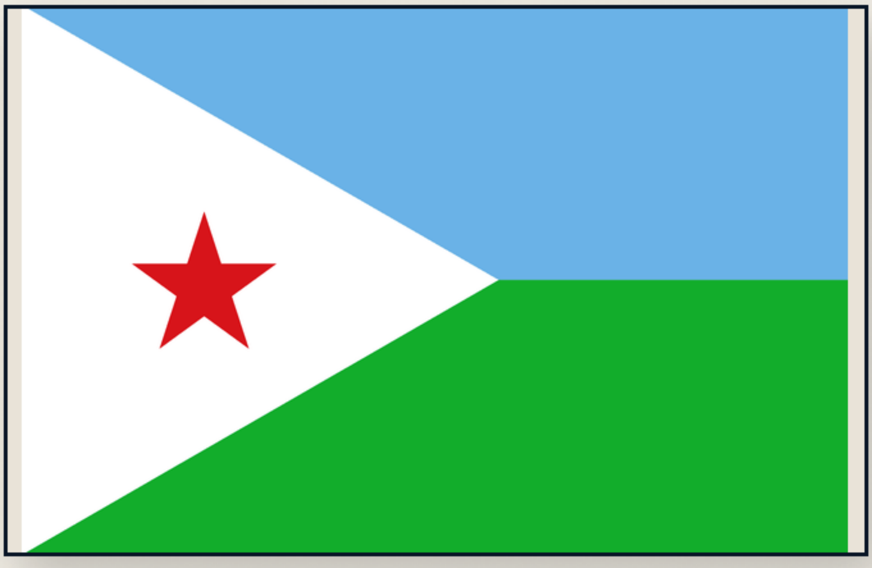
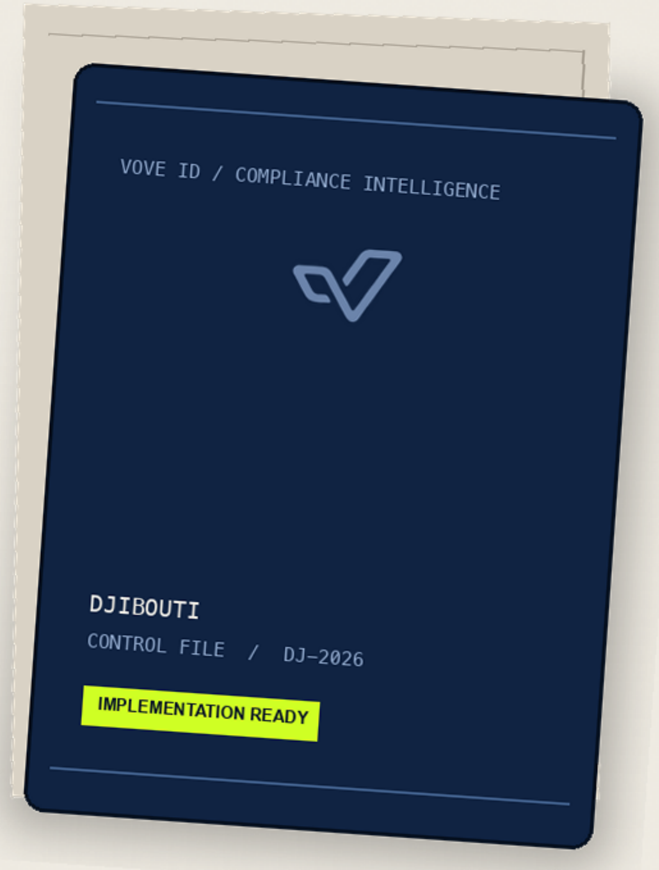
VOVE ID

VOVE COUNTRY CONTROL FILE
KYC / KYB / AML
2026 EDITION

DJIBOUTI



DJIBOUTI / DJ



KYC / KYB / AML

COMPLIANCE CHECKLIST

2026 EDITION

IMPLEMENTATION CHECKLIST / NOT LEGAL ADVICE

READ THIS FIRST

Djibouti KYC, KYB & AML Compliance Checklist

An implementation checklist for Djibouti's AML/CFT/CPF framework, ANRF reporting, beneficial ownership, sanctions, records, personal-data protection and regulated payment activities.

