



Guide

goAML FAQs

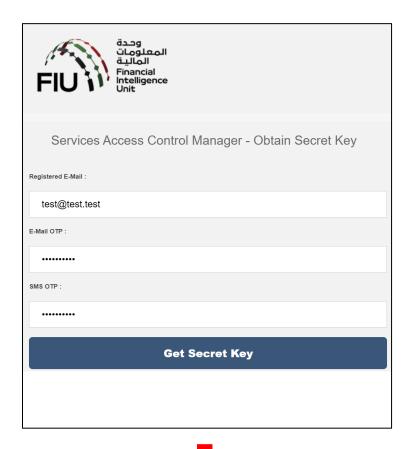
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Disclaimer

The FIU reserves the right to amend, modify or change the contents of this document when deemed necessary.



1. I logged in to the URL provided - https://services.uaefiu.gov.ae/sacm/getkey.php then entered my email address, email OTP and the SMS OTP. I am getting the below error.

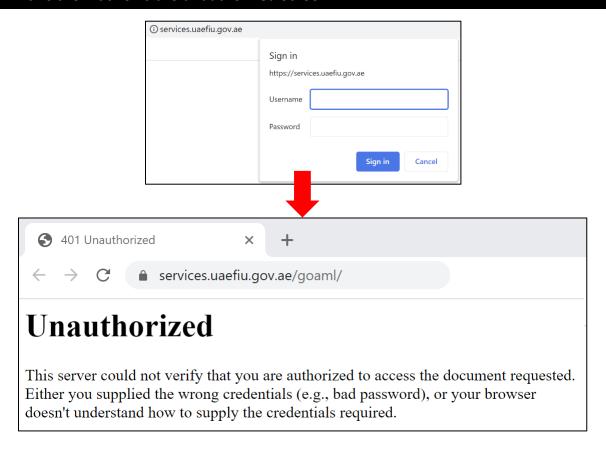






OTPs have a **24-hour validity**. Please contact <u>goaml@uaefiu.gov.ae</u> to request OTPs to be refreshed.

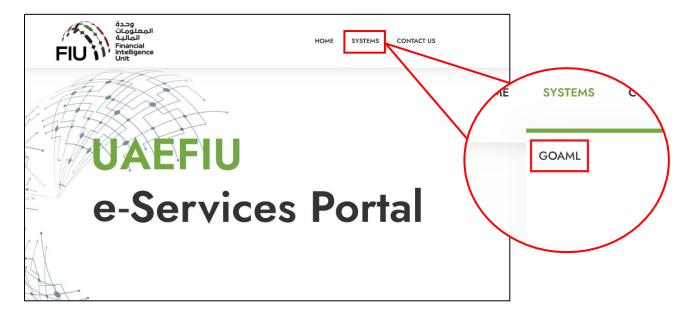
2. When I go to https://services.uaefiu.gov.ae > goAML Portal it opens a pop-up window as per below. Once filled, the same login screen pops up again, if I cancel this then it shows the unauthorized Screen.



In the pop up screen, fill in using the username received from no-reply.sacm@uaefiu.gov.ae and the Google authenticator passcode as the password.

- 3. If we have completed both stages of registration, how do we login to goAML?
 - 1. Click on the Login link https://services.uaefiu.gov.ae
 - 2. Navigate to SYSTEMS
 - 3. Click on GOAML



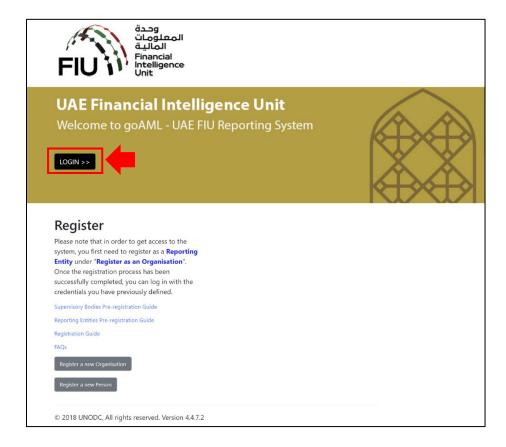


4. You will then see the below pop-up screen; where you need to use the username received from no-reply.sacm@uaefiu.gov.ae and the 6-digit Google Authenticator Passcode as the password (note that the code changes every 30 seconds for security reasons).

