAML System Readiness & TFS Compliance Checklist for DNFBPs

Introduction: The DNFBP Annual Compliance Checklist: goAML System Readiness & TFS Audit

Compliance with the goAML reporting system and the implementation of Targeted Financial Sanctions (TFS) are absolute statutory mandates, underpinned by Federal Decree-Law No. (10) of 2025 and Cabinet Decision No. 74 of 2020. Failure in this area is a significant governance and criminal liability risk for Designated Non-Financial Businesses and Professions (DNFBPs).

Compliance professionals must recognise that the goAML system is the central national conduit for all mandatory submissions. This includes the implementation of **Targeted Financial Sanctions (TFS)** measures, which require **asset freezing without delay (within 24 hours)** when a Confirmed Name Match is identified on the Sanctions Lists. AML/CFT obligations are governed by **Federal Decree-Law No. (10) of 2025**, which expands the scope of financial crime to include the **Financing of Arms Proliferation**.

Annual governance requires a meticulous review of the firm's interaction with this platform. The AML Compliance Officers or MLRO must ensure the reporting system is prepared to handle not just routine reports, but also the critical and time-sensitive CNMRs and PNMRs. Security protocols must be confirmed, user authority must be validated, and staff must be trained to differentiate between a Confirmed Match (freeze and CNMR) and a Partial Match (suspend/reject and PNMR). This comprehensive audit transforms a complex operational task into a clear, auditable compliance exercise.

Applicability in the UAE

The provisions of **Federal Decree-Law No. (10) of 2025** apply to all legal persons licensed or registered in the State. This includes all DNFBPs regulated by the Ministry of Economy, such as:

- Accounting and auditing practitioners
- Law firms, notaries, and other independent legal professionals
- Real estate brokers, agents, and developers
- Dealers in Precious Metals and Precious Stones (DPMS)
- Trust and Company Service Providers (TCSPs).

Need for DNFBPs to Ensure Alignment with goAML Requirements and TFS Compliance

1. Compliance with AML/CFT Reporting (goAML)

The goAML platform is the exclusive legal channel for DNFBPs to report suspicious transactions and activities to the Financial Intelligence Unit (FIU). Compliance is critical for several reasons:

- **Statutory Obligation:** DNFBPs are obliged to report Suspicious Transactions or Activities (STRs/SARs) **without delay**. Failure to report without delay, whether intentionally or through gross negligence, is a federal crime punishable by imprisonment and/or a fine.
- **Risk Mitigation:** Timely reporting is essential for detecting and preventing the firm's exploitation for Money Laundering (ML), Terrorism Financing (TF), and the Financing of Arms Proliferation.
- **Mandatory Registration:** DNFBPs are under an obligation to register on goAML to submit all required reports, including STRs/SARs and TFS reports (CNMRs/PNMRs). Non-registration or technical non-compliance risks administrative and financial sanctions from the Supervisory Authority.

2. Compliance with Targeted Financial Sanctions (TFS)

TFS involves the freezing of funds and the prohibition of services to designated individuals or entities listed on the UAE Local Terrorist List and the UNSC Consolidated List. This is a non-negotiable obligation that carries severe consequences for non-compliance.

- **Immediate Freezing Mandate:** Freezing measures must be applied **without delay** (immediately or in any case within 24 hours) upon designation. This applies to all funds or other assets, whether tangible or intangible, owned or controlled by the designated person.
- **Prohibition of Services:** DNFBPs are prohibited from providing any services, such as legal services, buying or selling real estate, or dealing in precious metals, to designated persons.
- **Criminal Liability:** Violation of the obligations set out in Cabinet Decision No. 74 of 2020 can result in imprisonment of no less than one year and no more than seven years, and/or a fine of up to **AED 5 million**.
- **Reporting Obligation:** Confirmed Name Matches require freezing and submission of a **CNMR** via goAML within **five business days** of freezing. Partial Name Matches require suspension or rejection and submission of a **PNMR**.

The Supervisory Authority verifies compliance during inspections. The lack of adequate policies and procedures is sufficient cause for the application of administrative sanctions.

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How to Use This Checklist

A culture of compliance relies on clear accountability. The following roles are critical to the effective use of this checklist:

Senior Management holds ultimate accountability for the efficacy of the firm's overall AML/CFT and TFS programme. Senior Management must champion and resource the Compliance function, confirming final approval for policy updates and major system investments.

The AML Compliance Officer or MLRO is responsible for leading this audit and ensuring all technical, procedural, and training requirements are met. This role interprets the EOCN and FIU guidance, translates it into internal policy, and manages the submission process for all goAML reports (STR, SAR, CNMR, PNMR, etc.).

