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VOVE COUNTRY CONTROL FILE

KYC / KYB / AML

2026 EDITION

GUINEA-BISSAU

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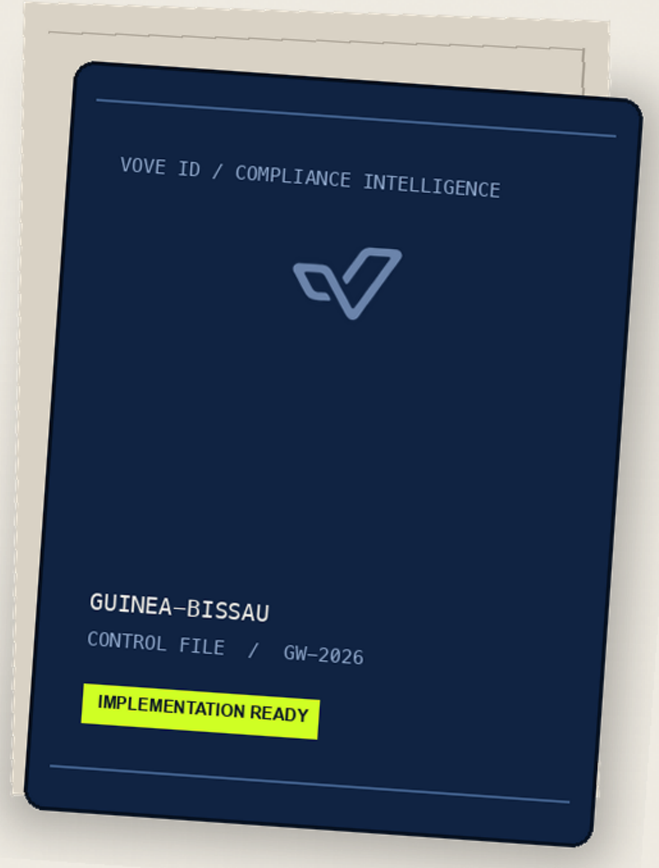

KYC / KYB / AML

COMPLIANCE CHECKLIST

2026 EDITION

IMPLEMENTATION CHECKLIST / NOT LEGAL ADVICE

READ THIS FIRST

Guinea-Bissau KYC, KYB & AML Compliance Checklist

An implementation checklist for Guinea-Bissau's AML/CFT framework, CENTIF-GB reporting, customer and beneficial-owner diligence, UMOA financial supervision, sanctions, records and privacy controls.

FIU	**Cellula Nacional de Tratamento de Informacoes Financeiras (CENTIF-GB)**
Primary AML law	**Law No. 3/2018 of 6 August 2018**
Suspicion reporting	**Without delay to CENTIF-GB; written or traceable, with 48-hour written confirmation where required**
Cash and transfer reports	**Thresholds depend on current BCEAO instructions**
Core retention	**10 years after relationship end or transaction execution**
FATF status	**Not named on FATF public lists as at 19 June 2026**

Scope and legal framework

Law No. 3/2018 of 6 August 2018 is Guinea-Bissau's operative AML/CFT law. UMOA adopted a replacement uniform AML/CFT/CPF law on 31 March 2023, but the latest authoritative implementation reporting reviewed for this edition says national enactment awaited Parliament. Apply Law No. 3/2018 until competent authorities confirm replacement, together with directly applicable UMOA/BCEAO instruments, OHADA company law and sector rules.

FATF context

Guinea-Bissau remains in GIABA enhanced follow-up after its May 2022 mutual evaluation and first follow-up in May 2023. It 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 28 August 2026. Confirm enactment of the 2023 UMOA uniform law, current CENTIF-GB filing specifications, BCEAO thresholds, targeted-sanctions procedures, beneficial-owner registry operation, privacy requirements and product permissions with the competent authority and qualified Guinea-Bissau 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 applicable law, entity, activity and supervisor before launch.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Determine whether each activity is a reporting entity.	Map every entity, product, channel and agent to the financial-institution, DNFBP or other covered categories and identify CENTIF-GB and the competent national or UMOA supervisor.	Applicability memo, product map and accountable-owner register.	Law No. 3/2018, Articles 5-6
Treat CENTIF-GB as the financial intelligence unit.	Appoint authorised correspondents, obtain the current filing form and route, and test controlled access before operations begin.	Correspondent appointment, channel test, procedure and access approvals.	Law No. 3/2018, Articles 59-64 and 79-82
Obtain authorisation before regulated activity.	Classify banking, payment, e-money, transfer, exchange, microfinance, insurance, securities, DNFBP and virtual-asset activities and obtain every required approval before launch.	Perimeter analysis, authority correspondence and licence register.	Law No. 3/2018, Articles 87-88; applicable UMOA, BCEAO and sector rules

