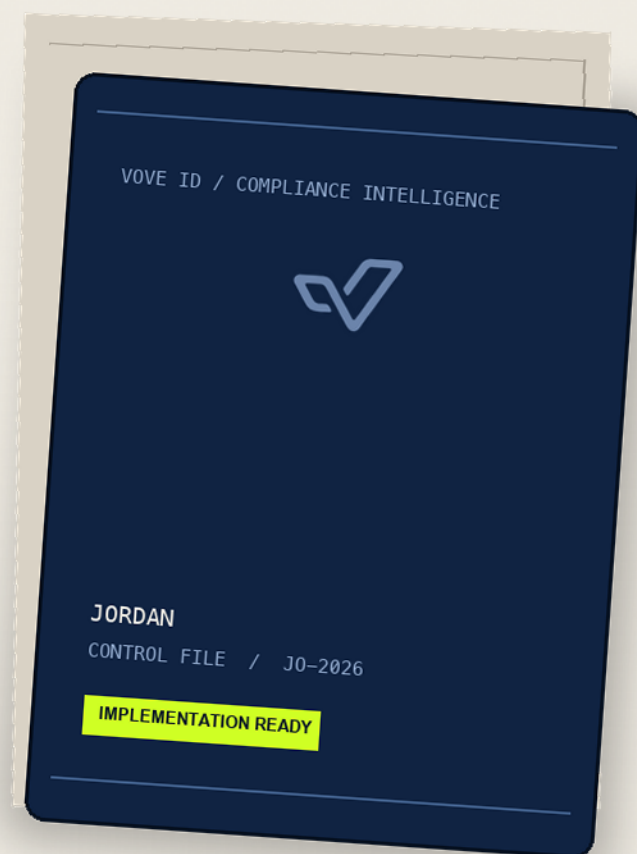


JORDAN



JORDAN / JO



KYC / KYB / AML

COMPLIANCE CHECKLIST

2026 EDITION

IMPLEMENTATION CHECKLIST / NOT LEGAL ADVICE



Jordan KYC, KYB & AML Compliance Checklist

Implementation checklist for Jordan customer due diligence, beneficial ownership, suspicious reporting, sanctions, privacy, payments and digital onboarding controls.

Primary AML law	Law No. 20 of 2021
FIU	Anti-Money Laundering and Counter Terrorist Financing Unit
SAR timing	Immediately, including attempted activity, regardless of value
Records	At least 5 years from the applicable transaction or relationship trigger
Beneficial ownership	Apply ownership and ultimate effective-control tests; registry guidance includes 20% criteria
Cross-border cash declaration	More than JOD 10,000 or equivalent
Privacy law	Personal Data Protection Law No. 24 of 2023, effective 17 March 2024
FATF public lists	Not listed at 19 June 2026

Scope and legal framework

Anti-Money Laundering and Counter Terrorist Financing Law No. 20 of 2021 is the operative framework. Sector instructions continue under Article 44 until amended, repealed or replaced. A September 2026 draft amendment is not treated as operative law.

FATF context

Jordan was absent from the FATF increased-monitoring and call-for-action lists dated 19 June 2026. FATF/MENAFATF's 2025 follow-up report records 9 Compliant, 27 Largely Compliant, 2 Partially Compliant and 2 Non-Compliant technical ratings. Absence from a public list is not a low-risk classification.

IMPORTANT

General information, not legal advice. Reviewed 7 October 2026. Confirm controlling Arabic text, later Gazette enactments, current sector instructions, AMLU filing specifications, beneficial-owner procedures, sanctions directions, privacy regulations and licensing with the competent authority and qualified Jordan counsel.

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

Classify the activity, Jordan nexus and supervisor before launch.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Determine whether the business is a reporting entity.	Map each service to financial institutions, real-estate and precious-metals businesses, specified legal and accounting activities, company-service activities and any category added by Cabinet.	Perimeter memo, service map and authority confirmation.	Law 20/2021 article 14
Obtain each activity-specific licence before operating.	Classify banking, exchange, money transfer, electronic payment, finance, securities, insurance and digital products under the current sector regime.	Licence matrix, approvals and conditions.	Banking Law ; Money Exchange Business Law ; CBJ payment instructions
Use current sector rules and controlling Arabic text.	Track CBJ, JSC, AMLU and other supervisory instructions, including amendments and Article 44 continuity.	Source inventory, translations and change log.	Law 20/2021 articles 21 and 44

Governance and risk assessment

Controls must be risk-based, documented and effective.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Assess and monitor ML/TF risks.	Cover customers, countries, products, services, delivery channels, transactions and new technologies in a proportionate assessment.	Methodology, assessment, approvals and updates.	Law 20/2021 article 15(a)-(c)
Maintain approved mitigation controls.	Document CDD, monitoring, SAR, records, sanctions, training and escalation procedures based on assessed risk.	Approved framework, procedures and issue register.	Law 20/2021 article 15(b), (f)
Appoint responsible compliance personnel and independent assurance.	Apply the exact sector instruction on authority, resources, reporting and testing.	Appointment, board reports, training, audit and remediation.	Law 20/2021; applicable supervisory instructions

