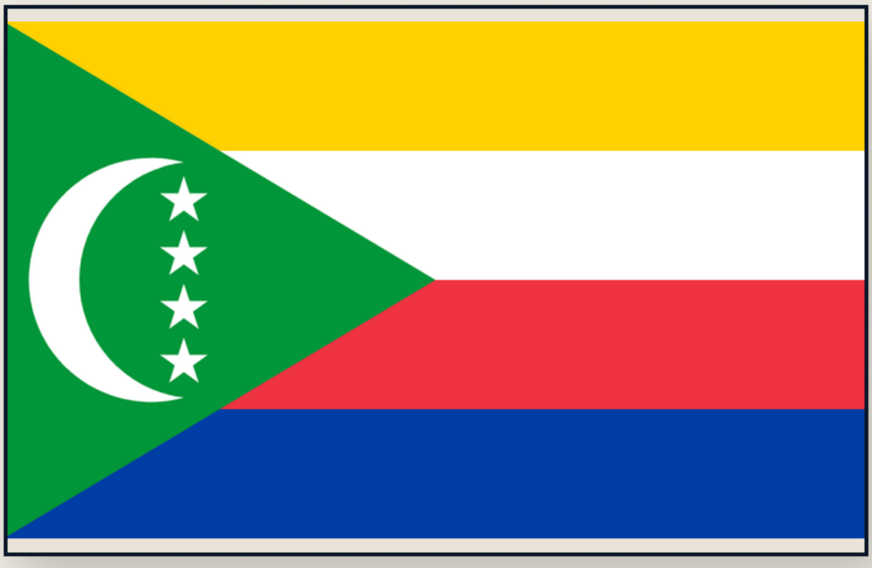
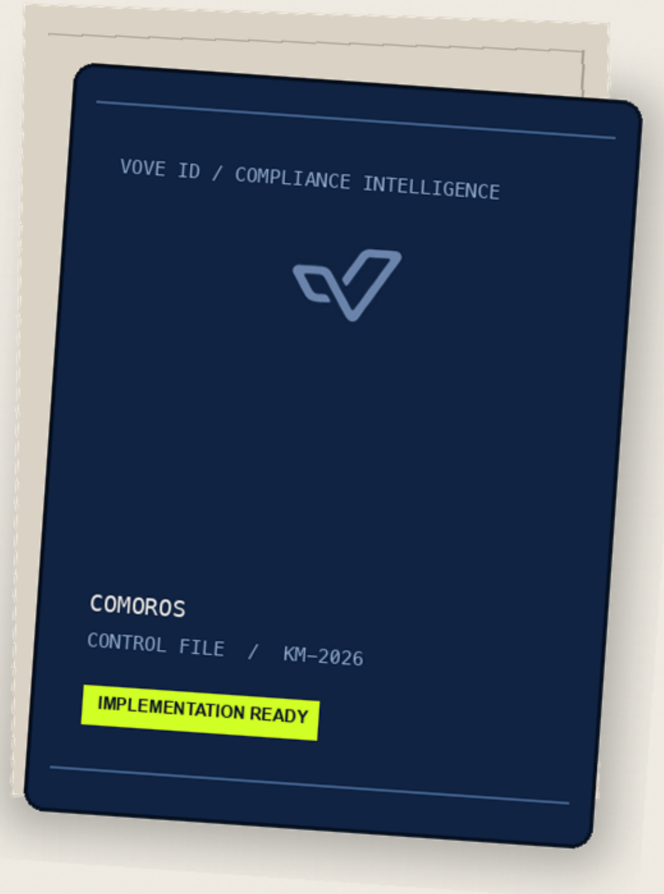
VOVE ID

VOVE COUNTRY CONTROL FILE
KYC / KYB / AML
2026 EDITION

COMOROS



COMOROS / KM



KYC / KYB / AML

COMPLIANCE CHECKLIST

2026 EDITION

IMPLEMENTATION CHECKLIST / NOT LEGAL ADVICE

READ THIS FIRST

Comoros KYC, KYB & AML Compliance Checklist

An implementation checklist for Comoros customer due diligence, suspicious reporting, beneficial ownership, sanctions, records, payments and regulated financial activity.

