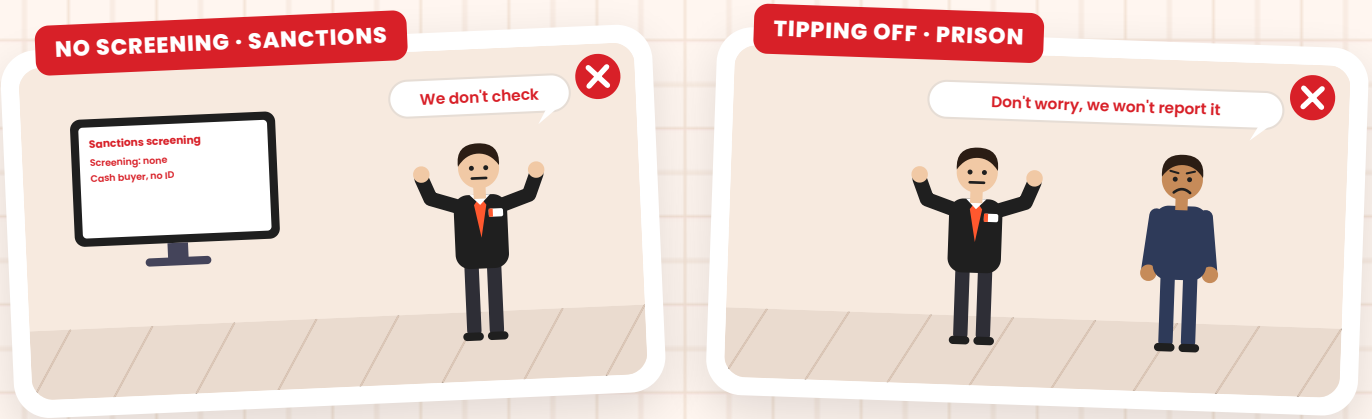
• UP TO AED 5M PER VIOLATION Cash sales, high-value customers & group entities

AML & Sanctions Compliance Guidebook for Automotive Companies

Scope, sanctions screening, customer checks, suspicious transaction reports and training under the 2025 AML law: **and why sanctions duties apply to every UAE business.**



AED 5M
maximum per violation for supervised businesses.

AED 100M
maximum total for a company.

Oct 2025
new AML law in force.

5 standards | 14 checkpoints | FDL 10/2025 · CD 74/2020 | Right way / wrong way | Ideal fix time

2018 Old AML law → **Oct 2025** New law, higher fines → **Now** Personal liability → **Managers are now personally liable.**

WHY THIS GUIDEBOOK EXISTS

High-value cars attract dirty money.

The **2025 AML law** raised fines to **AED 5,000,000 per violation** (up to AED 100M in total) for supervised businesses and made managers **personally liable**. Whatever the scope, sanctions screening and freezing apply to **every business in the UAE**.

This guidebook covers the 5 AML and sanctions standards for dealer groups.

WHERE THE RISK SITS

Scope
Are you supervised?
AM-01

Sanctions
Screen everyone
AM-02

Customers
ID and funds
AM-03

Reporting
STRs via goAML
AM-04

People
Training
AM-05

Records
5 years
AM-05

WHO ENFORCES IT

MoET
DNFBP supervisor
Inspections and fines

FIU
Financial Intelligence Unit
goAML reports

EOCN
Executive Office for Control & Non-Proliferation
Sanctions lists

Prosecution
Criminal cases
Personal liability

WHO IT'S FOR

Owners & MDs
Understand personal liability.

Sales & accounts
Screen and verify.

Compliance & auditors
Test files and logs.

COMPANY FINES AND PERSONAL LIABILITY

One unscreened buyer. A sanctions breach.

Sanctions duties apply to everyone in the UAE. For supervised businesses, AML fines run **AED 50,000–5,000,000 per violation**, up to AED 100M, with personal liability for managers.

THE PENALTY LADDER

LEVEL 1
AED 50K
Minimum administrative fine.

LEVEL 2
AED 5M
Maximum per violation.

LEVEL 3
AED 100M
Maximum total.

