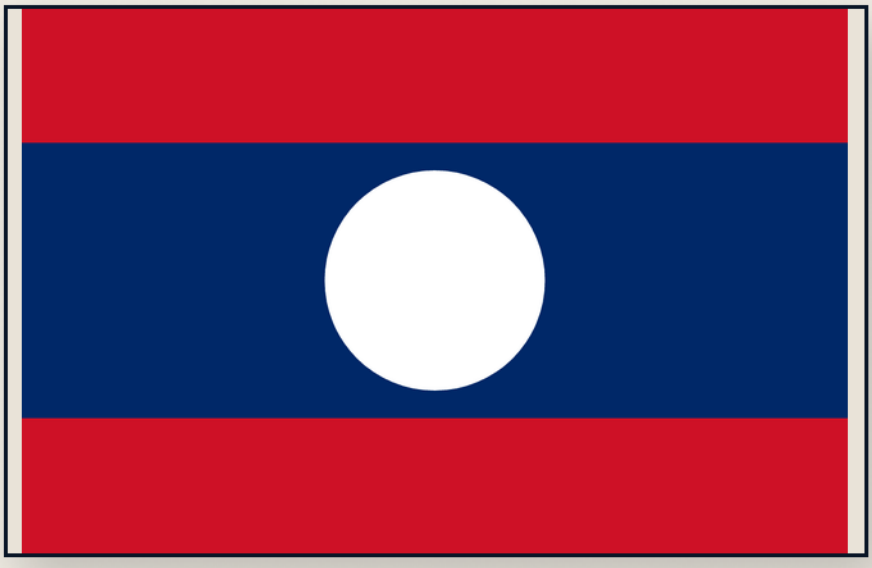
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VOVE COUNTRY CONTROL FILE

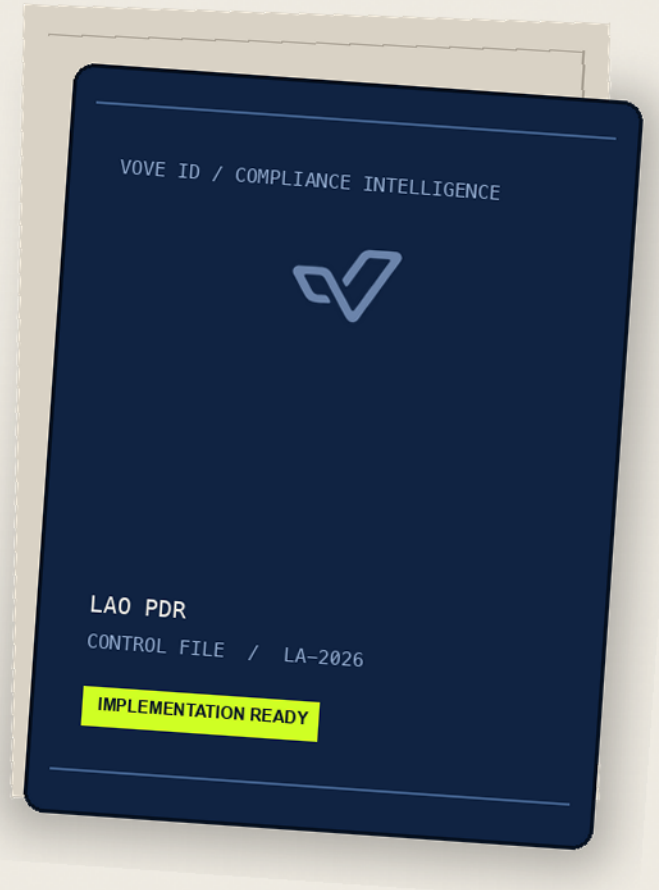
KYC / KYB / AML

2026 EDITION

LAO PDR



LAO PDR / LA



KYC / KYB / AML

COMPLIANCE CHECKLIST

2026 EDITION

IMPLEMENTATION CHECKLIST / NOT LEGAL ADVICE

READ THIS FIRST

Lao PDR KYC, KYB & AML Compliance Checklist

Implementation checklist for Lao customer due diligence, beneficial ownership, suspicious and threshold reporting, sanctions, records, payments, enterprise verification and data governance.

