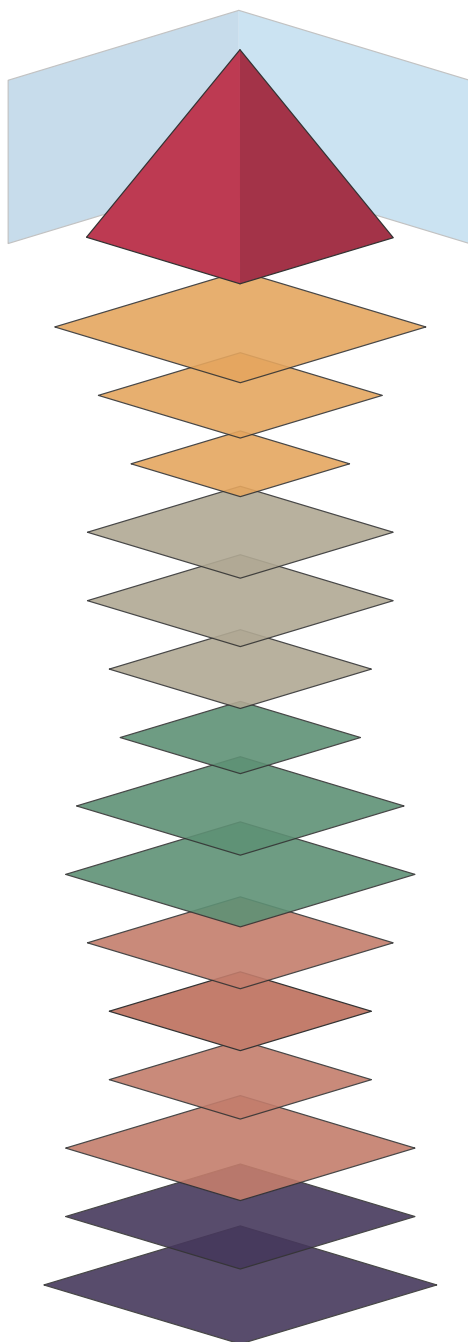


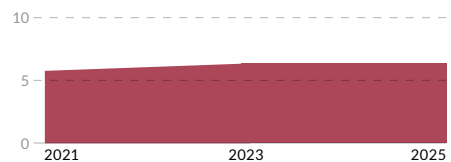
UNITED ARAB EMIRATES



6.35 $\nearrow 0.02$

CRIMINALITY SCORE

42nd of 193 countries $\nearrow 9$
17th of 46 Asian countries $\nearrow 3$
7th of 14 Western Asian countries -



CRIMINAL MARKETS 7.00 $\nearrow 0.03$

HUMAN TRAFFICKING	8.50	0.00
HUMAN SMUGGLING	6.50	0.00
EXTORTION & PROTECTION RACKETEERING	5.00	0.00
ARMS TRAFFICKING	7.00	0.00
TRADE IN COUNTERFEIT GOODS	7.00	0.00
ILLCIT TRADE IN EXCISABLE GOODS	6.00	$\nearrow 0.50$
FLORA CRIMES	5.50	0.00
FAUNA CRIMES	7.50	0.00
NON-RENEWABLE RESOURCE CRIMES	8.00	$\nearrow 0.50$
HEROIN TRADE	7.00	0.00
COCAINE TRADE	6.00	$\nearrow 0.50$
CANNABIS TRADE	6.00	$\nearrow 0.50$
SYNTHETIC DRUG TRADE	8.00	0.00
CYBER-DEPENDENT CRIMES	8.00	0.00
FINANCIAL CRIMES	9.00	$\nearrow 0.50$



CRIMINAL ACTORS 5.70 0.00

MAFIA-STYLE GROUPS	1.00	0.00
CRIMINAL NETWORKS	6.50	0.00
STATE-EMBEDDED ACTORS	6.50	0.00
FOREIGN ACTORS	7.00	0.00
PRIVATE SECTOR ACTORS	7.50	0.00

