

Automated high-risk NCR detection and the retrospective closure certificate

SQL and script automation for multi-phase flagging, and a field-by-field defence of Appendix I - United Arab Emirates

Document information	Detail
Reference	PMC-QA-SQL-005
Version and status	1.0 - issued for use, 7 October 2026
Companion documents	Protocol PMC-QA-AUD-004 (retrospective closure verification); article PMC-QA-ART-001 (SOR and NCR on UAE sites); statutory liability brief PMC-QA-LEG-002; escalation letter pack PMC-QA-LEG-003; SOR and NCR control workbook (20 sheets)
Companion files	ncr_flag_queries.sql - 30 documented queries; ncr_risk_engine.py - loader and runner; NCR_Risk_Query_Report.xlsx - the generated flag report; ncr_data.sqlite - the queryable database
Applies to	Any project on which the PMC holds a SOR and NCR register, whether or not the client has a reporting platform

Part A - Automated detection of high-risk NCRs

1. Three layers, and which one to use when

Flagging a non-conformance is not a sorting exercise. The register has to answer three different questions at three different speeds: what is dangerous right now, what is drifting, and what will become a claim in five years. That is why the pack ships three layers rather than one script.

Layer	What it does	Tool	Latency	Best used for
Layer 1 - In-workbook flags (columns AJ to AL of sheet 2, plus sheet 19)	Scores every NCR as it is typed, writes the flag and a plain-language reason, and counts the alerts by project phase. No installation, no macros, works in Excel, LibreOffice or Google Sheets	Excel formulas only	Immediate, on data entry	The daily site meeting and the weekly assurance pack
Layer 2 - SQL query pack and runner	Loads the workbook into a database and runs 30 queries that rank, cross-reference and join the registers, including phase-specific flags, ageing buckets, signatory concentration and CAPA effectiveness	Python + SQLite (or any SQL engine)	Seconds, on demand	Fortnightly review, handover readiness, decennial audit worklists

Layer	What it does	Tool	Latency	Best used for
Layer 3 - Scheduled execution	Runs Layers 1 and 2 unattended, writes the flag report to a dated file and emails or publishes the critical list	Cron, Windows Task Scheduler, Power BI scheduled refresh, Power Automate, or the Manus automation layer	Scheduled, e.g. 06:30 daily	Portfolio-level assurance where several projects are compared

2. The scoring model, and the same model in one line of SQL

The score is deliberately additive and explainable: every point can be traced to a fact in the register, which is what makes it defensible when a contractor disputes the flag. The Excel engine in columns AJ to AL of the NCR Register and the SQL expression below are the same model, so a flag raised in the workbook and a flag raised by the query pack always agree.

Condition in the register	Points	Why it carries weight
Class is Major or Systemic	4	Contractual and technical consequence, and the starting point of the escalation ladder
Class is Minor	1	Kept in the population so that patterns and repeats remain visible
Open past the agreed completion date	3	Breach of the accepted programme; the trigger for a Notice to Correct under FIDIC 2017 clause 15.1
Authority-linked or NOC-linked	3	Blocks a completion certificate, occupancy, energisation or Civil Defence approval
Repeat of a previous NCR	2	The corrective action did not hold: a system failure, not an incident
Programme impact of 14 days or more	2	Material delay exposure, and usually an extension-of-time argument in the making
Cost impact of AED 100,000 or more	2	Financial exposure and likely back-charge or deduction
Closed with no verification date	3	Closure on assurance: the exact condition decennial liability punishes
Closed with no closure certificate reference	2	The evidence pack cannot be traced or audited
Closed more than 90 days after raising	1	Evidence survival risk and a sign that closure was administrative

The SQL expression used by the pack

```
CASE WHEN class IN ('Major','Systemic') THEN 4 WHEN class = 'Minor' THEN 1 ELSE 0 END + CASE WHEN
closed_on = " AND agreed_date <> " AND julianday('now') > julianday(agreed_date) THEN 3 ELSE 0 END + CASE
WHEN lower(authority_linked) IN ('yes','y') THEN 3 ELSE 0 END + CASE WHEN lower(repeat_flag) IN ('yes','y')
THEN 2 ELSE 0 END + CASE WHEN closed_on = " AND COALESCE(programme_days,0) >= 14 THEN 2 ELSE 0 END
+ CASE WHEN closed_on = " AND COALESCE(cost_aed,0) >= 100000 THEN 2 ELSE 0 END + CASE WHEN
closed_on <> " AND (verification_date IS NULL OR verification_date = "") THEN 3 ELSE 0 END + CASE WHEN
closed_on <> " AND (cert_ref IS NULL OR cert_ref = "") THEN 2 ELSE 0 END + CASE WHEN closed_on <> " AND
```

```
COALESCE(days_open,0) > 90 THEN 1 ELSE 0 END. Bands: 10 or more CRITICAL, 6 to 9 HIGH, 3 to 5 WATCH, below 3 LOW.
```

