Regulation No. (1) of 2026

Regarding the System Governing the Postponement or Suspension of Suspicious Transactions, and the Freezing of Funds

The Financial Intelligence Unit:

having reviewed:

- Federal Decree by Law No. (10) of 2025 on Anti-Money Laundering and Combating the Financing of Terrorism and Proliferation (the "Decree-Law"); and
- Cabinet Decision No. (134) of 2025 regarding the Executive Regulation of Federal Decree-Law No. (10) of 2025 on Anti-Money Laundering and Combating the Financing of Terrorism and Proliferation (the "Executive Regulation");

issues the following Regulation.

Chapter I: Definitions and Scope

Section I: Definitions

Article (1)

The definitions set forth in the Decree-Law and the Executive Regulation, referred to hereinabove, shall apply to this Regulation. In addition, for the purpose of this Regulation, the following terms and expressions shall have the meanings assigned to each of them, unless the context requires otherwise:

Attempted Transaction: An initiated but not settled transaction, including instructions pending execution and queued or scheduled transactions.

Freezing Order: Order by the Head of the Unit to freeze Funds for a period up to thirty (30) days as provided under Article (5), Paragraph (2) of the Decree-Law and Article (51), Paragraph (3) of the Executive Regulation.

Immediately: Upon receipt, including outside of business hours and during weekends and official holidays.

Promptly: Within twenty-four (24) hours.

Reporting Entities: Financial Institutions, Designated Non-Financial Businesses and Professions (DNFBPs), and Virtual Asset Service Providers (VASPs).

Suspension Order: Order by the Head of the Unit to suspend a Transaction for a period up to ten (10) working days as provided under Article (5), Paragraph (1) of the Decree-Law and Article (51), Paragraph (1) of the Executive Regulation.

Third Party Money Laundering: The laundering of proceeds of crime by a person who was not involved in the commission of the Predicate Offence.

Postponement Suspicious Transaction Report (PSTR): A suspicious transaction report filed in application of Article (18) of the Decree-Law and having an urgent character due to the risk of imminent transfer, withdrawal, or dissipation of Funds suspected of being linked to the Crime.

Integrated Enquiry Management System (IEMS): A secure electronic communication and case-management system designated by the Unit to facilitate the exchange of information and the processing and management of requests between the Unit, Concerned Authorities, and Reporting Entities.

goAML: The secure electronic reporting system used by the Unit to receive and process Suspicious Transaction Reports (STRs), PSTRs, and other reports submitted by Reporting Entities.

Section II: Scope

Article (2)

1. The obligations set out in Chapter II, Section I of this Regulation are complementary to, and do not replace, the obligation of Reporting Entities to file STRs in accordance with the Decree-Law, the Executive Regulation, and any other applicable instructions or guidance issued by the Unit or the relevant Supervisory Authority. Reporting Entities remain fully bound by all existing STR obligations, including where the conditions for filing a PSTR are not met.
2. Nothing in this Regulation shall be construed as amending, restricting, limiting, suspending, or otherwise modifying the scope, triggers, timing, format, or content of STR obligations

under the Decree-Law, the Executive Regulation, or any other applicable regulatory instruments.

3. A PSTR is a specific form of suspicious transaction reporting that is filed only where the conditions set out in Article (3) of this Regulation are met, including the presence of an imminent risk of transfer, withdrawal, or dissipation of Funds. The filing of a PSTR does not relieve the Reporting Entity of its obligation to file an STR where required, including in relation to:
   a. Other suspicious Transactions or Funds involving the same customer or related parties; or
   b. Suspicious activities or patterns that do not meet the conditions for a PSTR but otherwise warrant the filing of an STR.

Chapter II: Reporting Entities

Section I: Urgent Reporting of Suspicions

Sub-Section 1: Conditions for Urgent Reporting of Suspicions

Article (3)

A Reporting Entity shall Promptly file a PSTR to the Unit when it suspects, or has reasonable grounds to suspect, that a Transaction or Attempted Transaction or Funds, in whole or in part, represent Proceeds or are related to or intended to be used in the Crime, and where the Reporting Entity suspects, or has reasonable grounds to suspect, that the Funds present a risk of imminent transfer, withdrawal, or dissipation.