3. NATURAL-PERSON IDENTIFICATION

Natural-person identification

Identify customers, beneficial owners and representatives at every applicable trigger.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Never use anonymous or fictitious accounts.	Identify and verify the customer with reliable, independent evidence before activation.	Identity attributes, document provenance and fraud checks.	Law 20/2021 article 15(d)
Apply risk-based CDD and enhanced measures when required.	Understand purpose and intended nature, verify relevant persons and apply EDD for higher risk or suspicion.	Trigger, profile, verification and approval.	Law 20/2021 article 15(d)-(e)
Verify representatives and authority.	Identify the representative and authenticate the mandate before accepting instructions.	Representative KYC, authority document and validation.	Law 20/2021 article 15; sector CDD instructions
Do not proceed when CDD cannot be completed.	Do not open, execute, begin or continue the relevant relationship or transaction; assess an AMLU report without tipping off.	Failure reason, restriction and SAR assessment.	Law 20/2021 article 16

4. KYB AND BENEFICIAL OWNERSHIP

KYB and beneficial ownership

Verify legal existence, ownership and ultimate effective control.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Verify the legal person and its authority structure.	Obtain current registry, constitutional, director, signatory and business-purpose evidence.	Certified extract, documents and discrepancy record.	Law 20/2021 article 15; sector CDD instructions
Identify natural persons who ultimately own or control.	Trace direct, indirect, layered, nominee and other control arrangements; do not stop at a legal-person shareholder.	Ownership chart, calculations and verified identities.	Law 20/2021 article 2; BO Regulation 62/2022
Apply registry criteria without treating a percentage as a safe harbour.	Use the current Regulation 62/2022 and CCD guidance, including relevant 20% ownership, voting, profit, appointment or liquidation criteria, while assessing ultimate effective control and fallback persons.	Criterion-by-criterion analysis and rationale.	BO Regulation 62/2022 article 9; CCD BO guidance
Maintain the company BO register and required filings.	Record prescribed particulars, reconcile changes and submit declarations through the live CCD procedure within the applicable deadline.	BO register, forms, receipts and change log.	Companies Law; BO Regulation 62/2022

PEPs, EDD, and remote onboarding

Apply enhanced measures to PEPs and higher-risk relationships.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Determine whether the customer or beneficial owner is a PEP.	Use risk-management procedures and apply the approval, wealth, funds and monitoring measures required by the applicable sector rule.	Screening, classification, approval and corroboration.	Law 20/2021 article 15(e)
Apply EDD proportionate to higher risk.	Obtain additional customer, purpose, ownership, source-of-wealth and source-of-funds information and intensify monitoring.	Risk trigger, additional CDD and approval.	Law 20/2021 article 15(d)
Control non-face-to-face onboarding.	For eligible CBJ-regulated services, apply Instructions 7/2021 and any product-specific identity, authentication, fraud and exception controls.	Method assessment, authentication result and exceptions.	CBJ electronic KYC Instructions 7/2021

Monitoring and suspicious reporting

Ongoing scrutiny supports immediate reporting to AMLU.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Monitor and refresh on a risk basis.	Compare activity with purpose, expected behaviour, risk and source of funds; update CDD when events or doubts arise.	Scenarios, alerts, reviews and refresh records.	Law 20/2021 articles 15 and 17(b)
Escalate suspicion without waiting for proof.	Assess transactions, activities and attempts promptly and document reasonable grounds and formation time.	Chronology, information and decision.	Law 20/2021 article 18
Notify AMLU immediately regardless of value.	Submit the prescribed SAR through the current goAML route and retain the acknowledgement.	Suspicion timestamp, submission and receipt.	Law 20/2021 article 18; AMLU FAQ
Prevent tipping off and protect SAR information.	Restrict access and customer communications and follow lawful information-sharing rules.	Access logs, scripts, training and incidents.	Law 20/2021 articles 19 and 20

Payments, wires, thresholds, and digital assets

Separate CDD triggers, declarations and activity-specific licensing.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Carry required originator and beneficiary information.	Apply the current sector wire-transfer fields, screening and missing-data procedures.	Field matrix, payment samples and repair queue.	Applicable CBJ AML/CFT and payment instructions
Do not misstate the JOD 10,000 border declaration as a customer threshold.	For physical cross-border cash or bearer negotiable instruments over JOD 10,000 or equivalent, support the Customs declaration obligation; keep product CDD thresholds separate.	Travel/courier controls, declaration and escalation.	Law 20/2021 article 23; Jordan Customs guidance
Obtain payment, transfer or exchange approval.	Map wallets, acquiring, remittance, exchange and ancillary features to live CBJ licensing and safeguarding requirements.	Product memo, licence and compliance tests.	Banking Law; Money Exchange Business Law; CBJ instructions
Treat virtual-asset activity as a launch-date perimeter issue.	Do not rely on the September 2026 draft amendment; obtain written confirmation of the operative licensing and AML treatment before offering a service.	Current-law memo, authority confirmation and approval.	Law 20/2021; draft 2026 amendment (non-operative)