FIU	**Agence Nationale de Renseignements Financiers (ANRF)**
Primary AML rule	**Law No. 106/AN/24, as amended by Law No. 178/AN/25**
Suspicion reporting	**Without delay to ANRF; later-arising suspicion is reported immediately**
Cash control	**Payments above DJF 1,000,000 are subject to control; confirm implementing reporting mechanics**
Core retention	**5 years after relationship end or the last occasional transaction**
FATF status	**Not named on FATF public lists as at 19 June 2026**

Scope and legal framework

Law No. 106/AN/24/9th L, as amended by Law No. 178/AN/25/9th L, is the operative AML/CFT/CPF framework. Law No. 104/AN/24/9th L governs terrorist financing and targeted financial sanctions. The 2025 Digital Code governs personal data. Banking, payment and electronic-money activities remain subject to Banque Centrale de Djibouti legislation and instructions.

FATF context

Djibouti is assessed through MENAFATF. It was not named on FATF's high-risk or increased-monitoring lists current at the 19 June 2026 plenary. Absence from those lists is not a low-risk finding; the January 2025 mutual evaluation documents material effectiveness and technical-compliance weaknesses.

IMPORTANT	General regulatory information, not legal advice or a licence determination. Reviewed as applicable on 22 August 2026. Confirm reporting-entity status, ANRF filing specifications, objective-reporting instruments, operational beneficial-owner register access, sanctions procedures, Digital Code implementation and product licensing with the competent authority and qualified Djiboutian 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.

1. SCOPE, AUTHORITIES, AND LICENSING

Scope, authorities, and licensing

Resolve the entity, activity and supervisor before launch.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Determine whether each activity is a reporting entity activity.	Map every entity, product, channel and agent to the financial-institution, VASP or DNFBP categories in Article 2-1-1 and identify ANRF and the competent sector supervisor.	Applicability memo, product map and accountable-owner register.	Law No. 106/AN/24 as amended, Article 2-1-1
Treat ANRF as Djibouti's financial intelligence unit.	Appoint required correspondents, obtain the current filing format and secure channel directly from ANRF, and test a controlled reporting path before operations begin.	Correspondent notice, channel test, procedure and access approvals.	Law No. 106/AN/24 as amended, Articles 3-2-1-1 to 3-3-4
Obtain authorisation before regulated financial activity.	Classify banking, payment, money-transfer, exchange, electronic-money, insurance and virtual-asset activities and obtain every required approval before launch.	Perimeter analysis, authority correspondence and licence register.	Law No. 119/AN/11/6th L; Instruction No. 2017-01; applicable sector rules

2. GOVERNANCE AND RISK ASSESSMENT

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, countries, products, services, transactions and distribution channels; update the assessment when risks or operations materially change.	Approved methodology, risk assessment, controls and version history.	Law No. 106/AN/24 as amended, Article 2-2-3
Maintain written controls and an empowered compliance function.	Assign senior accountability, confidential ANRF reporting authority, resources, staff screening, training and independent testing proportionate to risk.	Appointments, policies, training, testing and remediation log.	Law No. 106/AN/24 as amended, internal-control provisions
Assess new technology and virtual-asset exposure before use.	Identify and mitigate ML/TF/PF risks before launching a new product, channel, delivery mechanism or technology and before supporting virtual-asset activity.	Pre-launch assessment, approval, tests and residual-risk acceptance.	Law No. 106/AN/24 as amended, Articles 1-2-2 and 3-1-2-1

Natural-person identification

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

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Identify and verify customers and representatives.	Verify the customer using reliable independent documents, data or information; identify representatives and verify their authority.	Identity file, source provenance, mandate and verification result.	Law No. 106/AN/24 as amended, Articles 2-2-4 and 2-2-8
Understand purpose, nature and expected activity.	Record the relationship purpose, business nature, expected activity, counterparties, geography and source of funds sufficient for risk rating and monitoring.	Customer profile, expected-activity baseline and approval.	Law No. 106/AN/24 as amended, Articles 2-2-6 and 2-2-7
Do not proceed where mandatory CDD fails.	Do not execute, establish or continue the relationship when required CDD cannot be completed; file an STR where suspicion exists, without alerting the customer.	Decline or exit decision, investigation and restricted STR record.	Law No. 106/AN/24 as amended, Article 2-2-18