LEVEL 4
Prison
Personal criminal liability.

REAL CASES FROM US AUTOMOTIVE BUSINESSES

WHO	RESULT	WHAT HAPPENED
Federal Decree-Law 10/2025 In force 14 Oct 2025	**AED 5M** per violation	Replaced the 2018 law; personal liability for managers.
Company maximum FDL 10/2025	**AED 100M** total	Aggregate administrative fines.
Sanctions Cabinet Decision 74/2020	**All persons**	Freeze and report without delay.

PER VIOLATION
AED 5M
Maximum.

IN TOTAL
AED 100M
Company cap.

AND THEN
Prison
For **managers**.

HOW TO USE THIS GUIDE

One page per standard. Know your buyer.

1. **Header**: code, area, owner and the maximum penalty
2. **The law**: which regulator and which regulation
3. **The cost**: fine, what else can happen and a real case
4. **Right / wrong**: illustrated pass and fail, plus how to audit

THE 5 STANDARDS

AM-01	AML Scope Assessed ⛓ PRISON	FDL 10/2025	CRITICAL	AED 50K–5M	◷ 30 days	5
AM-02	Sanctions Screening ⛓ PRISON	CD 74/2020	CRITICAL	AED 50K–5M	◷ Immediate	6
AM-03	Customer Due Diligence ⛓ PRISON	FDL 10/2025	CRITICAL	AED 50K–5M	◷ Immediate	7
AM-04	Suspicious Transactions Reported ⛓ PRISON	FDL 10/2025	CRITICAL	Prison risk	◷ Immediate	8
AM-05	Training & Records ⛓ PRISON	FDL 10/2025	CRITICAL	AED 50K–5M	◷ 30 days	9

IDEAL FIX TIME · COUNTED FROM AUDIT SUBMISSION

◷ Immediate	Stop now · serious harm or clear breach	3 standards
◷ 30 days	Plan and close within 1 month · policies and systems	2 standards

SCORING EACH CHECKPOINT

PASS
Every criterion met at the time of audit, with evidence captured.

FAIL
Any criterion not met at the time of audit. Record what you saw and who owns the fix.

N/A
Only where "Applies when" rules it out. Record why.

Note. Whether motor dealers are DNFBPs depends on current designations; take legal advice. Sanctions duties apply regardless.

autosmart

AM-01 AML & SANCTIONS · MOET / FIU · STANDARD 01 OF 05

AML Scope Assessed

Area **Head office** | Person in charge **CFO · Legal Counsel** | Regulator **MoET · FIU · EOCN**

MAXIMUM PENALTY

AED 5,000,000

per violation · supervised businesses

From **AED 50,000** · company total up to **AED 100M**

• CRITICAL | ⛓ PRISON RISK

THE LAW

FDL 10/2025

Federal Decree-Law No. 10 of 2025 on AML/CFT (in force 14 Oct 2025) · **Cabinet Decision 74/2020** on targeted financial sanctions · **FDL 10/2025** designated non-financial businesses and professions (DNFBPs)

WHAT WE CHECK

The group has assessed whether any entity is a supervised business under the 2025 law, and if so, has registered on goAML and set up an AML programme.

CHECKPOINTS IN THE AUDIT

- Q1 Has legal advice confirmed whether each entity is in scope of the AML law?
- Q2 If in scope, is it registered on goAML?
- Q3 Is there a named compliance officer?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

For supervised businesses, administrative fines range from **AED 50,000 to AED 5,000,000 per violation**, up to **AED 100 million** in total.

BEYOND THE FINE

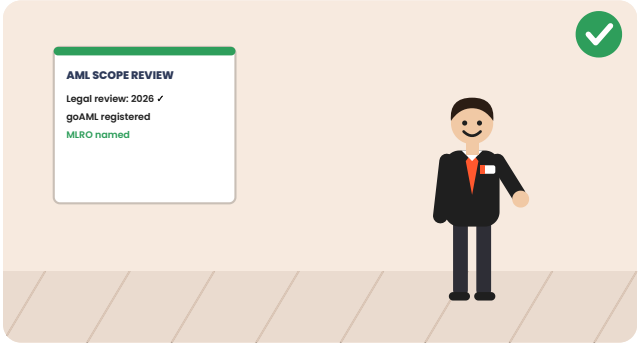
Managers and directors can be **personally liable**, including prison, even for negligence. Sanctions (asset-freeze) duties apply to **everyone in the UAE**, whether supervised or not.

