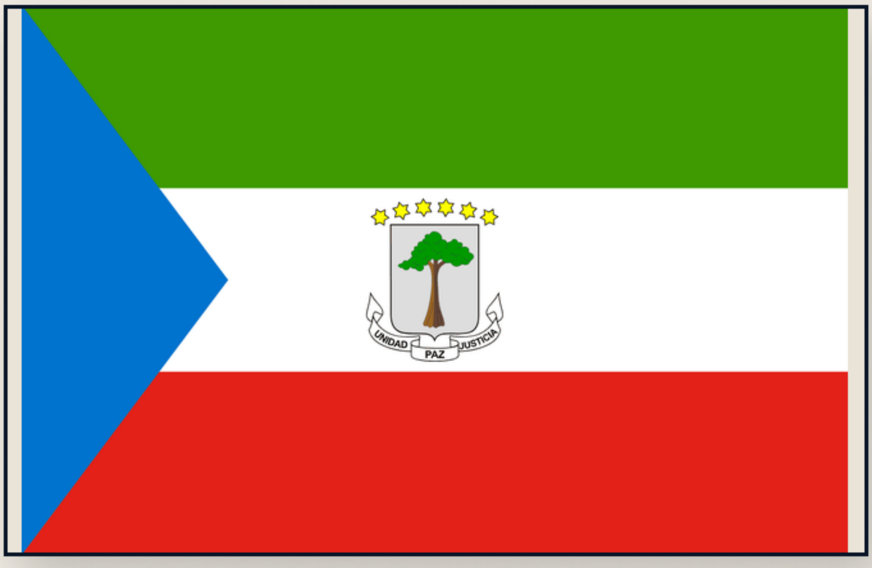
VOVE ID

VOVE COUNTRY CONTROL FILE

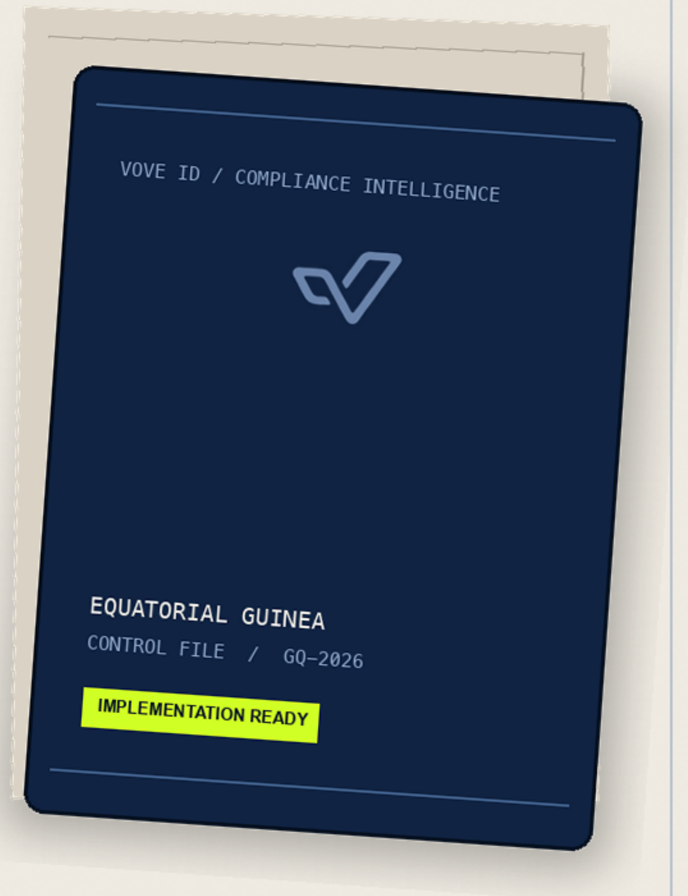
KYC / KYB / AML

2026 EDITION

EQUATORIAL GUINEA



EQUATORIAL GUINEA / GQ



KYC / KYB / AML

COMPLIANCE CHECKLIST

2026 EDITION

IMPLEMENTATION CHECKLIST / NOT LEGAL ADVICE

READ THIS FIRST

Equatorial Guinea KYC, KYB & AML Compliance Checklist

An implementation checklist for Equatorial Guinea's CEMAC AML/CFT/CPF framework, ANIF reporting, customer and beneficial-owner diligence, sanctions, records, company evidence and regulated payment activities.

FIU	**National Agency for Financial Investigation (ANIF)**
Primary AML rule	**Regulation No. 01/CEMAC/UMAC/CM of 11 April 2016**
Suspicion reporting	**Promptly to ANIF when suspicion exists; attempted transactions are covered**
Automatic cash reports	**CFAF 5 million practice reported for banks; confirm current instrument and scope**
Core retention	**5 years after relationship end or transaction execution**
FATF status	**Not named on FATF public lists as at 19 June 2026**

Scope and legal framework

Regulation No. 01/CEMAC/UMAC/CM of 11 April 2016 is directly applicable and provides the core AML/CFT/CPF framework. Decree No. 11/2007, reformed in 2019, establishes ANIF as the national FIU. COBAC, BEAC, CIMA, COSUMAF and national authorities apply sector overlays. OHADA Uniform Acts govern commercial-company and RCCM evidence.

