



7.03

UNITED ARAB EMIRATES



6.37 CRIMINALITY SCORE

33rd of 193 countries **14**th of 46 Asian countries **7**th of 14 Western Asian countries



HUMAN TRAFFICKING	8.50
HUMAN SMUGGLING	6.50
EXTORTION & PROTECTION RACKETEERING	5.00
ARMS TRAFFICKING	7.00
TRADE IN COUNTERFEIT GOODS	7.00
ILLICIT TRADE IN EXCISABLE GOODS	5.50
FLORA CRIMES	5.50
FAUNA CRIMES	7.50
NON-RENEWABLE RESOURCE CRIMES	7.50
HEROIN TRADE	7.00
COCAINE TRADE	6.50
CANNABIS TRADE	6.50
SYNTHETIC DRUG TRADE	8.00
CYBER-DEPENDENT CRIMES	8.00
FINANCIAL CRIMES	9.50
CRIMINAL ACTORS	5.70



CRIMINAL ACTORS	5.70
MAFIA-STYLE GROUPS	1.00
CRIMINAL NETWORKS	6.50
STATE-EMBEDDED ACTORS	6.50
FOREIGN ACTORS	7.00
PRIVATE SECTOR ACTORS	7.50





Funding provided by the United States Government.





ENACT is funded by the European Union and implemented by the Institute for Security Studies and INTERPOL, in affiliation with the Global Initiative Against Transnational Organized Crime.





UNITED ARAB EMIRATES

5.13 resilience score

84th of 193 countries
16th of 46 Asian countries
7th of 14 Western Asian countries

POLITICAL LEADERSHIP AND GOVERNANCE	5.00
GOVERNMENT TRANSPARENCY AND ACCOUNTABILITY	4.50
INTERNATIONAL COOPERATION	5.00
NATIONAL POLICIES AND LAWS	5.50
JUDICIAL SYSTEM AND DETENTION	5.50
LAW ENFORCEMENT	6.00
TERRITORIAL INTEGRITY	5.50
ANTI-MONEY LAUNDERING	3.50
ECONOMIC REGULATORY CAPACITY	5.50
VICTIM AND WITNESS SUPPORT	6.00
PREVENTION	6.50
NON-STATE ACTORS	3.00





Funding provided by the United States Government.





ENACT is funded by the European Union and implemented by the Institute for Security Studies and INTERPOL, in affiliation with the Global Initiative Against Transnational Organized Crime.

CRIMINALITY

CRIMINAL MARKETS

PEOPLE

The United Arab Emirates (UAE) remains predominantly a destination country for human trafficking. As most of the private-sector workforce constitutes foreign workers, human trafficking in the form of forced labour and sexual exploitation is highly prevalent in the country. Despite it being a legal framework, the kafala system continues to enable labour exploitation of migrant workers in the country through practices that include passport retention, non-payment of wages and restrictions of movement. Debt bondage created by agencies continues to be used as a tool in human trafficking, exacerbating victims' vulnerability. While women from other countries are most often trafficked for the purposes of sexual exploitation, male victims tend to be trafficked for labour purposes. The demand for domestic workers in the UAE has created an illicit market for unregistered agencies to take control of this criminal market. The country has also become a transit point for trafficking victims, with domestic workers from the Philippines and other Asian countries being trafficked to Syria via the UAE.

The UAE also continues to be a destination country for human smuggling due to the increased labour market demand fuelling irregular migration. The UAE remains one of the most popular destinations for Filipino migrant workers, many of whom hire smugglers to enter the country. Evidence also suggests that many irregular migrants stay in the country only temporarily before journeying on to other destinations in the Middle East or South Africa, increasingly making the country a transit point for human smuggling. Extortion in the form of blackmailing, which commonly targets women and adolescents, is prevalent in the UAE. Expat communities living in conditions of semi-slavery are also often subjected to extortion.

TRADE

The UAE continues to be one of the world's largest importers of weapons as well as a significant manufacturer of arms, and has played an active role as a provider in many conflicts, including through support of armed groups in Yemen and Libya as well as anti-government fighters in Syria. The UAE's growing role in the diversion of weapons to developing and unstable countries as well as the lack of transparency in this market create major risks of arms trafficking. Because there is a lack of information pertaining to arms circulating in the illicit-arms market, calculating the accurate market value is difficult. As part of the supply and demand chain, the UAE is reported to be complicit in such illicit transactions and bribery, which permeates all levels of government.

The market for counterfeit goods, which mostly consists of counterfeit luxury items, is widespread in the country, specifically in the 'old city' of Dubai, catering mostly to tourists. In addition to being a destination country, the UAE is also a significant source and transit country for counterfeit goods destined for EU countries. In the illicit excise goods market, the UAE has been the main country of origin of illicit cigarettes consumed in countries within Europe, North Africa, the Middle East and Central Asia, making it an important country of origin for tobacco products trafficked through different routes, including the extended Balkan route. Despite the wide-ranging nature of this market, internal consumption of illicit cigarettes remains low in the country. The UAE is also reported to act as a smuggling hub for transporting alcohol into neighbouring Saudi Arabia, where its consumption is banned.

