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Appeal to object to the Commission's Delegated Regulation removing the United Arab Emirates from EU's list of high-risk third countries

In view of the forthcoming ECON-LIBE meeting, where Commissioner Albuquerque will present the delegated regulation proposing to delist the UAE from the Union's list of high-risk third countries, we wish to reiterate our concerns with respect to the risks that the persistent weaknesses in the UAE's AML/CFT regime continue to pose to the EU's financial system.

In the [delegated regulation](#) that was released on 10 June, the Commission states that Member States have reported "some progress" in enhancing judicial and law enforcement cooperation. Given the UAE's historically poor record on international cooperation – especially when it comes to high-profile corruption and money laundering cases – this is hardly enough. Moreover, the Commission's explanation falls short of addressing the strong concerns expressed by the [European Parliament in April 2024](#), including when it comes to the UAE's meaningful implementation of effective AML/CFT rules, and decisive action on money laundering cases.

From the delegated act, we also learn that the UAE submitted a "list of commitments" aimed at improving judicial and law enforcement cooperation, which the Commission will now "closely monitor". According to the document seen by Transparency International EU, the UAE is "encouraged" to enhance judicial cooperation with Eurojust and facilitate law enforcement cooperation through Europol. The vague language used in the document – including mutual commitment of the UAE, EU and Member States to "exchange on the benefits of swift access to information on real estate by competent authorities" and to "explore the possibility of collaborating on mutually sharing suspicious cash declarations" – offers little assurance of meaningful future progress. Moreover, the lack of commitments to clamp down on financial secrecy or to increase investigations into financial crime and money laundering indicates that the European Parliament's concerns have been effectively sidelined in the EU-UAE structural dialogue. We are of the opinion that this list of commitments should not be enough to justify the country's delisting in the **absence of concrete evidence** as to whether recent reforms have translated into **effective, on-the-ground safeguards against financial crime**. Moreover, it is unclear what mechanisms the Commission would have to encourage further improvements if the UAE were removed from the EU list but failed to deliver on these commitments.

Moreover, the Commission's approach towards the UAE appears inconsistent with both the FATF and EU's listing process. Commitments and early progress made by other jurisdictions – such as Algeria, Angola and other countries – are insufficient to spare them from being designated as high-risk third countries. In contrast, limited progress on international cooperation and a series of ambiguous commitments seem to suffice for the Commission to justify the UAE's delisting.

We certainly welcome improvements in the UAE's AML legislative framework, which were introduced around and following its 'grey-listing' by FATF. However, we still lack evidence that **these recent changes have been adequately implemented in practice and are producing tangible results**.

Moreover, reforms made so far have been insufficient in the context of the real estate sector. The [Opacity in Real Estate Ownership \(OREO\) index](#), released by Transparency International and the Anti-Corruption Data Collective in March 2025, ranks the UAE near the bottom, citing significant **loopholes in its regulatory framework** and **persistent weaknesses in real estate data transparency**. More specifically:

- The UAE, with some exceptions, still does not provide public access to its real estate register. Its fragmented system, with each emirate maintaining its own independent real estate registry, further complicates the monitoring and tracing of property.
- Buyers who purchase properties directly from real estate developers, who are exempted from AML obligations, escape due diligence checks. This is a critical safeguard against the entry of illicit funds into the market.
- The UAE's weak beneficial ownership requirements allow for delays in identifying and verifying beneficial ownership information of clients, prioritising business continuity over due diligence.

These **structural loopholes** continue to make the UAE an attractive destination for [corrupt actors and criminals](#). New evidence emerging over the past year shows that the UAE remains a major **hub for illicit financial flows**. The [Dubai Unlocked](#) investigations, which were released in May 2024, revealed that 200 people, including alleged criminals, fugitives, political figures, and sanctioned individuals, have owned more than 1,000 properties in [Dubai](#).

In 2024 and 2025, Transparency International submitted complaints to the Dubai authorities providing information on properties of 13 politically exposed persons whose known incomes could not justify their [property purchases](#) and had allegations of financial crime against them. There is no public indication that the UAE authorities have undertaken investigations into these or other hundreds of publicly reported cases of suspicious property ownership.

Yet, the delegated regulation proposed by the Commission fails to explain how the UAE remedied these deficiencies. In fact, while the Commission recognises that Panama has made improvements in the transparency of beneficial ownership information by exchanging information of legal entities and arrangements, the paragraphs on the UAE merely report “some progress” regarding judicial and law enforcement cooperation, where in the course of the structural dialogue only [one extradition request](#) has been fulfilled.

Lastly, it is worth noting that the Commission is planning to delist the UAE at a time when the EU and the UAE have commenced negotiations for a [bilateral free trade agreement](#) – when the degree of exposure of the internal market to the UAE may increase. As pointed out in the previous resolution adopted by the European Parliament, **the UAE should be evaluated and assessed in a way that is proportionate to the country's risk exposure** as a [major global financial and trading hub](#) which, due to its geographical position and service-based economy, continues to attract significantly more trade and foreign investment.

For these reasons, we believe that the UAE should remain in the Union's list of high-risk third countries. As part of its structured dialogue with the UAE authorities, **the Commission should raise the key concerns voiced by the European Parliament in 2024 and secure strong, verifiable commitments for addressing them**. This might require the Commission to develop additional EU benchmarks – as it has done for other jurisdictions such as Panama – that reflect the concerns of the European Parliament. Only once these concerns have been adequately resolved and verified through the Commission's independent evidence-based assessment should the UAE be removed from the EU's list of high-risk countries.

Given the limited availability of information, and the restricted space for activists and independent journalists to operate in the UAE, **the EU is now the main source of pressure to ensure that the country addresses the remaining deficiencies.**