FIU	**Service de Renseignements Financiers (SRF)**
Primary AML rule	**Law No. 12-008/AU of 28 June 2012**
Suspicion reporting	**Immediately to the SRF, including attempted suspicious transactions**
Occasional CDD	**Above KMF 5,000,000; also below the threshold where suspicion or linked activity applies**
Core retention	**At least 5 years under Law No. 12-008/AU**
FATF status	**Not named on FATF public lists as at 19 June 2026**

Scope and legal framework

Law No. 12-008/AU of 28 June 2012 is the principal preventive AML/CFT law. Law No. 21-004/AU addresses terrorism, terrorist financing and money laundering offences. The Banque Centrale des Comores (BCC) supplements the framework for supervised financial institutions, including Decision No. 12-2023/BCC/DSBR.

FATF context

Comoros is assessed through GIABA. It was not named on FATF's high-risk or increased-monitoring lists current at the 19 June 2026 plenary. The May 2024 mutual evaluation and May 2026 follow-up nevertheless identify continuing technical and effectiveness gaps.

IMPORTANT	General regulatory information, not legal advice or a licence determination. Reviewed as applicable on 20 August 2026. Confirm reporting-entity status, current SRF filing specifications, sector thresholds, sanctions procedures, company and beneficial-owner information, privacy requirements and product licensing with the competent authority and qualified Comorian 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 licensing

Resolve the entity, activity and competent authority before launch.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Determine whether each activity is subject to the AML/CFT law.	Map every entity, product and channel to the financial-institution or designated non-financial categories and document the SRF and sector supervisor.	Applicability memo, product map and accountable-owner register.	Law No. 12-008/AU, Article 3
Treat the SRF as the financial intelligence unit.	Appoint the required correspondent and obtain the current reporting format and secure filing instructions directly from the SRF before operations begin.	Appointment, authority guidance, tested procedure and access approvals.	Law No. 12-008/AU, Articles 18-23 and 25
Obtain authorisation before regulated financial or payment activity.	Classify banking, microfinance, payment, remittance, foreign-exchange, insurance and other regulated services and obtain every required approval before launch.	Perimeter analysis, BCC or sector correspondence and licence register.	Law No. 13-003/AU; Law No. 20-005/AU; applicable sector rules

Governance and risk assessment

The programme must be documented, risk-based and independently tested.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain a documented ML/TF risk assessment.	Assess customers, products, channels, geography, cash, agents and technology and update the assessment on material change.	Approved methodology, risk map, controls and version history.	Decision No. 12-2023/BCC/DSBR, Articles 1-5
Maintain written controls, training and independent audit.	Assign senior accountability and an SRF correspondent, screen staff, train relevant personnel and independently test the programme.	Appointments, policies, training, audit and remediation log.	Law No. 12-008/AU, Article 14
Assess new products and technology before launch.	Document ML/TF risks and mitigating controls and, where Article 6 applies, send the assessment to the BCC before effective launch.	Pre-launch assessment, governing-body approval and BCC transmission.	Decision No. 12-2023/BCC/DSBR, Article 6

Natural-person identification

CDD uses reliable, independent evidence and continues throughout the relationship.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Identify and verify customers and representatives.	Verify identity and address using current official evidence and verify every representative's authority and identity.	Identity file, address evidence, mandate and verification result.	Law No. 12-008/AU, Article 8
Apply occasional-transaction CDD at the statutory trigger.	Identify occasional customers above KMF 5,000,000 and also where linked transactions reach the threshold, lawful provenance is uncertain or suspicion exists.	Aggregation test, identity record and escalation decision.	Law No. 12-008/AU, Article 9
Do not proceed where mandatory CDD fails.	Do not open, transact or continue the relationship when required CDD cannot be completed and file an STR in the circumstances required by the law.	Decline or exit decision, investigation and restricted STR record.	Law No. 12-008/AU, Article 8

