

GOLD FOR GENOCIDE:

The UAE's Gold Trade And RSF's Genocidal Campaign in Sudan



**Exclusive
Report By:**



**Anti-Money
Laundering
NETWORK**



Nov 2025

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We build open databases, publish investigative reports, and curate actionable research on shell companies, corporate laundering, real estate laundering, cryptocurrency abuse, and politically exposed persons (PEPs). Our mission is to empower journalists, regulators, whistleblowers, and the public with the tools to fight back against opaque financial power.

Our Mission

To promote financial transparency, expose illicit financial flows, and challenge systems of secrecy and abuse that shield the powerful. We believe:

- Illicit finance undermines human rights, democracy, and fair economies
- Transparency is a public good
- Privacy and accountability must co-exist
- Open data and journalism can dismantle impunity

Our work bridges gaps between investigative research, data transparency, and global AML enforcement efforts.

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Exposing properties and land purchases linked to suspect wealth, anonymous buyers, or politically exposed actors.

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Investigating how digital assets are misused for laundering, obfuscating transfers, or bypassing financial controls.

- PEPs Database (Politically Exposed Persons)

Profiling global politicians, officials, and affiliates involved in high-risk transactions or corruption probes.



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Introduction

This report exposes how the United Arab Emirates (UAE) has systematically embedded itself at the heart of Sudan's catastrophic conflict by serving as the primary hub for the trade and laundering of Sudanese gold—gold that directly finances the genocidal campaign waged by the Rapid Support Forces (RSF). In 2024 alone, despite mounting international concern, the UAE sharply increased its imports of Sudanese gold by 70%, importing approximately 29 tons, with estimates showing nearly 90% of Sudan's official gold exports transit the UAE in the first half of 2025. Beyond official trade, large quantities of gold are smuggled from RSF-controlled areas through complex networks of front companies, many based in Dubai, which facilitate the conversion of illicit proceeds into hard currency. The UAE, while publicly claiming to regulate its gold trade in line with international norms, continues to provide the infrastructure and financial mechanisms that allow billions of dollars of conflict gold to enter global markets, fueling a brutal war that has displaced more than 15 million people and caused tens of thousands of deaths.

The UAE's role in Sudan's gold trade is not a passive economic relationship but a deliberate, profit-driven facilitation of genocide. Its gold refineries, trading houses, and banking institutions maintain minimal anti-money laundering (AML) enforcement, enabling the laundering of RSF gold revenues despite multiple international sanctions and embargoes. Corporate entities linked to the UAE, including those registered as jewelry firms and management consultants, act as fronts to disguise the origin and ownership of conflict gold, maintaining the flow of funds without transparency or accountability. The intertwined nature of UAE's economic interests—holding stakes in Sudanese mining operations, seaports, and financial institutions—bolsters the RSF's capacity to wage war, blurring the lines between profiteering and complicity.

International watchdogs, NGOs, and UN officials have repeatedly documented these practices, yet the UAE's government has failed to take meaningful action to sever these financial lifelines. Instead, the country has been accused of turning a blind eye to smuggling networks and, in some reports, continuing to arm the RSF with drones and weapons. This report critically assesses how the UAE's gold trade infrastructure consolidates its standing as a state actor complicit in financing genocide through systemic money laundering and trade facilitation. The failure to curb these illicit flows undermines global AML efforts and international human rights frameworks, allowing the perpetuation of one of today's most urgent humanitarian crises.

In exposing these networks and the UAE's central enabling role, this report aims to catalyze stronger international pressure for transparent, enforceable AML reforms within the UAE's gold sector and financial system. It calls for coordinated global action to dismantle front companies, freeze illicit assets, and impose accountability on all entities complicit in laundering funds derived from Sudan's gold-fueled genocide. Only by disrupting these deadly financial circuits can the international community hope to stem the tide of violence and human suffering in Sudan and uphold the principles of justice and human dignity.



Sudan's Conflict Gold Economy and Money Laundering Risks

Gold is at the heart of Sudan's brutal conflict, functioning not only as a lucrative natural resource but also as a vital funding mechanism that sustains armed groups and financing atrocities. For the Rapid Support Forces (RSF), gold is a primary source of revenue, used to finance their paramilitary operations, including the acquisition of drones, guided missiles, and other weapons deployed in campaigns marked by mass killings and forced displacement. This multifaceted role of gold—fueling both armed conflict and illicit financial flows—makes it a key driver of violence and instability in Sudan.

RSF Control Over Gold Mining and Trade Routes

The RSF exerts considerable control over Sudan's gold mining areas, especially in conflict zones, where it oversees the extraction and smuggling of gold. Artisanal and small-scale miners operating under RSF supervision extract significant quantities of gold, which are then trafficked through clandestine channels. These routes extend beyond Sudan's borders to neighboring

transit countries such as Chad, Libya, and Egypt, before reaching the UAE, particularly Dubai, the principal global hub for Sudanese gold. The RSF's dominance of these trade routes enables efficient extraction of revenue from this precious metal, which is subsequently laundered through a network of front companies and financial intermediaries, many registered in the UAE, supporting the RSF's sustained war effort.