3. The query catalogue - what to run, and in which phase

Each query returns the items it flags, with the reason and the mandated action in the row. Query outputs are written to one tab per query in NCR_Risk_Query_Report.xlsx, alongside the 00 Summary tab that reports row counts and any query that returned no data because a sheet is still empty.

ID	Phase	What it flags	Fires when	Action it triggers	Owner
Q-00	All	The whole open population with its derived score, flag, age and position	Any time	Base view for ad-hoc analysis and the weekly pack	Quality Manager
Q-01	Phase 1	Authority-linked NCRs still open	Any	Weekly instruction; withhold the affected valuation line; notify the applicant	Resident Engineer
Q-02	Phase 1	Authority-linked closures with no instrument reference	Any	Verify the instrument directly; re-open the item internally	Quality Manager
Q-03	Phase 1	Pre-construction, permit and design items past the agreed date	Any	Weekly delay list to the contractor's project manager	Resident Engineer
Q-04	Phase 1	Authority tracker items not in a closed state	Any	Refresh the authority tracker and the submission dates	Resident Engineer
Q-10	Phase 2	Major and systemic items past the agreed date, ranked by overdue days	Any	Instruction to correct; Notice to Correct at 14 days past due	Project Director
Q-11	Phase 2	Repeat non-conformances still open	Any	Systemic quality review; audit the contractor's process control to ISO 9001:2015 clause 10.2	Quality Manager
Q-12	Phase 2	Open items with 100,000 AED or 14 days of exposure, ranked by exposure index	Any	Commercial review and a cost-recovery decision	Project Director
Q-13	Phase 2	Contractor and trade concentration: items, open items, repeats, average days, cost	Any	Performance discussion with the responsible party	Resident Engineer
Q-14	Phase 2	Discipline heat map across the register	Any	Resource and inspection planning by discipline	Discipline Lead
Q-20	Phase 3	Closed items with no verification date	Any	Re-verify and issue a retrospective certificate (PMC-QA-AUD-004)	Resident Engineer
Q-21	Phase 3	Closed items with no closure certificate reference	Any	Issue the closure certificate from sheet 12 and file the evidence pack	Quality Manager

ID	Phase	What it flags	Fires when	Action it triggers	Owner
Q-22	Phase 3	MEP and fire items open 14 days or more	Any	Testing and commissioning hold; witness testing scheduled	Discipline Lead
Q-23	Phase 3	Tier 1 audit items with no test date	Any	Schedule the test under the approved test plan	Quality Manager
Q-30	Phase 4	Any item open more than 30 days, with its escalation level	Any	Escalate by band: project, client, or board	Project Director
Q-31	Phase 4	Handover-phase items past the agreed date	Any	Taking-over readiness list with retention leverage	Resident Engineer
Q-32	Phase 4	Taking-over blockers: open items touching an authority instrument	Any	Authority engagement plan with the applicant	Project Director
Q-33	Phase 4	SOR observations converted to NCR but still unclosed	Any	Close the loop on the original observation	Quality Manager
Q-40	Phase 5	Decennial register items in the high band, not closed with a record	Any	Reapprove the monitoring plan; report to the client	Quality Manager
Q-41	Phase 5	Stability or safety items with no next review date	Any	Assign the review date; specialist re-assessment if progressive	Project Director
Q-42	Phase 5	Audit items with an unresolved forensic red flag	Any	Preserve originals; take legal advice before any action	Project Director
Q-43	Phase 5	Audited items with no certificate or no decennial review date	Any	Complete the certificate and the dossier index	Quality Manager
Q-50	All	Ageing profile of the open population in five buckets	Monthly	Drives the assurance pack narrative	Quality Manager
Q-60	All	Signatory concentration: one person closing a population of items	Any	Competency and independence check on the named signatory	Quality Manager
Q-70	All	CAPA actions past their target date	Any	Recover the CAPA schedule from the contractor's QA manager	Quality Manager
Q-71	All	CAPA with no effectiveness evidence	Any	Keep the action open until effectiveness is recorded one cycle later	Quality Manager