REAL ENFORCEMENT

14 Oct 2025

the new AML law took effect, replacing the 2018 law, with higher fines and **personal liability** for managers.

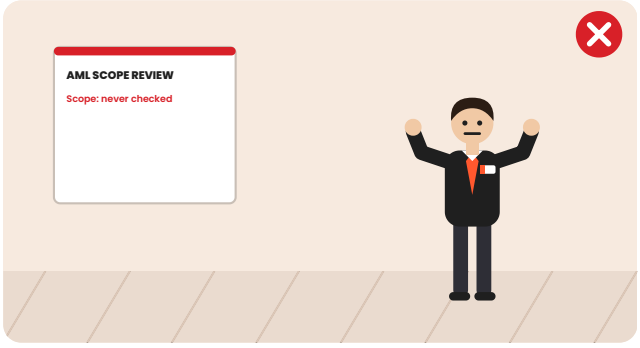
✔ RIGHT WAY



Scope reviewed, registration done.

✖ WRONG WAY

AED 5M + PRISON



Scope never checked.

PURPOSE

The 2025 law widened liability. Assuming you're out of scope is a risk.

FIX IT WITHIN

◷ 30 days

AUDIT CRITERIA · PASS WHEN

- Scope assessed
- goAML if required
- Compliance officer

IDEAL WAY OF AUDITING

1. Request the review

Evidence: Legal memo.

WORST CASE If in scope and unregistered: **AED 50,000–5,000,000** per violation.

AM-02 AML & SANCTIONS · MOET / FIU · STANDARD 02 OF 05

Sanctions Screening

Area **Sales · Accounts** | Person in charge **Compliance Officer** | Regulator **MoET · FIU · EOCN**

MAXIMUM PENALTY

AED 5,000,000

per violation · supervised businesses

From **AED 50,000** · company total up to **AED 100M**

• CRITICAL **⛓ PRISON RISK**

THE LAW

FDL 10/2025

Federal Decree-Law No. 10 of 2025 on AML/CFT (in force 14 Oct 2025) · **Cabinet Decision 74/2020** on targeted financial sanctions · **Cabinet Decision 74/2020**: screen, freeze and report under UAE and UN sanctions lists

WHAT WE CHECK

Customers and suppliers are screened against the UAE Local Terrorist List and UN sanctions lists, and any match is frozen and reported without delay.

CHECKPOINTS IN THE AUDIT

- Q1 Are customers screened against UAE and UN sanctions lists before sale?
- Q2 Is there a procedure to freeze and report a match?
- Q3 Are screening records kept?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

For supervised businesses, administrative fines range from **AED 50,000 to AED 5,000,000 per violation**, up to **AED 100 million** in total.

BEYOND THE FINE

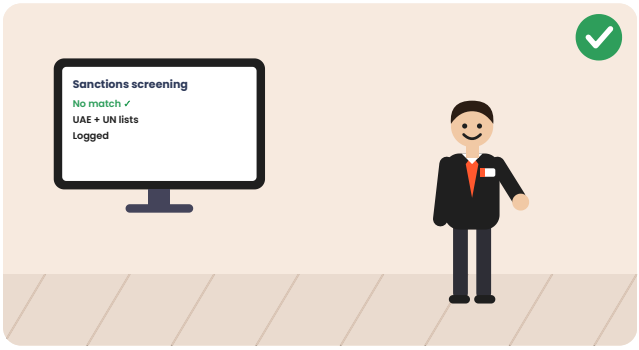
Managers and directors can be **personally liable**, including prison, even for negligence. Sanctions (asset-freeze) duties apply to **everyone in the UAE**, whether supervised or not.

REAL ENFORCEMENT

Everyone

Targeted financial sanctions apply to **all persons in the UAE**: freeze and report matches without delay.