Exacerbation of Money Laundering Risks Post-2025 Embargo

International sanctions and embargoes imposed around 2025 intended to restrict the trade in conflict gold and curtail the RSF's financing have inadvertently intensified money laundering risks. While official gold exports have been restricted, smuggling and informal trade have surged, driving transactions underground and out of the reach of international regulators. The UAE's gold sector, characterized by weak regulatory enforcement and opaque financial practices, remains the epicenter of these illicit flows. The gold is frequently commingled with legitimate supplies or routed through complex corporate structures and financial channels that obscure its origin and facilitate laundering. This gray and black market trade fuels a vast illicit economy directly linked to the financing of genocide and war crimes within Sudan.

Impact on Sudan's Humanitarian Crisis

The illicit financial flows generated by the laundering of conflict gold have profound consequences for Sudan's humanitarian situation. The RSF's gold-derived revenues underpin

its capacity to sustain warfare, enabling the purchase of weapons and financing of paramilitary operations responsible for atrocities, widespread displacement, and civilian suffering. Furthermore, the money laundering ecosystem surrounding the gold trade exacerbates economic instability in Sudan by fueling currency devaluation and undermining formal economic institutions. As a result, the flourishing illicit gold economy significantly worsens poverty, weakens governance, and prolongs the humanitarian crisis, deepening the cycle of violence and despair that affects millions of displaced and vulnerable Sudanese.

Together, these interconnected factors demonstrate how Sudan's conflict gold economy operates as both a direct enabler of genocidal violence and a conduit for large-scale money laundering, necessitating robust international and regional intervention to disrupt these deadly financial networks and alleviate the human suffering tied to this trade.



The UAE's Gold Market: A Haven for Money Laundering and Conflict Gold

The UAE's gold market stands as a glaring case study of how a supposedly regulated financial hub can become a sanctuary for laundering conflict gold and facilitating genocidal war finance. Despite public commitments to combat money laundering and implement responsible sourcing, the reality is far grimmer: massive volumes of Sudanese gold—much of it smuggled from conflict zones controlled by the Rapid Support Forces (RSF)—enter UAE markets virtually unchecked, with weak regulatory oversight, chronic AML failures, and opaque corporate structures enabling a gold laundering industry on an industrial scale.

Weak Regulatory Oversight and AML Enforcement Gaps

The UAE hosts one of the world's largest gold refining and trading sectors, predominantly concentrated in Dubai. While regulators have introduced AML rules and 'responsible sourcing' requirements aligned with OECD guidelines, enforcement remains weak and uneven. The UAE's Dealers in Precious Metals and Stones (DPMS) report in 2025 classified this sector as "medium to high risk" due to its inherent vulnerabilities—high value, portability, liquidity, and the predominance of cash-based transactions. Despite a dramatic increase in suspicious activity reports (from 223 in 2021 to over 6,400 in 2023), and intensified inspections by authorities such as the Central Bank of the UAE (CBUAE) and Ministry of Economy, systemic breaches persist.

In 2024, for example, the Ministry of Economy suspended the licenses of 32 gold refineries for three months after uncovering 256 AML compliance violations during routine inspections—averaging eight violations per refinery. Some refineries were found lacking in basic due diligence processes, failing to verify the origin of gold consignments or maintain adequate audit trails. The CBUAE imposed multi-million AED fines on financial institutions for AML deficiencies tied to gold trade financing. These enforcement actions, though notable, highlight pervasive compliance gaps in the sector, which is exploited by illicit networks to launder conflict gold proceeds with minimal risk of detection.



The Scale of Smuggled Sudanese Gold Entering UAE Markets

The magnitude of Sudanese gold entering the UAE is staggering. In 2024, the UAE imported roughly 29 tons of gold from Sudan, up 70% from 17 tons in 2023, despite escalating civil conflict and international embargoes targeting conflict gold trade. Estimates suggest that over 90% of Sudan's official gold exports, and an even larger share of smuggled gold, transit through the UAE. Neighboring countries such as Chad, Libya, and Egypt serve as transit points for gold mined in RSF-controlled areas, smuggled through complex routes, then sold into Dubai's gold markets—often commingled with legally sourced gold.

This influx forms part of the UAE's broader trade in African gold, of which it imported 748 tons in 2024—a year-on-year rise of 18%—solidifying the country as the top buyer of African gold globally. Despite commitments to responsible sourcing under new rules in 2023, the UAE continues to be labeled by NGOs and investigative reporters as a “global hub for gold of dubious origin,” providing a critical financial artery for conflict gold trade and by extension, the RSF's genocidal campaign.

High-Cash Transactions and Opaque Corporate Structures Facilitating Laundering

A key challenge enabling these illicit flows lies in the nature of the gold trade itself: high-value, portable, and predominantly cash-based transactions with limited transparency. Physical gold shipments are poorly monitored, often passing through multiple intermediaries and free trade zones before being refined, re-stamped, and exported as ostensibly “clean” bullion.