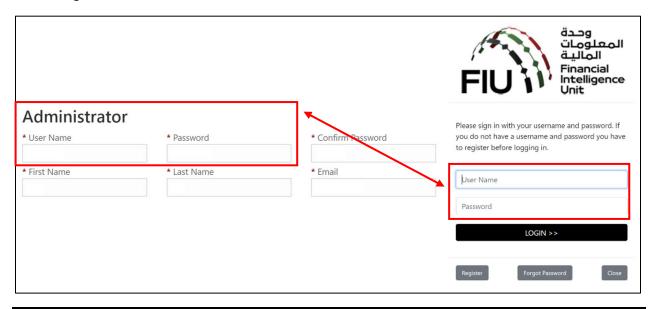


- 5. You will be directed to the goAML homepage
- 6. Click the Login Button





7. Type in the username and password you created at the time of registering on goAML then click login



4. What do I do if I forgot my login password in the 2nd stage?

The goAML system provides users with the **Forgot Password** button next to **Log In** button.





- Click Forgot Password button.
- The Reset Password Request window populates, enter **User Name > Email > Submit**



The registered email address will then receive an email with a link redirecting to the goAML portal where the **Reset Password Request** page will open.



After entering all the required details, the new password will be set.



5. I forgot my goAML username (2nd stage), how can I retrieve it?

Please send the goAML Support Team on goaml@uaefiu.gov.ae the below information to verify your identity and retrieve your username:

- 1) Entity name
- 2) First and last name as registered on goaml
- 3) Registered email address
- 4) Emirates ID Number
- 5) Passport Number
- 6) Date of Birth
- 7) Org ID
- 8) Nationality

6. What is the process of changing the entity's MLRO/Compliance Officer/Contact Person on goAML?

- 1) Appoint new MLRO/Compliance Officer/Contact Person.
- 2) Request the regulator's approval via email.
- 3) New MLRO to register on SACM (1st stage) and obtain the regulator's approval to obtain their own login credentials to the network.
- 4) New MLRO to register on goAML as a Person under the same Org ID.
- 5) Inform the goAML Support team (goaml@uaefiu.gov.ae) to deactivate old MLRO and activate the new one based on the regulator's approval.
- After initial login, new MLRO needs to change the contact person details under My ORG details on goAML <u>following Q8 below</u>.
- 7) Regulator should approve these changes on goAML.

Please refer to the 1^{st} stage and 2^{nd} stage registration guides.

7. What is the process of adding additional users under the same entity on goAML?

- 1) Register on the eservices portal (SACM) to gain access to the network.
- 2) Regulator to approve the SACM pre-registration.
- 3) New user to receive SACM username and security key.
- 4) New user to download Google Authenticator app on their mobile phone and use the secret key to set up their account.
- 5) New user to use the received username and the Google Authenticator 6 digit passcode to login to the network and access goAML.
- 6) New user to register as a Person under the same Org ID.
- 7) Organization admin user (MLRO/Compliance Officer) to approve the new user request following the steps depicted in <u>Section 5 of the goAML Registration Guide</u>.



8. How Do I update my Organization details? Or, there have been some changes in the organization details (e.g.name/licensed activity/address/contacts). How do I reflect the same on goAML?

In order to update an organization's details, the user must follow these steps:

- **Step 1:** The user should login to the FIU's portal using the user login credentials they acquired during the registration process
- Step 2: Once the user has logged in, he/she should go to the My goAML menu, then click on the My Org Details menu item



• **Step 3:** The user should then update entity details like the name, Incorporation number, acronym, commercial name, business activity, email, website, contact person, telephone number, address of the institution, etc.