Governance and risk assessment

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

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain an enterprise-wide ML/TF risk assessment.	Assess customers, products, channels, geography, cash, agents, technology and proliferation exposure and update on material change.	Approved methodology, assessment, controls and version history.	Law No. 3/2018, Articles 10-11 and 90
Maintain written controls and an empowered compliance function.	Assign senior accountability and confidential CENTIF-GB reporting authority; maintain screening, training, recruitment and independent-audit controls proportionate to risk.	Appointments, policies, training, testing and remediation log.	Law No. 3/2018, Articles 11 and 24
Assess new technology before use.	Identify and mitigate ML/TF, fraud, security and privacy risks before launching new products, delivery mechanisms or technologies.	Pre-launch assessment, approval, tests and residual-risk acceptance.	Law No. 3/2018, Article 37

3. NATURAL-PERSON IDENTIFICATION

Natural-person identification

CDD uses reliable evidence and continues through the relationship.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Identify and verify customers and representatives.	Verify the customer with reliable documents or information; identify any representative and verify identity and authority.	Identity file, source provenance, mandate and verification result.	Law No. 3/2018, Articles 18 and 25-28
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.	Law No. 3/2018, Articles 19-20
Do not proceed where mandatory CDD fails.	Do not open or execute, or terminate as applicable, when required identity or beneficial-owner information cannot be completed; consider confidential reporting.	Decline or exit decision, investigation and restricted reporting record.	Law No. 3/2018, Articles 28-29 and 79

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.	Law No. 3/2018, Articles 25-27; OHADA Uniform Acts
Identify natural-person beneficial owners using the statutory test.	Identify persons holding directly or indirectly more than 25% of capital or voting rights and persons exercising control by other means; document the analysis for other legal arrangements.	Ownership chart, source records, control analysis and verified identities.	Law No. 3/2018, Article 1(12) and Article 29
Treat company and beneficial-owner records as corroboration.	Obtain and reconcile available RCCM, CFE and company-held information; record gaps and do not assume the central beneficial-owner fields are complete.	Registry extracts, company records, discrepancy log and escalation.	OHADA framework; GIABA 2022 MER; IMF Country Report 25/167

PEPs, EDD, and remote onboarding

PEPs, 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 foreign, domestic and international-organisation PEPs and connected-person risk.	Screening, relationship map, match decision and refresh log.	Law No. 3/2018, Articles 22 and 54
Apply PEP approval, provenance and monitoring measures.	Obtain senior approval, take reasonable measures to establish source of wealth and funds, and conduct enhanced ongoing monitoring.	Approval, provenance analysis and monitoring plan.	Law No. 3/2018, Article 54
Control non-face-to-face and biometric risk.	Apply enhanced identity, fraud, device, liveness, minimisation, security and exception controls proportionate to the remote channel and data used.	Remote-onboarding assessment, privacy review, tests and exceptions.	Law No. 3/2018, Article 21 and Article 37

Monitoring and suspicious reporting

CENTIF-GB reporting must be prompt, traceable and confidential.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Monitor activity against the customer profile.	Examine unusual, complex, linked or apparently purposeless activity and preserve a reasoned conclusion.	Alerts, investigation, disposition and rule governance.	Law No. 3/2018, Articles 19-20 and 32
Report suspicion without delay to CENTIF-GB.	Report amounts or operations suspected, or reasonably suspected, to involve ML/TF; where reporting by phone or electronic means, confirm in writing within 48 hours as Article 81 requires.	Decision chronology, report, written confirmation, receipt and supplement log.	Law No. 3/2018, Articles 79 and 81
Prevent tipping off.	Restrict access and do not disclose a report, its contents or CENTIF-GB follow-up to the customer or unauthorised third parties.	Access logs, confidentiality procedure and training.	Law No. 3/2018, Article 82