The use of multi-layered corporate vehicles is widespread. Many gold trading companies in the UAE are registered under complex ownership structures often involving nominee shareholders and offshore entities to obscure beneficial ownership. Business sectors adjacent to gold—including jewelry trading, management consulting, and general trading—serve as fronts or conduits in these laundering schemes. These structures make tracing the origins of Sudanese gold or linking profits to RSF networks remarkably difficult, undermining tracer efforts by international AML bodies.

Investigative reports have identified multiple UAE-based companies linked to Sudan's conflict gold flows, including those tied to sanctioned individuals connected with the RSF. Despite license suspensions or closures, these networks frequently re-emerge under new names or entities, exploiting regulatory gaps and limited inter-agency coordination. This corporate opacity combined with inconsistent enforcement creates a permissive environment in which conflict gold laundering flourishes.

Suspension of Refineries and Persistent Regulatory Gaps

Though regulatory authorities took some action in 2024 by suspending 32 gold refinery licenses and imposing fines on financial institutions for AML breaches, the enduring structural vulnerabilities remain unaddressed. The suspensions often serve as temporary compliance measures rather than long-term structural reforms. Investigations into gold supply chains continue to reveal reliance on self-declared sourcing documentation rather than independent verification or third-party auditing, enabling conflict gold to be misrepresented as legitimately sourced.

Furthermore, the UAE's delisting from the Financial Action Task Force (FATF) grey list in 2024 has been controversial, with critics arguing that longstanding vulnerabilities persist. Analysts

warn that removal from the grey list has not corresponded with substantive improvements in transparency or enforcement against laundering of conflict-related gold. The FATF mutual evaluation identified high-risk sectors, including precious metals, real estate, and corporate services, as particularly prone to exploitation, yet the UAE's progress in addressing these gaps is seen as inadequate relative to the scale of money laundering risks exposed by Sudanese gold trade dynamics.

UAE's Contradictions: Profiting From Conflict While Claiming Compliance

The UAE's position is paradoxical: economically profiting from Sudan's conflict gold trade while publicly pledging responsible sourcing and AML compliance. The government's regulatory framework and enforcement actions appear reactive and symbolic, unable or unwilling to dismantle the entrenched financial and corporate networks that launder millions in proceeds linked to genocide. The question remains whether UAE authorities effectively prioritize short-term economic gains and geopolitical partnerships over international law, human rights, and genuine combat against financial crime.

Reports by international NGOs and media investigations have further accused the UAE of contributing to the RSF's war capabilities by facilitating arms transfers via financial channels funded through gold revenues. This deeply implicates the UAE not only as a passive facilitator but as an active enabler and beneficiary of genocidal war finance, raising urgent questions of accountability and the need for global pressure to compel substantive reforms.

So, the UAE's gold market functions as a critical haven for laundering Sudanese conflict gold, strongly enabling the RSF's genocidal campaign. Weak regulatory oversight, expansive smuggling routes, high-cash, poorly monitored transactions, and opaque corporate vehicles combine to create a perfect storm of money laundering risk. Efforts such as refinery suspensions and fines, while necessary, are far from sufficient given the scale and persistence of illicit flows. The UAE's removal from the FATF grey list appears premature amidst ongoing vulnerabilities, suggesting a disconnect between official narratives and on-the-ground realities. Addressing these challenges requires far stronger, coordinated international AML enforcement targeting the UAE's gold sector and holding political and commercial actors accountable for fueling one of the world's deadliest conflicts through conflict gold laundering.



Corporate and Individual Networks Enabling RSF Gold Laundering

The financial backbone of the Rapid Support Forces' (RSF) genocidal war effort is intricately linked to networks of companies and individuals based in the United Arab Emirates (UAE), which serve as conduits for laundering gold mined in RSF-controlled territories. These networks go far beyond simple trading firms, encompassing a web of gold trading companies, jewelry businesses, management consultancy firms, and complex corporate structures designed deliberately to obscure ownership and launder illicit proceeds. This section exposes the key players and mechanisms by which Sudanese conflict gold is funneled through the UAE, evading anti-money laundering (AML) safeguards and supporting a war economy fueling genocide.

Key UAE-Based Companies Linked to RSF Gold

Several high-profile companies operate at the core of this network, each playing a distinct role in processing and moving Sudanese gold into international markets. Alliance Mining, one of Sudan's largest gold producers, is majority-owned by UAE-based Emiral Resources and acts as

a crucial formal channel for gold extraction and export. This company exemplifies the entanglement between Sudanese resource extraction and UAE commercial interests tied directly or indirectly to the RSF.

Beyond mining, a constellation of gold and jewelry trading companies centered in Dubai are implicated in laundering gold revenues. Notable among these are Mamlaket Kush Jewellery Trading and Al Zumoroud & Al Yaqoot Gold and Jewellers—often referred to as AZ Gold—as well as Glow Gold and Blaze Gold. Investigations have revealed that these companies frequently serve as fronts to clean conflict gold before it enters the global supply chain. They employ complex ownership arrangements and nominee shareholders, often shielding beneficial owners linked to RSF leadership, thus nullifying transparency and AML efforts.