Once the request has been submitted, the Supervisory Body/Regulator will verify this information and upon approval, the system will send an automated confirmation email to the organization.

9. There have been some changes in my details (e.g. name/ID number/nationality/address/title/occupation/contact). How do I reflect the same on goAML?

goAML users can change their user details when required by navigating to the **My goAML** menu and selecting **My User Details**.



A registering person window will then expand; details on how to fill it out are available in the goAML Registration Guide. After submitting the request, the user should await approval from the admin user (MLRO/Compliance Officer) of the organization or if the MLRO/Compliance Officer has submitted the changes then the Supervisory Body/Regulator will carry out the approval.

10. Is it possible to delegate reporting responsibilities to external parties?

Yes. Delegation is possible on the goAML system. The registered reporting entity may delegate reporting function to a third party. However, it is recommended that the delegated party should create an account on the FIU's goAML platform (using the 'Register as an Organization' option) before receiving delegation of reporting responsibilities on behalf of an organization.



11. How do I delegate reporting to a third party?

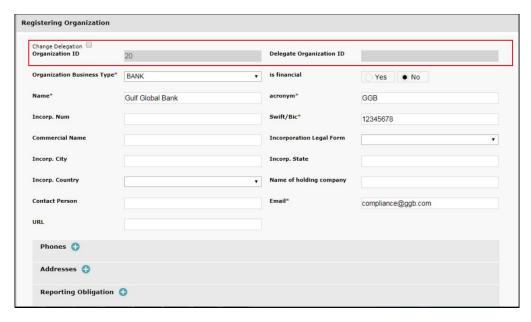
After logging on to the goAML portal, the MLRO/Compliance Officer should navigate to the **Admin** menu and Select **Active Organizations** from the drop-down menu. Kindly note that this feature is only available to the admin user of the organization i.e. the MRLO.



The **Active Organizations** page will be displayed, in which the user will need to click the **Change Selected Delegating Organization**. Kindly note that the delegated party should be registered and approved on the goAML platform by the Supervisory Body/Regulator before proceeding with this step. Please refer to the registration guide for details on how to register on the system as a new organization.



A **Registering Organization** form will then expand, in which the user will be required to specify the desired delegated party by selecting the **Change Delegation** checkbox.



The Change Delegation dialogue box will then populate, in which the user will be required to click **OK**.





Subsequently, the user should specify the Organization ID associated with the delegate party on the goAML system.



Once the request is submitted, it should then be approved by the Supervisory Body/Regulator before the delegation function is enabled.

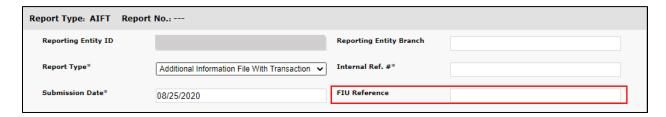
12. Who will approve an organization registration?

The respective Supervisory Body/Regulator will be approving their regulated entities registrations and any changes related to its details or its MLRO/Compliance Officer's details.

13. How do I add additional information to an STR/SAR that has been already submitted?

The MLRO/Compliance Officer may submit additional information pertaining to an existing report by submitting a relevant 'AIF' (Additional Information File) or AIFT (Additional Information File with Transactions) if the additional transactions need to be reported.

The MLRO/Compliance Officer must quote the original report reference number by referencing the report's web reference number in the FIU reference field as shown below.



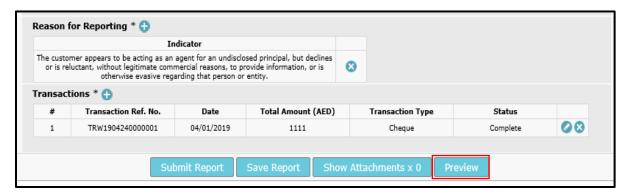
14. There are two registration options on the website. Which one should I select?

