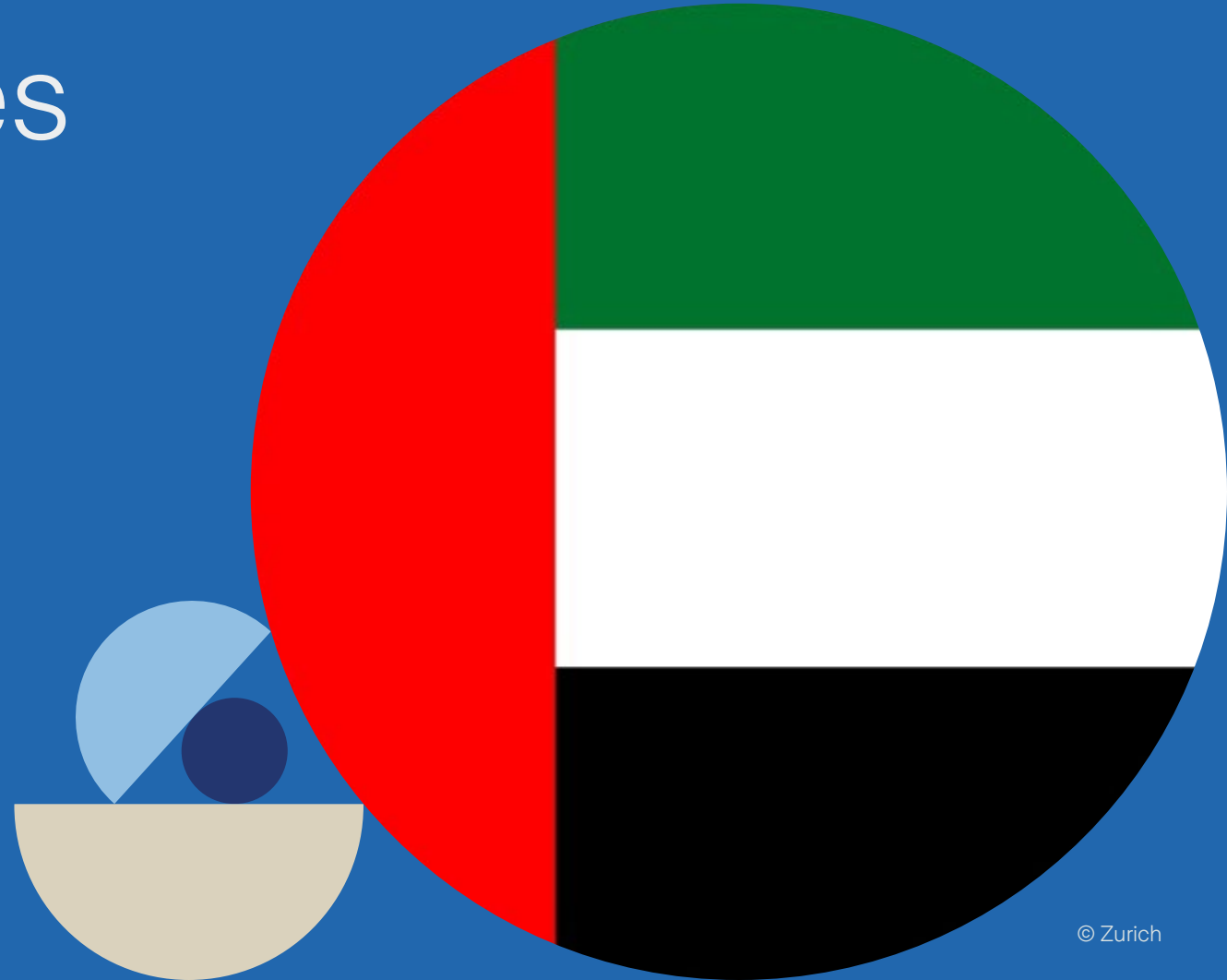


United Arab Emirates AML



A completed and stamped KYC form AND supporting documents need to be provided. Refer to the “KYC Document Requirements – UAE” for a complete list of required supporting documents.

Below is additional information for each UAE Partner:

ADNIC

Abu Dhabi National Insurance Company

Insured can complete KYC details in below web link and upload the required documents:

https://online.adnic.ae/AML/CCD_Legal.aspx

Documents can also be shared with compliance team email:

KYC_document@adnic.ae

AAIC

Ain Ahlia Insurance Company

No additional information

Dubai Insurance

On a case-by-case basis, proof of address may be required: Tenancy Contract (Ejari Copy) and the copy of Utility Bill.

**** Note:** Most of the requested documents are legal and required to operate in the UAE. Insured should already have the documents on hand.

ADNIC

Abu Dhabi National Insurance Company

At renewal, insured must re-submit all documents.

AAIC

Ain Ahlia Insurance Company

At renewal, insured will only be required to submit the following items:

- A copy of the valid Commercial License
- Confirmation on whether there have been any changes in ownership

If there have been changes in ownership, the client will be required to re-submit all documents

Dubai Insurance

At renewal, insured must re-submit all documents.

UAE – Ultimate Beneficial Owner (UBO)

Question	Scenario	Threshold	Who to Identify	Passport Required/ Emirates ID
If the UBO company (Parent company) is privately held in the US, at what % of ownership is the passport information required? Should it be the top corporate official in the UAE or does it need to be the US-based owner?	Private U.S. company	≥25%	Each individual UBO (natural person)	Yes/US-Based owners
If the UBO company (Parent company) is publicly traded in the US, at what % of ownership is the passport information required? Does this only trigger for officers at 25% or above? If no person owns >25% of the company, no information is needed?	Public U.S. company (on major exchange)	≥25% (if any)	Only if someone owns ≥25% directly or indirectly	For 25% and above shareholders
	No UBO ≥25%, no clear ownership	N/A	Senior managing officer	Yes, for the senior officer
Are there situations where the top-ranking UAE corporate officer can be registered in the KYC process versus the US based top ranking corporate officers?	If UBOs/control is not identified in the US senior management.	N/A	Senior managing officer in the UAE	Yes, for UAE Senior management

Note: Passport/ID required for each identified UBO qualified individual who meets the threshold

Ultimate Beneficial Owner (UBO) requirements under KYC procedures in the UAE:

What details must be collected?

As per Article 5 and Article 8 of Cabinet Decision No. (10) of 2019, the following minimum information must be collected for **each UBO**, regardless of their residency (UAE or abroad):

- Full legal name
- Nationality
- Date and place of birth
- Residential address
- Identification details (e.g. passport number, ID number)
- Ownership percentage % and nature of control

Verification of Information:

Under Customer Due Diligence (CDD) and Enhanced Due Diligence (EDD) obligations, the information provided must be verified through valid supporting documentation, including but not limited to:

- Passport copy
- Shareholders register or declaration of beneficial ownership
- Any document proving the ownership/control structure

Is it mandatory to collect and verify UBO documents?

Yes – It is mandatory.

If the UBO Refuses to Provide Documents:

In such cases, the insurer is obligated under UAE Federal AML/CFT regulations and Central Bank guidelines to identify and verify the UBO of all legal entities. Failure to comply may result in regulatory non-compliance.



Disclaimer: These instructions and associated information contained herein are provided for your convenience and general guidance. The information provided may not be sufficient in every instance. As such, additional documents or information may be necessary to complete processing.