Article (4)

Where considering whether to file a PSTR, Reporting Entities may take into consideration one or more of the following non-exhaustive and indicative criteria, as appropriate to the circumstances of the case:

1. The suspicious Transaction relates to Funds at least equal to *five hundred thousand (500,000) Dirhams*, including situations where several lower-value Transactions appear to be linked. The above threshold shall not apply to Transactions suspected of being linked to a Predicate Offence considered to be a high- or medium-high threat in the current National Risk Assessment or in any update thereto. It also does not apply to Transactions suspected of being linked to Third Party Money Laundering, an organized criminal organization, or the

Financing of Terrorism. The threshold is indicative and does not limit the obligation to file a PSTR where risk indicators are otherwise present.
2. The suspicious Transaction is linked to a Politically Exposed Person or other High-Risk Customer, including where such person is acting as a Beneficial Owner of a legal person or arrangement customer.
3. There is a risk that the owner of the suspected Funds will leave the country.
4. The Funds cannot be monitored.
5. Any other relevant *criteria*, including those in the Unit related guidance.

Article (5)

Reporting Entities shall refrain from carrying out a Transaction subject to the filing of a PSTR in accordance with Article (3) of this Regulation unless:

1. A period of three (3) business days has elapsed since the filing of the PSTR, and the Reporting Entity has not received any communication from the Unit.
2. The Unit authorizes the Reporting Entity to process the Transaction.
3. It is not objectively possible to refrain from carrying out the Transaction, or doing so would be likely to frustrate efforts to pursue the customer and/or the intended beneficiary of the suspicious Funds. In such cases the Reporting Entity must file a PSTR within two (2) hours after carrying out the Transaction.

Sub-Section 2: Modalities for Urgent Reporting of Suspicions

Article (6)

1. The PSTR shall be submitted through goAML and must include:
   a. The type and the value of Suspicious Transaction and associated Funds, including other Transactions or Funds that appear to be linked to the Suspicious Transaction.
   b. The full identity of the parties involved.
   c. The nature of suspicions.
   d. The rationale for urgency, including the risk of transfer, withdrawal or dissipation of Funds.
   e. The nature of the business relationship, when applicable.
   f. The balance in the account or total value of the customer's available Funds entrusted to the Reporting Entity.

g. The expected timeframe for the execution of the Transaction (in the absence of a Suspension Order).
h. Identification of linked accounts or customers.
i. Any known foreign nexus (cross-border element).
j. Any additional information that the Reporting Entity considers relevant.

2. Where the information listed in Paragraph (1.h-j) of this Article cannot be obtained within the timeline specified in Article (3), the Reporting Entity may provide such information as soon as it becomes available.

3. Where the PSTR is filed after the execution of Transaction, it must also include a justification for it being submitted after the Transaction has been carried out, in line with the provisions of Article (5.3) of this Regulation.

4. In exceptional circumstances, the PSTR may be communicated to the Unit verbally. In such cases, a written PSTR must be filed with the Unit no later than twenty-four (24) hours after the verbal submission.

Section II: Implementation of the Suspension Order

Sub-Section 1: Receipt and Execution of the Suspension Order

Article (7)

1. Suspension Orders will be issued in writing through IEMS or, under exceptional circumstances, verbally, followed Immediately by email, in which case a written order bearing the signature of the Head of the Unit will be issued within twenty-four (24) hours of the issuance of the verbal order.

2. Suspension Orders issued by the Unit are Immediately binding and self-executing, and do not require internal validation, legal review, or customer-related procedural steps prior to execution.

3. Upon receiving a Suspension Order, the Reporting Entity shall:

   a. Acknowledge receipt through IEMS within two (2) hours of receipt, irrespective of the day of the week or time the order is issued, unless the Transaction cannot proceed outside of business hours. In such case, the Reporting Entity shall acknowledge receipt within two (2) hours of opening of business.

b. Refrain from processing the Transaction, or any other Transaction that may create a risk of dissipation of the suspicious Funds, including any Transaction functionally equivalent or designed to circumvent the suspension:
   (i) for the duration specified in the Suspension Order, not to exceed ten (10) business days; or
   (ii) if no duration is specified in the Suspension Order, for a period of ten (10) business days or until the suspension is lifted by the Head of the Unit, whichever is sooner.
c. Promptly respond to any request by the Unit for additional information.
d. Proactively communicate with the Unit on matters related to the Suspension Order, including by submitting a PSTR related to any additional Transactions susceptible of being related to the suspended Suspicious Transaction.
e. Refrain from disclosing to the customer or any other person, directly or indirectly, the existence of the Suspension Order, the submission of a PSTR or STR, or any other information susceptible of tipping-off the customer, unless expressly written approved by the Unit.