Primary AML law	**Amended AML/CFT Law No. 64/NA dated 1 July 2024**
FIU	**Anti-Money Laundering Intelligence Office (AMLIO)**
Suspicious reporting	**Promptly, including attempted transactions, regardless of amount**
Cash reports	**LAK 100 million or more under Decision No. 417/BOL; report every 30 days**
Wire reports	**LAK 8 million or more per transfer under Decision No. 963/BOL**
Beneficial ownership	**20% ownership/benefit, then other control, then senior management fallback**
Records	**At least 10 years from transaction completion or relationship termination**
FATF status	**Increased monitoring at 30 October 2026**

Scope and legal framework

The Law on Anti-Money Laundering and Counter-Financing of Terrorism (Amended) No. 64/NA dated 1 July 2024, the 2025 amended CDD Decision No. 11/NCC, AMLIO and Bank of the Lao PDR instruments, and sector laws form the core framework. Current Lao-language texts and later instruments control.

FATF context

Lao PDR is an APG member and remained under FATF increased monitoring in the statement dated 30 October 2026. Its action plan and current APG follow-up must be reflected in risk governance without treating nationality alone as determinative.

IMPORTANT

General information, not legal advice. Reviewed 14 November 2026. Confirm the controlling Lao text, amendments, current AMLIO reporting schema, sector thresholds, sanctions directions, licensing conditions, enterprise-register data and data-protection requirements with the competent authority and qualified Lao 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 and reporting-entity role before launch.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Determine whether each activity is a reporting entity activity.	Map banking, non-bank finance, securities, insurance, money or value transfer, foreign exchange, gaming, real estate, precious metals and stones, legal, accounting and other designated activity to the current perimeter.	Perimeter memo, activity map and dated authority sources.	AML/CFT Law No. 64/NA, Articles 15-16
Obtain every required licence and approval.	Confirm the Bank of the Lao PDR or competent sector authority route before offering a regulated financial, payment, exchange, securities, insurance or virtual-asset service.	Licence matrix, decisions, conditions and renewal calendar.	Applicable sector law and BOL instruments
Maintain AMLIO reporting access.	Keep current online-reporting credentials, forms, delegated users and escalation contacts for each reporting entity.	Registration evidence, access review and authority directory.	AML/CFT Law, Articles 26-27; AMLIO Reporting Entities page

2. GOVERNANCE AND RISK ASSESSMENT

Governance and risk assessment

Controls must be risk-based, governed and independently tested.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Assess institutional ML/TF/PF risk.	Assess customers, geographies, products, channels, transactions, technology, agents and delivery methods and refresh after material change.	Methodology, assessment, approval and remediation log.	CDD Decision No. 11/NCC, Articles 6-10
Maintain internal AML/CFT controls.	Document policies, employee screening, management-level compliance responsibility, training, escalation and independent testing proportionate to risk.	Programme, appointments, training and audit reports.	AML/CFT Law, Articles 16-18; CDD Decision, Article 12
Control branches and subsidiaries.	Apply lawful group standards and information-sharing controls and document additional measures where a host country prevents equivalent implementation.	Group policy, country assessment and escalation record.	AML/CFT Law, Article 16; CDD Decision, Article 12

3. NATURAL-PERSON IDENTIFICATION

Natural-person identification

CDD applies at onboarding and each statutory or regulatory trigger.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Identify and verify natural-person customers.	Collect the required name, date and place of birth, nationality, address, occupation and official identity evidence and verify through reliable independent sources.	Identity record, verification result and provenance.	CDD Decision No. 11/NCC, Articles 13-14
Apply CDD at relationship and transaction triggers.	Apply CDD at onboarding, suspicion, doubts about prior data and the applicable customer- and sector-specific occasional-transaction triggers, including linked transactions.	Dated trigger table, decision and CDD file.	AML/CFT Law, Article 20; CDD Decision, Articles 18-19
Understand purpose and monitor continuously.	Record purpose and intended nature, create a risk profile, scrutinize activity and keep customer and beneficial-owner information current.	Profile, risk decision, alerts and refresh history.	AML/CFT Law, Articles 20-21; CDD Decision, Articles 18 and 35
Control failed CDD.	Do not establish, or cease, the relationship when required CDD cannot be completed and consider a suspicious transaction report without tipping off.	Failure record, disposition and reporting assessment.	AML/CFT Law, Article 21; CDD Decision, Article 21

KYB, representatives, and beneficial ownership

Verify legal existence, authority, ownership and actual control.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Verify enterprises and legal arrangements.	Obtain current name, legal form, proof of existence, governing documents, registered and operating address, directors, business activity and authorized persons.	Registry evidence, constitutional documents and independent checks.	CDD Decision, Articles 15-18 and 24
Apply the legal-person beneficial-owner cascade.	Identify and reasonably verify natural persons with 20% or more ownership or benefit; if unresolved, identify other ultimate control; if none is identified, identify the relevant senior manager.	Ownership chart, control analysis, fallback rationale and verified identities.	CDD Decision No. 11/NCC, Article 25
Identify parties to legal arrangements.	For trusts or analogous arrangements identify and verify settlors, trustees, protectors if any, beneficiaries or classes, and persons exercising ultimate control.	Arrangement documents, role register and verified identities.	CDD Decision, Article 26
Verify representatives and mandates.	Confirm authority and identify and verify each natural person acting for a customer.	Representative KYC, mandate and authority checks.	CDD Decision, Article 22

