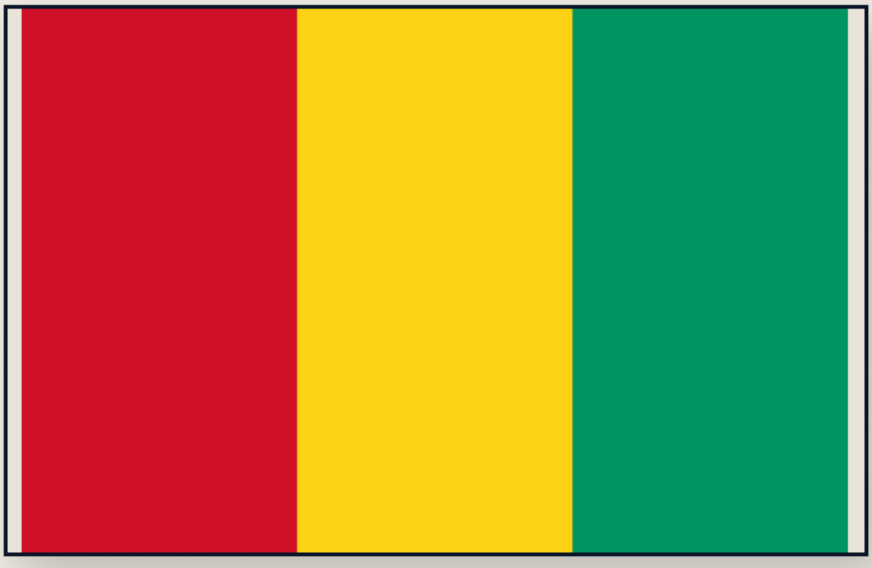
VOVE ID

VOVE COUNTRY CONTROL FILE

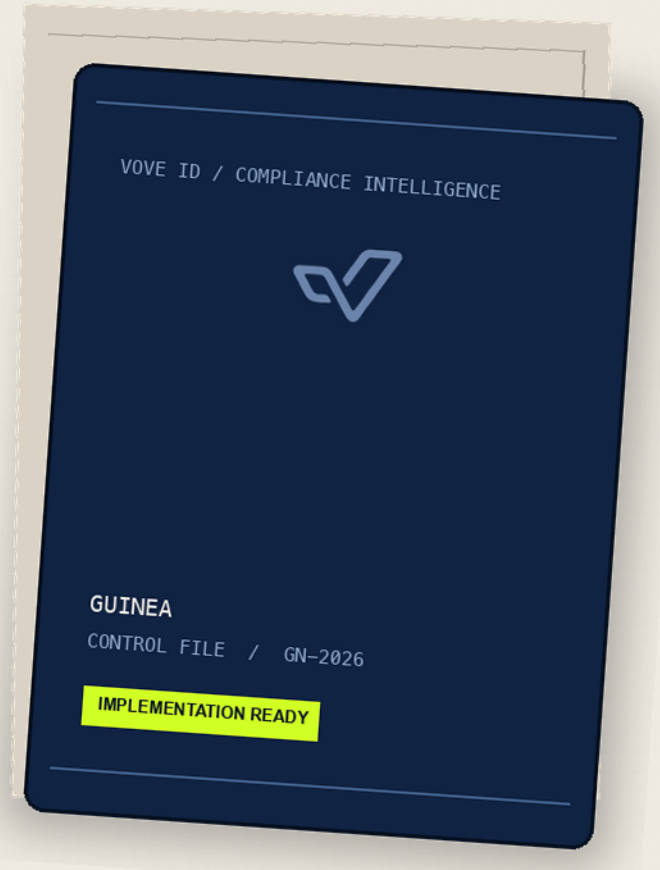
KYC / KYB / AML

2026 EDITION

GUINEA



GUINEA / GN



KYC / KYB / AML

COMPLIANCE CHECKLIST

2026 EDITION

IMPLEMENTATION CHECKLIST / NOT LEGAL ADVICE

READ THIS FIRST

Guinea KYC, KYB & AML Compliance Checklist

An implementation checklist for Guinea's AML/CFT/CPF framework, CENTIF reporting, customer and beneficial-owner diligence, sanctions, records, personal-data protection and regulated financial services.

