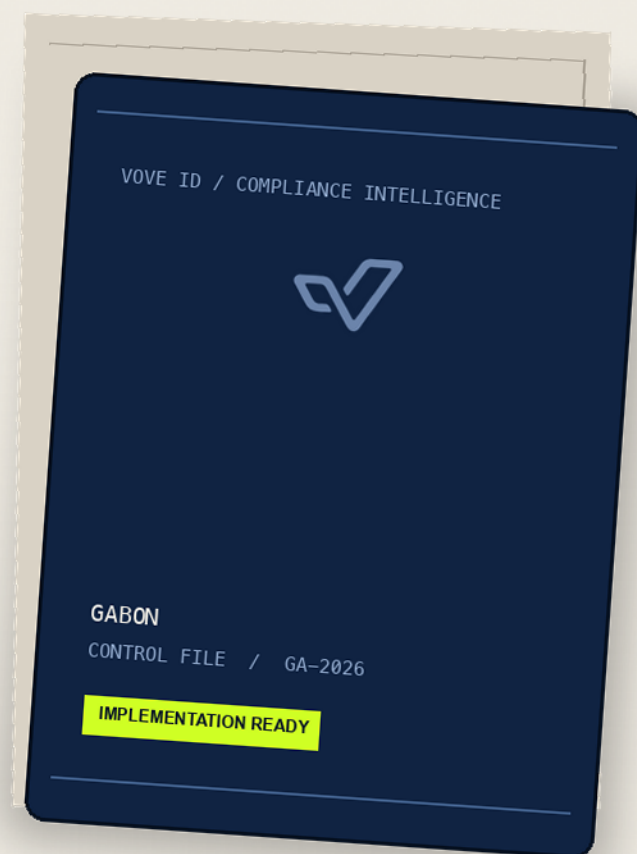


GABON



GABON / GA



KYC / KYB / AML

COMPLIANCE CHECKLIST

2026 EDITION

IMPLEMENTATION CHECKLIST / NOT LEGAL ADVICE



Gabon KYC, KYB & AML Compliance Checklist

An implementation checklist for Gabon's CEMAC AML/CFT/CPF framework, ANIF reporting, beneficial ownership, sanctions, records, personal-data protection and regulated financial services.

FIU	Agence Nationale d'Investigation Financiere (ANIF)
Primary AML rule	CEMAC Regulation No. 02/24
Suspicion reporting	Forthwith to ANIF; oral or electronic reports require written confirmation within 48 hours
Cash reporting	CFA 5,000,000 or more, single or apparently linked, subject to stated exceptions
Core retention	10 years for financial-institution CDD and transaction records
FATF status	Not named on FATF public lists as at 19 June 2026

Scope and legal framework

CEMAC Regulation No. 02/24/CEMAC/UMAC/CM of 20 December 2024 is the operative regional AML/CFT/CPF rule and repealed Regulation No. 01/16. CEMAC Regulation No. 04/24 governs targeted financial sanctions. National and sector overlays include Decree No. 0441/PR/MEP of 25 November 2024 on ANIF, COBAC Regulation R-2023/01, BEAC and CIMA rules, OHADA company law, and Law No. 025/2023 amending Gabon's personal-data law.

FATF context

Gabon is assessed through GABAC and remains in enhanced follow-up following its 2023 mutual evaluation. GABAC published a second enhanced follow-up in March 2026. Gabon was not named on FATF's high-risk or increased-monitoring lists current at 19 June 2026. Absence from those lists is not a low-risk finding.

IMPORTANT

General regulatory information, not legal advice or a licence determination. Reviewed as applicable on 26 August 2026. Confirm reporting-entity status, sector rules, current ANIF filing specifications, beneficial-owner register access and filing, national sanctions procedures, APDPVP formalities, product permissions and later instruments with the competent authority and qualified Gabonese 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
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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.
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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 CEMAC reporting entity.	Map every entity, product, channel and agent to the financial-institution or DNFBP categories and identify ANIF and the competent sector supervisor.	Applicability memo, product map and accountable-owner register.	CEMAC Regulation No. 02/24, Articles 6-7
Treat ANIF as Gabon's financial intelligence unit.	Notify authorised correspondents, obtain the current prescribed filing route and format directly from ANIF, and test controlled access before operations begin.	Correspondent notice, channel test, procedure and access approvals.	CEMAC Regulation No. 02/24, Articles 86-97 and 107-109; Decree No. 0441/PR/MEP, Articles 2-3, 33 and 48
Obtain authorisation before regulated financial activity.	Classify banking, microfinance, insurance, payment, exchange, investment and other financial services with the competent national authority, COBAC, BEAC, COSUMAF, CIMA or other supervisor and obtain every approval before launch.	Perimeter analysis, authority correspondence and licence register.	Applicable CEMAC, COBAC, BEAC, COSUMAF, CIMA and national sector rules