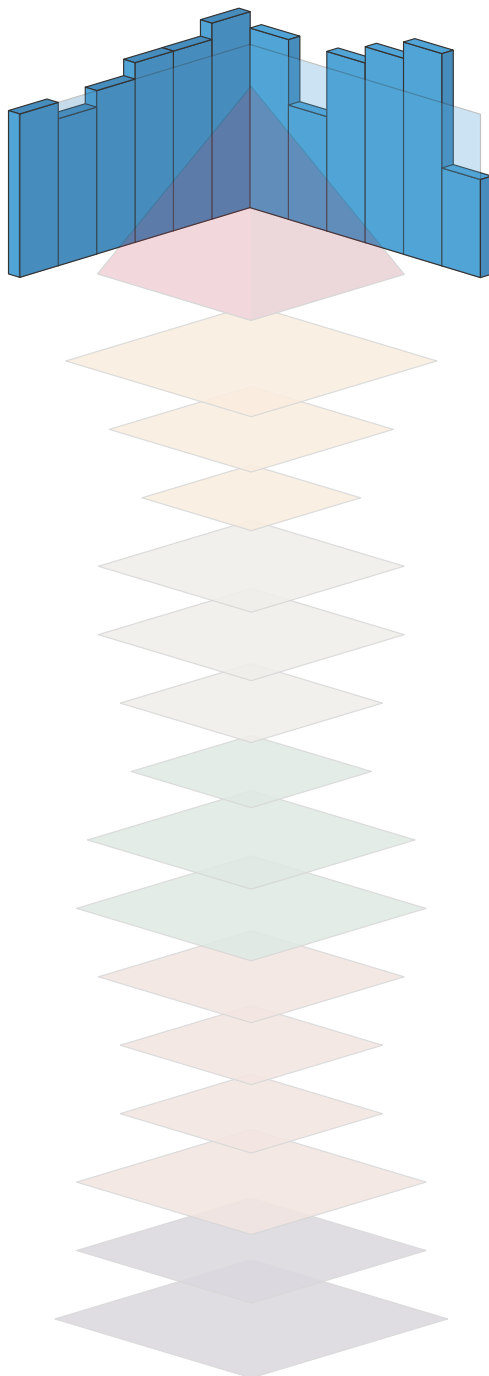


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ENACT is funded by the European Union
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UNITED ARAB EMIRATES



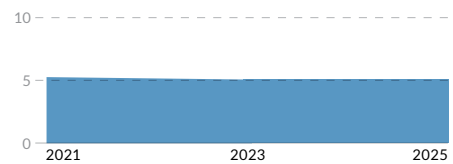
5.13_{0.00}

RESILIENCE SCORE

79th of 193 countries $\nearrow$ 5

15th of 46 Asian countries $\nearrow$ 1

7th of 14 Western Asian countries -



POLITICAL LEADERSHIP AND GOVERNANCE	5.00	0.00
GOVERNMENT TRANSPARENCY AND ACCOUNTABILITY	4.50	0.00
INTERNATIONAL COOPERATION	5.00	0.00
NATIONAL POLICIES AND LAWS	5.50	0.00
JUDICIAL SYSTEM AND DETENTION	5.50	0.00
LAW ENFORCEMENT	6.00	0.00
TERRITORIAL INTEGRITY	5.50	0.00
ANTI-MONEY LAUNDERING	3.50	0.00
ECONOMIC REGULATORY CAPACITY	5.50	0.00
VICTIM AND WITNESS SUPPORT	6.00	0.00
PREVENTION	6.50	0.00
NON-STATE ACTORS	3.00	0.00



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CRIMINALITY

CRIMINAL MARKETS

PEOPLE

The UAE's human trafficking market is complex and consolidated, primarily involving labour and sex trafficking. Vulnerable migrant workers, particularly in low-paid roles, face exploitation through high recruitment fees, passport confiscation, unpaid wages and coercive employment practices. Legal ambiguity persists due to restrictive sponsorship frameworks and reliance on administrative rather than criminal remedies. The UAE functions as both a destination and transit country, with a high prevalence of modern slavery and trafficking. Independent agents and unregistered agencies, often using forged documents, drive trafficking. Links between trafficking and other crimes, such as cyber-enabled fraud, highlight the interwoven nature of criminal networks operating in the region.