ENVIRONMENT

Flora crimes are relatively limited in scale and scope compared to other environmental crimes in the country, with limited data suggesting small-scale flora smuggling includes rare and expensive date palm trees and dragon blood trees. Smuggling of sandalwood, rosewood and Agarwood into the country also occurs. Furthermore, the UAE continues to be regarded as a major global transit hub for the illicit wildlife trade between Africa and Asia as well as a significant destination market for exotic animals, including lion and cheetah cubs, wolves and monkeys. There is also a large illegal market for falcon trading and smuggling in the country. In recent years, an illegal wildlife marketplace has emerged on social media, opening up digital avenues for smugglers by granting them virtual reach while lowering but not eliminating the risk of detection.

The UAE continues to be one of the world's major gold trading hubs. In particular it is the main destination for gold from African countries. Non-existing regulatory frameworks to prevent illicit gold trade, combined with continued trade of gold originating from conflict zones, mean the UAE gold market is not only detrimental to the UAE, but also to other regions in the world. Funds from illicit gold arriving in the country is reportedly laundered and then exported to destination countries such as India, Saudi Arabia, Turkey and Switzerland. In addition to the gold originating from African countries, there are reports suggesting an emerging smuggling route between Chile and the UAE. Diamond smuggling is another one of the non-renewable-resource crimes identified in the country. The discrepancies between the officially declared imports of gold to the UAE and that of African exports destined



for the UAE illustrate the potential corruption at various levels of the state apparatus.

DRUGS

The country is identified as a major transit hub for heroin, which is usually trafficked from Iran and Afghanistan and destined for Europe. Demand is generated by both domestic and external actors. With a steady demand for cocaine, the UAE continues to be predominantly a destination country for trade in this drug. Cocaine traffickers from an array of international mafia and other criminal groups, including the Naples-based Camorra mafia, Irish crime groups and Balkan gangs, as well as criminal groups from the Netherlands, have operated out of Dubai. While these groups do not in general transit or distribute their products in the UAE, they manage their operations from the country where they feel safe and can invest money earned from criminal activities.

Even though the UAE is not a major consumer or producer of cannabis, it is mainly used as a transit hub for further shipments supplied from Pakistan and Afghanistan. However, the consumption of cannabis vaping products has been on the rise in the country. With the increasing consumption of synthetic drugs, especially methamphetamine and Captagon, the UAE is both a major country of destination and transit for synthetic drugs, with a growing local market.

CYBER-DEPENDENT CRIMES

Malware, ransomware and distributed denial-of-service attacks appear to be increasingly prevalent in the UAE. Corporate users and banks are the main targets of financial malware attacks, making it one of the most targeted countries among the Gulf states. Despite the increasing commitment to strengthening its cyber-security strategy, cyber-dependent crimes remain a major threat to the country's development and growth.

FINANCIAL CRIMES

As an international financial hub, the UAE has experienced widespread financial crimes in recent years in the form of financial scams committed via online phishing, internet and trade fraud, and phone scams. While there have been allegations of government officials involved in the embezzlement of public funds, private-sector actors in the country, specifically Russian businesspeople close to the Kremlin, have been implicated in allegations of corruption, tax evasion and fraud.

CRIMINAL ACTORS

While mafia-style groups do not exist in the UAE, privatesector actors, foreign criminal actors and criminal networks continue to play major roles in the country's organizedcrime landscape. The UAE has more than 30 commercial free zones and two financial free zones with their own regulations and various levels of transparency, making it a suitable place for illicit activities, especially financial crimes, to be carried out by private-sector actors. Most of these actors are predominantly involved in financial crimes in the form of misappropriation of funds, tax evasion and money laundering, among others.

Foreign actors with a sustained presence in the UAE include Indian, Pakistani and Balkan (predominantly Albanian) criminal groups that are also heavily involved in a variety of criminal markets, including smuggling of excise goods and drug trafficking. Such organizations have often cooperated with Emirati nationals and local criminal networks, and carried out money laundering of their illicit profits in the country. After the Russian invasion of Ukraine in early 2022 and the ensuing war, which is ongoing, the UAE has gradually become a hub for Russian oligarchs trying to avoid sanctions and secure their wealth. Criminal networks are also central to the UAE's environmental-crime markets. These networks are mostly involved in drug trafficking, human trafficking, excise goods and firearms trafficking, and exerting variable levels of violence depending on the market in which they are involved.

Outside of isolated cases where some state agents have facilitated smuggling, there is no evidence of high-ranking officials participating in criminal markets. However, the UAE's highly personalized institutions, lack of state accountability and lack of free press make assessing the level of stateembedded actors in criminal activities extremely challenging. Any involvement by high-level officials is likely to be dealt with privately, with no opportunity for external scrutiny. Anecdotal evidence and hearsay indicate participation in criminal markets by actors from within the ruling families, ranging from active involvement to turning a blind eye to criminal activities by non-state actors.



