

Updated AML Frameworks: UAE, Cayman Islands & Mauritius

Executive Summary



In response to FATF greylisting, increased international scrutiny, and evolving global standards, the UAE, Cayman Islands, and Mauritius have undertaken significant updates to their Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) regimes. These changes directly impact:

- Corporate Service Providers (CSPs)
- Trustees, family offices, and nominee structures
- Crypto businesses and Virtual Asset Service Providers (VASPs)
- Banks and professional firms engaging with entities in these jurisdictions

This briefing outlines the key regulatory enhancements, reporting requirements, and risk exposure in each jurisdiction as of mid-2025.

Jurisdictional Comparison Table

Feature / Jurisdiction	UAE	Cayman Islands	Mauritius
FATF Status (2025)	Removed from Grey List (Feb 2024)	Removed from Grey List (Oct 2023)	Removed (2022)
AML Supervisory Authority	UAE Executive Office & Central Bank	Cayman Islands Monetary Authority (CIMA)	Financial Services Commission (FSC)
UBO Disclosure	Mandatory; Filing via goAML Portal	Mandatory; Enhanced BO rules	Mandatory; Central BO Register
Virtual Asset Regulation	Regulated via VARA (Dubai) and ESCA (ADGM, DIFC)	Virtual Asset Service Providers (VASP) registered under VASP Act	VASP licensing regime via FSC
CDD/EDD Requirements	FATF-aligned; stricter EDD on high-risk countries and sectors	Strong EDD on trusts, crypto, complex structures	Enhanced KYC and transaction scrutiny for offshore clients
SAR Filing System	goAML Platform (FIU UAE)	FRA (Financial Reporting Authority)	FIU Mauritius Online Portal
Corporate Service Provider Regulation	All CSPs must register and maintain AML procedures	CSPs licensed under Companies Management Law	CSPs regulated under the Financial Services Act
Penalties for AML Breach	Up to AED 5 million and revocation of license	Unlimited fines + imprisonment	Fines + license suspension/revocation

UAE: Focus Points (Post-Greylist Exit)

- All DNFBPs (Designated Non-Financial Businesses and Professions), including CSPs, must:
 - Register with the goAML system
 - Conduct risk-based due diligence
 - Appoint a Compliance Officer or MLRO
- Increased inspections in real estate, precious metals, and offshore nominee companies
- ADGM/DIFC firms must comply with separate financial free zone regulations aligned to FATF

Cayman Islands: Substance & AML Consolidation

- FATF greylist removal led to:
 - Stronger enforcement of beneficial ownership registers
 - Mandatory AML/CFT manuals for all licensees and exempted companies
 - Enhanced monitoring of funds, trusts, and SPVs
- CIMA requires audit trails and board-level compliance oversight

Mauritius: FSC Modernization & FATF Exit

- Strong AML improvements post-2022:
 - Beneficial ownership registries are verified and accessible to regulators
 - VASP licensing formalized with clear CDD and monitoring rules
 - Local AML obligations extend to foreign clients of Mauritian CSPs
- FSC inspections now include on-site AML reviews, document sampling, and training compliance

Practical Implications for Offshore Clients & CSPs

- Banking impact: Expect stricter onboarding if forming entities or holding assets in these jurisdictions
- Trusts and foundations: Must comply with updated UBO transparency and recordkeeping rules
- Crypto firms: Subject to licensing and transaction monitoring obligations
- Firms servicing HNWLs: Must update internal policies to reflect local AML requirements — especially for high-risk clients or complex structures

Recommended Action Items

- Conduct jurisdiction-specific AML gap assessments
- Ensure UBO disclosures are filed and updated as required
- Review and update CDD, onboarding forms, and training logs
- Register or license as a CSP/VASP where applicable