ID	Phase	What it flags	Fires when	Action it triggers	Owner
Q-72	All	Repeat root causes across the project	Quarterly	System-level preventive action and a monitoring change	Project Director
Q-80	All	Monthly trend: raised against closed, with major and repeat counts	Monthly	Trend reporting to the client	Quality Manager
Q-90	All	One unified ranking of NCRs, audit findings and decennial exposures	Fortnightly	Single list for the quality review meeting	Project Director
Q-99	All	INSTANT FLAG: every critical item requiring same-day action	Daily	The daily site-meeting action list	Resident Engineer

4. Running it

Step	Command or action	Result
1	python3 ncr_risk_engine.py	Loads the workbook, prints the tables loaded and the instant flag list, writes out/ncr_data.sqlite and out/NCR_Risk_Query_Report.xlsx
2	python3 ncr_risk_engine.py path/to/workbook.xlsx path/to/queries.sql --out /path/out	Same, for any workbook or query pack, including a per-project copy
3	sqlite3 out/ncr_data.sqlite	Ad-hoc analysis: every table and view from the pack is available to any analyst without touching the workbook
4	Paste any query block into Power BI, Power Query, Tableau or a warehouse	The blocks are plain SQL and portable; the schema comment at the top of the .sql file lists every column
5	Schedule step 1 daily at 06:30	The critical list is ready before the site meeting; the report is written to a dated file for the record
6	Publish Q-14 and Q-50 to the client dashboard	Phase-level and ageing visibility without giving the client access to the register itself

Governance point	Control applied
Documented information (ISO 9001:2015 clause 7.5)	Each run writes a dated report file; the query pack and the workbook carry a revision reference, so the evidence trail of what was flagged and when is itself auditable
Non-conformity and corrective action (ISO 9001:2015 clause 10.2)	Q-70, Q-71 and Q-72 test the CAPA record: overdue actions, missing effectiveness evidence and repeated root causes are flagged, not left to memory
Monitoring and measurement (ISO 9001:2015 clause 9.1)	The KPI sheet, Q-50 and Q-80 give the trend data the clause requires, and the alert engine sheet gives the thresholds
Access control where a client or regulator requires it (ISO/IEC 27001:2022 Annex A 5.15 and 8.3)	The database and the report are generated from a read-only copy; distribution of the forensic column set (sheet 16, column O) is restricted to the nominated reviewers
Data integrity	The loader never writes to the workbook. Originals stay untouched, which preserves them for any later forensic or legal purpose
Version control	Keep one folder per revision of the query pack. When the scoring model changes, the change is recorded in the pack header and the previous scoring of a population is preserved rather than silently restated

5. Worked output from the shipped workbook

Running the pack against the shipped workbook (three worked examples plus the audit tracker samples) produces the following instant-flag list. It is shown here exactly as the runner prints it, so the reader can see the shape of the output before substituting real data.

Source	Reference	Flag	Points	Description	Owner	Mandated action
Audit finding	NCR-0142	CRITICAL	28	Structural raft - cube results and pour card not traceable (red flag recorded)	Contractor QA Manager	Preserve originals; take legal advice (Appendix G category E)
Open NCR	NCR-0001	CRITICAL	11	Raft reinforcement cover below specification, open 64 days and past the agreed date	Contractor QA Manager	Same-day notification to the Project Director and the client
Open NCR	NCR-0003	HIGH	6	Repeat tile lippage, past the agreed date at handover phase	Subcontractor foreman	Weekly assurance pack with the owner and the date
Open NCR	NCR-0002	CRITICAL	12	Fire-stopping references missing, closed without a verification date or certificate	Contractor QA/QC Manager	Same-day notification; re-open and re-verify before the instrument check

The one line that matters

Of the 30 queries, only Q-99 should be run every day. Everything else answers a question that arises weekly, monthly or on a trigger. A pack that is run selectively is used; a pack that is run exhaustively is abandoned in the second month.

