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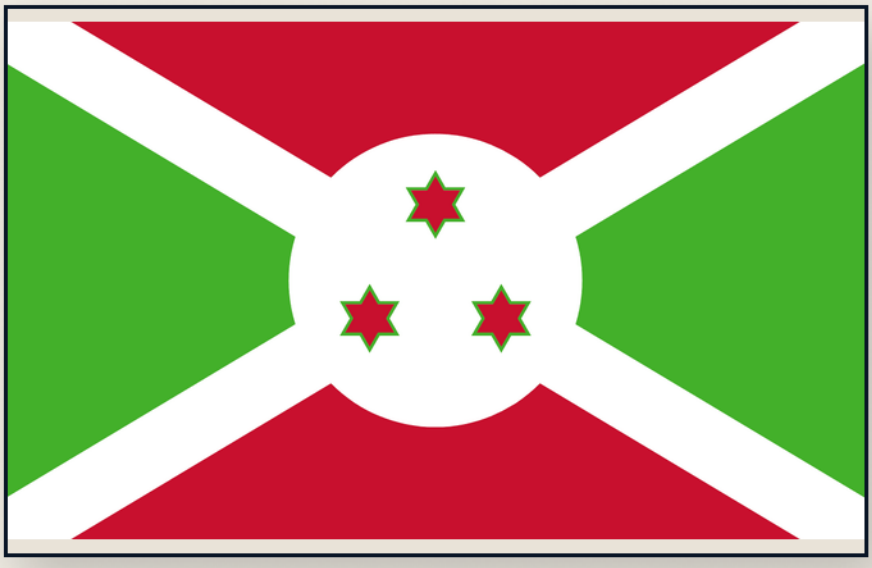

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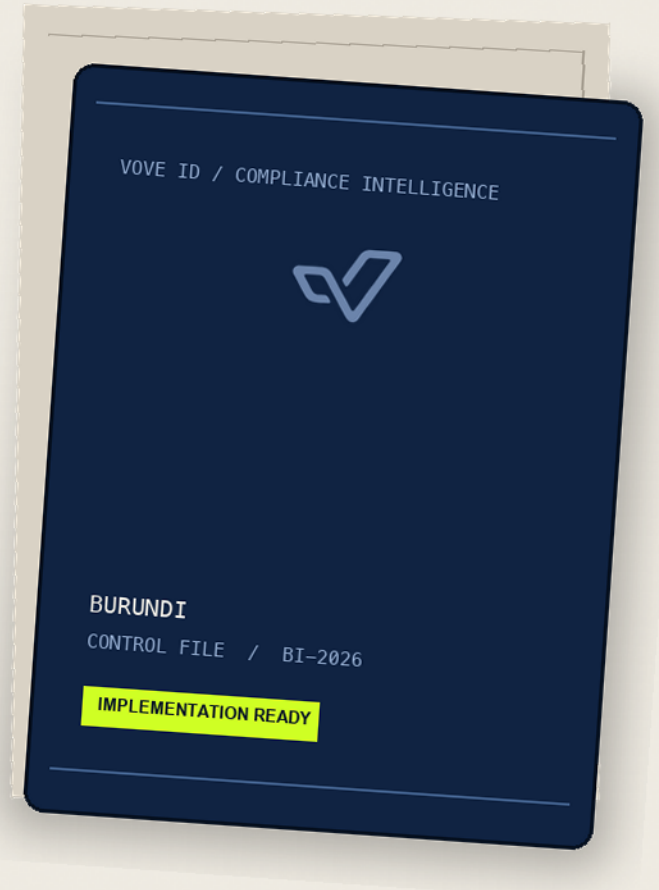

KYC / KYB / AML

COMPLIANCE CHECKLIST

2026 EDITION

IMPLEMENTATION CHECKLIST / NOT LEGAL ADVICE

READ THIS FIRST

Burundi KYC, KYB & AML Compliance Checklist

An implementation-focused checklist for financial institutions, fintechs and designated non-financial businesses operating in Burundi under the amended AML/CFT law, BRB Regulation No. 02/2026, company-registration rules and the 2026 personal-data law.

