

**By Email**

5 December 2022

**To:** Money Laundering Reporting Officers (MLRO) of Relevant Persons

**Re: Late submission fee for 2022 AML Returns**

Dear MLRO,

The purpose of this letter is to remind Relevant Persons of their obligation under AML Rule 14.5.1 to complete the annual AML Return and to submit the Return to the DFSA by the end of September each year. In October 2022, the DFSA issued a late submission fee to 42 Relevant Persons pursuant to FER Rule 7.1.2(1) for failure to submit their annual AML Return.

The annual AML Return requires Relevant Persons to self-assess compliance and provides the DFSA with key qualitative data. This regulatory filing is an integral part of our effort to combat money laundering and terrorist financing. It allows the DFSA to identify relevant AML issues and trends that might be emerging in the DIFC. The information submitted in the AML Return is part of our desk-based risk assessment process conducted prior to an onsite risk assessment visit. Further, the AML Return assists in the selection process and prioritisation of firms for onsite risk assessment visits.

The DFSA would like to remind Relevant Persons that a failure to submit the annual AML Return on time is considered a breach of AML Rule 14.5.1 and the Relevant Person will be liable to pay a late submission fee of USD 1,000 under FER Rule 7.1.2(1). The DFSA will consider this in the assessment of a Relevant Person's compliance with AML obligations, and which may result in a negative compliance record.

Relevant Persons are reminded that the DFSA has zero tolerance for any delayed financial crime risk-related submissions or reporting and takes immediate, formal steps and actions in respect of Relevant Persons who do not comply with their regulatory obligations. Relevant Persons must ensure their monitoring programs factor in these mandatory deadlines to avoid regulatory action.

If you have any questions in relation to this letter, please contact us using the DFSA Supervised Firm Contact Form found on the [DFSA ePortal](#).

Yours sincerely,



**Justin Baldacchino**  
**Managing Director, Supervision**

CC: Compliance Officers of Authorised Firms