Human smuggling in the UAE overlaps significantly with trafficking, particularly concerning domestic workers, due to blurred legal definitions and limited oversight. Unregistered agencies and agents exploit migrant vulnerabilities, while administrative remedies often replace criminal action. Reluctance to classify cases as smuggling, influenced by domestic worker demand and societal reliance on migrant labour, limits both victim support and data collection. Many workers are smuggled from South and South East Asia, Western Asia as well as sub-Saharan Africa, contributing to labour market distortion and undercutting wages. The UAE also acts as a transit hub for smuggling, facilitated by its air connectivity and visa practices. Extortion-related practices have been reported in the UAE, particularly in the context of commercial disputes. In some cases, people are said to take advantage of the intricacies of the legal system to exert pressure on businesses, encouraging settlements or agreements under the implied threat of litigation. Moreover, extortion in the form of blackmailing, which commonly targets women and adolescents, is also prevalent in the UAE.

TRADE

Arms trafficking within the UAE is limited in scope, however, the country plays a notable role in international arms trade dynamics. As a significant importer and exporter of weapons, the UAE maintains regulated legal transfers to various destinations, some of which include regions experiencing instability. While export controls are in place, discussions have emerged about the adequacy of end-user verification and the potential for diversion through third-party channels. Instances of arms reportedly originating from the UAE appearing in unauthorized contexts abroad,

such as in regional conflicts, notably in Yemen and Sudan, have raised concerns about oversight mechanisms. Maritime trafficking in the Arabian Sea and Horn of Africa further complicate this issue. Domestically, evidence of illicit arms trafficking remains scarce, though the potential reputational and compliance implications of international diversions implicating the country remain an area of focus.

The counterfeit goods market in the UAE is highly consolidated, fuelled by its position as a global trade and travel hub with strong local demand. Despite legal prohibitions, counterfeit luxury items are widely available, particularly in districts like Deira and Al-Karama. Low perceived legal risk and high consumer participation contribute to the market's resilience. Authorities disposed of hundreds of thousands of counterfeit items in recent years, including high-value goods. While enforcement actions – such as seizures, raids and intellectual property reforms – have intensified, the volume of counterfeit trade remains substantial, undermining legitimate markets and posing consumer safety risks due to unregulated, untested products.

Illicit trade in excise consumer goods, including tobacco and alcohol, also persists in the UAE, largely due to price differentials, taxation policies and consumer demand. Smuggled tobacco, in particular, is a significant concern, with illicit products entering through maritime routes and land borders. Some operations exploit the regulatory flexibility of free trade zones or reroute goods through neighbouring countries to avoid detection. The UAE also serves as both a transit and manufacturing centre, notably supplying illicit tobacco to South Asia.

ENVIRONMENT

Flora crimes remain a concern in the UAE, particularly in relation to the movement of high-value plant commodities. Dubai has been identified as a key transit and commercial hub in the trade of items such as rosewood, sandalwood and Somali charcoal, which are often directed toward markets in Asia. Additionally, domestic interest in Agarwood and its derivatives contributes to local demand. The high commercial value and scarcity of these resources contribute to incentives for unauthorized harvesting and trade. International reporting continues to highlight notable volumes transiting through the region, with involvement by various actors operating across borders.