IT and Systems Teams are responsible for the technical integrity of the screening and monitoring systems. Their duties include executing user deactivations, managing system updates against the Sanctions Lists, and verifying that automated controls comply with the latest Business Rejection Rules (BRRs).

KYC and Frontline Teams function as the initial line of defence. These teams are responsible for accurately collecting customer data, reviewing screening alerts (Partial Matches, False Positives), and timely escalating suspicious activity to the MLRO.



The DNFBP Annual Compliance Checklist: goAML System Readiness & TFS Audit

Part 1: User, Governance, and Access Audit

This section ensures that access to the mandatory goAML platform is strictly controlled, accurately reflecting the DNFBP's current compliance and reporting staff.

MLRO & Deputy Credentials:

Yes

No

- Has the designated **Compliance Officer (CO) / MLRO** confirmed their goAML login credentials are functional and secure?
- If a Deputy MLRO is appointed, have their credentials been verified, noting that the deputy is only authorised should the lead CO / MLRO be unavailable?

User Authority & Independence:

- Are the MLRO's details (first name, last name, etc.) in the goAML system current and accurately populated?
- Are there clear controls ensuring that the MLRO operates with the **independence** required to submit STRs or SARs without inappropriate influence from Senior Management or operational roles?

Deactivation & Review:

- Has a full audit been conducted to confirm that **former employees** or personnel no longer assigned compliance duties have had their goAML access immediately revoked?
- Does the firm maintain a log of all **Admin** access changes to the goAML platform, as required by governance standards?

Part 2: TFS Reporting Readiness & Procedural Compliance

This section verifies that the firm is technically and procedurally ready to submit time-sensitive CNMRs and PNMRs, adhering to the EOCN Guidance.

TFS Mechanism Registration:

- | | Yes | No |
|--|--------------------------|--------------------------|
| <ul style="list-style-type: none"> Is the Reporting Entity registered for the EOCN Notification Alert System (NAS) to receive automated email notifications on all updates to the Sanctions Lists (UAE Local Terrorist List and UNSC Consolidated List)? | <input type="checkbox"/> | <input type="checkbox"/> |
| <ul style="list-style-type: none"> Are appropriate internal procedures established to screen effectively on weekends and public holidays to prevent access or use of funds subject to freezing? | <input type="checkbox"/> | <input type="checkbox"/> |

Screening and Match Identification:

- | | | |
|---|--------------------------|--------------------------|
| <ul style="list-style-type: none"> Does the internal screening process correctly check against key identifiers for Natural Persons (Name, DOB, Nationality, ID/Passport) and Legal Persons (Entity Name, Trade License, Address)? | <input type="checkbox"/> | <input type="checkbox"/> |
| <ul style="list-style-type: none"> Are policies in place to ensure screening targets include existing customers, potential customers, counterparty names for transactions, UBOs, directors, and agents? | <input type="checkbox"/> | <input type="checkbox"/> |

CNMR Submission Protocol (Confirmed Name Match):

Yes

No

- If a Confirmed Name Match is an **existing customer**, are procedures in place to **freeze assets without delay** (within 24 hours) and submit a **CNMR** via goAML within **five business days** from freezing?
- If a Confirmed Name Match is a **potential customer**, are procedures in place to **reject the transaction** and submit a **CNMR** via goAML within **five business days** from rejection?
- Are staff trained to attach **obligatory information** to the CNMR, including ID documents of the match and documentary proof of frozen funds or assets?

PNMR Submission Protocol (Partial Name Match):

- If a Partial Name Match is identified on an **existing customer** (ID available), are procedures in place to **suspend the transaction** and submit a **PNMR** via goAML within **five business days** from suspension?
- If a Partial Name Match is identified on a **potential customer** (ID NOT available), are procedures in place to **reject the transaction** and submit a **PNMR** via goAML if ID documents are not obtained within **ten business days**?
- Is internal documentation maintained for all **False Positive** results, even though no reporting is required?

Ensure your AML policy aligns with FIU reporting protocols and BRRs.

We author and revise AML/CFT Policy, Controls, and Procedures Documentation.

Draft Your Compliance Policies

Part 3: Transactional & Jurisdictional Reporting

This section confirms that staff are aware of the DNFBP's specific transactional and jurisdictional reporting obligations.

Mandatory Transaction Fields:

Yes No

- For Person reporting, are staff instructed on how to format names (First Name, Last Name) and correctly enter UAE resident details (Emirates ID and ID Number fields must match)?

Specialized Report Knowledge (REAR / DPMSR):

- Is the compliance staff aware of the mandatory requirements for submitting a **Real Estate Activity Report (REAR)** via goAML for freehold property transactions involving:
 - Cash payments of **AED 55,000 or more?**
 - Virtual currencies?
 - Funds converted from or to a virtual asset?
- Do procedures ensure that **Dealers in Precious Metals and Stones (DPMS)** submit a DPMSR for relevant cash transactions?