Primary AML/CFT law	**Law No. 1/08 of 27 March 2025 amending Law No. 1/02 of 4 February 2008**
Financial intelligence unit	**Cellule Nationale du Renseignement Financier (CNRF)**
STR timing	**Promptly; without delay after the statutory suspicion trigger**
Threshold reports	**CNRF or competent-authority thresholds - confirm the live instrument**
Core AML retention	**10 years under relationship- and transaction-specific clocks**
Beneficial ownership	**Identify the natural person who ultimately owns or controls, or on whose behalf activity occurs**
Financial supervisor	**Banque de la Republique du Burundi (BRB) for BRB-supervised entities**
Privacy law	**Law No. 1/03 of 10 March 2026**
Data-breach notice	**Notify the protection body within 72 hours; high-risk individuals within 96 hours**
FATF public lists	**Not named in the June 2026 public statements**

Scope and legal framework

Law No. 1/08 of 27 March 2025 amended Law No. 1/02 of 4 February 2008 and is Burundi's principal AML/CFT statute. Decree No. 100/009 of 9 February 2026 updates the CNRF framework. BRB Regulation No. 02/2026 applies additional controls to credit institutions, the National Postal Service, exchange bureaux, payment institutions, financing or guarantee funds and microfinance institutions. Law No. 1/03 of 10 March 2026 governs personal-data processing.

FATF context

As at 27 July 2026, Burundi was not named in FATF's June 2026 statements on jurisdictions under increased monitoring or jurisdictions subject to a call for action. Burundi is an ESAAMLG member, and its current mutual evaluation report remained in draft ahead of planned ESAAMLG plenary consideration in August-September 2026.

IMPORTANT	This checklist is general regulatory information, not legal advice or a licence determination. It reflects primary and authoritative materials reviewed on 27 July 2026. Confirm current CNRF forms, access and threshold instruments; BRB circulars and licence conditions; sanctions directions; company and beneficial-ownership filing developments; personal-data agency implementation; and all sector overlays with the competent authority and qualified Burundian counsel before launch.

HOW TO USE THIS GUIDE

Turn each requirement into owned evidence

For every row, assign an owner, confirm whether the control applies, link the evidence, record gaps, and set a remediation date. A checked box is not evidence by itself.

01 / SCOPE	02 / DESIGN	03 / EVIDENCE	04 / REVIEW
Confirm institution, supervisor, product, customer and risk scope.	Map each obligation to a policy, system control or human review.	Retain the document, decision, timestamp, owner and rationale.	Test the control and update it when rules or risks change.

Checklist legend

CONTROL tells you what outcome to cover. IMPLEMENTATION ACTION translates that outcome into operational work. EVIDENCE suggests what an auditor or reviewer should be able to inspect. SOURCE points back to the primary rule or regulator guidance.

Minimum review record

Keep a compact decision record for each checklist row so a later reviewer can reconstruct what applied, who decided, and what evidence was inspected.

APPLICABILITY	OWNERSHIP	TRACEABILITY
Applicable, not applicable, or pending legal confirmation, with a short rationale.	Named control owner, reviewer, approval date and next review date.	Evidence link, source version, test result, gap status and remediation ticket.

Scope, authorities and regulated activities

Resolve the entity, activity, supervisor and reporting perimeter before onboarding or launch.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
The AML/CFT law applies to listed financial institutions, public and private licensing bodies, and designated non-financial businesses and professions.	Map each entity, product, branch, agent, distributor and outsourced function to the statutory list and document the responsible supervisor.	Perimeter memorandum, entity-product map, licences and supervisor correspondence.	Law No. 1/08 of 27 March 2025, arts. 1-3
CNRF is the national FIU and receives, analyses and disseminates suspicious transaction reports.	Appoint an authorised correspondent and obtain the current CNRF form, access, submission and acknowledgement instructions before production reporting.	Appointment, access record, reporting procedure and test evidence.	Law No. 1/08, arts. 4-6; Decree No. 100/009 of 9 February 2026
BRB Regulation No. 02/2026 applies to credit institutions, the National Postal Service, exchange bureaux, payment institutions, financing or guarantee funds and microfinance institutions.	Document whether each service is within a BRB-supervised category and obtain the required activity-specific approval before launch.	Classification, application, approval, conditions and service map.	BRB Regulation No. 02/2026, arts. 1-2
Virtual-asset services are within the AML law's defined regulated perimeter, but the reviewed sources did not establish a standalone live VASP licensing route.	Do not launch exchange, transfer, custody or other virtual-asset activity without a written perimeter and licensing decision from BRB and other competent authorities.	Legal analysis, authority correspondence, licence or written no-objection and product controls.	Law No. 1/08, art. 3 definitions; controlled licensing uncertainty