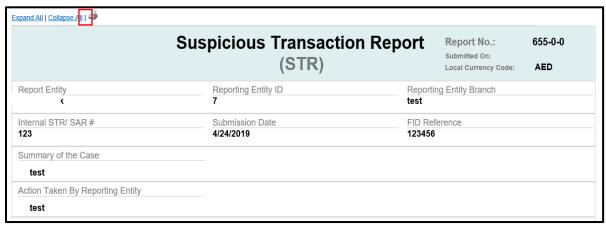
An Organization is required to select the **Register as an Organization** option when registering on the goAML system for the first time. Once the Supervisory Body/Regulator approves the request, the reporting entity may subsequently allow internal users within the organization to register on the system by selecting the **Register as a Person** option.



15. Can a report be printed before submission?

Yes. All reports can be printed before submission. The user will have to click the preview button before submitting the report then click the printer icon to print the report as shown in the below figures.





16. What is the 'Message Board'?

The goAML Message Board is the internal means of communication between the FIU and goAML users. The advantage of such an internal communication channel is that it allows two-way communication between reporting entities and the FIU.

Reporting entities are notified immediately through the Message Board if their reports are accepted or rejected. Similarly, this feature is used in the instance where the FIU requires further information from a reporting entity.

17. Is the 'Message Board' specific to a user or the entire organization?

The Message Board is not linked to any specific user but rather the organization as a whole.



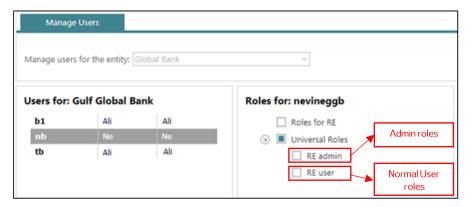
18. How can I set access rights for users registered under my organization?

The goAML is preconfigured with two roles that are defined in the system for both the organization's admin user **RE Admin** (user who registered the organization i.e. MLRO/Compliance Officer) and the organization's users **RE User** (user who registered as a person under the same **Org ID**). These roles have been designed with several access rights being allowed for each specific subset of users in the system. The reporting entity's admin user can specify what roles the organization's users are to assume as shown below:

• Navigate to Admin, then click User-Role Management



• Click on the desired user within the organization and specify their role.



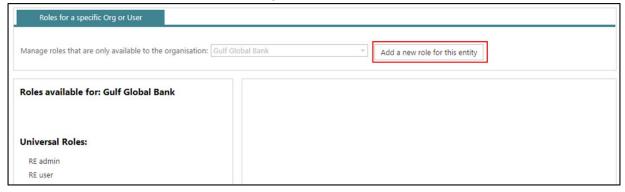
Should the organization's admin user consider that the preconfigured user access rights defined are not suitable for their users, and then they may add a new role for their organization as shown below:



Navigate to Admin, then click Role Management



Click on Add a new role for this entity



The system will then allow the organization's admin to create a new role for their organization, in which they can specify their own access rights for different types of users in the organization.

19. When should an Account / Person / Entity be chosen?

An "Account" should be chosen when the report involves transactions. A "Person" or an "Entity" should be chosen if no "Account" details are available to the organization.

<u>Examples</u>: For cash deposit transactions, the organization should choose "Bi Party", from "Person" to "Account". For cash withdrawal transactions, the organization should choose "Bi Party" from "Account" to "Person". For remittances, the organization should choose "Bi Party" from "Account" to "Account".

In case of non-banking/non-MSBs organizations, a "Person" or an "Entity" will be more convenient to use.

20. How do I file a fraud related report?

Fraud is not a report type on the goAML. However to file a fraud incident, organizations may opt to file a Suspicious Transactions Report or a Suspicious Activity Report depending on the type of fraud incident that the organization is reporting. Additionally the most suitable **Reason For Reporting** should be chosen to carefully describe the red flags that should be highlighted.