RESILIENCE

LEADERSHIP AND GOVERNANCE

The UAE is a federation of absolute monarchies, with minimal political and civil liberties and high levels of surveillance. However, the UAE continues to outperform many other Gulf countries in indices of efficiency of public administration and accountable governance. The government continues to adopt a strong stance against organized crime, focusing specifically on human trafficking, drug trafficking and cyber-dependent crimes. The provision of adequate resources for interdiction, and training for different tiers of the Emirati government, including law enforcement bodies and civil society organizations, have been put in place with the aim of combating organized crime. Nonetheless there is limited evidence that this approach has translated into action, with continuing weak enforcement and loopholes present under a regulatory system that is inconsistently applied across onshore and offshore jurisdictions within the UAE. Despite active steps taken to streamline bureaucratic and administrative practices and its relatively good performance in the fight against corruption, the country still lacks effective anti-corruption mechanisms. Scrutiny is applied unevenly, with senior members of the ruling family operating with impunity. The lack of access to corporate data and government processes that would allow civil-society actors to scrutinize both the government and the beneficiaries of Emirati companies, including those that work with the state or are owned by state actors, adversely affects government transparency and accountability in the UAE.

At international level, the UAE is a signatory to most of the important international treaties that are regulating organized crime and corruption. The country continues to cooperate in the fight against global transnational crime through INTERPOL and has signed several extradition and anti-human-trafficking treaties with other countries. Despite efforts to improve international cooperation in combating transnational organized crime, there are still notable gaps, particularly when it comes to investigations into money laundering. At the national level, the country has a relatively comprehensive legal framework addressing all criminal markets. Despite the presence of a legal and institutional framework to combat organized crime, the UAE increasingly appears to attract corrupt politicians and transnational organized-crime groups seeking to invest proceeds accrued from their illicit activities.

CRIMINAL JUSTICE AND SECURITY

The judiciary in the UAE outperforms its regional counterparts in terms of its effectiveness in launching criminal investigations, the timeliness of adjudication and the effectiveness of its correctional system. However, the judicial system lacks specialized units tasked with combating organized-crime-related issues. The UAE judiciary, vulnerable to political influence, lacks independence, as judges are appointed by executive decree. Violations of international due process have been observed in recent years, specifically in numerous high-profile trials involving political members of the opposition, human-rights defenders and foreigners. In addition to overcrowding in national prisons as well as issues of isolation, language barriers and insufficient medical treatment, there are also recurrent allegations of torture and mistreatment of those in custody.

Law enforcement bodies in the UAE, particularly in Dubai and Abu Dhabi, are sufficiently resourced and police forces have access to a number of specialized units, such as a unit responsible for countering human trafficking. Budget allocations for law enforcement agencies have grown steadily, funding the establishment of police training academies and related initiatives across all the emirates.

Lastly, the UAE has placed a strong emphasis on border control and territorial integrity, implementing the highest levels of technology at its airports and seaports, and building walls and fences along its borders with Saudi Arabia and Oman. However, vulnerabilities continue to exist given its geographic location on several transnational smuggling routes and its proximity to countries with prominent criminal markets. The country's integrity is also being targeted through cyber-dependent crimes.

ECONOMIC AND FINANCIAL ENVIRONMENT

Despite the UAE's anti-money laundering systems and framework, shortcomings inherent in these systems and problems regarding the country's cooperation efforts in money laundering have allowed it to become an active global hub for money laundering by corrupt officials and criminals, enabling them to launder their illicit revenues in the domestic market, specifically in the property market.

The UAE continues to make efforts to improve its already solid economic regulatory capacity to ease procedures for establishing and operating businesses. At the same time, state interference can sometimes be an impediment to private-sector development. The ruling families have considerable influence over the economy, potentially skewing market competition and openness.

CIVIL SOCIETY AND SOCIAL PROTECTION

Although the country has a fairly robust framework and system to provide trafficking victims with support in the form of shelters providing protection, support services such as medical care, psychological support, legal counselling



and immigration assistance, and hotlines in different languages, such efforts have shortcomings in targeting all victims of organized crime. Despite these efforts, there are allegations of the imprisonment of some of these victims for forced sex work. Reports also persist that some victims are unwilling to approach law enforcement officials due to fear of being imprisoned for immigration or other violations. With regard to drug use, a taboo subject in the country, the UAE has changed its approach. It has continued prevention efforts with a focus on destigmatizing many of these topics, prioritizing awareness and rehabilitation, and warning of the dangers of narcotics and prescription drugs. Rehabilitation is offered as an alternative to punishment through the criminal justice system. The government not only runs training programmes for police officers and prosecutors, but also amplified awareness of trafficking by continuing to post informational notices at airports and disseminating publications in various languages directed at most-at-risk communities.

Civil society continues to be limited in the country, with international human-rights groups being denied entry to the UAE and activists being at serious risk of detention, prosecution and mistreatment in custody. Similarly, the media landscape has been gradually deteriorating in recent years. Journalists are subject to surveillance, arbitrary imprisonment and mistreatment, resulting in self-censorship and lack of criticism. Most of the media outlets active in the country are owned by groups with ties to the government, further limiting the independence of the media.



This summary was funded in part by a grant from the United States Department of State. The opinions, findings and conclusions stated herein are those of the authors and do not necessarily reflect those of the United States Department of State.