Governance, risk assessment and control ownership

Build documented, risk-based controls with accountable governance.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Reporting institutions must establish AML/CFT policies, procedures, internal controls, employee screening, training and independent control arrangements.	Approve and periodically test a control framework covering CDD, BO, PEPs, sanctions, monitoring, reporting, records and training.	Policy suite, approvals, control library, training and assurance reports.	Law No. 1/08, arts. 75-76; BRB Regulation No. 02/2026, arts. 4 and 18-20
Institutions must identify and assess their ML/TF risks and apply controls proportionate to risk.	Assess customers, countries, products, services, transactions, delivery channels and new technologies before launch and on material change.	Risk assessment, methodology, source data, change log and approvals.	Law No. 1/08, arts. 23-38
BRB-supervised institutions must appoint an AML/CFT officer with adequate authority, independence and access and notify BRB and CNRF.	Approve the appointment, formal mandate, resources, escalation rights and group coverage; file required notifications.	Appointment, notifications, job mandate, access and board reporting.	BRB Regulation No. 02/2026, arts. 18-19

Natural-person identification and CDD

Identify and verify customers, representatives and ultimate actors using reliable independent evidence.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Regular and occasional customers, and persons acting for them, must be identified and their authority verified through independent and reliable sources.	Capture identity attributes, verify evidence provenance, confirm mandates and establish the purpose and expected nature of activity.	CDD file, source provenance, verification result, authority and risk decision.	Law No. 1/08, art. 53; BRB Regulation No. 02/2026, arts. 5 and 10
Remote onboarding requires adapted identification measures and may use a reliable, independent digital-identification system.	Authenticate documents and apply risk-calibrated independent checks, supplementary evidence and escalation without assuming one technology is legally sufficient.	Remote-onboarding standard, vendor review, model tests, first-payment control and exceptions.	Law No. 1/08, art. 54; BRB Regulation No. 02/2026, art. 7
Anonymous and fictitious-name accounts are prohibited.	Block activation until the customer and required actors are identified and verified under the applicable rule.	Account controls, test results and rejected-case log.	Law No. 1/08, art. 52; BRB Regulation No. 02/2026, art. 5
CDD information must remain accurate and relevant during the relationship.	Use risk-based and event-driven refreshes for identity, purpose, expected activity, ownership and authority.	Refresh schedule, triggers, updated files and exception testing.	Law No. 1/08, art. 65; BRB Regulation No. 02/2026, art. 5

KYB, authority and beneficial ownership

Verify legal existence, representatives, ownership and ultimate natural-person control.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Businesses and branches register through the ADB commercial register and maintain registrations for later changes.	Obtain current registry evidence, constitutive documents, tax number, registered address, managers and representative mandates; reconcile later changes.	Commercial-register certificate, NIF, statutes, change filings and discrepancy log.	Commercial Code 2015, arts. 34-37; ADB official creation and modification procedures
Institutions must discover and verify the natural person who ultimately owns or controls the customer or on whose behalf a transaction occurs.	Trace ownership and control through every layer and record the natural-person conclusion and evidence; do not substitute an undefined percentage.	Ownership chart, control analysis, source records and verified BO files.	Law No. 1/08, art. 3 definitions and arts. 51, 53 and 64; BRB Regulation No. 02/2026, arts. 3, 5-6
Trustees or equivalent managers must disclose that they act for others at relationship and prescribed occasional -transaction triggers.	Identify the arrangement, trustee or manager, settlor, beneficiaries and all persons exercising ultimate control; confirm any live threshold instrument.	Instrument, role register, identity files, control analysis and threshold check.	Law No. 1/08, art. 55
The 2026 national risk assessment reported that Burundi did not yet have a national BO register.	Do not represent ordinary commercial-register evidence as a verified national BO filing; monitor for a new register and reconcile when implemented.	Registry checks, customer-supplied ownership evidence, independent corroboration and change-monitoring log.	Burundi National Risk Assessment 2026, para. 161

PEPs, enhanced due diligence and reliance

Apply stronger approval, evidence and monitoring where risk is higher.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Domestic, foreign and international-organisation PEPs, close family and known associates fall within the statutory PEP framework.	Screen customers, beneficial owners, controllers and representatives at onboarding, list updates and periodic review.	Screening, match rationale, relationship mapping and review record.	Law No. 1/08, art. 3 definitions 35-38
BRB-supervised institutions apply enhanced control to PEP relationships; statutory PEP status continues for two years after the relevant function ends.	Require risk-based senior approval, source-of-wealth and source-of-funds evidence and enhanced monitoring, including after office where risk persists.	Source file, approval, monitoring plan and two-year status diary.	Law No. 1/08, art. 3 definition 38; BRB Regulation No. 02/2026, art. 5
Reliance on a third party does not remove the reporting institution's responsibility.	Confirm equivalent CDD and supervision, obtain identity material without delay, contract for access and test retrieval.	Due diligence, agreement, retrieval test and exceptions.	Law No. 1/08, arts. 46 and 58-60; BRB Regulation No. 02/2026, arts. 8-9
Simplified identification may be allowed only in circumstances defined by the competent authority and may not override suspicion.	Use simplified treatment only with the exact current instrument, documented lower-risk basis and a suspicion override.	Instrument, risk rationale, approval and monitoring.	Law No. 1/08, arts. 56 and 60