21. Where can reporting entities view the historical data (the previous STR) after deploying the goAML?

Organizations, who were previously using the STR System, will be provided access to a platform on which they can search and view their historical STRs.

22. Do reporting entities still need MPLS connection to file suspicious reports?

MPLS connection is still required for those organizations who need to access CBSP for Payment Systems i.e. all CBUAE regulated organizations. Other than that, organizations may access the goAML using a normal internet connection through the eservices portal "Services Access Control Management" (SACM).

23. Will the MLRO/Compliance Officer be accountable for the reports he submits?

As per Section (7) – Article (20) item (3) of the Cabinet Decision No. (10) of 2019 Concerning the Implementing Regulation Of Decree Law No. (20) Of 2018 on Anti- Money Laundering and Combating the Financing of Terrorism and Illegal Organizations, "Appropriate arrangements for compliance management for combating the Crime, including appointing a compliance officer" and Section (8) – Article (21) lists down the expected tasks of the Compliance Officer.

24. Should the goAML be used to submit responses related to Search and Freeze Notices received from the FIU?

No. goAML is a platform to submit suspicious reports only.

25. How long will the processed reports remain the goAML web before they are cleaned?

5 calendar days

26. How long will the draft report remain in the draft mode before they are cleaned up from the goAML Web?

15 calendar days.

27. How long will the rejected reports remain in the goAML web before they are cleaned up?

5 calendar days. Hence, please Click **Revert**, edit the report in the draft mode and resubmit it before the 10 days grace period allowed for resubmission. Otherwise, the organization will need to submit a fresh report.



28. What is the character count/capacity of the "Summary of the Case" field on the web form?

4000 characters.

29. I submitted my Pre-registration request and received the SMS OTP; however, I did not receive the email OTP?

Please check the junk mailbox. If not found there, then the email may have been blocked by your entity's mail servers. Please request your IT team to whitelist the system's email address no-reply.sacm@uaefiu.gov.ae and inform the goAML Support team so it can be resent via emailing goaml@uaefiu.gov.ae

30. I am the new MLRO/Compliance Officer for an active entity on goAML, how do I register myself?

Please register yourself **as a Person** under the same <u>Org ID</u>. Your request will be assessed by your regulator and approved or rejected accordingly.

To know how to register as a person, please refer to section 4 in the goAML Registration Guide (2nd stage registration).

31. I switched employers and need to register myself as the new MLRO/Compliance Officer for my new employer.

You can contact your previous employer's regulator to deactivate your old user on both stages, the eservices portal (SACM) and goAML so you can use your details to create new profiles under your new employer.

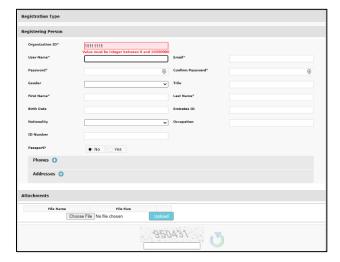
To know how to register as a person, please refer to section 4 in the goAML Registration Guide (2nd stage registration).

32. My mobile number is still associated with my previous employer and I am unable to use this number for pre-registering with my current employer?

You can contact your previous employer's regulator to deactivate your old user on both the eservices portal (SACM) and goAML so you can use your details to create new profiles under your new employer.

33. My organization ID is not being recognized and I am getting the below error





You need to register as an organization and not as a person. The "register a person button" is available for additional users only after an organization is active.



34. I'm having trouble uploading documents on the goAML. What should I do?

Each attachment size should not exceed 5MB. The file name should be short and should not include any special characters. For report attachments, there is a max capacity of 20MB per report.

Make sure to click on the "Upload" button before submitting the form.