PEPs, enhanced due diligence, and remote onboarding

Higher-risk and non-face-to-face relationships require enhanced controls.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Identify PEPs, family members and close associates.	Use an appropriate risk system, classify the PEP type, obtain senior-management approval, establish source of funds and income or wealth, and apply enhanced ongoing monitoring.	Screening, classification, approval and corroboration.	AML/CFT Law, Article 22; CDD Decision, Article 23
Apply enhanced due diligence to higher risk.	Collect additional identity, ownership, purpose, source and transaction evidence and intensify monitoring under a documented risk decision.	EDD checklist, approval and monitoring plan.	CDD Decision, Article 21
Mitigate non-face-to-face risk.	Use approved identity methods and additional fraud, device, session, liveness and monitoring controls appropriate to the risk and sector rules.	Method assessment, session record and control tests.	CDD Decision, risk-based and CDD provisions

Monitoring and suspicious reporting

Detection and filing must preserve prompt reporting and confidentiality.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Examine unusual and suspicious activity.	Investigate complex, unusual, large or pattern-inconsistent activity and attempted transactions, documenting the purpose, parties and findings.	Alerts, analysis, supporting material and decision.	AML/CFT Law, Articles 16 and 27
Report suspicion promptly to AMLIO.	Promptly file when there is suspicion or reasonable ground to suspect proceeds of a predicate offence, money laundering or terrorist financing, including attempts and regardless of amount.	Trigger timestamp, analysis, report, receipt and chronology.	AML/CFT Law No. 64/NA, Article 27
Use the current AMLIO reporting route.	Use the current AMLIO form and online channel, preserve validation and receipt evidence, and follow any lawful AMLIO direction.	Submitted form, portal receipt and correspondence.	AMLIO Reporting Entities page; Instruction No. 42/AMLIU
Prevent tipping off.	Restrict access and communications concerning STRs, related information and AMLIO analysis.	Access logs, confidentiality controls and training.	AML/CFT Law, Articles 29 and 42

7. THRESHOLDS, TRANSFERS, AND PAYMENTS

Thresholds, transfers, and payments

Keep the operative instrument, scope and aggregation logic attached to each threshold.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Report covered cash transactions at LAK 100 million or more.	For covered financial-institution cash transactions, detect transactions at or above LAK 100,000,000 and submit the prescribed report every 30 days; confirm later instruments before production use.	Rule version, detection tests, report and receipt.	Regulation No. 417/BOL dated 5 June 2015, Articles 3-4; AML/CFT Law, Article 26
Report covered wire transfers at LAK 8 million or more.	Detect reportable transfers at or above LAK 8,000,000 per instance and apply the current exceptions, fields and AMLIO reporting procedure.	Rule version, field mapping, report and reconciliation.	Decision No. 963/BOL dated 27 November 2015, Articles 2 and 8-9
Carry required wire-transfer information.	Capture required originator and beneficiary data, repair missing information, and reject or return transfers when the operative conditions require.	Field matrix, samples, repair queue and decisions.	AML/CFT Law, Article 24; Decision No. 963/BOL, Articles 5-7
Obtain payment or money-transfer authorization before launch.	Classify the service and obtain every applicable Bank of the Lao PDR licence or approval, including agent and outsourcing permissions where required.	Product memo, authority decision and conditions.	Applicable BOL payment and money-transfer instruments

8. TARGETED FINANCIAL SANCTIONS AND CPF

Targeted financial sanctions and CPF

Use current UN and Lao directions and act without delay.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Screen current designations.	Screen customers, beneficial owners, representatives and transactions at onboarding, on list updates and throughout the relationship.	List version, screening logs and match decisions.	Decrees No. 553/GOV and 554/GOV dated 4 September 2025; AML/CFT Law, Article 28
Freeze relevant funds without delay.	Withhold or freeze funds linked to terrorists or terrorist organizations under the consolidated UNSCR list without delay and report to AMLIO and relevant authorities.	Match decision, freeze timestamp, asset inventory and report.	AML/CFT Law, Article 28; Decree No. 553/GOV
Apply proliferation-financing controls.	Screen applicable PF designations, freeze and report under the current competent-authority procedure, and control release or false-positive resolution.	Procedure, screening evidence, reports and authority decisions.	Decree No. 554/GOV dated 4 September 2025