Fauna crimes are similarly pervasive in the UAE, which continues to serve as both a destination and transit point for various wildlife products, including exotic birds, reptiles, big cats and ivory. Dubai, in particular, functions as a strategic hub for the movement of such goods between Asia and Africa. Cultural preferences, such as the traditional

practice of falconry and the demand for exotic animals, contribute to sustained interest. Traffickers reportedly use advanced concealment methods to circumvent controls, and some logistical vulnerabilities have been highlighted at key transit points. Certain markets, particularly those dealing in exotic pets, have reportedly continued operations with limited visibility.

The UAE serves as a key node in the global trade of gold and diamonds, with its central geographic position and advanced infrastructure facilitating high-volume flows of precious commodities. While the country plays a prominent role in legitimate trade, concerns have been raised regarding oversight of sourcing practices, particularly where imports originate from regions with limited transparency. The domestic market is supported by strong demand and a regulatory environment that has historically offered flexible trade conditions. In some instances, actors are reported to have employed sophisticated concealment methods and documentation practices to move gold linked to high-risk jurisdictions. Despite the introduction of enhanced compliance measures, variations in due diligence and traceability persist, especially within certain free trade zones. These dynamics present ongoing challenges to oversight. Meanwhile, fuel smuggling within the UAE appears limited, though it may occur sporadically across regional borders in response to market disparities. Nevertheless, reports highlight the significant role of UAE-based private companies in managing Russia's shadow fleet, which is used to circumvent Western oil sanctions. These companies facilitate sanctions evasion by offering opaque ownership structures and logistical services.

DRUGS

The heroin trade in the UAE is predominantly transit-oriented, with limited domestic consumption but notable cross-border trafficking activity. The UAE's location along major air and maritime corridors makes it an attractive transit point for heroin originating from Afghanistan and destined for Europe, East Africa or South East Asia. Interdictions at airports and ports have revealed heroin concealed in commercial shipments or carried by people smuggled through complex travel routes.

The UAE has also been cited as a regional transit point for cocaine shipments originating from Latin America. Ports and airports have been used for both air cargo and maritime container smuggling, often involving concealed loads or transshipment. Trafficking networks often leverage the country's advanced infrastructure and financial systems, sometimes using front companies or trade-based laundering to mask transactions. Nevertheless, domestic consumption is considered to be low. Similarly, the cannabis trade in the UAE remains limited in terms of domestic use due to strict legal prohibitions and robust enforcement. However, cannabis products are occasionally intercepted at ports and airports, often in the form of resin or herbal cannabis

hidden in personal luggage or shipments. These seizures point to the UAE's role as a transit location rather than a significant consumer market. The government's zero-tolerance policy and stringent penalties for drug offences have deterred local demand.

The synthetic drug trade, on the other hand, is an area of concern. Seizures of methamphetamine, Captagon and other synthetic substances have increased, often involving large quantities trafficked through commercial shipments. Captagon in particular has been found in maritime containers and air cargo, frequently linked to regional conflict economies. Some synthetic drugs are transported through the UAE to other Gulf countries or North Africa. Enforcement authorities have increased inspections and regional cooperation to counter synthetic drug flows, but the adaptability of trafficking networks continues to present challenges. The domestic market for synthetic drugs appears limited, though seizures suggest a growing presence in transit operations.

CYBER-DEPENDENT CRIMES

The UAE, a regional leader in digital transformation, faces significant cybercrime risks due to its high internet penetration and rapid digitalization. The country experiences numerous daily attacks, with most of the targeted organizations reporting ransomware incidents. Threats also include distributed denial of service attacks and data breaches. Cybercriminal groups such as Anonymous Sudan and the Smishing Triad Gang have targeted both state and private sectors. The country's digital exposure continues to attract sophisticated cyber threats.

