UAE AML / DNFBP RESOURCE ARTICLE

Who Are DNFBPs?

Understanding the UAE's Updated AML Perimeter

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When we mention Anti-Money Laundering and most people picture a bank. But the UAE framework has never stopped at financial institutions. It also reaches a defined set of non-financial businesses and professions -Designated Non-Financial Businesses and Professions, or DNFBPs and that perimeter was redrawn recently enough that many firms are still working from the old map.

Key update

Federal Decree-Law No. 10 of 2025 replaced the 2018 AML law and came into force on 14 October 2025. Its Executive Regulations followed under Cabinet Resolution No. 134 of 2025, published in the Official Gazette on 15 November 2025 and effective from 14 December 2025, replacing Cabinet Resolution No. 10 of 2019.

Where the Perimeter Sits

Article 3 of the Resolution sets out the categories. In summary:

01 Commercial Gaming Operators, including commercial gaming conducted on board vessels or marine craft, where a single financial transaction or several transactions that appear to be linked , equals or exceeds AED 11,000

AED 11,000

02 Real estate brokers and agents, when concluding transactions or settlements on behalf of their customers in relation to the purchase or sale of real estate

03 Dealers in valuable metals and precious stones, where a single cash transaction or several transactions that appear to be linked, equals or exceeds AED 55,000

AED 55,000

04 Lawyers, notaries, other independent legal professionals and independent accountants, when preparing, conducting or executing financial transactions for their customers in respect of the activities specified in the Resolution

05 Company and Trust Service Providers, when performing or executing a transaction on behalf of their customers in respect of the specified activities which include acting as an agent in the establishment of legal persons, acting as (or arranging for another person to act as) a director, secretary or partner, providing a registered office or correspondence address, acting as a trustee, and acting as a nominee shareholder

06 Other businesses or professions that may subsequently be designated by the Supervisory Authority in coordination with the National Committee

When we read those qualifiers closely. For most of these categories, DNFBP status attaches to the activity rather than to the licence. The same firm can sit inside the perimeter for one engagement and outside it for the next, which makes engagement-level mapping a practical necessity rather than a theoretical exercise.

A Significant Addition: Commercial Gaming Operators

The Executive Regulations now expressly recognise Commercial Gaming Operators as DNFBPs a genuinely new category. It covers operators of commercial gaming halls, internet commercial gaming, sports betting and lottery gaming, and extends to commercial gaming conducted on board vessels or marine craft.

The trigger is a single financial transaction, or several that appear to be linked, equal to or exceeding AED 11,000. The Resolution also provides that a transaction solely involving gaming chips or gaming instruments is not treated as a financial transaction for this purpose. AML/CFT supervision of the sector sits with the General Commercial Gaming Regulatory Authority.

Threshold

AED 11,000

Excluded

Transactions solely involving gaming chips or gaming instruments are not treated as a financial transaction for this purpose.

Supervision

General Commercial Gaming Regulatory Authority

Why DNFBPs Matter to the AML Framework

DNFBPs occupy positions that offer visibility into ownership structures, financial activity, property transactions, valuable assets, corporate arrangements and now, commercial gaming activity. That visibility is exactly why these sectors carry distinct money laundering, terrorist financing and proliferation financing risks.

For audit, accounting and tax professionals the relevance is immediate. In the course of an engagement, a firm may encounter information about beneficial ownership, source of funds, related parties, cross-border structures, unusual transactions, or a gap between what a client has explained and what the records show.

> So, the starting question is not "Have we collected the KYC documents?" It is: "Do we understand the customer, the activity and the risks well enough to explain and support our decision?"

None of which means treating every customer as suspicious. The framework is risk-based by design. Firms are expected to identify and understand the risks relevant to them, conduct appropriate Customer Due Diligence, identify beneficial owners, understand the purpose and intended nature of the relationship, monitor on an ongoing basis, and escalate where escalation is warranted.

The perimeter question itself is now settled in the text. The harder work is deciding which of your own engagements fall inside it — and being able to show how you reached that conclusion.

Key take-away

The harder work is deciding which of your own engagements fall inside the perimeter — and being able to show how you reached that conclusion.