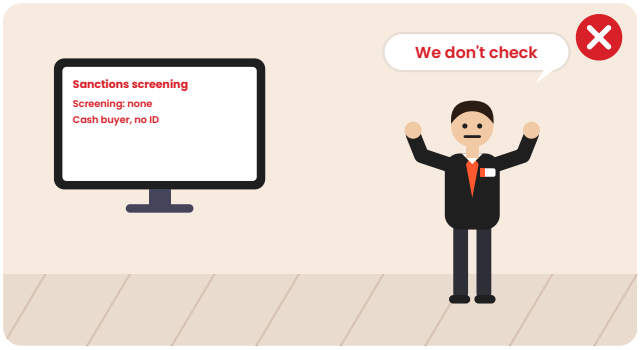
✔ RIGHT WAY



Screened and logged.

✖ WRONG WAY

AED 5M + PRISON



No screening, cash buyer without ID.

PURPOSE

Sanctions duties apply to every business in the UAE.

FIX IT WITHIN

◷ Immediate

AUDIT CRITERIA · PASS WHEN

- Screening before sale
- Freeze and report procedure
- Records

IDEAL WAY OF AUDITING

1. Test 3 recent sales

Evidence: Screening log.

WORST CASE Sanctions breaches are among the most serious offences, with **prison** risk.

AM-03 AML & SANCTIONS · MOET / FIU · STANDARD 03 OF 05

Customer Due Diligence

Area **Sales · Accounts** | Person in charge **Compliance Officer** | Regulator **MoET · FIU · EOCN**

MAXIMUM PENALTY

AED 5,000,000

per violation · supervised businesses

From **AED 50,000** · company total up to **AED 100M**

• CRITICAL | ⛓ PRISON RISK

THE LAW

FDL 10/2025

Federal Decree-Law No. 10 of 2025 on AML/CFT (in force 14 Oct 2025) · **Cabinet Decision 74/2020** on targeted financial sanctions · **FDL 10/2025** customer due diligence

WHAT WE CHECK

For high-value and cash sales, the buyer's identity (Emirates ID or passport) is verified, the source of funds is recorded, and third-party payments are questioned.

CHECKPOINTS IN THE AUDIT

- Q1 Is ID verified for every sale?
- Q2 Is the source of funds recorded for large cash payments?
- Q3 Are third-party payments checked?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

For supervised businesses, administrative fines range from **AED 50,000 to AED 5,000,000 per violation**, up to **AED 100 million** in total.

BEYOND THE FINE

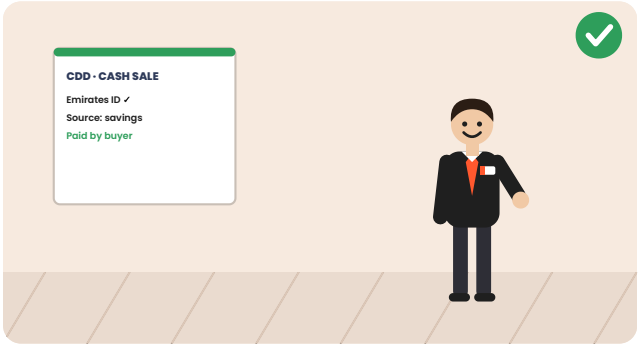
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REAL ENFORCEMENT

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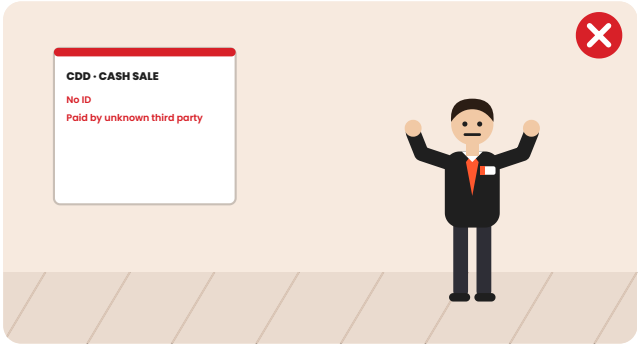
✔ RIGHT WAY



ID verified, source recorded.