FINANCIAL CRIMES

Various factors contribute to the UAE's status as a major global hub for financial crimes, including its strategic geographical location, thriving real estate market, cash-based economy and global connectivity. Financial crimes in the UAE are becoming more consolidated within the broader illicit economy, driven by systemic vulnerabilities such as low tax rates, transparency gaps and limited oversight. Fraud, including pyramid schemes, advance-fee scams and identity theft, continues to affect consumers and businesses alike. Online platforms have been used to promote fraudulent investment opportunities, often targeting non-citizens or residents unfamiliar with local laws. The UAE's financial institutions have strengthened internal controls, but challenges remain addressing fraud linked to transnational actors and sophisticated digital methods. Furthermore, transnational networks are also active, with cases involving large-scale tax fraud.

CRIMINAL ACTORS

There is no evidence to suggest domestic mafia-style groups exist in the UAE. However, loosely organized criminal networks, though less dominant than foreign actors, are active in drug trafficking, money laundering and human trafficking. These groups operate with medium to high levels of violence and have a transnational reach, maintaining a presence in both the UAE and several European cities. Their international operations foster connections with foreign criminal networks, shaped by the cross-border nature of their illicit activities. While specific entities have not been identified, the networks are known to involve influential entrepreneurial figures, reflecting a fusion of criminal and business interests that complicates efforts to disrupt their operations.

State-embedded actors in the UAE are reported to exert considerable influence over certain illicit economies, with allegations pointing to the use of bribery and structural vulnerabilities at key points of entry, including ports, free trade zones and border crossings. These dynamics appear to be facilitated by limited institutional oversight and a political and judicial context that may contribute to a climate of impunity. Additionally, some international reports have raised concerns about the country's alleged involvement in arms transfers to conflict-affected regions, notwithstanding existing sanctions. The centralized nature of governance, the close interlinkage between state and private sector interests, and restrictions on independent media contribute to a lack of transparency, making it challenging to fully assess the extent of any state-affiliated involvement in criminal activities.

The organized crime landscape in the UAE appears to be significantly influenced by foreign criminal actors, notably from Eastern Europe, the Balkans and parts of Africa, who are reported to take advantage of residency programmes and invest extensively in the real estate sector. Transnational networks – such as those reportedly linked to cybercrime, drug trafficking and money laundering – operate from the UAE. While foreign groups are considered to play a prominent role in various illicit markets, the nature of their interaction with local networks is difficult to discern. Findings from a major international investigation in 2024 highlighted how the relatively low level of regulation in Dubai's property market may attract people associated with terrorism, sanctioned entities and politically exposed persons, creating opportunities for laundering the proceeds of crime. These developments suggest that regulatory and enforcement gaps may be contributing to the UAE's emergence as a node in transnational organized crime networks.

Organized crime groups operating in the UAE are reported to leverage various industries – particularly banking, legal services and logistics – to launder money laundering and invest illicit proceeds. Some logistics and shipping companies, while functioning within legal parameters, have been cited in reports as potentially enabling illicit trade, occasionally through corrupt practices in key areas such as ports and free trade zones. The country's expansive network of free trade zones – often noted for limited regulatory oversight – has been identified as a potential vulnerability in the broader anti-money laundering framework. Furthermore, the close interconnection between public and private sectors may contribute to a lack of transparency regarding the full extent of organized crime within the business environment.

RESILIENCE

LEADERSHIP AND GOVERNANCE

The UAE presents a governance landscape marked by strong domestic measures to counter organized crime, underpinned by notable legal and institutional developments. The country maintains a low overall crime rate and has implemented a range of policies to prevent and respond to criminal activity within its jurisdiction. At the same time, international reports have raised concerns about the UAE's involvement in broader regional dynamics, including alleged connections to illicit networks in external conflict zones. These issues have drawn attention to the complex intersection between national policy and international perceptions of accountability. Domestically, the UAE has demonstrated tangible progress in enhancing political participation, particularly through improved gender representation in the Federal National Council. These

steps suggest a gradual move toward broader inclusivity in governance. However, the political system remains highly centralized, with limited space for civil liberties and political rights under current institutional structures.

