



## CHECK LIST



## UAE DNFBP AML Risk Mapping Checklist

This checklist is designed for Designated Non-Financial Businesses and Professions (DNFBPs) in the UAE to implement a proportionate Risk-Based Approach (RBA) to Anti-Money Laundering (AML) compliance. It covers risk categories, scoring tips, and a review schedule template.

### 1. Risk Categories

Identify and classify clients based on inherent AML/CFT risk factors:

Geographic Risk – Country of residence or operation (e.g., high-risk jurisdictions per FATF list).

Customer Risk – Politically Exposed Persons (PEPs), nature of business activity, reputation.

Product/Service Risk – Complexity of the service offered, potential for anonymity.

Transaction Risk – Size, volume, and frequency of transactions.

Delivery Channel Risk – Face-to-face vs. non-face-to-face onboarding.

### 2. Risk Scoring Tips

Assign numerical values to risk factors to create a total risk score for each client:

Score each factor from 1 (Low Risk) to 5 (High Risk).

Example: PEP status = 5, local resident with clean history = 1.

Add scores across all factors to get a total risk score.

Categorize total scores: 5–8 = Low Risk, 9–15 = Medium Risk, 16–25 = High Risk.

Document the rationale for each score to ensure audit readiness.

### 3. Review Schedule Template

Set periodic review intervals based on the client's risk rating:

High Risk – Review every 3 months.

Medium Risk – Review every 6–12 months.

Low Risk – Review every 12–24 months.

Trigger reviews immediately if red flags or suspicious activity arise.



4. Quick Reference Table

Risk Factor	Low Risk (1)	Medium Risk (3)	High Risk (5)
Geography	UAE/local	Low-risk foreign	High-risk jurisdiction
Customer Type	Individual, long-term client	New corporate client	PEP or complex corporate structure
Product/Service	Simple service	Moderate complexity	Complex/high anonymity potential
Transaction Size	< AED 50,000	AED 50,000 – 500,000	> AED 500,000
Delivery Channel	Face-to-face	Mixed	Non-face-to-face

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