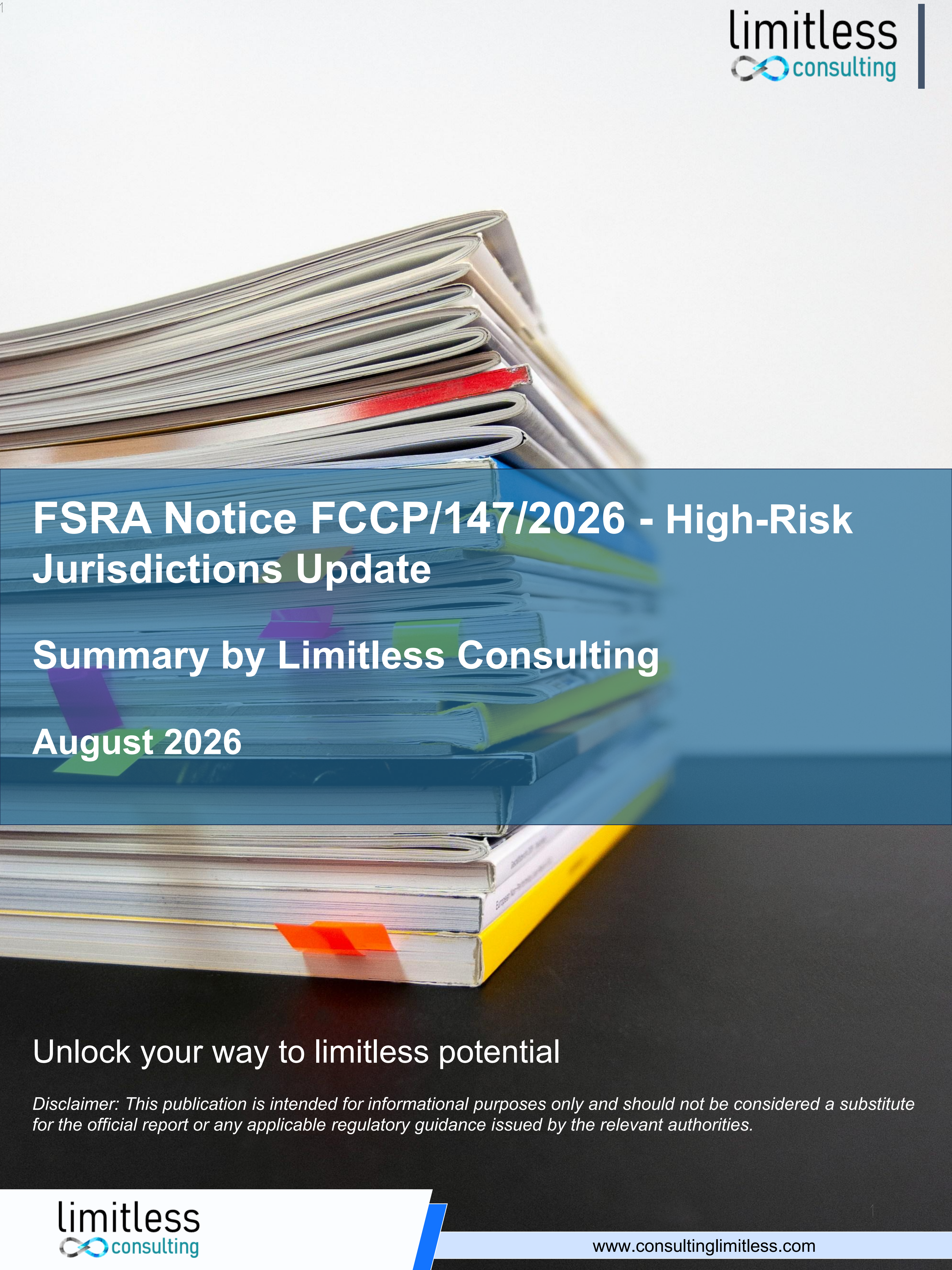


A stack of several thick books with various colored spines (red, blue, green, yellow) and pages, some with tabs sticking out. The books are stacked diagonally from the top left to the bottom right.

FSRA Notice FCCP/147/2026 - High-Risk Jurisdictions Update

Summary by Limitless Consulting

August 2026

Unlock your way to limitless potential

Disclaimer: This publication is intended for informational purposes only and should not be considered a substitute for the official report or any applicable regulatory guidance issued by the relevant authorities.

FSRA Notice FCCP/147/2026 — High-Risk Jurisdictions Update

Executive Summary

On 21 August 2026, ADGM FSRA issued Notice FCCP/147/2026 confirming the Committee's decision (NAMLCFTC No. 36 of 2026) updating counter-measures for high-risk jurisdictions.

The Committee decided to

1. Adopt the FATF Blacklist and its Recommendation 19 countermeasures
2. Adopt the FATF Gray List and its enhanced due diligence requirements
3. Post and keep both lists' URL links updated on the Committee website
4. Require all entities to regularly verify and review both lists
5. Require re-evaluation of due diligence when a jurisdiction is removed from a list
6. Require all in-scope entities to implement the stated countermeasures

1. Gray List Obligations (Increased Monitoring)

Entities must regularly review the Gray List, identify associated weaknesses, and apply proportionate compliance measures for relationships and transactions involving persons from these jurisdictions.

Key requirements

- Regular review of the Gray List to identify associated weaknesses and deficiencies
- CDD measures proportionate to risk, applied to relationships and transactions with persons from listed jurisdictions
- Enhanced due diligence applied where circumstances warrant (FATF Rec. 10; Cabinet Decision 10 of 2025)

FSRA Notice FCCP/147/2026 — High-Risk Jurisdictions Update

Applicability

- Applies to all FIs, DNFBPs, VASPs and NPOs in the UAE
- Entities must factor Gray List risk into risk-based compliance measures
- Re-evaluate due diligence measures when a jurisdiction is removed from the list by FATF

2. Blacklist Obligations (High-Risk Jurisdictions)

Enhanced due diligence is mandatory for all business relationships and transactions connected to Blacklist jurisdictions, including entities acting on their behalf.

Required countermeasures

- No branches or representative offices in Blacklist jurisdictions
- Enhanced internal reporting, with STRs submitted to the FIU via GoAML
- No reliance on third parties in Blacklist jurisdictions to conduct due diligence
- Targeted financial sanctions per UN Security Council Resolutions and Cabinet Decision No. 74 of 2020

Consequences of Non-Compliance

- FSRA will take appropriate action against FIs, DNFBPs, VASPs and NPOs for failure to implement these measures
- Action may extend to directors and senior management personally