35. I have registered the wrong mobile number on SACM and I'm not receiving the SMS OTP. What do I do in this case?

Please send an email to the goAML Support team on goaml@uaefiu.gov.ae to revoke your current request so you can re-register using the correct mobile number.

36. I have changed my mobile phone and lost my Google Authenticator App. How do I login?

We suggest that download the Google Authenticator App on the new mobile phone and redo the setup following section 5 of the Pre-Registration Guide found <u>HERE</u>.

37. Who approves my organization's pre-registration on SACM (1^{st} stage) and my registration on goAML (2^{nd} stage)?

Your Supervisory Body/Regulator approves both requests for your organization.

38. I registered as a person under my entity's Org ID in goAML; however, my request has not been approved yet. Who do I follow up with?

You may follow up with the admin user of your organization who is usually the MLRO/Compliance Officer. All additional users registering under the same entity are to be approved by the entity's admin user i.e. the MLRO/Compliance Officer.



39. I am not receiving email notifications from goAML. What is the issue?

Please check the junk mailbox. If not found there, then the emails may be blocked by your entity's mail servers. Please request your IT team to whitelist the system's email address no-reply.goaml@uaefiu.gov.ae and inform the goAML Support team.

40. My Supervisory Body/Regulator has rejected my goAML requests a few times for not uploading the required documents, although I have uploaded them while I submitted my request. What is the solution?

Please click on browse to select the documents you would like to upload, and then click on upload. You should then see a pop-up message on your screen asking for a confirmation to upload the documents. If you do not see the pop-up then you will need to adjust your web browser setting and enable pop-ups. Otherwise, the documents will not be uploaded on the system.

41. I am the MLRO/Compliance Officer of ABC Company. I have registered my organization on goAML; do I need to register myself as a Person under the organization in order to complete the registration process?

The MLRO/Compliance Officer is the registering person for any organization. Hence, he is registered by default once the organization is registered on goAML. This means that no Person registration is required. Person registration is only needed if the organization wishes to register additional users beside the MLRO/Compliance Officer.

42. Which kind of reporting entities is the obligation to report High Risk Countries (HRC) related transactions/activities applicable to?

This obligation is applicable to all banking and non-banking financial institutions (FIs) as well as designated non-financial business and professions (DNFBPs).



43. What is the scope of obligation to file HRC/HRCA reports and to which transactions must the three days holding period apply?

The obligation for reporting as well as hold the transaction/activity is for cross border transactions through banking or remittance channels. These transactions may include; transactions destined to, originated from or being routed through jurisdictions which are classified as a 'High-Risk Jurisdiction subject to a Call for Action' by FATF (list available here).

It also includes any transaction(s) (from/to any country in any currency) where the remitter or the beneficiary is an individual who is associated with a country classified under the aforementioned category by virtue of nationality or residency (including both, residents and non-resident of UAE). The same applies for transactions where any of the parties is an entity, which is associated with such a country by virtue of place of incorporation, or a person of such nationality has a stake or signing authority within that entity.

44. Does the HRC reporting obligation have any threshold in terms of the amount of the transaction(s)?

No, such transactions must be reported to the FIU irrespective of the amount of value being transacted.

45. What is the channel or medium, which the reporting entities must use to file HRC/HRCA reports?

The only medium, which is available for filing any kind of report to the FIU, is the goAML Platform while using the commensurate report type. Kindly refer the goAML Web Submission Guide available of the UAE FIU's website.

As such, the FIU will not accept any filing through emails, hard copies or even through the goAML Message Board in the form of a message.

Such transactions must be reported to the FIU in the form of a High Risk Country Transaction Report - HRC while ensuring all those transactions are duly and accurately populated in the transactions fields of the report. However, if due to the nature of transaction, the reporting entity does not have sufficient details to populate the mandatory transaction(s) fields, they must report the transaction attempt in the form of High Risk Country Activity Report – HRCA while detailing the attributes of the transactions such as amount, account numbers etc. in the available field as text.