Part B - Appendix I in detail: the retrospective closure certificate

6. What the certificate is, and the rule that makes it work

The retrospective closure certificate is a single-page record issued for one audited item. It states what the original closure claimed, how the item was verified, what the verification found, what was rectified, what the designer concluded about stability and safety, what residual risk remains and who owns it, and it is signed by a verifier who is independent of the person who signed the original closure.

The rule that makes it work is supersession without deletion. The original closure record stays in the file, unaltered, next to the certificate. Deleting or overwriting the original destroys the very thing the certificate is meant to defend: the ability to show that the PMC found the problem, established the facts and fixed them. A certificate that sits on top of a preserved record is evidence of control; a certificate that replaces a record is evidence of concealment.

7. Field-by-field breakdown: what each field records and why it protects the PMC

The table below is the substantive answer to how the certificate protects against a decennial claim. Each row does three things: it records a fact, it closes a gap that a claimant would otherwise exploit, and it names the evidence that must exist to complete it honestly.

Certificate field	What it records	How it protects the PMC	Evidence needed to complete it honestly	Failure mode if omitted
Certificate reference and date	A unique identifier and the date of verification, not the date of the original closure	Creates a traceable artefact with its own provenance; establishes that the verification happened inside the ten-year period	The register entry, the audit tracker row (sheet 16) and the dossier index entry	The verification cannot be linked to the item or to a date, and the ten-year chronology breaks
NCR reference and original closure (date, signatory, role, register entry)	What was claimed at the time, and by whom	Shows the PMC identified and recorded the original defect; confirms that the certificate is a correction of the record, not a discovery made under pressure	The original closure record, unaltered, with its revision history	Without the original, the certificate looks like a document created for the claim, which is far worse than the underlying defect
Supersession statement	That the certificate supplements and does not replace the original, which is retained unaltered	Removes any suggestion of tampering and preserves the evidentiary chain	The file structure itself: both documents in the same item dossier (Appendix J folder 03 and 10)	Concealment exposure under the Penal Code and the cybercrime law, and the loss of credibility in any later dispute
Verification basis (documents reviewed, physical method, testing, designer assessment)	The exact method by which the truth was established, with references	Directly answers the question 'on what basis did the engineer certify this?' - the core of a professional negligence allegation	Test reports with laboratory accreditation, calibration certificates, dated photographs, the designer's signed assessment	The certificate becomes an opinion rather than a record, and an opinion is much easier to attack
Verified condition	Complying with the criterion, non-compliant as specified, or unable to verify without opening up	States the truth in one of three unambiguous ways and removes the temptation of an over-claim	The inspection or test record against the stated acceptance criterion	An over-claimed condition is worse than a known open item: it converts a quality issue into a misrepresentation
Rectification detail (method, completion, re-test, result, who carried it out, who verified)	What was done to the works, and the proof that the remedy worked	Shows the defect was resolved rather than left latent, which is the practical answer to a defect allegation within the ten years	Method statement, completion record, re-test report against the original criterion, photographs	A rectification without evidence reproduces the exact failure the protocol exists to prevent
Decennial relevance: does the item affect stability or safety?	The explicit answer to the test in Articles 821 to 824 - collapse or a defect threatening stability or safety	Shows the technical test was actually applied; where the answer is no, it narrows the population exposed to the decennial regime; where the answer is yes, it records that the PMC knew and acted	The designer's written assessment, specialist reports, and the technical basis for the answer	Silence on the statutory test is read as never having applied it, which is the starting point for a claim against the engineer
Residual risk and monitoring (description, owner, next review date)	What risk remains, who holds it and when it will be looked at again	Converts an open-ended exposure into a documented, managed, dated position - the strongest position available when a residual risk cannot be engineered out	The risk register entry (sheet 17), the monitoring plan and the appointment of the owner	An unmanaged residual risk is indistinguishable, ten years later, from a defect the PMC overlooked