High Risk Country (HRC/HRCA) Procedures:

- Do staff know that **HRC and HRCA reports** must be submitted for transactions or activities related to **High-Risk Countries**?
- Are staff trained that HRC/HRCA reports must be submitted **three working days before** the transaction or activity is executed?

Equip your team with the knowledge to meet FIU reporting standards.

Learn about goAML report filing and transaction red flags.

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How a RACI Matrix Enables Task Delegation

The frequent and time-sensitive nature of goAML reporting, particularly for TFS measures, necessitates clear operational accountability. Here is an explanation of the RACI framework, with context for its application within the **goAML System and TFS Compliance Checklist**.

The term **RACI** is an acronym where each letter represents a distinct level of responsibility or involvement required for an activity, a task, or a decision. Using a RACI matrix prevents ambiguity, minimises duplication of effort, and ensures that necessary approvals are obtained.

Role	Definition	Implication in DNFBP Compliance
Responsible (R)	The person or role that performs the task or does the work to complete the activity.	This is the hands on role, such as the KYC Analyst performing the screening or the IT Manager executing the system change. An activity can have multiple 'R's.
Accountable (A)	The person or role who is ultimately answerable for the correct and thorough completion of the deliverable or task. They sign off on the work.	This role must ensure compliance and completion. In AML, this is typically the AML Compliance Officer (MLRO) or Senior Management . Only one 'A' is assigned per task.
Consulted (C)	The person(s) whose opinions, expertise, or input are required before the work can be completed. This is a two way communication.	This involves expert roles, like IT needing to consult the MLRO before updating screening rules, or the MLRO consulting the Legal team on a complex Partial Name Match.
Informed (I)	The person(s) who must be kept up to date on progress or decisions, usually after the action or decision has occurred. This is a one way communication.	This often applies to Senior Management who need assurance that critical tasks (like freezing assets or deactivating former users) were completed, but do not need to be involved in the execution.

RACI Matrix Need for the goAML & TFS Compliance Task Delegation

In this specific checklist, the RACI matrix serves as the **governance tool** for operationalising time-sensitive, high-risk reporting and control measures.

Value of the RACI in this Context:

- **TFS Urgency:** When a Confirmed Name Match occurs, tasks like "Implement Freeze Measures (Within 24 Hours)" require clear demarcation. The CO/MLRO is Responsible (R) for execution and generally Accountable (A) for the subsequent reporting, while the IT/Systems team is Consulted (C) to lock the accounts.
- **Preventing "Tipping Off":** Clear roles define who is merely Informed (I) versus those who are actively Responsible (R). This is critical in preventing unauthorised disclosure of suspicious activity, which is a criminal offence.
- **Accountability Hierarchy:** The matrix explicitly assigns ultimate Accountability (A) for high-level tasks, such as auditing goAML user access or approving policy changes, to Senior Management (SM). This aligns directly with regulatory expectations that ultimate oversight cannot be delegated.
- **Auditable Traceability:** The completed matrix provides auditors and Supervisory Authorities with instant, verifiable evidence showing who was responsible for actions related to maintaining goAML controls, addressing user turnover, and executing urgent compliance duties.



RACI Matrix for the goAML & TFS Compliance

Legend: R = Responsible | A = Accountable | C = Consulted | I = Informed

Activity	CO / MLRO	SM (Senior Management)	IT / Systems	KYC / Frontline
Implement Freeze Measures (Within 24 Hours)	R	I	C	C
Review & Submit CNMR / PNMR (Within 5 Bus. Days)	A	I	I	C
Audit goAML Access / Deactivate Former Users	R	A	R	I
Maintain TFS Screening System Updates	C	A	R	I
Submit REAR / DPMSR Reports	R	A	I	C
Approve Policy Changes Post Audit	I	A+R	C	I

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Best Practices for DNFBPs to Streamline goAML Reporting and TFS Compliance

- **Establish Internal Procedures:** Set and implement clear internal controls that **prohibit staff from "tipping off"** a customer about freezing measures or investigations.
- **Prioritise Training:** Conduct ongoing TFS training for all relevant employees and senior management to ensure awareness of sanctions evasion typologies and reporting duties.
- **Maintain Records of Negatives:** Maintain internal documentation of all **False Positive** and **Negative Match** screening results for inspection purposes, even though reporting is not required.
- **Align Policies:** Ensure the firm's overall AML/CFT policy, including its risk appetite, explicitly addresses the requirements of Cabinet Decision No. 74 of 2020 on TFS.

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About AML UAE

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 customised 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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