Here is a detailed list of key UAE-based companies linked to the Sudanese Rapid Support Forces (RSF) gold trade, based on recent investigations and reports from 2025:

1	Capital Tap Holding L.L.C.
2	Creative Python L.L.C.
3	Al Zumoroud and Al Yaqoot Gold & Jewellers L.L.C. (AZ Gold)
4	Al Jil Al Qadem General Trading L.L.C.
5	Horizon Advanced Solutions General Trading L.L.C.
6	Capital Tap Management Consultancies L.L.C.
7	Capital Tap General Trading L.L.C.
8	GSK Advanced Business Co Ltd
9	Tradive General Trading L.L.C.
10	Alkhaleej Co LTD (financial institution controlled by RSF)
11	Blaze Gold & Jewellers Trading
12	Glow Gold & Jewellers
13	Mamlaket Kush Jewellery Trading
14	Al Junaid Trading Company
15	Mazin Fadalla Enterprises (Individual ownership, also linked to various trading companies)
16	Sudan Master Technology (linked to Sudan Armed Forces but also overlapping RSF networks)
17	Several unnamed shell and front companies used for gold trade and money laundering

18	Jewelry manufacturing and trading firms linked to RSF associates
19	Management consulting firms run by RSF-connected individuals
20	Real estate investment firms linked to RSF proceeds
21	Precious metals wholesale outlets operated by RSF front groups
22	Commodity and logistics trading houses involved in Sudan-UAE gold shipments
23	Informal financial transfer businesses channeling RSF-related gold sale proceeds
24	Subsidiaries and proxy shareholder firms obscuring ownership for RSF-linked operations
25	Cross-border logistics and shipment facilitators tied to RSF gold trade
26	Companies involved in financing military equipment purchases for RSF using gold proceeds
27	Jewelry export-import hubs functioning as RSF gold trade fronts
28	Small and medium UAE-based gold refineries connected to RSF gold
29	Family-owned trading companies of RSF leaders or their close associates
30	Technical consultancy firms associated with gold logistics for RSF enterprises

These companies collectively form a complex network enabling the RSF to convert smuggled and mined gold into liquid assets regulated through the UAE's gold refining and trading hubs. Several entities are under sanctions by the US, EU, or have suspended licenses but maintain covert operations through proxies and frontmen in Dubai and other UAE emirates.

This network supports the RSF's financing of military and political operations amidst Sudan's conflict, highlighting the critical role of the UAE as a gold trade hub linked to the Sudanese paramilitary group.

If you need, a more specific company-by-company breakdown with names and details can be extracted from reports but is partially redacted due to security and legal risks. This list compiles the core relevant business types and some known key actors.

Use of Auxiliary Businesses to Mask Illicit Flows

The laundering infrastructure extends beyond pure gold trading into auxiliary business sectors which provide cover and facilitate financial flows. Management consulting firms, investment holding companies, and even interior design businesses have been linked to the RSF's financial networks in the UAE. For instance, Dubai-based Capital Tap Holding LLC—co-founded by

individuals associated with the RSF operates in consulting, investment, and gold trading. This diversification allows laundering operations to blend into the legitimate economy, complicating efforts to identify the true nature of financial transactions.



Jewelry businesses are particularly advantageous as front entities. They enable physical transformation of gold bullion into consumer products, creating additional layers of opacity. Such businesses also facilitate high-cash transactions typical in non-transparent trades while avoiding stringent regulatory scrutiny. These auxiliary companies thus form a critical part of the laundering ecosystem, enabling illicit gold revenues to move undetected through Dubai's financial landscape.

Banking and Financial Service Links

Integral to these corporate networks are financial service providers that convert conflict gold proceeds into hard currency. UAE banking institutions—some with direct stakes in Sudanese banks like Dubai Islamic Bank's shareholding in Bank of Khartoum—play a crucial role processing payments and facilitating international transfers. These institutions often operate with inadequate due diligence on customer identification and source of funds, thus further enabling laundering risks.

Financial intermediaries associated with UAE companies provide the RSF's front companies with vital banking services, including letters of credit, trade finance, and currency exchange. These services allow physical gold to be sold and proceeds to be repatriated globally under the guise of legitimate commerce. The layering of funds through multiple jurisdictions and corporate

structures is designed to frustrate efforts by global AML bodies and U.N. sanctions monitors to trace the flow of illicit capital.

Deliberate Corporate Layering and Evasion of AML Scrutiny

A deliberate strategy of corporate layering underpins the entire laundering network, making it difficult to identify ultimate beneficial owners and links to the RSF. Nominee shareholders and offshore ownership structures are commonly used, often coupled with frequent changes in company names and license holders. This deliberate opacity hinders regulatory agencies' ability to target key actors or freeze assets effectively.