FIU	**Cellule Nationale de Traitement des Informations Financieres (CENTIF)**
Primary AML law	**Law L/2021/0024/AN of 17 August 2021**
Suspicion reporting	**Immediately to CENTIF, including attempts, regardless of amount**
Objective reports	**Cash and cross-border-wire thresholds require a current BCRG instruction**
Core retention	**10 years after relationship end or occasional transaction**
FATF status	**Not named on FATF public lists as at 19 June 2026**

Scope and legal framework

Law L/2021/0024/AN of 17 August 2021 is Guinea's principal AML/CFT law. BCRG Instruction No. 109/DGSIF/DSB of 11 January 2023 specifies application for financial institutions. Sector, company and data overlays include BCRG instruments, OHADA company law and Law L/2016/037/AN on cybersecurity and personal data.

FATF context

Guinea is assessed through GIABA and remains in enhanced follow-up after its 2023 mutual evaluation. GIABA published a second enhanced follow-up in November 2025. Guinea 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 27 August 2026. Confirm reporting-entity status, current CENTIF filing specifications, BCRG thresholds and sector instructions, beneficial-owner register implementation, targeted-sanctions workflow, personal-data authority formalities and product permissions with the competent authority and qualified Guinean 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 supervisor before launch.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Determine whether each activity is a reporting entity.	Map each entity, product, channel and agent to the financial-institution, DNFBP, virtual-asset or covered public-authority categories and identify CENTIF and the competent supervisor.	Applicability memo, product map and accountable-owner register.	Law L/2021/0024/AN, Articles 5-9 and 56
Treat CENTIF as Guinea's financial intelligence unit.	Appoint authorised correspondents, obtain CENTIF's current filing route and prescribed form, and test controlled access before operations begin.	Correspondent appointment, channel test, procedure and access approvals.	Law L/2021/0024/AN, Articles 75-94
Obtain authorisation before regulated financial activity.	Classify banking, inclusive finance, payment, e-money, transfer, exchange, insurance, securities and virtual-asset activities and obtain every required approval before launch.	Perimeter analysis, authority correspondence and licence register.	Law L/2021/0024/AN, Articles 20 and 42; applicable BCRG and sector laws

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 risk assessment.	Assess customers, products, channels, geography, cash, agents, technology, virtual assets and proliferation exposure and update the assessment on material change.	Approved methodology, assessment, controls and version history.	Law L/2021/0024/AN, Articles 21-23
Maintain written controls and an empowered compliance function.	Assign senior accountability and confidential CENTIF reporting authority; maintain screening, recruitment, training and independent audit controls proportionate to risk.	Appointments, policies, training, testing and remediation log.	Law L/2021/0024/AN, Articles 50-53; BCRG Instruction No. 109
Assess new technology before use.	Identify and mitigate ML/TF, fraud, cybersecurity and privacy risks before launching a new product, distribution mechanism or technology.	Pre-launch assessment, approval, tests and residual-risk acceptance.	Law L/2021/0024/AN, Article 23; Law L/2016/037/AN

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 using reliable independent information; identify anyone acting for the customer and verify identity and authority.	Identity file, source provenance, mandate and verification result.	Law L/2021/0024/AN, Articles 25-26
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 L/2021/0024/AN, Article 26
Do not proceed where mandatory CDD fails.	Do not open or execute, or terminate as applicable, when required CDD cannot be completed; consider a confidential suspicious-operation report.	Decline or exit decision, investigation and restricted reporting record.	Law L/2021/0024/AN, Articles 32-33

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 L/2021/0024/AN, Article 27; 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.	Law L/2021/0024/AN, Article 27(3)
Treat company and beneficial-owner records as corroboration.	Obtain and reconcile available RCCM and company-held beneficial-owner information; record gaps and do not assume a fully operational central register.	Registry extracts, company records, discrepancy log and escalation.	OHADA company and RCCM framework; GIABA Guinea MER 2023

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.	Law L/2021/0024/AN, Articles 35-37
Apply PEP approval, provenance and monitoring measures.	Obtain senior-management approval, take reasonable measures to establish source of wealth and funds, and conduct enhanced ongoing monitoring.	Approval, provenance analysis and monitoring plan.	Law L/2021/0024/AN, Article 36
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.	Law L/2021/0024/AN, Article 34; Law L/2016/037/AN