Failed CDD, monitoring and suspicious reporting

Stop unsafe activity, monitor continuously and report suspicion promptly and confidentially.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
If doubt about the true beneficial actor persists after verification, the operation or relationship must end and suspicion must be considered for reporting.	Operate a controlled block or exit and preserve the confidential STR decision.	Failure reason, block, closure, analysis, STR and acknowledgement.	Law No. 1/08, art. 64; BRB Regulation No. 02/2026, art. 6
Complex, abnormally large or unusual activity without apparent economic or lawful purpose requires examination and written documentation.	Investigate source, destination, purpose and actors, refresh CDD and retain the confidential written analysis.	Alerts, cases, source evidence, report and approval.	Law No. 1/08, arts. 66-67 and 72-73; BRB Regulation No. 02/2026, art. 12
Reporting entities that suspect or reasonably suspect criminal proceeds or terrorist-financing links must report promptly to CNRF.	Timestamp the trigger and submit using the current CNRF format and route without waiting for proof of an offence.	Internal report, analysis, STR, CNRF receipt and timeline.	Law No. 1/08, arts. 12-15; BRB Regulation No. 02/2026, art. 14
Suspected activity is withheld before reporting unless non-execution is impossible or would frustrate the investigation; tipping off is prohibited.	Govern transaction holds, lawful post-execution reporting and restricted communications; escalate urgent cases to CNRF.	Hold decision, exception rationale, access logs and communications record.	Law No. 1/08, arts. 16-18; BRB Regulation No. 02/2026, art. 15

Wires, thresholds, payments and agents

Keep CDD triggers, special examination and threshold reports distinct.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Cash and other threshold reports apply at amounts set by CNRF or the competent authority, including apparently linked operations.	Obtain and version-control the live CNRF and BRB threshold instruments; configure aggregation and do not invent a value from the primary law.	Current instrument, configuration, tests, reports, receipts and exception record.	Law No. 1/08, arts. 41 and 48; BRB Regulation No. 02/2026, arts. 3 and 13
Electronic transfers require verified originator name, account and address or alternative identity information.	Validate required data through the chain and preserve originator and beneficiary records.	Field matrix, validation, repair queue, samples and decisions.	Law No. 1/08, arts. 69-70
Incoming transfers lacking complete originator information must be repaired and verified; if the information is not obtained, refuse and report to CNRF.	Define repair, reject, suspend, investigate and report rules with auditable timelines.	Repair requests, reject decisions, STRs and testing.	Law No. 1/08, art. 71
Payment services and exchange activity require the applicable BRB approval and AML controls.	Map the product, agent, outsourcing and settlement chain to the current payments and exchange rules and licence conditions.	Licence, conditions, agent register, oversight and audit results.	Law No. 1/07 of 11 May 2018; BRB Payment Regulation No. 002/2024; BRB Regulation No. 02/2026

Targeted financial sanctions and proliferation risk

Screen, freeze, restrict and report under the current designation framework.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Funds linked to UN-designated terrorists, terrorist financiers and terrorist organisations are subject to a court-defined freeze, and holders must freeze them immediately.	Maintain list-update, screening and rapid escalation controls and obtain competent-authority direction for the specific match.	List inventory, update logs, screening, match decision, freeze and legal direction.	Law No. 1/08, art. 88
Relevant designated-person funds must be reported promptly to CNRF or another competent authority.	Notify through the current route, preserve the receipt and do not release or deal without written authority.	Notification, receipt, direction and release decision.	Law No. 1/08, art. 89
The reviewed AML statute is framed principally around ML and TF; CPF implementation details require separate confirmation.	Screen applicable UN proliferation designations and obtain current Burundi implementation and reporting instructions before dealing.	Legal update, screening records, authority correspondence and escalation decision.	Controlled uncertainty; CNRF 2026 mutual-evaluation materials

9. RECORDS, ACCESS AND ASSURANCE

Records, access and assurance

Retain reconstructable records under the correct statutory clock.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
CDD, account, correspondence, identity, BO and analysis records are retained for 10 years after the business relationship ends.	Map every record class to the relationship-based clock and apply legal holds.	Retention schedule, configuration, sample and deletion test.	Law No. 1/08, art. 47(1); BRB Regulation No. 02/2026, art. 11
Domestic and international transaction data sufficient to reconstruct each operation are retained for 10 years after execution.	Use transaction-based clocks and retain amount, currency, actors, accounts and supporting evidence.	Archive configuration, reconstruction test and retrieval log.	Law No. 1/08, art. 47(2)
Required information must be readily accessible to CNRF and other competent authorities.	Index linked identity, transaction, investigation and reporting evidence and test controlled export.	Request register, retrieval tests, access log and response package.	Law No. 1/08, arts. 47 and 74