8. TARGETED FINANCIAL SANCTIONS

Targeted financial sanctions

Use current UN and Jordan designation procedures.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Screen designations and ownership or control.	Screen relevant parties at onboarding, transactions and list updates, using current UN and Jordan lists.	List versions, tests and decisions.	Law 20/2021 article 40; Instructions 1/2021
Freeze without delay and notify through the live route.	Prevent dealing or asset availability on a confirmed match and make required notifications without prior notice.	Match analysis, restriction time and notification.	Law 20/2021 article 40; Instructions 1/2021
Use exemptions, delisting or release only under written authority.	Apply the designation-specific procedure and preserve all conditions and approvals.	Legal analysis, permission and release record.	Law 20/2021 article 40(f); Instructions 1/2021

Records and regulator access

Retention triggers differ for transactions and relationships.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Retain transaction records for at least five years.	Run the period from completion and preserve enough data to reconstruct individual transactions.	Schedule, trigger, samples and retrieval test.	Law 20/2021 article 17(a)
Retain CDD, account, correspondence and analysis records for at least five years.	Run the period from relationship termination or transaction date, whichever is longer, subject to lawful holds.	Schedule, trigger and deletion approval.	Law 20/2021 article 17(a)
Keep records current and available to competent authorities.	Maintain controlled access, legal holds and a complete production audit trail.	Update history, access matrix and production log.	Law 20/2021 article 17(b)

Privacy, biometrics, breaches, and transfers

Apply Law 24/2023 and current implementing instruments.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Map processing conditions, notices and rights.	Inventory personal and sensitive data, establish a lawful basis or valid consent, provide required information and support data-subject rights.	Data map, notices, consent and rights log.	Personal Data Protection Law 24/2023 articles 4-7
Apply enhanced governance to sensitive and high-risk processing.	Assess biometric and financial-data processing, conduct a DPIA where required and appoint an accredited DPO when statutory criteria apply.	Classification, DPIA, DPO analysis and appointment.	Law 24/2023; PDPD DPIA and DPO guidance
Control processors, security incidents and transfers.	Contract processors, implement safeguards, assess transfer conditions and make notifications through the current statutory route.	Contracts, security controls, transfer assessment and incident record.	Law 24/2023 articles 20-23; current regulations

Practical evidence packs

Evidence must reconstruct decisions end to end.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain an onboarding pack.	Bundle identity, authority, KYB, BO, PEP, sanctions, purpose, risk, privacy and approvals.	Complete sample and retrieval result.	Operational control supporting Law 20/2021
Maintain SAR and sanctions case packs.	Link activity, suspicion time, report, receipt, confidentiality, restrictions and communications.	Case pack, timeline and access record.	Law 20/2021 articles 18-20 and 40
Maintain a launch and legal-change pack.	Record perimeter, licences, reporting, sanctions, privacy, vendors, tests and the status of the 2026 draft AML amendment.	Signed pack, source register and approvals.	Official sources listed below

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.

Anti Money Laundering and Counter Terrorist Financing Law No. 20 of 2021

AMLU · Primary legislation - official English translation

[Open official source](#)

Official Gazette issue 5743

Prime Ministry of Jordan · Official gazette

[Open official source](#)

Reporting-entity obligations

AMLU · Official guidance

[Open official source](#)

AMLU instructions register

AMLU · Official instructions register

[Open official source](#)

Suspicious activity reporting FAQ and goAML route

AMLU · Official filing guidance

[Open official source](#)

High-risk countries and National Committee Decision 2/2026

AMLU · Official current guidance

[Open official source](#)

CBJ AML/CFT instructions register

Central Bank of Jordan · Official supervisory register

[Open official source](#)

Electronic KYC Instructions No. 7/2021

Central Bank of Jordan · Official supervisory instructions

[Open official source](#)

Beneficial ownership register guidance

Companies Control Department · Official registry guidance

[Open official source](#)

Beneficial ownership official register page

Companies Control Department · Official registry portal

[Open official source](#)

Cross-border cash declaration under Law 20/2021

Jordan Customs · Official guidance

[Open official source](#)

Personal Data Protection Law No. 24 of 2023

Ministry of Digital Economy and Entrepreneurship · Primary legislation - official translation

[Open official source](#)

Personal Data Protection Directorate and implementation guidance

Ministry of Digital Economy and Entrepreneurship · Official regulator guidance

[Open official source](#)

Jordan Follow-Up Report 2025

FATF / MENAFATF · Authoritative assessment

[Open official source](#)

FATF increased monitoring - 19 June 2026

FATF · Authoritative current status

[Open official source](#)

FATF call for action - 19 June 2026

FATF · Authoritative current status

[Open official source](#)

September 2026 draft AML amendment status

Jordan News Agency (Petra) · Official news - draft only

[Open official source](#)

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