9. RECORDS AND AUTHORITY ACCESS

Records and authority access

Records must reconstruct identities, decisions and transactions.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Retain AML records for at least ten years.	Keep customer, CDD, beneficial-owner, correspondence, transaction, account, analysis and reporting records for at least ten years from transaction completion or relationship termination, as applicable.	Retention schedule, archive and retrieval test.	AML/CFT Law No. 64/NA, Article 25
Reconstruct transactions and decisions.	Preserve sufficient data to reconstruct the transaction and the identity, risk, monitoring, reporting and sanctions decisions.	Reconstruction test and complete sample case.	AML/CFT Law, Article 25
Produce records lawfully and swiftly.	Operate controlled retrieval and disclosure workflows for AMLIO, supervisors and other competent authorities.	Request log, approval, production and receipt.	AML/CFT Law, Articles 25 and 45

10. DATA GOVERNANCE, BIOMETRICS, INCIDENTS, AND TRANSFERS

Data governance, biometrics, incidents, and transfers

Apply current electronic-data, cybersecurity, confidentiality and sector rules to identity data.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Map lawful collection and disclosure.	Document AML and sector duties, notice, purpose, access and authorized disclosure for identity, biometric, financial and screening information.	Data inventory, notice, legal basis and disclosure log.	Law on Electronic Data Protection No. 25/NA; AML/CFT Law, Article 29
Protect identity and biometric information.	Minimize collection, restrict access, secure storage and transmission, and assess vendors processing identity or biometric data.	Security assessment, access logs, contracts and tests.	Law on Electronic Data Protection No. 25/NA and applicable sector cybersecurity rules
Control hosting and cross-border transfers.	Confirm current localization, authorization, security and contract requirements before hosting or transferring regulated or personal data outside Lao PDR.	Transfer assessment, authority advice and contract controls.	Current Lao electronic-data, cybersecurity and sector requirements

11. PRACTICAL EVIDENCE PACKS

Practical evidence packs

Evidence must reconstruct decisions end to end.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain an onboarding evidence pack.	Bundle identity, authority, KYB, beneficial ownership, PEP, sanctions, purpose, risk and approval evidence.	Complete sample and retrieval result.	Operational control supporting AML/CFT Law Articles 20-25
Maintain reporting and sanctions case packs.	Link trigger, analysis, decision time, filing, receipt, freeze, authority correspondence and confidentiality evidence.	Case pack, timeline and access record.	AML/CFT Law, Articles 27-29
Maintain a launch and legal-change pack.	Record perimeter, licences, thresholds, reporting, sanctions, data governance, vendors, source versions and control tests.	Signed pack, source register and approvals.	Official sources listed below

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 on Anti-Money Laundering and Counter-Financing of Terrorism (Amended) No. 64/NA dated 1 July 2024
Anti-Money Laundering Intelligence Office · Primary legislation - official English translation
Open official source

Decision on Customer Due Diligence Measures for Reporting Entities (Amended) No. 11/NCC dated 29 May 2025
Anti-Money Laundering Intelligence Office · Official CDD decision
Open official source

AMLIO regulations index
Anti-Money Laundering Intelligence Office · Official authority index
Open official source

AMLIO reporting entities, forms and online reporting
Anti-Money Laundering Intelligence Office · Official reporting guidance
Open official source

Instruction on Suspicious Transaction Reporting No. 42/AMLIU dated 12 January 2016
Anti-Money Laundering Intelligence Office · Official FIU instruction
Open official source

Regulation on Cash Transaction Reports No. 417/BOL dated 5 June 2015
Bank of the Lao PDR · Official threshold regulation
Open official source

Decision on Reporting Wire Transfers above the Specified Limit No. 963/BOL dated 27 November 2015
Bank of the Lao PDR · Official wire-transfer decision
Open official source

Decrees No. 553/GOV, 554/GOV and 555/GOV dated 4 September 2025
Anti-Money Laundering Intelligence Office · Official sanctions and enforcement instruments
Open official source

Second National Risk Assessment of Lao PDR 2024
Anti-Money Laundering Intelligence Office · Official national risk assessment
Open official source

Lao Trade Portal
Ministry of Industry and Commerce · Official laws and trade information portal
Open official source

FATF increased-monitoring statement - October 2026
FATF · Authoritative current public-list status
Open official source

FATF high-risk jurisdictions statement - October 2026
FATF · Authoritative current public-list status
Open official source

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