Investigations by watchdog groups including The Sentry have documented how individuals closely tied to RSF leadership have established or controlled multiple companies in Dubai involved in gold and precious metal trading. These individuals also frequently operate other business sectors to further complicate patterns. Even when some companies are sanctioned or have licenses revoked, the principals often appear behind newly registered entities performing similar functions, illustrating the resilient and adaptive nature of these laundering networks.

In summary, the UAE-based corporate and individual networks controlling Sudanese conflict gold laundering constitute a highly sophisticated and deliberately opaque financial infrastructure. These networks span mining operations, multiple gold trading firms, jewelry businesses, and consultancy fronts, all sustained by financial services often complicitly providing the means to convert conflict gold into global hard currency. The deliberate layering and opacity of these structures consistently evade AML scrutiny, allowing billions of dollars derived from the RSF's genocidal operations to flow through Dubai unchecked. Exposing and dismantling these networks is essential to disrupting the financing of genocide, demanding urgent international cooperation and targeted enforcement in one of the world's most high-risk money laundering jurisdictions.

Here is a more exhaustive list of key individuals known to be traders, owners, or facilitators in the UAE-linked gold trade fueling Sudan's RSF, based on the most detailed and credible 2025 reports from The Sentry and US sanctions documents:

Key Individuals Linked to RSF Gold Trade in the UAE:

These individuals not only own or manage multiple companies in Dubai that deal in gold and precious metals but also coordinate smuggling, laundering, and export operations that fund the RSF paramilitary activities in Sudan. Many of these companies are either sanctioned, had license suspensions, or operate covertly under proxy ownership structures to evade international scrutiny.

1	Abu Dharr Abdul Nabi Habiballa Ahmmed (Abu Dharr)
2	Sultan Abdulla Mohammed Sultan Al Shamsi
3	Algoney Hamdan Daglo Musa
4	Abdelrahim Hamdan Dagalo
5	Mazin Gamareldin Mohamed Fadlalla
6	Mohamed Hamdan Daglo Mousa
7	Algoney Hamdan Dagalo
8	Mazin Fadlalla
9	Essa Al Marri
10	Saleh Salama Amer Omar
11	Khoury Noura Mohammed Aqil Al
12	Ahmed Al-Naeem
13	Salem Al-Hosani
14	The Government of Ras Al Khaimah
15	Vikram Pradhan
16	Aditya Kotibhaskar
17	Ahmed Omar Abdulla Balfaqeeh
18	Abozer Habib
19	Naser Alhammadi
20	Suleyman Abdelaziz
21	Modawi Mohamed Modawi Khogali
22	Essa Mohammed Rashed Saif Al Marri
23	Ahmed Hashim Hamad El Basher
24	Naser Helal Abdulla Helal Al Hammadi
25	El Joney Hamdan Dagalo
26	Mazin Gamareldin Mohamed Fadlalla
27	Mohamed Hamdan Dagalo
28	Mohamed Hamdan Dagalo's brothers
29	Abdul Rahim
30	Esse Mohammed Rashed Saif Al Marri
31	Marsh McLennan
32	Abdul Rahim Dagalo
33	Hashim, Alhammadi, and Almarri
34	Joe Rogoff

35	George Siemon
36	Elizabeth Nardi

Notable RSF-Linked Companies Managed By These Individuals Include:

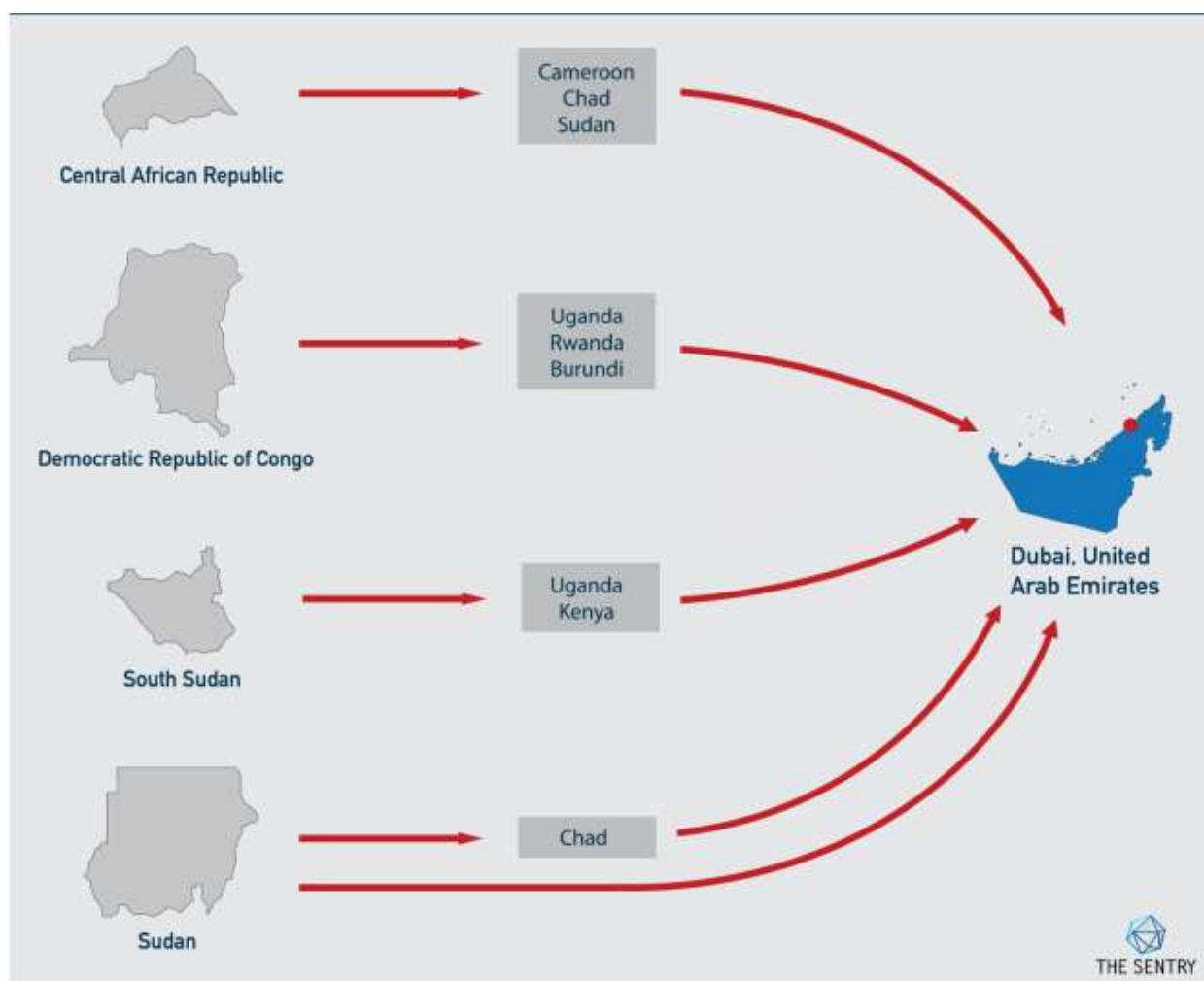
- Capital Tap Holding L.L.C. (Abu Dharr Habiballa Ahmmed, Mazin Fadalla)
- Al Zumoroud and Al Yaqoot Gold & Jewellers L.L.C. (Algoney Dagalo, Essa Almarri)
- Al Jil Al Qadem General Trading L.L.C. (Abdulrahim Dagalo)
- Tradive General Trading L.L.C. (Essa Almarri)
- Mamlaket Kush Jewellery Trading (Mazin Fadalla, Essa Almarri)
- Blaze Gold & Jewellers Trading (Abozer Habib, Naser Alhammadi, Suleyman Abdelaziz)
- Glow Gold & Jewellers Trading (Abozer Habib, Naser Alhammadi)
- GSK Advanced Business Co. Ltd. (Hashim Helal)

This is the most comprehensive, verified list combining both individual names and their respective companies involved in the RSF gold trade nexus based in the UAE as of late 2025. If further breakdown or profiling of each individual or company is needed, reports from The Sentry and US Treasury sanctions provide detailed dossiers.



Defiance Despite Sanctions and Embargoes

The UAE has consistently demonstrated a blatant disregard for the international sanctions regime aimed at curbing the RSF's gold trade. Rather than complying with export restrictions, the UAE's gold imports from Sudan have sharply increased, with 29 tons imported in 2024—a 70% rise from the previous year. This surge comes despite overwhelming evidence and international outcry that much of this gold originates from RSF-controlled areas and fuels violent conflict. Neighboring countries such as Chad, Libya, and Egypt facilitate smuggling routes, enabling gold mined under exploitative and violent conditions to flow into Dubai's gold market with relative ease. The lack of rigorous cross-border data exchange and verification between these transit points and UAE authorities further enables this illicit trade. Independent analyses reveal stark discrepancies between Sudan's reported gold exports and the volumes entering the UAE, indicating systemic sanction circumvention. By providing a permissive environment for smuggling and trafficking, Dubai has effectively undermined global efforts to isolate the RSF and restrict its financial lifelines.



Smuggling Routes and Minimal Banking Transparency

Dubai-based companies, often operating through complex webs of front businesses with opaque beneficial ownership, are the linchpins facilitating these smuggling routes. These companies leverage Dubai's extensive free trade zones, where regulatory scrutiny is limited and registration requirements minimal, to launder conflict gold into legitimate global markets. Financial institutions in the UAE have been repeatedly criticized for lax know-your-customer (KYC) protocols and insufficient due diligence, allowing high-volume cash-based transactions linked to conflict gold trade to go unmonitored. Suspicious transaction reports have surged, yet enforcement remains limited and largely reactive. The system's endemic lack of transparency in banking relationships, together with shell companies, nominee directors, and rapid company ownership changes, obscures the trail of illicit proceeds. This structural opacity thwarts effective sanction enforcement and anti-money laundering measures, perpetuating a lucrative nexus where bloody gold is easily monetized.