KYB, registries, and beneficial ownership

Corporate evidence does not replace natural-person ownership and control analysis.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Verify legal existence, governance and authority.	Obtain a current registration extract, constitutional documents, address, directors and signatory powers and reconcile inconsistencies.	Registry extract, statutes, powers and reconciliation.	Law No. 12-008/AU, Article 8; OHADA Uniform Acts
Identify and verify natural-person beneficial owners.	Understand the ownership and control structure, identify the natural persons who ultimately own or effectively control the customer, and verify them using reliable independent evidence.	Ownership chart, source records, control analysis and verified identities.	Law No. 12-008/AU, Articles 1 and 8
Do not assume a complete central beneficial-owner register.	Obtain current registry and authority evidence, reconcile it to customer-supplied ownership and control records, and document any information gap.	Registry search, customer declaration and discrepancy log.	GIABA 2024 Mutual Evaluation, Immediate Outcome 5 and Recommendation 24 analysis

PEPs, EDD, and remote onboarding

Higher-risk and remote relationships require enhanced controls.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Detect PEP exposure in customers and beneficial owners.	Use risk-sensitive systems to identify domestic, foreign and international-organisation PEPs, family members and close associates.	Screening, relationship map, match decision and refresh log.	Decision No. 12-2023/BCC/DSBR, Articles 7-12
Apply PEP approval, source and monitoring measures.	Obtain senior approval, establish source of wealth and source of funds, and conduct enhanced ongoing monitoring.	Approval, provenance analysis and monitoring plan.	Decision No. 12-2023/BCC/DSBR, Articles 7-8
Control remote-onboarding risk.	Apply identity, fraud, device, liveness and exception controls proportionate to the channel and do not lower CDD where suspicion exists.	Channel assessment, vendor review, tests and exceptions.	Law No. 12-008/AU, Article 8; Decision No. 12-2023/BCC/DSBR, Article 3

Monitoring and suspicious reporting

SRF reporting is immediate, traceable and confidential.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Monitor activity against the current customer profile.	Examine unusual, complex or apparently unjustified activity and preserve a reasoned conclusion.	Alerts, investigation, disposition and rule governance.	Law No. 12-008/AU, Articles 8 and 12
Report suspicious and attempted transactions immediately to the SRF.	File when funds are suspected or reasonably suspected to be criminal proceeds or connected to terrorism or terrorist financing, including attempts regardless of amount.	Decision chronology, report, receipt and supplemental-information log.	Law No. 12-008/AU, Article 25
Prevent tipping off.	Restrict access and do not disclose an STR, its contents or a related inquiry to the customer or an unauthorised third party.	Access logs, confidentiality procedure and training.	Law No. 12-008/AU, Article 28

Payments, wires, thresholds, and agents

Payment controls preserve required data and separate CDD thresholds from reporting duties.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Do not treat the KMF 5,000,000 CDD trigger as a universal cash-report threshold.	Apply Article 9 identification and aggregation while confirming any current objective-reporting rule or sector threshold directly with the SRF and supervisor.	CDD trigger logic, authority confirmation and filing matrix.	Law No. 12-008/AU, Article 9
Preserve required wire-transfer information.	Collect and retain accurate originator and beneficiary information; refuse a transfer lacking required information and inform the SRF.	Message sample, exception workflow, refusal and SRF notice.	Law No. 12-008/AU, Article 11
Retain accountability for third parties and agents.	Perform due diligence, obtain required CDD information immediately, secure supporting documents on request and monitor performance; ultimate responsibility remains with the institution.	Due diligence, contract, retrieval test and monitoring.	Decision No. 12-2023/BCC/DSBR, Articles 13-15