FATF context

Equatorial Guinea is assessed through GABAC. 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 mutual evaluation published in March 2025 records major effectiveness and technical-compliance weaknesses.

IMPORTANT	General regulatory information, not legal advice or a licence determination. Reviewed as applicable on 23 August 2026. Confirm reporting-entity status, ANIF filing specifications, automatic-report instruments, beneficial-owner information access, targeted-sanctions procedures, current personal-data rules and product licensing with the competent authority and qualified Equatoguinean 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 supervisor before launch.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Determine whether each activity is a reporting-entity activity.	Map each entity, product, channel and agent to Article 6 financial-institution and DNFBP categories and document the competent AML and sector supervisor.	Applicability memo, product map and supervisor register.	CEMAC Regulation No. 01/2016, Article 6
Treat ANIF as the sole national STR recipient.	Appoint an accountable correspondent and obtain the current form, secure route and acknowledgement process directly from ANIF before operations begin.	Appointment, ANIF instructions, channel test and access approvals.	CEMAC Regulation No. 01/2016, Articles 65-71 and 83; Decree No. 11/2007 as reformed
Obtain approval before regulated financial activity.	Classify banking, microfinance, insurance, securities, foreign-exchange, payment, electronic-money and virtual-asset activity and obtain each required approval before launch.	Perimeter analysis, authority correspondence and licence register.	CEMAC/COBAC/BEAC/ CIMA/COSUMAF 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/PF risk assessment.	Assess customers, countries, products, services, transactions and channels and update the assessment when risks or operations materially change.	Approved methodology, assessment, controls and version history.	CEMAC Regulation No. 01/2016, Articles 13-15 and 40
Maintain written internal controls and accountable leadership.	Assign senior responsibility, confidential reporting authority, staff screening, training, testing and remediation proportionate to risk.	Appointments, policies, training, tests and remediation log.	CEMAC Regulation No. 01/2016, Articles 55-61
Assess new technology before deployment.	Identify and mitigate ML/TF/PF, fraud and data risks before launching new products, delivery mechanisms or technology.	Pre-launch assessment, approval, tests and residual-risk acceptance.	CEMAC Regulation No. 01/2016, Article 40

Natural-person identification

CDD uses reliable independent evidence and continues throughout the relationship.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Identify and verify customers before establishing the relationship.	Verify the customer using reliable independent documents, data or information and record provenance and validity.	Identity file, source provenance and verification result.	CEMAC Regulation No. 01/2016, Articles 21-23
Verify representatives and their authority.	Identify the person acting for a customer, verify identity and authenticate the power to act before permitting access or execution.	Identity evidence, mandate, validation and access record.	CEMAC Regulation No. 01/2016, Article 29
Do not proceed where mandatory CDD fails.	Do not open, execute or continue when required CDD cannot be completed; consider an STR and prevent tipping off.	Decline or exit decision, investigation and restricted STR record.	CEMAC Regulation No. 01/2016, Articles 23, 32 and 83

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 one-stop-shop and RCCM evidence, constitutional documents, address, directors, signatories, tax and licence records and reconcile inconsistencies.	Registry extract, statutes, powers, tax record and licence file.	OHADA AUDCG and AUSCGIE; CEMAC Regulation No. 01/2016, Article 31
Identify and verify natural-person beneficial owners.	Trace ownership and control to the natural persons who ultimately own or control the customer; if no person is identified, document the senior-manager fallback and verify that person.	Ownership chart, source records, control analysis and verified identities.	CEMAC Regulation No. 01/2016, Articles 1, 21, 23 and 31
Do not assume a complete public beneficial-owner register exists.	Use customer, RCCM and independent records, investigate inconsistencies and document evidence gaps; obtain authority guidance before relying on any national BO facility.	Source comparison, discrepancy review and authority correspondence.	GABAC Mutual Evaluation 2024, Recommendation 24 findings

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 foreign and domestic PEPs, family members and close associates at onboarding and throughout the relationship.	Screening, relationship map, match decision and refresh log.	CEMAC Regulation No. 01/2016, Articles 25 and 60
Apply PEP approval, provenance 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.	CEMAC Regulation No. 01/2016, Articles 25 and 60
Control remote-onboarding risk.	Use reliable identity evidence and proportionate fraud, device, liveness and exception controls; confirm current national data and electronic-process requirements.	Remote-onboarding assessment, vendor review, tests and exceptions.	CEMAC Regulation No. 01/2016, Articles 21-23 and 40