✖ WRONG WAY

AED 5M + PRISON



No ID, third-party cash.

PURPOSE

Cars are a known way to move illicit funds.

FIX IT WITHIN

◷ Immediate

AUDIT CRITERIA · PASS WHEN

- ID verified
- Source recorded
- Third parties checked

IDEAL WAY OF AUDITING

1. Sample cash sales

Evidence: CDD files.

WORST CASE Up to **AED 5,000,000** per violation if supervised.

AM-04 AML & SANCTIONS · MOET / FIU · STANDARD 04 OF 05

Suspicious Transactions Reported

Area **Sales · Accounts** | Person in charge **Compliance Officer** | Regulator **MoET · FIU · EOCN**

MAXIMUM PENALTY

AED 5,000,000

per violation · supervised businesses

From **AED 50,000** · company total up to **AED 100M**

• CRITICAL **⛓ PRISON RISK**

THE LAW

FDL 10/2025

Federal Decree-Law No. 10 of 2025 on AML/CFT (in force 14 Oct 2025) · **Cabinet Decision 74/2020** on targeted financial sanctions · Reporting suspicious transactions to the FIU via goAML; no tipping off

WHAT WE CHECK

Suspicions are escalated internally, reported to the FIU through goAML, and the customer is never tipped off.

CHECKPOINTS IN THE AUDIT

- Q1 Do staff know how to escalate suspicions?
- Q2 Are STRs filed through goAML when required?
- Q3 Is tipping off prevented?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

For supervised businesses, administrative fines range from **AED 50,000 to AED 5,000,000 per violation**, up to **AED 100 million** in total.

BEYOND THE FINE

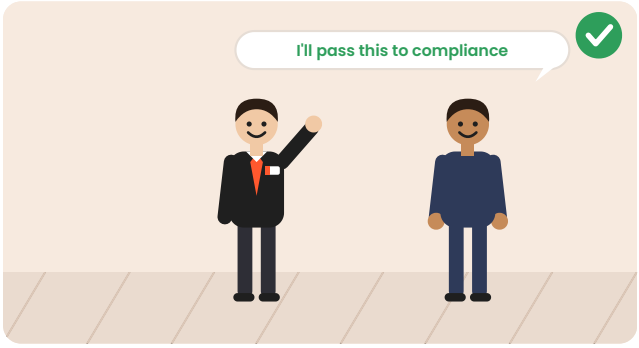
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REAL ENFORCEMENT

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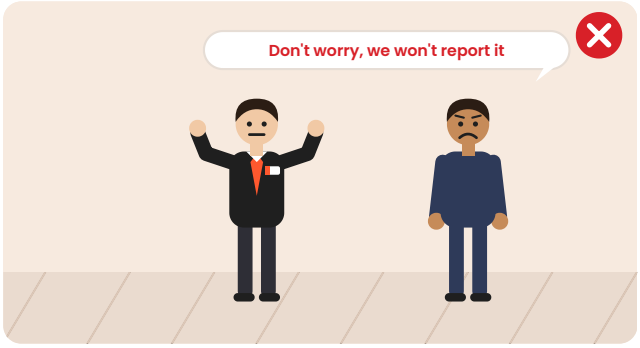
✔ RIGHT WAY



Escalated to compliance.

✖ WRONG WAY

PRISON RISK



Customer tipped off.

PURPOSE

Failing to report and tipping off are criminal offences.

FIX IT WITHIN

◷ Immediate

AUDIT CRITERIA · PASS WHEN

- Escalation route
- STRs filed
- No tipping off

IDEAL WAY OF AUDITING

1. Check the escalation log

Evidence: Log.

WORST CASE **Personal criminal liability** for managers.

