Corvantis Commodities DMCC

General trading (base metals, commodities) · DMCC Free Zone · Illustrative case, fictional company

OVERALL RISK

HIGH · Score 31/100

Staff vs implied trade flow **3 / USD 60–80M** Visa count vs shipment data	Primary sanctions hits [10] **0** Entity, IBC, 2 directors	Watchlist flags **2 of 2 directors** Commercial databases, 2019 Cyprus dispute
DMCC registered companies [2] **>26,000** 2,300 new in 2025	Max corporate AML fine (UAE) [5] **AED 100M** Decree-Law 10/2025, up from AED 50M	

Summary

Active DMCC free-zone trading company with red flags across ownership, adverse information and the economics of its trade flow. Ownership runs through a Seychelles IBC with no public natural-person disclosure, and both directors are flagged in commercial watchlist databases for a 2019 trade-finance dispute in Cyprus. A former bank counterparty reports a pending UAE regulatory inquiry into trade-finance documents on Jebel Ali shipments. The company shows three staff against an implied USD 60–80M annual trade flow, which matches several FATF trade-based money laundering indicators [7]. The UAE regime has tightened (FATF grey list exit in February 2024, EU high-risk list exit in August 2025, a new AML law in force since October 2025) [3] [4] [5], which raises the evidentiary bar for counterparties. Do not engage without forensic review and sanctions-counsel sign-off.

Registry and legal status

STATUS: ATTENTION

Corvantis Commodities DMCC appears on the DMCC public register as an active free-zone company, licence valid to November 2026, with general trading and base-metals trading activities [1]. DMCC had more than 26,000 registered companies at end-2025 after 2,300 new registrations that year [2]. That scale is relevant: a DMCC licence is easy to obtain and says little about the substance behind it.

The entity was renamed in Q1 2024. Its previous name, Tessaline Trade FZE, does not appear on the current public listing; Mercatora found it through a 2023 bill-of-lading record. A rename is legal and common after an ownership change, but it breaks name-based screening and adverse-media history unless the prior identity is searched as well. Two directors are on record, both non-UAE nationals resident outside the UAE. The registered office is a flexi-desk in Jumeirah Lakes Towers.

Beneficial ownership

STATUS: FAIL

100% of shares are held by Tessaline Global IBC, a Seychelles international business company. No public source names its shareholders. UAE law requires every mainland and non-financial free-zone entity to keep a register of beneficial owners holding 25% or more, file it with the registrar (Cabinet Resolution 109 of 2023, in force since 16 November 2023, with penalties under Cabinet Decision 132 of 2023) [6]. That register is held by DMCC and is not public, so the buyer depends on the company's own disclosure.

Seychelles left the EU tax blacklist in February 2024 and the EU grey list (Annex II) in February 2026 [9]. That improves the jurisdiction's tax-cooperation standing; it does not make this IBC's ownership visible. Both directors return matches in two commercial risk-intelligence databases for involvement in a 2019 trade-finance dispute in Cyprus. Neither is on a primary sanctions list. Federal Decree-Law 10 of 2025 created a specific offence for providing false or misleading beneficial-ownership information [5], so a refusal to name the owners is itself informative.

Sanctions and watch-lists

STATUS: PASS

No direct or fuzzy match above threshold for the entity, its former name, the Seychelles parent or the two directors on the OFAC SDN and non-SDN lists [10], the EU consolidated list [11], the UK OFSI consolidated list [12], the UAE Local Terrorist List published by the Executive Office for Control and Non-Proliferation [13], or the UN and other national lists aggregated by OpenSanctions [14].

This is primary-list screening only. It does not clear the case. UAE trading companies have been a recurring target of secondary-sanctions designations: in a single November 2023 action the US Treasury designated about 130 people and companies, including several UAE-based logistics and financial firms, for helping move goods and money into Russia [8]. Base-metals trading routed through Dubai is a high-exposure segment, and the buyer should screen every vessel, consignee and end-buyer on the shipments it would touch, not just the seller.

Adverse information

STATUS: FAIL

Two high-severity items within 24 months, both from non-public counterparties rather than press coverage.

1. A former correspondent bank of the company reports that a UAE supervisory authority opened an inquiry in Q2 2024 into documentation discrepancies on letters of credit for copper cathode shipments through Jebel Ali. Discrepancies cited: invoice values 18–22% above contemporaneous LME prices and two bills of lading reused across separate LCs. Status: unresolved.
2. A 2023 claim in the Singapore International Commercial Court by a former counterparty for non-delivery under a nickel contract, settled under a confidentiality agreement.

Over-invoicing, reuse of transport documents and pricing out of line with market benchmarks are all named in the FATF and Egmont Group trade-based money laundering risk indicators [7]. No English- or Arabic-language press coverage of either item was found.