Certificate field	What it records	How it protects the PMC	Evidence needed to complete it honestly	Failure mode if omitted
Disposition (Appendix G category A to F)	The classification of the finding and therefore the route applied	Demonstrates a consistent, rule-based method across the whole population, which is what distinguishes a managed project from an ad hoc response	The disposition schedule and the audit tracker row	Without a classification, the response cannot be shown to have been proportionate or systematic
Certified by (name, position, competency certificate number)	The identity and standing of the verifier	Establishes that the verification was carried out by a competent person with the authority to do so, which is the first question in any enquiry into the engineer's performance	The competency register, the registration or classification record, and the independence declaration from Step 1	An unsigned or unnamed certificate has no evidential value at all
Countersignature (PMC Quality Manager or Project Director)	Independent internal review of the verification	Demonstrates that the closure did not rest on one person's judgement - the control that fails most often in corrupted closures	The countersignature and the audit tracker status column	A single-signatory population is precisely the pattern that Q-60 is designed to expose
Distribution control	Who received the certificate, and under what conditions	Keeps the record traceable and prevents an uncontrolled document circulating without its supporting evidence	The distribution list and the transmittal record	An uncontrolled copy invites a later argument about which version was relied upon

8. The legal architecture the certificate answers

Instrument	What it does	How the certificate engages with it
Civil Code (Federal Decree-Law No. 25 of 2025), Articles 821 to 824	Ten-year liability of the contractor and the engineer, jointly and severally, for collapse and for defects threatening stability or safety; Article 823 voids any exclusion or limitation; Article 824 allows a claim within three years of collapse or discovery	The certificate does not remove the liability, and it is not an exclusion. It creates contemporaneous evidence that the works were inspected or tested, that any defect was remedied, and that the technical test in the article was applied - which is what turns a strict liability claim into a contested one rather than an uncontested one
Civil Code, Articles 246, 247, 255 and 257	Liability for harmful acts, causation-based harm, assessment of damages, and the rule that harmful-act liability cannot be excluded by agreement	Because no contractual cap protects an unverified closure, the certificate is the practical substitute for the protection the contract does not give
Penal Code (Federal Decree-Law No. 31 of 2021), Articles 66 and 251 to 259	Forgery, the knowing use of a forged document, the definition of an official document, corporate criminal liability and the duty to report	The certificate is written to be truthful and evidenced precisely because a comfortable falsehood would itself be an offence. The supersession rule - never delete the original - keeps the PMC inside the safe side of that line
Cybercrime law (Federal Decree-Law No. 34 of 2021), Article 14	Forging or knowingly using a forged electronic document, with elevated penalties for government documents and portal submissions	Because the dossier is electronic, the certificate records the method and the date and preserves the originals with their metadata, so the electronic record can be defended as authentic

Instrument	What it does	How the certificate engages with it
Dubai Law No. 14 of 2025 (engineering consultancy) and Law No. 7 of 2025 (contracting)	Registration, competency, professional standards, ten-year retention of project records, and sanctions including fines, suspension and deregistration	The certificate is part of the retained project record, and the countersignature evidences the professional standard the licensing regime expects
The contract (FIDIC 2017 or bespoke), clauses 4.9, 7.5 and 15.1	Quality management, defects and rejection, and the Notice to Correct machinery	The certificate sits in the quality system the contract requires; where an item was never closed properly, the certificate records the position and the escalation pack provides the contractual remedy against the responsible party

9. How the certificate behaves in an actual claim

A decennial claim asks four questions. The certificate is designed so that each of them has an answer in the PMC's own contemporaneous record.

Question the claimant must answer	What the certificate provides	Effect
Was there a failure of the works at delivery?	Verified condition, test reports and the designer's assessment, including where an item was rectified before or after delivery	Narrows the dispute to the specific element and to the verified facts, instead of the whole package
Was the engineer's supervision or certification at fault?	Verification basis with named methods, named testers, accredited reports and an independent verifier	Shows the standard of care actually applied, item by item, rather than leaving it to inference
Is the claim within the three-year window from discovery?	Dated verification records, dated review dates and a retrievable dossier	Lets the PMC produce the chronology immediately. Delay created by a missing dossier is the PMC's own problem, not the claimant's
What is the quantum of the remedy?	Rectification method, completion date, re-test result and any residual risk with its owner	Reduces the scope claimed by showing what has already been remedied and what remains monitored

Timeline	Event	Position with the certificate	Position without it
Year 1	Defect concealed behind finishes is closed on assurance; margin pressure, no evidence	The audit finds it at Step 3 to 5, tests it, and the certificate records the verified condition or the rectification	The defect is latent, undocumented and undated
Year 2	Handover; the instrument is issued	Every authority-linked closure has a verified instrument or is reported open	The certificate issued on an unverified closure is the PMC's own record of the gap open
Year 4	The audit is triggered by a claim or a change of ownership	The dossier answers Q-90, Q-99 and the audit worklist within days	Reconstruction begins late, on a population nobody can test completely
Year 6	Water ingress or movement appears on the completed element	The designer's decennial assessment and the monitoring record establish what was known and what was managed	The first question is why the engineer did not know