4. Upon receiving a verbal Suspension Order, the Reporting Entity must duly record:
   a. The time, channel of communication, and name and title of the Unit official who communicated the verbal order.
   b. The date and time at which the Suspension Order will enter into effect, when relevant.
   c. Any additional instructions provided by the Unit regarding communications with the customer.

Article (8)

Where the Reporting Entity is unable to execute all or part of the Suspension Order, such as where the Transaction has already been executed, or has executed the Order with delay, it must submit an explanation in writing and provide supporting documentation to the Unit - including any information at its disposal regarding the current status and location of the suspicious Funds - within two (2) hours of receipt of the Suspension Order. In such cases, Reporting Entities shall preserve any remaining related Funds and flag related accounts pending further instruction.

Sub-Section 2: Lifting and Expiration of the Suspension Order

Article (9)

At the expiration of the duration of the Suspension Order, as specified in Article (7.3.b) of this Regulation, or upon receiving an order lifting the suspension from the Head of the Unit, the Reporting Entity shall:

1. Execute the Transaction, unless otherwise required under the provisions of other legislative and/or regulatory acts or the Reporting Entity's internal policies and procedures.
2. Promptly acknowledge receipt and inform the Unit whether the Transaction has been executed.

Execution after lifting the suspension does not relieve the Reporting Entity from its obligation to report other Suspicious Transactions where appropriate.

Section III: Implementation of the Freezing Order

Sub-Section 1: Receipt and Execution of the Freezing Order

Article (10)

1. Freezing Orders will be issued in writing through IEMS or, under exceptional circumstances, verbally, followed Immediately by email, in which case a written order bearing the signature of the Head of the Unit will be issued within twenty-four (24) hours of the issuance of the verbal order.
2. Freezing orders issued by the Unit are Immediately binding and self-executing, and do not require internal validation, legal review, or customer-related procedural steps prior to execution.
3. Upon receiving a Freezing Order, the Reporting Entity shall:
   a. Acknowledge receipt in writing (including through a secure software application) within two (2) hours of receipt of the written Freezing Order, unless the Funds cannot be accessed, transferred, or otherwise disposed of, or the Reporting Entity does not conduct any relevant business activity outside of business hours. In such case, the Reporting Entity shall acknowledge receipt within two (2) hours of opening of business.
   b. Freeze, without prior notice, all Funds, accounts, or business relationships identified in the Freezing Order:
      (i) for the duration specified in the Freezing Order, not to exceed thirty (30) days, unless extended by the Attorney General or their delegate; or

(ii) if no duration is specified in the Freezing Order, for a period thirty (30) days or until the Freezing Order is revoked by the Head of the Unit or the Attorney General or their delegate, whichever is sooner.

c. Promptly respond to any request by the Unit for additional information.
d. Proactively communicate with the Unit on matters related to the Freezing Order, including by submitting a PSTR related to the existence of any additional Funds susceptible of being related to the frozen Funds.
e. Following execution of the Order, notify the customer of the Freezing Order and of the fact that it has been issued by the Unit, and request supporting documentation to verify the legitimacy of the Transaction and the lawful origin of the Funds.
f. Promptly submit any supporting documentation provided by the customer to the Unit.

Article (11)

1. For the duration of the Freezing Order, the Reporting Entity must ensure that the Funds remain:
   a. Fully immobilized and unavailable.
   b. Non-transferable, non-convertible, and non-withdrawable.
   c. Non-susceptible to debit Transactions, collateralization, pledging, restructuring, or any other operation aimed at or that may result in the dissipation of all or part of the frozen Funds.
   d. Protected from fees, charges, automatic deductions or withdrawals, or forced liquidation, unless otherwise instructed by the Unit.
2. Unless otherwise instructed by the Unit, the Reporting Entity shall allow the processing of all credit Transactions including interest or profits on the account subject to the Freezing Order. The Reporting Entity shall Promptly inform the Unit of any credited Transaction.
3. The Reporting Entity shall transfer frozen Funds to interest-bearing or profit-generating deposit accounts at prevailing market rates, when applicable.
4. The Reporting Entity shall undertake all reasonable measures, including but not limited to regular Funds monitoring, maintenance, and prompt reporting of any incidents, to prevent economic value diminution, when applicable, throughout the duration of the freeze.

