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ANTI-MONEY LAUNDERING

Financier Worldwide canvasses the opinions of leading professionals on current trends in anti-money laundering.





UNITED ARAB EMIRATES

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Respondents



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Q. What are the most pressing anti-money laundering (AML) risks currently facing the UAE? To what extent are you seeing the emergence of threats such as synthetic identities, AI driven fraud and other technology enabled laundering methods?

A. The United Arab Emirate's (UAE's) risk landscape is evolving rapidly, particularly with the introduction of Federal Decree Law No. 10 of 2025 and the increasing sophistication of technology enabled crime. Traditional threats such as trade-based money laundering, sanctions evasion and misuse of complex corporate structures remain prominent, but digital channels are accelerating the emergence of synthetic identities, AI-enabled fraud and automated mule networks. Criminals are also leveraging privacy enhancing virtual asset tools that complicate attribution and tracing. The forthcoming opening of the UAE's first integrated casino resort in Q1 adds another dimension: gaming environments carry inherent risks related to cash-intensive activity, cross-border value movement and complex patron behaviour. Global experience shows that without strong controls, casinos can become attractive vehicles for layering

and high-velocity transactions. These developments raise the bar for financial institutions (FIs), which must deploy more advanced analytics, large language model (LLM) enabled monitoring, and continuous risk assessment capabilities to detect typologies that are becoming increasingly sophisticated and interconnected.

Q. How would you characterise the direction AML regulation and enforcement is heading in the UAE? What does this suggest about the evolving role of financial institutions, regulators and technology in combatting financial crime?

A. AML regulation in the UAE is moving decisively toward an outcome focused, coordinated and more technologically informed model. The 2025 law strengthens alignment with Financial Action Task Force (FATF) standards, expands the Financial Intelligence Unit's (FIU's) operational powers and introduces a new Supreme Committee to enhance national oversight. Enforcement is becoming more assertive, with clearer corporate liability and personal accountability

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for senior leadership. FIs are expected to demonstrate effectiveness, not just procedural compliance. Advanced monitoring tools, stronger model governance and better reporting quality are increasingly expected. Technology now sits at the centre of both regulatory supervision and institutional defence strategies, driving a shift toward data driven risk management.

Q. How are lawmakers and regulators in the UAE navigating the tension between AML obligations and data privacy laws, especially in relation to customer due diligence and information sharing?

A. The UAE continues to strengthen its privacy framework, but the anti-money laundering (AML) regime is clear that confidentiality cannot obstruct detection and reporting. FIs must share suspicious transaction information with the FIU promptly, and bank secrecy provisions cannot be used to resist information requests. At the same time, the law protects this information by classifying it as confidential and restricting onward disclosure. Alongside federal requirements, the regulatory landscape is evolving

through new technology-specific rules. The Dubai International Financial Centre's AI Regulation No. 10, enforceable from 2026, introduces principles for transparency, human oversight and responsible AI deployment as firms rely more on advanced analytics for customer due diligence and monitoring. Abu Dhabi's International Financial Centre's rules on automated decision systems, requiring human oversight and auditability of automated decisions, similarly emphasise explainability and governance. Together, these frameworks balance privacy with effective risk management – firms must maintain strong governance and purpose-bound processing while ensuring AML, sanctions and fraud risks can be properly identified, shared and escalated.

Q. What are the biggest operational challenges companies in the UAE face in maintaining AML compliance – particularly around data management, transaction monitoring and reporting? How are technology solutions helping to streamline these processes?

A. A persistent challenge for FIs in the UAE is that AML, sanctions and fraud



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controls are built on fragmented data across legacy platforms. This limits visibility and produces large volumes of low-value alerts. Modern LLM driven and agentic AI solutions are changing how FIs tackle this problem. These technologies can interpret unstructured data, reconcile disparate records, build richer customer and counterparty profiles, and generate structured investigative outputs. The result is a more coherent understanding of risk and far more consistent case handling. Deploying solutions that can automate repetitive steps, enhance narrative quality and support real-time decisions enables them to reduce manual workload, create more accurate alerts and significantly increase overall investigative efficiency.

Q. How are companies approaching the integration of new AML technologies – such as artificial intelligence (AI) driven monitoring, automated know your customer, or blockchain analytics? What barriers are they encountering in terms of cost, interoperability or regulatory acceptance?

A. FIs increasingly view artificial intelligence (AI) driven monitoring,



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automated know your customer (KYC) and blockchain analytics as interconnected layers of a modern financial crime framework. Agentic AI can orchestrate complex investigative steps, from analysing alerts to compiling case summaries, while blockchain analytics offers a specialised capability for assessing virtual asset exposure. But meaningful integration requires more than technology: FIs need new skills, clearer model governance structures and robust data foundations to ensure these tools perform reliably within AML, sanctions and KYC domains.

Q. How should companies assess the effectiveness of their AML programmes? What approaches or tools are proving most valuable in driving continuous improvement?

A. Effectiveness is now the central benchmark for AML compliance in the UAE. FIs must show that their risk assessments, customer due diligence processes and monitoring systems align and operate reliably. Leading firms rely on data-driven methods, including model validation, calibration testing and typology-based scenario reviews tailored to

regional threats. Outcome-based metrics, such as escalation quality, investigation timelines and suspicious transaction report conversion rates offer clearer insight than traditional checklists. Independent programme reviews help benchmark performance and identify weaknesses before regulatory inspections. Continuous improvement depends on analytics, structured feedback loops and strong governance to ensure controls evolve alongside emerging risks.

Q. As financial crime continues to evolve, what do you see as the most critical shifts that will shape the future of AML regulation, enforcement and compliance over the years ahead?

A. Several shifts are likely to define the next phase of AML in the UAE and the wider region. First, regulation will continue moving toward effectiveness-based supervision, with greater emphasis on measurable outcomes, asset recovery and cross-border cooperation. Second, the next generation of AI – including LLMs and agentic AI – will sit at the centre of both criminal methodologies and institutional responses, prompting



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heightened expectations around governance, explainability and data integrity. Third, the regulatory perimeter will expand, with sectors such as virtual assets, gaming, professional services and the real economy facing closer scrutiny. The forthcoming casino opening in the UAE is a clear example of how new business models can reshape the risk landscape. FIs that invest early in resilient data, intelligently deployed AI and a genuine risk-led culture will be best positioned. □

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ANKURA is an independent global expert services and advisory firm that delivers end-to-end solutions to manage conflict, crisis, performance, risk, strategy and transformation. Ankura's financial crime compliance (FCC) team helps organisations successfully manage and mitigate financial crime risk in an increasingly complex and evolving risk and regulatory landscape with confidence. The firm combines subject matter expertise, cross-functional experience and global reach with advanced data analytics and technology solutions. Ankura's senior team members have all experienced long careers inside leading FIs, managing and leading FCC practices.

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