Financial signals

STATUS: ATTENTION

DMCC does not publish members' financial statements, and the company provided none. Shipment-level trade data for the 12 months to June 2026 shows 41 inbound and outbound consignments of copper cathode, aluminium ingot and nickel briquettes with an implied value of USD 60–80M. That flow is carried by three visa holders and a

flexi-desk lease. Mercatora found no warehouse lease, no LME or DGCX membership, no trade-credit insurance and no positive bank reference.

A thin balance sheet is normal for a back-to-back trader, but the combination of high notional volume, minimal substance, a recent rename and an offshore parent is the structural pattern described in the FATF/Egmont indicators [7].

FATF/Egmont TBML indicator group [7]	Observed at Corvantis	Severity
Structural: entity with minimal physical presence or staff	3 visas, flexi-desk, no warehouse	High
Structural: complex or opaque ownership, offshore links	Seychelles IBC, owners undisclosed	High
Structural: recent name change or re-registration	Renamed from Tessaline Trade FZE, 2024	Medium
Trade activity: volume inconsistent with business profile	USD 60–80M on 3 staff	High
Documents: prices out of line with market	Invoices 18–22% above LME (reported)	High
Documents: reuse or inconsistency of transport documents	2 B/Ls reused across LCs (reported)	High

Mapping of observed facts to the four FATF/Egmont indicator groups (2021). Company facts are fictional.

UAE regulatory context

STATUS: NEUTRAL

The UAE was on the FATF list of jurisdictions under increased monitoring from 4 March 2022 to 23 February 2024; the FATF credited a new Executive Office for AML/CFT, a specialist financial-crimes court and new guidance for designated non-financial businesses [3]. The EU followed by removing the UAE from its high-risk third-country list with effect from 5 August 2025 [4]. Federal Decree-Law 10 of 2025 replaced the 2018 AML law, doubled maximum corporate fines to AED 100M, extended FIU freezes from 7 to 30 days and allows liability on circumstantial evidence of knowledge [5].

For a buyer the effect is two-sided. Banks in the UAE now apply stricter documentary scrutiny to commodity trade finance, so a trader under inquiry may lose banking lines quickly, and counterparties that pay or receive through it can have funds frozen for 30 days without notice.

Date	Event	Relevance to buyer	Source
4 Mar 2022	UAE added to FATF grey list	Enhanced due diligence by EU banks	[3]
2 Nov 2023	US Treasury designates ~130 targets incl. UAE firms (Russia)	Secondary-sanctions exposure of Dubai traders	[8]
16 Nov 2023	Cabinet Resolution 109/2023 on beneficial owners in force	UBO register mandatory, not public	[6]
23 Feb 2024	UAE removed from FATF grey list	Lower country risk, higher focus on entities	[3]

5 Aug 2025	UAE removed from EU high-risk third-country list	EU EDD no longer mandatory by country	[4]
Oct 2025	Federal Decree-Law 10/2025 replaces 2018 AML law	AED 100M fines, 30-day FIU freezes	[5]

UAE AML and sanctions timeline, 2022–2025.

Web presence and reputation

STATUS: ATTENTION

The website was registered in March 2024, two weeks after the rename, and lists no team, no office photographs and no named clients. Product pages describe 'origin-agnostic metals sourcing', which in base metals is a warning sign for blending sanctioned or undocumented material. No industry-association memberships, no LinkedIn presence for the company and no profiles for the directors on professional networks. The phone number on the site is shared with eight other DMCC entities registered at the same business centre.

Recommended next steps

STATUS: DO NOT ENGAGE

Mercatora's recommendation is not to transact. If the commercial case is strong enough to continue, the steps below are the minimum to move the case out of HIGH, and the buyer's compliance function should own the decision.

- Request a certified DMCC register extract showing the beneficial-owner filing and the full name history since 2019 [1] [6].
- Obtain certified Seychelles IBC registers of members and directors and rescreen every natural person found [9] [14].
- Commission an independent forensic review of 12 months of LCs, invoices and bills of lading against LME settlement prices and vessel AIS data [7].
- Obtain written sanctions-counsel sign-off covering Russia-related secondary-sanctions risk on metals origin, vessels and end-buyers [8] [10].
- Require written confirmation from the company's UAE bank of account status and any regulatory hold, given 30-day FIU freeze powers [5].
- If any trade proceeds: no prepayment, payment only by confirmed LC from a first-tier bank, independent inspection at load port and mill test certificates traced to the smelter.
- Rescreen weekly against OFAC, EU, UK and UAE lists for the life of the relationship [10] [11] [12] [13].

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https://sanctionssearch.ofac.treas.gov/

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[12] UK Government · Financial sanctions consolidated list of targets (OFSI)

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