Governance and risk assessment

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

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain an enterprise-wide ML/TF/PF risk assessment.	Assess customers, products, channels, geography, cash, agents, technology and proliferation risk before launch and on material change; reflect Gabon's national risk findings.	Approved methodology, risk assessment, controls and version history.	CEMAC Regulation No. 02/24, Articles 12-15
Maintain written controls and an empowered compliance function.	Assign senior accountability, confidential ANIF reporting authority, resources, training and independent testing.	Appointments, policies, training, testing and remediation log.	CEMAC Regulation No. 02/24; COBAC Regulation R-2023/01 for covered institutions
Assess new technology before use.	Identify and mitigate ML/TF/PF, fraud, cybersecurity and privacy risks before launching a new product, distribution mechanism or technology.	Pre-launch assessment, approval, tests and residual-risk acceptance.	CEMAC Regulation No. 02/24, Article 25; Law No. 025/2023

3. NATURAL-PERSON IDENTIFICATION

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 with reliable independent evidence; identify anyone acting for the customer and verify identity and authority.	Identity file, source provenance, mandate and verification result.	CEMAC Regulation No. 02/24, Articles 20 and 29-30
Understand purpose and expected activity.	Record relationship purpose, products, expected volumes, counterparties, geography and source of funds sufficient for risk rating and monitoring.	Customer profile, expected-activity baseline and approval.	CEMAC Regulation No. 02/24, Article 21
Do not proceed where mandatory CDD fails.	Do not open or execute, or terminate as applicable, when required identification cannot be completed; consider and confidentially file an STR.	Decline or exit decision, investigation and restricted STR record.	CEMAC Regulation No. 02/24, Article 41

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 RCCM, constitutional, address, director, signatory, tax and licence evidence and reconcile inconsistencies.	RCCM extract, statutes, powers, tax record and licence file.	CEMAC Regulation No. 02/24, Article 31; OHADA Uniform Acts
Identify natural-person beneficial owners through ownership, control and fallback tests.	Identify natural persons with ultimate controlling interests, then control by other means, and use the principal-manager fallback only where no person is identified under the first two tests.	Ownership chart, source records, control analysis and verified identities.	CEMAC Regulation No. 02/24, Article 33
Apply register disclosure separately from AML CDD.	Capture declared beneficial owners; if none is declared, apply the Regulation's more-than-25% and specified control or officeholder rules. Do not substitute this register fallback for Article 33 CDD.	Register filing, calculation, officeholder record and reconciliation.	CEMAC Regulation No. 02/24, Articles 76-82

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 appropriate systems to identify domestic, foreign and international-organisation PEP exposure and connected-person risk.	Screening, relationship map, match decision and refresh log.	CEMAC Regulation No. 02/24, Articles 23 and 67
Apply PEP approval, provenance and monitoring measures.	Obtain senior-management approval, take reasonable measures to establish source of funds or assets, and conduct enhanced ongoing monitoring.	Approval, provenance analysis and monitoring plan.	CEMAC Regulation No. 02/24, Article 23
Control non-face-to-face and biometric risk.	Apply enhanced identity, fraud, device, liveness, sensitive-data and exception controls proportionate to the remote channel and data used.	Remote-onboarding assessment, impact review, tests and exceptions.	CEMAC Regulation No. 02/24, Article 22; Law No. 025/2023

Monitoring and suspicious reporting

ANIF reporting is prompt, traceable and confidential.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Monitor activity against the current customer profile.	Examine unusual, complex, linked or apparently purposeless activity and preserve a reasoned conclusion.	Alerts, investigation, disposition and rule governance.	CEMAC Regulation No. 02/24, Articles 21 and 63-64
Report suspicious and attempted transactions forthwith to ANIF.	File when the entity knows, suspects or has good reason to suspect criminal proceeds or ML/TF/PF; confirm a telephone or electronic report in writing within 48 hours using ANIF's current prescribed route.	Decision chronology, report, receipt and supplemental-information log.	CEMAC Regulation No. 02/24, Articles 105 and 109; ANIF official reporting form
Prevent tipping off.	Restrict access and do not disclose an STR, its content or ANIF action to the customer or unauthorised third parties.	Access logs, confidentiality procedure and training.	CEMAC Regulation No. 02/24, Article 110