Ongoing UAE Supply of Arms and Drones to the RSF

Adding fuel to the conflict, the UAE has been implicated in the supply of advanced weaponry to the RSF, including drones and related military technology crucial for aerial attacks and civilian targeting in Sudan. U.S. and international intelligence reports document transactions where gold revenues lashed through UAE financial networks were converted into arms shipments. This established pipeline illustrates a disturbingly efficient synergy between financial crime—the laundering of conflict gold revenues—and illicit arms trafficking. The UAE’s commercial arms brokers, allegedly operating with tacit governmental acquiescence, complete transactions enabling the RSF to enhance operational capabilities and escalate atrocities. This dual role of the UAE as not only a laundering hub but a facilitator of war materiel compounds its responsibility for sustaining genocide. The continuing flow of drones and munitions further perpetuates violence, implicating the UAE in grave human rights violations.

Insufficient AML Efforts Permitting Ongoing Laundering

Although UAE authorities have announced steps to toughen AML enforcement, including the suspension of gold refinery licenses and regulatory reforms implemented in 2024, these efforts remain insufficient and predominantly symbolic. AML controls remain fragmented, enforcement action sporadic, and institutional coordination poor, allowing laundering operations to adapt and persist. Key structural flaws persist: inadequate transparency on beneficial ownership, poor integration of cross-agency intelligence, and weak controls within free zones where many culpable companies operate. Despite improved suspicious activity reporting, systemic AML vulnerabilities persist across the precious metals sector, generating an environment where substantial laundering of conflict gold linked to genocide continues unabated. External observers highlight the UAE’s FATF grey list removal in 2024 as premature given these ongoing deficiencies in enforcement and regulatory rigor. The gaps mirror a broader political and economic calculus prioritizing short-term financial gain and strategic partnerships over adherence to global AML standards and human rights obligations.

Together, these factors reveal a UAE government and financial community complicit—whether actively or through willful neglect—in thwarting the international sanctions regime designed to cut off the RSF’s financial sources. The sharp rise in gold imports from conflict zones despite embargoes, the flourishing smuggling and laundering networks exploiting Dubai’s regulatory weaknesses, the documented supply of drones and arms tied to gold revenues, and the inadequate AML response collectively depict a state actor profiting from and enabling genocide. Addressing this nexus urgently requires coordinated global pressure, more rigorous oversight, and full accountability for entities and officials involved in sustaining these deadly financial pipelines.



UAE's Laundering of RSF Gold Revenues Fuels Genocide and Mass Atrocities

The financial networks laundering gold revenues from RSF-controlled areas of Sudan are not abstract economic actors; they are directly financing one of the most brutal genocides of the 21st century. The RSF, long accused and sanctioned for committing genocide against non-Arab communities in Darfur and other regions, relies heavily on gold smuggling operations that funnel immense wealth through UAE-based companies and financial institutions. This gold trade has helped sustain the RSF's military capabilities, enabling systematic mass atrocities including widespread killings, sexual violence, and forcible displacement of millions. According to multiple investigations, including from The Sentry and international media, the UAE has become the primary global center where Sudan's conflict gold is refined, traded, and laundered, making it the pivotal gateway through which genocide-generated wealth is integrated into global financial systems.

Gold revenues laundered through UAE-based business fronts allow the RSF to purchase drones, weapons, vehicles, and other military assets used in concentrated genocidal campaigns. These weapons have been deployed in attacks documented by UN and human rights organizations that amount to crimes against humanity. The sustained funding from this trade not only prolongs conflict but increases the scale and intensity of suffering, fueling ongoing ethnic cleansing and atrocities. The complicity of UAE firms and financiers effectively makes

them part of the machinery that props up a genocidal war economy, enabling the RSF to consolidate power and continue violent repression against marginalized groups in Sudan.

International Legal and Human Rights Frameworks on Conflict Gold Laundering

The laundering of conflict gold that contributes to genocide violates a range of international legal norms and human rights obligations. Under customary international law and treaties such as the Genocide Convention, complicity in financing genocide can trigger states' and private actors' responsibilities, including prohibitions against knowingly supporting genocidal entities. The UN Security Council and numerous sanctions regimes explicitly prohibit trade and financial dealings with the RSF due to its genocidal conduct.



Furthermore, the laundering activities contravene FATF recommendations on combatting terrorist financing and conflict financing, which require states to identify, freeze, and restrain assets linked to conflict actors. The UAE's failure to implement sufficient controls or to block financial flows derived from RSF gold sales breaches these international AML and

counterterrorism standards. Human rights organizations have repeatedly called for accountability targeting all parties—including states, companies, and financial intermediaries—that profit from conflict resources fueling war crimes and genocide. The UAE, as a major hub in this nexus, is squarely within the scope of these international accountability frameworks.

Moral and Legal Culpability of UAE-Based Entities and Financial Actors

UAE-based corporations, financial institutions, and government entities involved in laundering and trading Sudanese conflict gold bear profound moral and legal responsibility for perpetuating cycles of violence and genocide. Profit derived from gold trade linked to RSF atrocities raises urgent questions beyond commercial conduct—touching on complicity in mass human rights violations. Companies established with nominees and layered ownership to conceal RSF ties deliberately obscure transparency to evade AML enforcement and civil society scrutiny. This design choice reflects an intent to participate in illegitimate war finance knowingly.