AM-05 AML & SANCTIONS · MOET / FIU · STANDARD 05 OF 05

Training & Records

Area **Sales · Accounts** | Person in charge **Compliance Officer · HR** | Regulator **MoET · FIU · EOCN**

MAXIMUM PENALTY

AED 5,000,000

per violation · supervised businesses

From **AED 50,000** · company total up to **AED 100M**

• CRITICAL **⛓ PRISON RISK**

THE LAW

FDL 10/2025

Federal Decree-Law No. 10 of 2025 on AML/CFT (in force 14 Oct 2025) · **Cabinet Decision 74/2020** on targeted financial sanctions · AML training and record keeping (at least 5 years)

WHAT WE CHECK

Sales and accounts staff are trained on AML and sanctions, and records are kept for at least 5 years.

CHECKPOINTS IN THE AUDIT

Q1 Have staff been trained in the last 12 months?

Q2 Are CDD and transaction records kept for 5 years?

WHAT NON-COMPLIANCE COSTS YOU

THE FINE

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BEYOND THE FINE

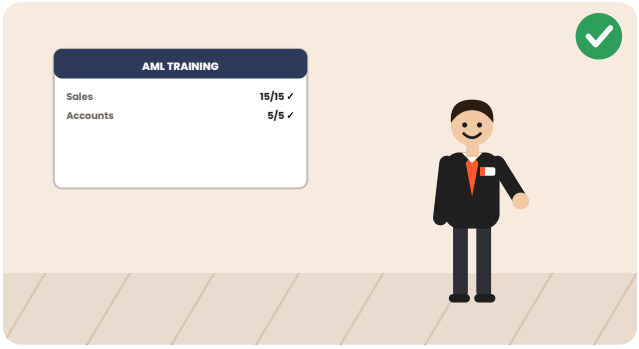
Managers and directors can be **personally liable**, including prison, even for negligence. Sanctions (asset-freeze) duties apply to **everyone in the UAE**, whether supervised or not.

REAL ENFORCEMENT

AED 100M

maximum total administrative fines for a company under the 2025 AML law.

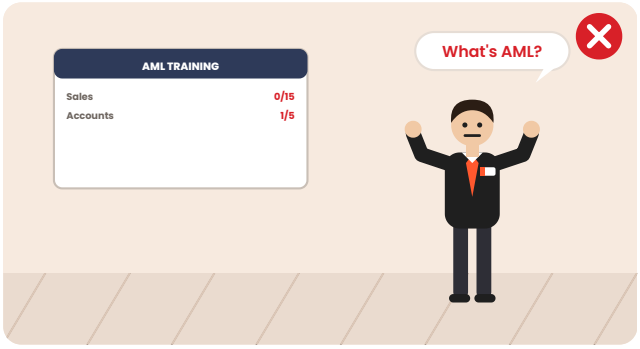
✔ RIGHT WAY



All trained.

✖ WRONG WAY

AED 5M + PRISON



No sales staff trained.

PURPOSE

Untrained staff can't spot red flags.

FIX IT WITHIN

◷ 30 days

AUDIT CRITERIA · PASS WHEN

- ✓ Annual training
- ✓ 5-year records

IDEAL WAY OF AUDITING

1 Check logs

Evidence: Training log.

WORST CASE Standard findings, adding to fines of up to **AED 5M**.

SCREEN BEFORE YOU SELL

Your 30-day AML action plan.

Today

- [ ] **AM-02** Sanctions Screening
  Immediate
- [ ] **AM-03** Customer Due Diligence
  Immediate
- [ ] **AM-04** Suspicious Transactions Reported
  Immediate

This week

Re-audit the site in 30 days.

This month

- [ ] **AM-01** AML Scope Assessed
  30 days
- [ ] **AM-05** Training & Records
  30 days

?/5 Count your passes. Sanctions fails can be **criminal** for everyone.

SOURCES

• AMLUAE: UAE AML Law 2025 (Federal Decree-Law No. 10) · amluae.ae
• Federal Decree-Law No. 10 of 2025; Cabinet Decision No. 74 of 2020 · uaelegislation.gov.ae

Disclaimer. For compliance-audit guidance only; not legal advice. Confirm your scope with a qualified adviser.

AUDIT SIGN-OFF

DEALERSHIP / SITE	AUDITOR	DATE	SCORE __ / 5

BRANCH / DEALER PRINCIPAL SIGNATURE	COMPLIANCE LEAD SIGNATURE