Monitoring and suspicious reporting

ANIF reporting must be prompt, traceable and confidential.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Monitor activity against the current customer profile.	Examine complex, unusually large or apparently purposeless activity and preserve the facts, analysis and reasoned conclusion.	Alerts, investigation, disposition and rule governance.	CEMAC Regulation No. 01/2016, Articles 22, 35 and 43
Report suspicious transactions and attempts promptly to ANIF.	File when the statutory suspicion grounds arise, including attempted transactions, using the current ANIF form and route; preserve a decision chronology.	Decision log, STR, transmission proof and receipt.	CEMAC Regulation No. 01/2016, Article 83
Prevent tipping off.	Restrict access and do not disclose an STR, related information request or investigation to the customer or unauthorised persons.	Access logs, confidentiality procedure and training.	CEMAC Regulation No. 01/2016, Articles 87-89

Payments, wires, thresholds, and agents

Payment controls preserve required data and distinguish verified duties from reported practice.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Confirm the current automatic cash-reporting rule before configuring it.	The 2024 evaluation records bank reports at CFAF 5 million and above; obtain the operative instrument, reporting frequency, sector scope, aggregation rule and ANIF format before production use.	Authority-confirmed specification, detection logic, filing and receipt.	GABAC Mutual Evaluation 2024, paragraphs 184-186
Preserve required originator and beneficiary information on wires.	Capture, validate and transmit required payer and payee data; hold, reject or investigate deficient transfers under documented risk-based procedures.	Message samples, validation rules, exceptions and decisions.	CEMAC Regulation No. 01/2016, Articles 36-38
Retain accountability for agents and technical partners.	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.	Regulation No. 04/18/CEMAC/UMAC/COBAC; applicable approvals

8. TARGETED FINANCIAL SANCTIONS

Targeted financial sanctions

Use current lists while confirming incomplete national mechanics.

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.	CEMAC Regulation No. 01/2016, Articles 105-113; UNSC consolidated list
Freeze covered funds without prior notice.	Prevent movement or availability immediately on a confirmed designation match and escalate through the competent national process.	Freeze procedure, timestamps, legal basis and authority communication.	CEMAC Regulation No. 01/2016, Articles 105-106
Govern matches, reporting, false positives and release.	Obtain the current national reporting and release route, preserve confidentiality and release property only on documented lawful authority.	Report, receipt, match rationale, authority instruction and reconciliation.	CEMAC Regulation No. 01/2016, Articles 105-113; GABAC MER 2024, Recommendations 6-7

Records and regulator access

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

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Retain CDD records for at least five years.	Retain identification and relationship records for five years after the relationship ends, subject to lawful extensions and holds.	Schedule, configuration, archive sample and legal-hold log.	CEMAC Regulation No. 01/2016, Articles 38-39
Retain transaction and analysis records for at least five years.	Preserve transaction records for five years after execution and retain examination results so individual transactions can be reconstructed.	Transaction reconstruction, analysis file and retrieval test.	CEMAC Regulation No. 01/2016, Articles 38-39
Respond securely to competent-authority requests.	Authenticate requests, protect STR confidentiality, produce reproducibly and log scope, timing and acknowledgement.	Request, approval, production index and receipt.	CEMAC Regulation No. 01/2016, Articles 39 and 68-71

Privacy, biometrics, and transfers

Apply verified privacy and security rules without inventing an authority or deadline.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Map the lawful handling of identity and compliance data.	Document purpose, legal basis, notice, access, recipients, security and retention and reconcile national privacy rules with mandatory AML duties.	Data inventory, legal assessment, notices and control map.	Applicable Equatoguinean privacy, cybercrime and sector-confidentiality rules
Apply enhanced controls to biometric and sensitive data.	Document necessity, minimise collection, restrict access, encrypt data and independently test biometric security and vendor handling.	Impact assessment, security tests, access controls and approval.	Applicable national law and CEMAC sector security requirements
Confirm transfer and incident procedures before production.	Obtain current primary guidance on cross-border transfers, regulator competence and incident notification; do not invent a portal, adequacy test or deadline.	Counsel memo, authority guidance, transfer assessment and incident plan.	Current national and sector-specific data rules

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 CEMAC Regulation No. 01/2016
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 CEMAC Regulation No. 01/2016, Articles 83 and 87-89

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.

Regulation No. 01/CEMAC/UMAC/CM of 11 April 2016
CEMAC / GABAC · Primary regional regulation
Open official source

Equatorial Guinea mutual evaluation 2024
GABAC · Authoritative country assessment
Open official source

Equatorial Guinea mutual-evaluation publication page
FATF · Authoritative country assessment
Open official source

Equatorial Guinea country assessment page
FATF · Authoritative country status
Open official source

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

Decree reforming the National Agency for Financial Investigation
Government of Equatorial Guinea · Primary national decree
Open official source

Regulation No. 04/18 on payment services
BEAC · Primary regional regulation
Open official source

BEAC payment rules and instructions
BEAC · Official regulator library
Open official source

OHADA Uniform Act on commercial companies and GIEs
OHADA · Primary regional company law
Open official source

COBAC regulations library
BEAC / COBAC · Official supervisor library
Open official source

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

Document control

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