Monitoring and suspicious reporting

CENTIF reporting is immediate, 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.	Law L/2021/0024/AN, Articles 26 and 39
Report suspicion and attempted suspicious operations immediately to CENTIF.	File immediately when funds or property are suspected, or reasonably suspected, to be criminal proceeds or linked to terrorist financing, including attempts regardless of amount, using CENTIF's current form and route.	Decision chronology, report, receipt and supplemental-information log.	Law L/2021/0024/AN, Articles 45 and 87
Prevent tipping off.	Restrict access and do not disclose a suspicious-operation report or related CENTIF information to the customer or unauthorised third parties.	Access logs, confidentiality procedure and training.	Law L/2021/0024/AN, Articles 49 and 94

Payments, wires, thresholds, and agents

Payment controls preserve required data and apply only verified thresholds.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Apply objective reporting only at currently prescribed thresholds.	Obtain the current BCRG instruction and CENTIF method before configuring cash and cross-border-wire reporting; aggregate as the instrument requires and retain the legal basis.	Current instruction, configuration, filings and receipts.	Law L/2021/0024/AN, Article 46
Preserve required wire-transfer information.	Carry required originator and beneficiary information through the payment chain and risk-govern missing or incomplete information.	Message samples, validation rules, exceptions and escalation.	Law L/2021/0024/AN, Articles 40-43
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 L/2021/0024/AN, Article 50(2); applicable BCRG sector rules

Targeted financial sanctions

Use current UN designations and Guinea's controlled legal process.

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 L/2021/0024/AN, Articles 20 and 44; 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 the current competent-authority process.	Freeze procedure, timestamps, legal basis and authority communication.	Law L/2021/0024/AN, Articles 20 and 44
Report and govern matches, false positives and release.	Use the current national reporting and challenge process, file a suspicious-operation report where warranted, and release only on documented lawful authority.	Reports, receipt, match rationale, authority instruction and reconciliation.	Law L/2021/0024/AN, Articles 20, 44-45

Records and regulator access

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

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Retain CDD and transaction records for 10 years.	Retain CDD, account, correspondence, analysis and transaction records for 10 years after relationship end or the occasional transaction, subject to longer legal holds.	Schedule, configuration, archive sample and legal-hold log.	Law L/2021/0024/AN, Article 54
Make transaction records reconstructable.	Preserve sufficient detail to reconstruct individual domestic and international operations and associated decisions.	Transaction reconstruction and retrieval test.	Law L/2021/0024/AN, Article 54(2)
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 L/2021/0024/AN, Articles 47, 54-55 and 88

Privacy, biometrics, and transfers

Personal-data duties apply alongside AML confidentiality and retention.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Document lawful and transparent identity processing.	Map purposes, data, legal basis, notices, rights, recipients, security and retention and complete currently required declarations or authorisations.	Data inventory, legal assessment, notices and authority record.	Law L/2016/037/AN, personal-data provisions
Apply enhanced safeguards to biometric and sensitive data.	Minimise collection, restrict access, test security and document an applicable statutory basis before biometric or sensitive-data use.	Impact assessment, legal basis, security tests and approval.	Law L/2016/037/AN
Control processors, incidents and cross-border transfers.	Bind processors, preserve confidentiality and security, and obtain current authority guidance before configuring transfers or incident notices; do not invent a portal or deadline.	Processor contract, transfer assessment, incident procedure and authority guidance.	Law L/2016/037/AN

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 L/2021/0024/AN
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 L/2021/0024/AN, Articles 45-49 and 87-94

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 L/2021/0024/AN on AML/CFT
BCRG · Primary national legislation
Open official source

BCRG Instruction No. 109 applying the AML/CFT law to financial institutions
BCRG · Primary supervisory instruction
Open official source

BCRG AML/CFT application instruction for inclusive financial institutions
BCRG · Primary supervisory instruction
Open official source

Guinea second enhanced follow-up report - November 2025
GIABA · Authoritative country assessment
Open official source

Guinea mutual evaluation materials
GIABA · Authoritative country assessment
Open official source

BCRG compliance and supervisory materials
BCRG · Official regulator materials
Open official source

Law L/2016/037/AN on cybersecurity and personal data
Supreme Court of Guinea · 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

Version 1.0 / Published 27 August 2026 / Last reviewed 27 August 2026 / Owner: VOVE ID Compliance Research