KYB, registries, and beneficial ownership

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

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Verify legal existence, governance and authority.	Obtain current ODPIC or free-zone registration, constitutional, address, director, signatory, tax and licence evidence and reconcile inconsistencies.	Registry extract, statutes, powers, tax record and licence file.	Law No. 106/AN/24 as amended, Articles 2-2-4, 2-2-6 and 3-5-1-1
Identify and verify natural-person beneficial owners.	Trace ownership and control to the natural persons who ultimately own or control the customer; document the law's control and fallback analysis and verify each identified person.	Ownership chart, source records, control analysis and verified identities.	Law No. 106/AN/24 as amended, Article 2-2-4
Reconcile customer CDD with the national beneficial-owner register.	Obtain current beneficial-owner information, compare it with ODPIC or free-zone filings, investigate differences and ensure changes are notified within one month by the legal person.	Register evidence, discrepancy review and update record.	Law No. 106/AN/24 as amended, Articles 3-5-1-2 to 3-5-1-5

5. PEPS, EDD, AND REMOTE ONBOARDING

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-based systems to identify PEPs, direct family members and known close associates at onboarding and throughout the relationship.	Screening, relationship map, match decision and refresh log.	Law No. 106/AN/24 as amended, Article 2-2-20
Apply PEP approval, provenance and monitoring measures.	Obtain senior-management approval, establish source of wealth and source of funds, and conduct enhanced ongoing monitoring.	Approval, provenance analysis and monitoring plan.	Law No. 106/AN/24 as amended, Article 2-2-20
Control non-face-to-face risk.	Use reliable identity evidence and proportionate fraud, device, liveness and exception controls; document how remote verification meets AML and Digital Code requirements.	Remote-onboarding assessment, vendor review, tests and exceptions.	Law No. 106/AN/24 as amended, Article 2-2-4; 2025 Digital Code

Monitoring and suspicious reporting

ANRF reporting is prompt, traceable and confidential.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Monitor activity against the current customer profile.	Examine complex, unusually large, linked or apparently purposeless activity and preserve the facts, analysis and reasoned conclusion.	Alerts, investigation, disposition and rule governance.	Law No. 106/AN/24 as amended, Articles 2-2-7 and 2-2-14
Report suspicious transactions and attempts without delay to ANRF.	File when required suspicion grounds arise; if suspicion emerges after execution, report immediately, and submit supplemental information without delay.	Decision chronology, report, receipt and supplemental-information log.	Law No. 106/AN/24 as amended, Article 3-3-1
Prevent tipping off.	Restrict access and do not disclose an STR, related transmission or ANRF analysis to the customer or unauthorised third parties.	Access logs, confidentiality procedure and training.	Law No. 106/AN/24 as amended, Article 3-4-2

Payments, wires, thresholds, and agents

Payment controls preserve required data and distinguish controls from reporting duties.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Control cash and bearer payments above DJF 1,000,000.	Detect single or linked payments above the statutory control level and apply the current implementing control or reporting procedure confirmed with the competent authority; do not infer a universal automatic report from the threshold alone.	Detection logic, authority-confirmed procedure, review and filing where required.	Law No. 106/AN/24 as amended by Law No. 178/AN/25, Article 2-1-2
Route cross-border transfers above DJF 1,000,000 through an authorised institution.	Block or redirect covered transfers unless executed by or through an authorised credit or financial institution; retain required originator and beneficiary data.	Routing rule, message sample, exception workflow and authorisation evidence.	Law No. 106/AN/24 as amended, Article 2-1-3 and wire-transfer provisions
Retain accountability for agents and outsourcing.	Verify permissions, diligence providers, contract for security and record access, train agents, monitor performance and test retrieval.	Due diligence, contract, training, monitoring and retrieval test.	Instruction No. 2017-01 and applicable Banque Centrale de Djibouti rules