Transparency and accountability remain critical concerns in the UAE, despite notable efforts to reduce corruption. The country is widely regarded as one of the least corrupt in the Arab world, supported by the implementation of a national anti-corruption strategy and oversight bodies such as the Federal Audit Authority. Nevertheless, effective external oversight is limited. International human rights organizations face barriers to operating in the country, and NGOs are subject to significant governmental control, which limits independent scrutiny. While technical tools such as e-payment systems have been adopted to enhance transparency in public finances, access to detailed budgetary

and procurement data is restricted. Although progress in anti-corruption efforts has been acknowledged, the lack of democratic processes and meaningful civil society oversight undermines the broader accountability framework.

The UAE has shown strong commitment to combating organized crime, actively participating in over 40 international cooperation agreements, including those addressing money laundering. The country has ratified key international conventions on issues like narcotics, arms trade and corruption. However, inconsistencies remain in the application of extradition agreements. The UAE has extradited people in cases involving Denmark, France, Italy and Albania, but has declined requests from other countries citing technicalities or documentation deficiencies. High-profile fugitives, including those with active arrest warrants, continue to reside in the UAE with apparent impunity. Mutual legal assistance treaty requests are not always fulfilled, particularly when political alignment is lacking, raising questions about selective international cooperation and undermining broader transnational crime-fighting efforts.

The UAE has developed a comprehensive legal framework to address various forms of organized crime, covering human trafficking, drug trafficking, cybercrime, wildlife trafficking and money laundering. These laws span the entire criminal justice process, from investigation to prosecution and sentencing. However, enforcement gaps persist, particularly in labour-related cases that may include trafficking indicators. These are frequently handled through administrative penalties rather than criminal proceedings. The UAE's fragmented legal system – comprising federal, emirate-level and free zone laws – contributes to regulatory inconsistencies and creates opportunities for actors to exploit jurisdictional loopholes, ultimately weakening the uniform application of justice.

CRIMINAL JUSTICE AND SECURITY

The UAE's judicial system includes specialized units that deal with organized crime cases, but questions remain regarding the judiciary's independence. Judges are appointed through executive decrees, and many serve on short-term contracts, including foreign nationals. While public prosecution operates under a nominally independent federal structure, rulings are reportedly subject to political influence. The legal system blends elements of Sharia law, civil law and, in Dubai, English common law for financial disputes. Despite the centralized control of prisons, conditions in detention facilities raise significant human rights concerns. Overcrowding, reports of physical abuse, inadequate healthcare and poor hygiene are prevalent, with some instances of corruption among prison staff. These issues suggest that prisons may become environments conducive to organized criminal activity, even if they remain formally under state control, which is often undermined by corruption among prison staff.

Law enforcement capabilities in the UAE are considerable, with specialized units dedicated to countering organized crime and significant investment in surveillance and technological infrastructure. Initiatives such as the installation of electronic gates at airports – linked to INTERPOL databases – enhance the state's ability to detect forged documents and identify trafficking victims. Nevertheless, while technological innovation is prioritized, law enforcement agencies remain largely administrative and lack a strong investigative branch at the federal level. Public trust in law enforcement is inconsistent, and while intelligence-sharing mechanisms are in place, their effectiveness is not well-documented. Law enforcement also works with international partners, but concerns persist about privacy and the balance between public safety and human rights protections in the context of widespread surveillance.

Territorial integrity poses an ongoing challenge for the UAE, particularly given its geographic location along major trafficking routes and its proximity to criminal markets in neighbouring countries. The country's borders are porous and difficult to secure, partly due to the limitations of enforcement capacity and infrastructure. Border control personnel have been reported to be susceptible to corruption, and criminal actors are said to control or influence key nodes in the country's transport infrastructure, including ports and airports. The presence of more than 40 free trade zones with varying legal regimes contributes to enforcement challenges, as differing commercial regulations can be exploited by traffickers and smugglers.