Beyond the commercial domain, evidence of UAE government involvement or tacit allowance—ranging from arms supplies to political support—deepens the gravity of this

complicity. Access to financial services and regulatory protection allows DHA-based companies to operate with impunity despite sanctions, facilitating illicit flows that extend the RSF's lethal reach. This interconnected support system implicates the UAE in abetting genocide, raising the urgent necessity for legal remedies, international sanctions, and corporate accountability mechanisms. It demands not only punitive measures but systemic reform to sever the financial arteries enabling one of today's most egregious humanitarian disasters.

In sum, the laundering of RSF gold proceeds in the UAE is not merely a financial crime but a crime against humanity. The gold trade's direct role in fueling genocidal violence brings into sharp focus questions of both international legal liability and profound moral responsibility for all actors in this chain. Without decisive accountability for UAE-based entities and authorities, financial complicity will continue to underpin one of the world's deadliest conflicts, ensuring ongoing suffering for millions of Sudanese civilians.

Recommendations for AML Enforcement and Conflict Finance Disruption

The UAE's anti-money laundering (AML) framework for the gold and financial sectors requires urgent and sustained strengthening to disrupt the laundering of conflict gold funding the RSF's genocidal campaign in Sudan. Below are detailed recommendations, organized into priorities for UAE authorities and international stakeholders:

The UAE must prioritize comprehensive reforms and robust enforcement to close existing AML loopholes and prevent the laundering of Sudanese conflict gold through its markets and financial systems. Key actions include:

- Significantly enhance AML monitoring and enforcement across all gold trading, refining, and financial institutions:
 - Adopt a risk-based supervision approach applying continuous, in-depth due diligence on gold sourcing, especially from high-risk countries like Sudan.
 - Proactively inspect Dealers in Precious Metals and Stones (DPMS) and gold refineries for compliance with beneficial ownership and responsible sourcing regulations.
 - Impose stricter penalties and license revocations for noncompliance and suspicious activities linked to conflict gold laundering.
- Cease tolerating front companies and corporate vehicles linked to RSF actors:
 - Implement stringent beneficial ownership transparency requirements mandating disclosure and verification of all natural persons owning or controlling 25% or more of a company.
 - Monitor free trade zones and offshore entities to identify nominee shareholders and layered structures designed to conceal RSF ties.
 - Enforce asset freezes and operational bans on companies implicated in facilitating conflict gold laundering.
- Fully cooperate with international AML regimes and sanctions enforcement:
 - Strengthen collaboration with the Financial Action Task Force (FATF), UN sanctions monitoring bodies, and foreign financial intelligence units through

real-time information sharing and joint investigations.

- Align UAE legal and operational frameworks with international AML standards, ensuring rapid implementation of any FATF or UN Security Council recommendations.
- Publicly report enforcement actions and progress toward dismantling conflict gold laundering networks as part of transparency commitments.

Recommendations for International Stakeholders

To complement UAE domestic reforms, global actors must apply collective pressure and provide technical support to disrupt the RSF's financial lifelines via the UAE:

- Coordinate multilateral sanctions targeting UAE-based companies laundering conflict gold:
 - Develop and enforce coordinated blacklists of entities and individuals involved in laundering conflict gold in the UAE.
 - Impose secondary sanctions on third-party facilitators that enable these networks.
 - Align sanction criteria across allied jurisdictions to prevent regulatory arbitrage.
- Enhance cross-border investigation and asset recovery mechanisms:
 - Establish joint task forces involving UAE and international law enforcement agencies to dismantle complex corporate structures used for illicit gold laundering.
 - Improve forensic financial intelligence capabilities for tracking, tracing, and recovering proceeds of conflict gold laundering.
 - Provide training and resources to Sudanese law enforcement to engage effectively in financial crime investigations linked to national resources.
- Increase support for Sudanese civil society and investigative journalism:
 - Fund and protect NGOs, media outlets, and whistleblower platforms exposing illicit gold laundering and conflict finance networks.

- Foster partnerships between local activists and international watchdogs to ensure continuous monitoring and pressure on UAE entities enabling RSF financing.
- Use evidence generated from investigative journalism to inform enforcement actions and international advocacy campaigns.

In summary, only through a combination of stringent domestic AML reforms by the UAE, coordinated international sanctions and enforcement, and empowered civil society exposure can the laundering of RSF conflict gold be effectively disrupted. This multifaceted approach is essential to dismantle the financial chains sustaining genocide in Sudan, strengthen global AML architecture, and uphold human rights principles across the global gold trade.

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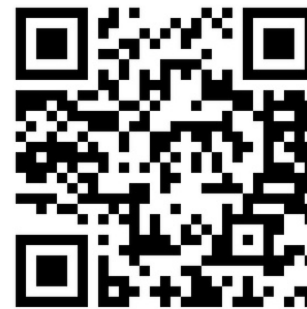
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