46. Is currency exchange and value added services such as utility bill payments exempted from the HRC reporting obligation?

This obligation does not apply to currency exchange transactions and domestic transactions for value added services. However, if the transaction is a cross border payment (even for a bill payment), the obligation will be applicable.



47. What other transaction types are exempted from the HRC reporting obligation?

The obligation only applies to international or cross border transfers in any currency. As such all other transaction types such as card purchases, card payments, WPS transactions, domestic cheques, domestic utility payments etc. do not fall under the purview of this obligation.

48. Is the HRC reporting obligation applicable for transactions related to trading such as stocks, forex, crypto assets, bonds, mutual funds, commodities etc.?

The transactions related to trading will fall under the purview of this obligation if they are cross border in nature. If not, they are exempted.

For example, if a national of a designated high risk country purchases stock through a stock broker in the UAE while remitting funds from outside the UAE or if such a person liquidates his bonds or sell his crypto assets and wants the money to be remitted to an account outside the UAE; such transactions need to be reported.



49. What is expected from the reporting entities during and after the three-day holding period for HRC reporting?

The transactions must be placed on hold for three working days during which the FIU may respond to the report with an instruction or advice regarding the reported transaction(s). In the meantime, the reporting entity can also perform their due diligence on the transaction(s) as well as the associated parties. In absence of any response from the FIU within the stipulated timeline, the reporting entity can take a call at its own discretion based on their due diligence as to whether to execute or not execute the transaction.

50. How long will the DPMS reports remain the goAML web before they are cleaned?

In order to safeguard the confidential information pertaining to the submitted DPMS reports, goAML system is programmed to delete reports as described below:

- Dispose of web-report information after creation and not yet submitted is 15 days.
- Dispose of web-report information after submission and rejection for invalid structure or failed validation – waiting to be reverted is 5 days.
- Dispose of web-report information after being reverted is 10 days.



51. What are the DPMSR reporting requirements?

SI No	Queries	Our understanding on the reporting requirements	Confirmation (Yes / No)	Remarks
1.1	Transactions with Individuals: Transactions with resident individuals: Obtain identification documents (Emirates ID or Passport) for cash transactions equal to or exceeding AED 55,000 and need to be reported in DPMSR	Need to be reported	Yes	
1.2	Transactions with non-resident individuals: Obtain identification documents (ID or Passport) for cash transactions equal to or exceeding AED 55,000 and need to be reported in DPMSR	Need to be reported	Yes	
1.3	Credit card, cheque or bank transactions with individuals exceeding AED55,000 need not be reported. However, if there is any suspicion arises, it has to be reported under STR	Not to be reported	Yes, no reporting is required	
1.4	Old gold exchange (old gold/ jewellery exchanged for new jewellery): If there is no cash transaction (exceeding the threshold limit), such transactions need not to be reported	Not to be reported	Yes, no reporting is required	



	<u>Transactions with entities / companies:</u>			
1	B2B cash transactions equal to or exceeding AED 55,000 need to be reported in DPMSR	Need to be reported	Yes	
	Cheque and local wire transfers	Not to be reported	Yes, no reporting is required if it's a wire transfer from a bank within the UAE, however, if the transfer is made through an exchange house, you still have to report the transaction in goAML under DPMSR	
	All international wire transfers	Need to be reported	DPIVISK	
			Yes, that's correct	
2	Barter transactions - Gold to Gold trading: wholesalers accept bullion against jewellery and making charge is paid by cheque or wire transfer	Not to be reported	Yes, that's correct	
3	Margin calls, Loans with banks	Not to be reported	Yes, that's correct	
4	Intra-company transfers	Not to be reported	Yes, that's correct	
5	Intra-company sale/ purchase in cash exceeding the prescribed threshold	Need to be reported	No, no reporting required	
6	Installment transactions in cash exceeding the threshold limit, to be reported at the time of receiving funds	Need to be reported	Yes, that's correct	