8. TARGETED FINANCIAL SANCTIONS

Targeted financial sanctions

Screen, freeze and report under current national procedures.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Screen applicable UN and national 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. 104/AN/24; UN Security Council Consolidated List
Freeze covered funds and assets without prior notice.	Prevent prohibited movement or availability immediately upon a confirmed designation match and escalate through the competent national process.	Freeze procedure, timestamps, legal basis and authority communication.	Law No. 104/AN/24, targeted-financial-sanctions provisions
Govern matches, false positives and release.	Report confirmed matches through the current authority route, preserve confidentiality and release assets only on documented lawful authority.	Report, receipt, match rationale, authority instruction and reconciliation.	Law No. 104/AN/24; current implementing instructions

Records and regulator access

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

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Retain CDD and relationship records for at least five years.	Retain identification, verification and relationship records for five years after relationship end or the last occasional transaction, subject to longer legal holds.	Schedule, configuration, archive sample and legal-hold log.	Law No. 106/AN/24 as amended, Article 2-2-19
Retain transaction and analysis records for at least five years.	Preserve transaction documents and information, examinations and analyses for five years from relationship end or the last occasional transaction and maintain reconstructability.	Transaction reconstruction, storage control and retrieval test.	Law No. 106/AN/24 as amended, Article 2-2-19
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. 106/AN/24 as amended, ANRF and supervisory powers

Privacy, biometrics, and transfers

The 2025 Digital Code applies alongside AML secrecy and retention duties.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Document lawful, fair and accountable identity-data processing.	Map purposes, legal bases, notices, rights, recipients, security and retention; appoint a local representative where the extraterritorial rule requires one.	Data inventory, legal-basis assessment, notices and representative record.	2025 Digital Code, Book I, Articles 2-6 and 54
Apply enhanced safeguards to biometric and sensitive data.	Document necessity and the permitted condition, minimise collection, restrict access, perform the required impact assessment and test security before use.	Impact assessment, security tests, access controls and approval.	2025 Digital Code, Book I, sensitive-data and impact-assessment provisions
Control international transfers and incidents.	Document the lawful transfer mechanism and equivalent protection before export; implement current Commission notification and incident procedures without inventing a portal or deadline.	Transfer assessment, safeguards, incident plan and authority guidance.	2025 Digital Code, Book I, international-transfer and security provisions

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, privacy, risk, approvals and exceptions under stable identifiers.	Complete sampled onboarding pack.	Operational control supporting Law No. 106/AN/24 as amended
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. 106/AN/24 as amended, Articles 3-3-1 and 3-4-2

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. 178/AN/25 amending the AML/CFT/CPF framework
Official Journal of Djibouti · Primary legislation
Open official source

Law No. 106/AN/24 - AML/CFT/CPF
Official Journal of Djibouti · Primary legislation
Open official source

Law No. 104/AN/24 - terrorist financing and targeted sanctions
Official Journal of Djibouti · Primary legislation
Open official source

Decree No. 2024-314 implementing Law No. 106
Official Journal of Djibouti · Primary decree
Open official source

Djibouti Digital Code
Official Journal of Djibouti · Primary legislation
Open official source

Djibouti mutual evaluation
MENAFATF · Authoritative country assessment
Open official source

Djibouti country assessment page
FATF · Authoritative country status
Open official source

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

Banque Centrale de Djibouti
Banque Centrale de Djibouti · Official regulator guidance
Open official source

Instruction No. 2017-01 on electronic money
Banque Centrale de Djibouti · Official regulatory instruction
Open official source

Law No. 119/AN/11 on credit institutions and financial auxiliaries
Banque Centrale de Djibouti · Primary legislation
Open official source

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

Document control

Version 1.0 / Published 22 August 2026 / Last reviewed 22 August 2026 / Owner: VOVE ID Compliance Research

General regulatory information, not legal advice or a licence determination. Reviewed as applicable on 22 August 2026. Confirm reporting-entity status, ANRF filing specifications, objective-reporting instruments, operational beneficial-owner register access, sanctions procedures, Digital Code implementation and product licensing with the competent authority and qualified Djiboutian counsel before launch.