Privacy, biometrics, breaches and transfers

Apply Law No. 1/03 of 10 March 2026 alongside mandatory AML processing.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Personal-data processing must be lawful, fair, purpose-limited, proportionate, accurate, time-limited and secure.	Inventory KYC, BO, screening, monitoring and reporting data and document purpose, legal basis, access, recipients and retention.	Processing register, basis assessment, notices, access matrix and retention map.	Law No. 1/03 of 10 March 2026, arts. 5-8
Biometric identification and other sensitive-data processing are prohibited unless an Article 10 exception applies, with additional safeguards.	Before facial, fingerprint, liveness-template or comparable biometric use, document the exact exception, necessity, security and any required impact assessment and authorisation.	Legal assessment, explicit consent where applicable, DPIA, authorisation, encryption and access tests.	Law No. 1/03, arts. 9-10 and 40-41
High-risk processing requires a prior DPIA and submission to the protection body with an authorisation request.	Complete the legal and technical risk analysis, obtain DPO review and do not deploy until the prescribed authorisation process is complete.	DPIA, DPO opinion, application, authority decision and remediation.	Law No. 1/03, arts. 40-41
Transfers abroad require an adequate destination or safeguards approved by Burundi's personal-data protection body.	Map every hosting, support and vendor destination and obtain the required adequacy or safeguards decision before transfer.	Transfer map, adequacy analysis, safeguards, approval and access logs.	Law No. 1/03, arts. 15-16
A qualifying breach is notified to the protection body within 72 hours; affected individuals are notified within 96 hours where high risk arises.	Run a documented breach triage clock, preserve the risk analysis and issue clear notifications with consequences and mitigation.	Incident log, discovery time, risk assessment, notices, receipts and remediation.	Law No. 1/03, arts. 45-46

11. PRACTICAL EVIDENCE PACKS AND CHANGE CONTROL

Practical evidence packs and change control

Make every acceptance, escalation and regulatory decision reconstructable.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
A complete customer file links identity, KYB, BO, screening, risk, approval, monitoring and reporting decisions.	Block activation where mandatory evidence or approval is missing and preserve the release decision.	Control checklist, linked file, approvals and release log.	Law No. 1/08, arts. 47, 51-76
Thresholds, reporting routes, sanctions directions, registers, licences and privacy implementation are time-sensitive.	Assign owners to monitor CNRF, BRB, ADB, the personal-data protection body, FATF and ESAAMLG on a documented schedule.	Legal inventory, source log, change assessment and implementation tickets.	Official sources listed below

SOURCES AND FURTHER READING

Verify against current official material

Primary law and regulator guidance control. Contextual VOVE ID reading is included to help teams operationalize the requirements and is not legal authority.

Law No. 1/08 of 27 March 2025 amending the AML/CFT law
CNRF Burundi · Primary legislation
Open official source

CNRF official portal
CNRF Burundi · Official FIU portal
Open official source

Decree No. 100/009 of 9 February 2026 on the CNRF
Ministry of Finance, Burundi · Primary executive instrument
Open official source

BRB Regulation No. 02/2026 on AML/CFT
Banque de la Republique du Burundi · Primary regulator rule
Open official source

BRB announcement of the 2026 AML/CFT framework
Banque de la Republique du Burundi · Official regulator guidance
Open official source

Law No. 1/03 of 10 March 2026 on personal-data protection
ARCT Burundi · Primary legislation
Open official source

Official publication page for the 2026 personal-data law
ARCT Burundi · Official legal publication
Open official source

Burundi National Risk Assessment 2026
CNRF Burundi · Official national risk assessment
Open official source

Official company-creation procedure
Agence de Developpement du Burundi · Official registry procedure
Open official source

Burundi Commercial Code 2015
Agence de Developpement du Burundi · Primary commercial legislation
Open official source

Burundi mutual-evaluation status
FATF · Authoritative assessment index
Open official source

Burundi draft mutual-evaluation report review - July 2026
CNRF Burundi · Official evaluation status
Open official source

Jurisdictions under Increased Monitoring - 19 June 2026
FATF · Authoritative public statement
Open official source

High-Risk Jurisdictions subject to a Call for Action - 19 June 2026
FATF · Authoritative public statement
Open official source

Document control

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