Payments, wires, thresholds, and agents

Payment controls preserve required data and use only verified thresholds.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Apply cash and transfer reports only at current prescribed thresholds.	Obtain the current BCEAO instructions and CENTIF-GB method before configuring cash or fund-transfer reporting; aggregate only as the instrument requires.	Current instruction, configuration, filings and receipts.	Law No. 3/2018, Articles 13-15 and 79(7)
Preserve required wire-transfer information.	Carry required originator and beneficiary information through the payment chain and reject or risk-govern incomplete information as applicable.	Message samples, validation rules, exceptions and escalation.	Law No. 3/2018, Articles 33-34
Retain accountability for agents and outsourcing.	Verify permissions, diligence providers, contract for security and record access, train agents, monitor compliance and test retrieval.	Due diligence, contract, training, monitoring and retrieval test.	Law No. 3/2018, Articles 24, 52-53 and 87

Targeted financial sanctions

Use current UN and applicable UMOA designations and controlled national 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. 3/2018, Articles 105-107; UN 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 current national and UMOA procedures.	Freeze procedure, timestamps, legal basis and authority communication.	Law No. 3/2018, Articles 105-107; applicable UMOA instruments
Report and govern matches, false positives and release.	Use the current competent-authority process, file a suspicious-operation report where warranted, and release only on documented lawful authority.	Reports, receipt, match rationale, authority instruction and reconciliation.	Law No. 3/2018, Articles 79 and 105-107

Records and regulator access

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

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Retain CDD and transaction records for ten years.	Retain identity records for ten years after account closure or relationship end and transaction records for ten years after execution, subject to longer legal holds.	Schedule, configuration, archive sample and legal-hold log.	Law No. 3/2018, Article 35
Make transaction records reconstructable.	Preserve sufficient account, transaction, correspondence, analysis and decision detail for competent-authority use.	Transaction reconstruction and retrieval test.	Law No. 3/2018, Articles 35-36
Respond securely to competent-authority requests.	Authenticate requests, protect reporting confidentiality, produce reproducibly and log scope, timing and receipt.	Request, approval, production index and acknowledgement.	Law No. 3/2018, Articles 36, 64-67 and 82

Privacy, biometrics, and transfers

Apply constitutional confidentiality and security safeguards; confirm sector and implementing rules.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Document lawful and proportionate identity processing.	Map purposes, data, authority, notices, access, security and retention; confirm current Guinea-Bissau privacy and sector requirements before production use.	Data inventory, legal assessment, notices and approvals.	Constitution of Guinea-Bissau, privacy and communications guarantees; Law No. 3/2018, Articles 78 and 89-90
Apply enhanced safeguards to biometric and sensitive data.	Minimise collection, restrict access, test security and document a valid legal basis before biometric or sensitive-data use.	Impact assessment, legal basis, security tests and approval.	Constitutional privacy principles; applicable sector rules
Control processors, incidents and cross-border transfers.	Bind processors, preserve confidentiality and security, and obtain current authority or counsel confirmation before configuring transfers or incident notices; do not invent a portal or deadline.	Processor contract, transfer assessment, incident procedure and authority guidance.	Law No. 3/2018, Articles 78 and 89-91; applicable privacy and sector 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, risk, approvals, privacy records and exceptions under stable identifiers.	Complete sampled onboarding pack.	Operational control supporting Law No. 3/2018
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. 3/2018, Articles 79-82

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. 3/2018 on combating money laundering and terrorist financing
Prosecutor General's Office of Guinea-Bissau / Official Gazette · Primary national legislation
Open official source

2023 UMOA uniform AML/CFT/CPF law
BCEAO · Primary regional legislative instrument - national enactment pending confirmation
Open official source

Guinea-Bissau mutual evaluation report
GIABA · Authoritative country assessment
Open official source

GIABA 2023 annual report - first Guinea-Bissau follow-up
GIABA · Authoritative follow-up record
Open official source

GIABA 2024 annual report
GIABA · Authoritative follow-up status
Open official source

Guinea-Bissau 2025 Article IV consultation
International Monetary Fund · Authoritative implementation-status source
Open official source

BCEAO Guinea-Bissau regulatory materials
BCEAO · Official financial regulator materials
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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