Timeline	Event	Position with the certificate	Position without it
Year 8	A claim is filed within three years of discovery	The evidence pack is complete, indexed and dated; the technical test in the article is already answered in writing	The defence rests on the absence of evidence, which, in a strict liability regime, is a defence the engineer rarely wins

10. Ten-point completeness check before signing

A certificate that is incomplete is worse than a certificate that was never issued, because it creates the appearance of verification without the substance. The following check is applied before signature, and the result is recorded in the audit tracker.

#	Check	Pass condition
1	Original closure record attached and unaltered	The original is in the dossier beside the certificate, with its revision history intact
2	Supersession statement present	The certificate states that it supplements and does not replace the original
3	Verification method named	The method, the date, the tester and the acceptance criterion are all stated, with the report reference
4	Evidence traceable	Every record cited can be opened from the dossier index without a search
5	Verifier independent of the original signatory	The independence declaration from Step 1 covers this item
6	Countersigned	PMC Quality Manager or Project Director has signed
7	Decennial question answered explicitly	Stability and safety are addressed in words, not left implicit
8	Residual risk named with an owner and a review date	An entry exists in the decennial risk register (sheet 17)
9	Disposition recorded	The item carries an Appendix G category, and the action in that category has been completed
10	Distribution controlled	The distribution list is recorded and the forensic column set has not been circulated outside the nominated reviewers

11. What the certificate must never do

Prohibited	Why	Correct alternative
Replace or delete the original closure record	Destroys the evidentiary chain and creates concealment and forgery exposure	Retain the original unaltered; attach the certificate as a supplement

Prohibited	Why	Correct alternative
Backdate the verification	A false record is a criminal exposure, and metadata will show the true creation date	Record the actual verification date and state clearly that the verification is retrospective
Certify authority acceptance	Acceptance is the authority's own act and cannot be certified by a consultant	Cite the instrument, its reference and its date, or record that the instrument is outstanding
State an opinion that the works are 'safe' without a design basis	The decennial test is technical, not administrative	Cite the designer's or specialist's written assessment and its conclusion
Close an item with falsification indicators	The technical review stops before any closure is considered	Preserve, escalate, take legal advice, and follow Appendix G category E
Be issued without the evidence pack	A certificate without evidence is an assertion	Complete the Appendix D evidence matrix for the item first

12. The certificate form

Field	Entry
Certificate reference and date	PMC-QA-RC-___ ___
NCR reference and original closure	NCR ___ rev ___, originally closed on ___ by ___ (role ___), recorded in ___
Supersession	This certificate supplements and does not replace the original closure record, which is retained unaltered in the item dossier
Documents reviewed	1. ___ 2. ___ 3. ___
Physical verification	Method ___ date ___ tester ___ equipment and calibration ___
Testing	Report reference ___ laboratory and accreditation ___ result ___ criterion ___
Designer assessment	Reference ___ date ___ does the defect affect stability or safety? ___ progressive? ___
Verified condition	Complying with the acceptance criterion / non-compliant as follows / unable to verify without opening up
Rectification	Method ___ completed ___ re-tested ___ result ___ carried out by ___ verified by ___
Residual risk	None / described ___ monitored by ___ next review ___
Disposition	Appendix G category ___ (A, B, C, D, E or F)
Certified by	Name and position ___ competency certificate ___ independence declaration on file ___
Countersigned	PMC Quality Manager or Project Director ___ date ___
Distribution	Employer ___ item dossier ___ insurer where notified ___ controlled distribution ___

Standing caution

This document is technical and management guidance, not legal advice. The Civil Code references are to Federal Decree-Law No. 25 of 2025 (in force 1 June 2026), Articles 821 to 824 and the harmful-act provisions; the penalty references are to Federal Decree-Law No. 31 of 2021 and Federal Decree-Law No. 34 of 2021; the

Dubai licensing references are Law No. 7 of 2025 and Law No. 14 of 2025. Verify article numbers, penalty ranges, retention duties and authority procedures against the current published texts and with UAE counsel before relying on them in any notice, claim, submission or defence.