Payments, wires, thresholds, and agents

Payment controls preserve required data and apply scoped objective reporting.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Report covered cash transactions of CFA 5,000,000 or more.	Aggregate single and apparently linked cash transactions and report to ANIF, applying only express exceptions while retaining enhanced scrutiny.	Aggregation tests, exception basis, filing and receipt.	CEMAC Regulation No. 02/24, Article 18
Preserve required wire-transfer information.	Carry required originator and beneficiary data through the payment chain; seek missing data and, if not obtained within three days, refrain from execution and inform ANIF.	Message sample, exception workflow, request and ANIF notice.	CEMAC Regulation No. 02/24, Articles 36-38
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.	CEMAC Regulation No. 04/18; COBAC Regulation R-2023/01 and applicable sector rules

8. TARGETED FINANCIAL SANCTIONS

Targeted financial sanctions

Use the current CEMAC sanctions framework and controlled national procedures.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Screen applicable UN, regional 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. 04/24; UN Security Council Consolidated List
Freeze covered property without delay or prior notice.	Prevent prohibited movement or availability of covered funds and economic resources and escalate immediately under the competent national process.	Freeze procedure, timestamps, legal basis and authority communication.	CEMAC Regulation No. 04/24
Report and govern matches, false positives and release.	Make required reports within the applicable 24-hour and quarterly periods, file an STR where required, and release only on documented lawful authority.	Reports, ANIF receipt, match rationale, authority instruction and reconciliation.	CEMAC Regulation No. 04/24

Records and regulator access

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

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Retain financial-institution CDD records for at least 10 years.	Retain identification and relationship records for at least 10 years after account closure or relationship end, subject to longer legal holds.	Schedule, configuration, archive sample and legal-hold log.	CEMAC Regulation No. 02/24, Article 39
Retain transaction records for at least 10 years.	Preserve transaction, accounting, correspondence and special-examination records for at least 10 years after the transaction.	Transaction reconstruction, storage control and retrieval test.	CEMAC Regulation No. 02/24, Articles 39-40 and 64
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.	CEMAC Regulation No. 02/24, Articles 40 and 97; Decree No. 0441/PR/MEP, Articles 31-33

Privacy, biometrics, and transfers

Gabon's amended personal-data law applies alongside AML secrecy and retention duties.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Document a lawful, necessary and transparent basis for identity processing.	Map purposes, data, notices, rights, recipients, security and retention; obtain APDPVP declarations or authorisations where the current law requires them.	Data inventory, legal-basis assessment, notices and authority record.	Law No. 025/2023 amending Law No. 001/2011
Apply enhanced safeguards to biometric and sensitive data.	Minimise collection, restrict access, test security and document the applicable express-consent, public-interest or other statutory basis before biometric or sensitive-data use.	Impact assessment, consent or legal basis, security tests and approval.	Law No. 025/2023, including sensitive-data provisions
Control processors, incidents and cross-border transfers.	Bind processors, maintain confidentiality and security, and obtain current APDPVP instructions before configuring international transfers or incident notices; do not invent a portal or deadline.	Processor contract, transfer assessment, incident procedure and authority guidance.	Law No. 025/2023

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, privacy records and exceptions under stable identifiers.	Complete sampled onboarding pack.	Operational control supporting CEMAC Regulation No. 02/24
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. 02/24, Articles 105-110

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.

CEMAC Regulation No. 02/24 - AML/CFT/CPF (English) GABAC · Primary regional regulation Open official source
CEMAC Regulation No. 04/24 - targeted financial sanctions GABAC · Primary regional regulation Open official source
Decree No. 0441/PR/MEP of 25 November 2024 on ANIF Official Gazette of Gabon · Primary national decree Open official source
ANIF Gabon publications and reporting materials ANIF Gabon · Official FIU guidance Open official source
ANIF Gabon suspicious-transaction report form ANIF Gabon · Official FIU form Open official source
Gabon second enhanced follow-up report - March 2026 GABAC · Authoritative country assessment Open official source
Gabon mutual evaluation - July 2023 GABAC · Authoritative country assessment Open official source
COBAC regulations and supervisory materials BEAC / COBAC · Official banking-supervisor materials Open official source
Law No. 025/2023 amending the personal-data protection law Official Gazette of Gabon · Primary national legislation Open official source
OHADA commercial companies and RCCM framework OHADA · Official company-law materials Open official source
FATF high-risk and monitored jurisdictions FATF · Authoritative current status Open official source
United Nations Security Council consolidated sanctions list United Nations · Authoritative sanctions list Open official source

Document control

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