Targeted financial sanctions

Use current UN and national instruments and controlled escalation procedures.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Screen applicable designations.	Screen customers, beneficial owners, controllers, representatives and transactions at onboarding, list updates and before relevant execution.	List inventory, update logs, screening configuration and dispositions.	Law No. 12-008/AU, Article 11; Law No. 21-004/AU
Freeze prohibited property and prevent dealing.	Immediately escalate a potential designation match, prevent prohibited movement or availability, and act under current competent-authority instructions.	Freeze procedure, timestamps, legal basis and authority communication.	Law No. 21-004/AU; applicable UN Security Council resolutions
Control false positives and release.	Document match analysis and obtain current authority instructions for reporting, false-positive resolution and lawful release; do not invent a national portal or deadline.	Match rationale, authority instruction, report and reconciliation.	Law No. 21-004/AU; GIABA 2024 Mutual Evaluation, Recommendations 6-7

Records and regulator access

Records must reconstruct the customer, ownership, transaction and decision.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Retain transaction records for at least five years.	Preserve sufficient domestic and international transaction records for at least five years from the transaction and longer where a legal hold applies.	Schedule, transaction reconstruction and legal-hold log.	Law No. 12-008/AU, Article 12
Retain CDD and analysis records for at least five years.	Preserve identity, account, correspondence and analysis records for at least five years after the relationship ends or the occasional transaction, as applicable.	Archive sample, configuration and retrieval test.	Law No. 12-008/AU, Article 12
Respond securely to competent-authority requests.	Authenticate requests, protect STR confidentiality, produce reproducibly and log scope, timing and receipt.	Request, approval, production index and acknowledgement.	Law No. 12-008/AU, Articles 13 and 22

Privacy, biometrics, and transfers

Identity data requires proportionate safeguards even where AML duties mandate collection.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Map the legal basis and necessity for identity processing.	Document purpose, data, access, recipients, security and retention under current Comorian law and AML confidentiality duties.	Data inventory, legal assessment, notices and access matrix.	Law No. 12-008/AU, Articles 13, 21 and 28; applicable Comorian law
Apply enhanced safeguards to biometric and sensitive data.	Minimise collection, restrict access, test security and document necessity before biometric or sensitive-data use.	Impact assessment, security tests, access controls and approval.	Risk-based control; confirm current Comorian data-protection requirements
Confirm transfer and incident requirements before production use.	Obtain a dated local-law analysis and current authority guidance before configuring international transfers, breach notices or biometric processing.	Legal update, authority guidance and implemented procedure.	Controlled legal uncertainty; no unsupported deadline asserted

11. PRACTICAL EVIDENCE PACKS

Practical evidence packs

Maintain concise packs that reproduce decisions and support supervisory access.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain a reconstructable onboarding pack.	Bundle identity, KYB, beneficial ownership, screening, risk, approvals and exceptions under stable identifiers.	Complete sampled onboarding pack.	Operational control supporting Law No. 12-008/AU, Articles 8 and 12
Maintain a reconstructable monitoring and reporting pack.	Link transactions, alerts, analysis, approvals, reports and post-filing controls while protecting confidentiality.	Complete sampled case pack and access log.	Operational control supporting Law No. 12-008/AU, Articles 25-29

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. 12-008/AU - AML/CFT
Ministry of Justice, Comoros · Primary legislation
Open official source

Law No. 21-004/AU - terrorism, financing and money laundering
Banque Centrale des Comores · Primary legislation
Open official source

Decision No. 12-2023/BCC/DSBR - AML/CFT measures
Banque Centrale des Comores · Primary regulation
Open official source

Law No. 13-003/AU - banking law
Banque Centrale des Comores · Primary legislation
Open official source

Law No. 20-005/AU - payment services and providers
Banque Centrale des Comores · Primary legislation
Open official source

Comoros Mutual Evaluation Report 2024
FATF / GIABA · Authoritative country assessment
Open official source

Comoros Follow-up Report 2026
FATF / GIABA · Authoritative follow-up assessment
Open official source

Comoros country page
FATF · Authoritative country status
Open official source

FATF black and grey lists
FATF · Authoritative current status
Open official source

OHADA legal framework
OHADA · Official company-law materials
Open official source

United Nations Security Council consolidated sanctions list
United Nations · Authoritative sanctions list
Open official source

Document control

Version 1.0 / Published 20 August 2026 / Last reviewed 20 August 2026 / Owner: VOVE ID Compliance Research

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