Article (12)

Where the Reporting Entity is unable to execute all or part of the Freezing Order or has executed the Order with delay, it must submit an explanation in writing and provide supporting documentation to the Unit - including any information at its disposal regarding the current status and location of the suspicious Funds - within two (2) hours of receipt of the written Freezing Order. Reporting Entities shall report any attempted dissipation or customer behavior observed prior to the receipt of the Freezing Order.

Sub-Section 2: Extension, Lifting and Expiration of the Freezing Order

Article (13)

Upon receiving an extension of the Freezing Order from the Attorney General or their delegate, the Reporting Entity shall:

1. Maintain, and continue to apply, for the duration of the extended Freezing Order, all measures applicable under Articles (10.3.b- f) and (11) of this Regulation.
2. Promptly notify the Unit of any legal, operational or technical issue in implementing the extended Freezing Order.

Article (14)

At the expiration of the duration of the Freezing Order without extension, or upon receiving an order revoking the Freezing Order from the Head of the Unit, the Reporting Entity shall:

1. Lift the freeze and unblock the Funds, together with accrued interest and profits, unless otherwise required under the provisions of other legislative or regulatory acts or the Reporting Entity's internal policies and procedures.
2. Promptly acknowledge receipt where appropriate and inform the Unit that the freeze has been lifted.
3. Notify the owner of the Funds that the Freezing Order has expired or been revoked.

Section IV: Monitoring Order

(Article 15)

Without prejudice to the provisions of Articles (7.3.d) and (10.3.d) of this Regulation, Reporting Entities shall, where so directed by the Unit:

1. Monitor, for a period to be specified by the Unit but not exceeding thirty (30) days, the Transactions or activities that are being carried out through one or more accounts or other business relationships managed by the Reporting Entity by or for the benefit of Customers determined by the Unit to present a significant risk of Money Laundering, its Predicate Offences or the Financing of Terrorism or Proliferation.
2. Report to the Unit on the results of such monitoring within the timeline set by the Unit. A Monitoring Order may coexist with a Suspension or Freezing Order or may follow the expiration of such Orders.

Section V: Recordkeeping and Auditability

Article (16)

Reporting Entities must document all actions taken in application of Articles (3), (7) to (10), and (12) to (15) of this Regulation and maintain such records for a minimum duration of five (5) years from the date of exiting the business relationship. Records should capture all system actions and personnel involved. The records maintained must be sufficiently detailed to support supervisory assessments, criminal investigations and prosecutions, and international cooperation requests.

Section VI: Internal Procedures

Article (17)

Reporting Entities shall establish clear internal procedures specifically addressing the actions prescribed in Sections I to V of Chapter II of this Regulation, to ensure their ability to execute such actions swiftly and effectively. Such internal procedures shall:

1. Allocate to the Compliance Officer, or an employee of similar status and level of seniority, the responsibility for the receipt, execution, monitoring, and reporting on Suspension, Freezing, and Monitoring Orders.
2. Establish internal escalation protocols ensuring 24/7 operational coverage, including outside business hours and during national holidays, unless the Reporting Entity does not process Transactions or allow access, transfer or disposal of Funds or the conduct of any other business activities outside of business hours.
3. Maintain clear segregation of duties between operational staff and decision-making personnel.

4. Periodically test the effectiveness and adequacy of the procedures through an independent audit function.
5. Maintain regular, dedicated training programs for all personnel involved in the implementation of the requirements under this Regulation.

Chapter III: Sanctions and Final Provisions

Article (18)

Without prejudice to any additional sanctions provided for in any other applicable Law, Articles (28), (29), and (35) of the Decree-Law apply to any violation of the provisions of this Regulation, deliberately or through gross negligence.

Article (19)

This Regulation shall be published in the Official Gazette and enter into force sixty (60) days after the date of its publication.

Abu Dhabi in 20/05/2026

Ali Faisal Ba'alawi

Chief of the Financial Intelligence Unit