ECONOMIC AND FINANCIAL ENVIRONMENT

The UAE's anti-money laundering (AML) framework has seen significant reform in recent years, aimed at strengthening compliance with international standards set by the Financial Action Task Force (FATF). These enhancements include the establishment of a Financial Intelligence Unit, the introduction of legislation mandating customer due diligence, and mechanisms for the reporting of suspicious transactions. Additionally, the UAE has implemented sector-specific regulatory frameworks for its free trade zones and has increased enforcement activities, as reflected by sanctions levied on institutions failing to meet compliance requirements. These actions were key in the UAE's removal from the FATF grey list in 2024. While the country's progress has been recognized internationally, some observers have noted ongoing concerns regarding transparency and enforcement consistency. The European Parliament, for instance, has retained the UAE on its list of high-risk jurisdictions, underscoring the need for continued vigilance. The real estate sector remains an area of focus for AML efforts, with international investigations highlighting vulnerabilities to illicit financial flows and underscoring the importance of due diligence protocols in this space.

The UAE's economic regulatory environment is broadly supportive of business growth, characterized by

pro-investment policies, open trade practices and simplified procedures that foster entrepreneurial activity. The country has sustained robust economic performance, benefitting from high levels of economic freedom and stable monetary policy. While these strengths continue to drive development and investor confidence, some areas of regulatory oversight require further strengthening. For instance, free trade zones – while instrumental in attracting foreign investment – vary in compliance enforcement, which can create vulnerabilities for exploitation. The UAE’s economic openness has prompted international attention regarding sanctions enforcement, with some observers noting that the country’s role as a global financial and commercial hub may inadvertently create pathways that can be exploited to bypass such measures.

CIVIL SOCIETY AND SOCIAL PROTECTION

The UAE has demonstrated increasing efforts to support victims and witnesses of trafficking. The government reported a notable rise in trafficking investigations, prosecutions and victim identification. Shelters funded by various stakeholders offer services such as healthcare, education and legal assistance to trafficking victims, and formal referral mechanisms have been established to ensure access to these facilities. Special attention is provided to children and vulnerable groups, with infrastructure such as specialized interview rooms in police departments and shelters dedicated to men, women and children. Legal and procedural tools support victim participation in prosecutions, including the provision of safe transportation and the enforcement of privacy rights. However, these mechanisms are not uniformly applied. Screening of vulnerable populations for trafficking indicators remains inconsistent, and victims continue to risk penalties for crimes committed as a result of their exploitation. Legal requirements that place a high burden of proof on victims of sexual exploitation and the insufficient inclusion of male victims in public service frameworks further underscore the limitations of the current support system.

Preventive efforts have been significantly expanded through the activities of the National Committee to Combat Human Trafficking. With a dedicated annual budget, the Committee oversees the implementation of a national action plan and supports public awareness campaigns, labour inspections and international training exchanges. The government also introduced mobile applications, multilingual hotlines and social media campaigns to raise awareness and facilitate reporting. While these efforts represent progress, the focus remains heavily skewed towards trafficking and labour violations, with broader prevention strategies for other forms of organized crime less well-developed.

The role of civil society and other non-state actors in combating organized crime in the UAE is limited by an increasingly restrictive operating environment. While some civil society organizations are permitted to operate with

state oversight, they face regulatory hurdles that constrain their independence. International human rights organizations are regularly denied entry, and local activists risk detention, prosecution and mistreatment. Media outlets are tightly controlled, and journalists face harassment, arrest or exile for content deemed critical of the government. Regulatory bodies enforce broad censorship mandates, and cybercrime laws are used to target dissenting voices. These constraints severely limit the ability of civil society actors to hold authorities accountable or contribute meaningfully to the prevention and mitigation of organized crime. Arbitrary detentions of activists, the use of surveillance against journalists and the continued suppression of independent reporting further illustrate the challenges facing non-state actors in the UAE’s civic landscape.

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