8	Advance payment in cash exceeding the threshold limit, to be reported at the time of receiving funds Frequency in reporting 'qualifying transitions	Need to be reported Within 2 weeks of occurring the transaction	Yes, that's correct Yes that's correct	
9	Invoice/ID documents need to be attached to DPMSR while reporting?	Not mandatory, however, for further clarification, traders may do so (if required)	Preferably yes	
10	For wire transfers from outside the country, identification required while reporting in DPMSR are: Trade license, Name of the entity, ID proof of the local representative etc.	All international wire transfer needs to be reported with the stated identification proofs	Yes, if the amount equals to or above AED 55,000/-	
11	In barter transactions, if the making charges is paid in cash exceeding the threshold limit, it needs to be reported under DPMSR	Need to be reported	"Making charges" is not considered a reportable transaction if there is no buying or selling of precious metals and stones involved	
12	If transactions are conducted through LC (Letter or Credit by banks)	Not to be reported	Yes, that's correct	
13	Unfixed gold: If the fund is received in cash and in more than one installment exceeding the threshold limit, it needs to be reported under DPMSR	Need to be reported	Yes, that's correct	



14	Wire transfer from a mainland company to a company in Free zone (part of the group company, therefore intra company) for the supplies, do we need to report?	Wire remittance needs to be reported since DAFZA is considered out of state - whereas cheque payment need not be reported	No reporting is required if it's within the same group
15	Bullion Business (B2B Transactions)		
15. 1	If both the parties (buyer and seller) are registered entities/companies in UAE and settlement is taking place by local transfer between their accounts in USD with the same bank in UAE. Please advise if such transactions are to be reported.	Not to be reported as the transaction is between two banks locally	Yes, that's correct
15. 2	If both the parties (buyer and seller) are registered entities in UAE and settlement is taking place by international wire transfer in USD. However, both bank accounts involved are in UAE but with different banks. Please advise if such transactions are to be reported.	Need to be reported as this involves international wire transfers OR Need not be reported as both are local banks	If it's an international wire transfer it has to be reported
15. 3	During the webinar on 13.06.2021, we were explained on the various option available in the DMPSR template; (Individuals, Account, Entity)	Kindly clarify, what you mean by 'Account' option.	Will get back to you on this
	If one party (buyer or seller) is registered on UAE mainland & other is registered at free zone in UAE (say DMCC). Both parties are operating in UAE and have		



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15.4	bank accounts in UAE. Settlement is done by either of the followings:			
	 Transfer from one party's AED account to other party's AED account or 			
	Transfer from one party's USD account to other party's USD account (both have accounts in the same bank in UAE) or	Please advise if such transactions are to be reported.	No reporting is required	
	 Transfer from one party's USD account to other party's USD account (both have accounts in different banks in UAE) 			
	FTZ (Free Trade Zone) company an offshore company (registered in UAE)?			
16.0	OAE):	If yes, then which of these transactions need to be		
16.0	a) Settlement between 2 FTZ (registered in UAE) companies in either AED or USD whereby both having accounts with same bank operating in UAE	reported on DPMSR?	Scenario A should not be reported	
	b) Settlement between 2 FTZ (registered in UAE) companies in either AED or USD whereby their respective accounts are with different banks operating in UAE as USD settlement will be thru		Scenario B should be reported	



	international (cross border) wire transfer		
c)	Settlement between FTZ & onshore companies (registered in UAE) under same scenarios as above		
d)	Settlement between 2 onshore companies (registered in UAE) is USD having accounts either with same bank or different banks operating in UAE.	Scenario C should be reported Scenario D should not	
e)	Do physical trade with commercial banks operating & regulated outside UAE need to be uploaded?	be reported	
f)	What about trade between related parties whereas one is registered on mainland and other in FTZ but having accounts with banks operating in UAE in AED & USD?	No No reporting is	
	1171ED & 03D.	required	