VOVE ID

VOVE COUNTRY CONTROL FILE

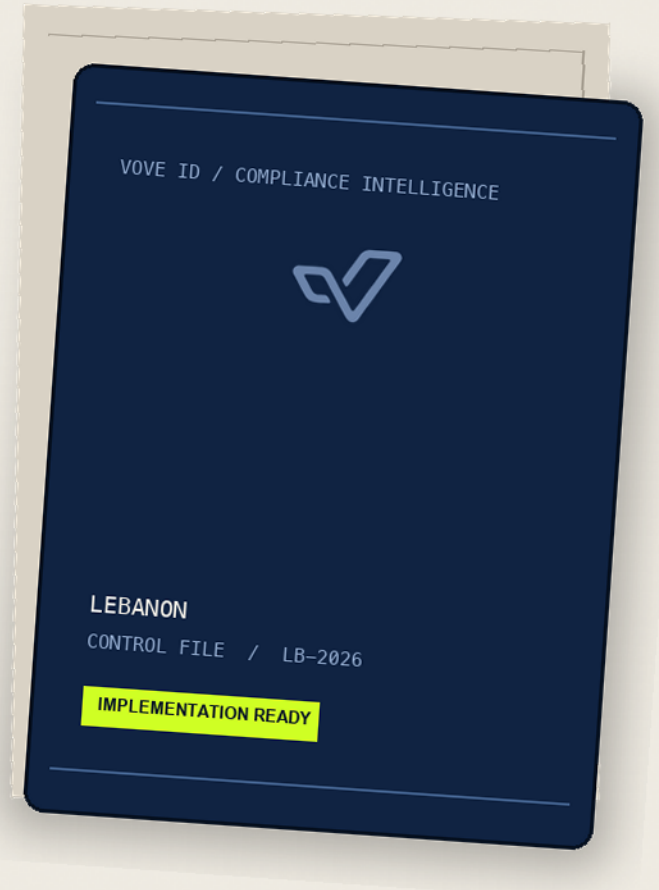
KYC / KYB / AML

2026 EDITION

LEBANON



LEBANON / LB



KYC / KYB / AML

COMPLIANCE CHECKLIST

2026 EDITION

IMPLEMENTATION CHECKLIST / NOT LEGAL ADVICE

READ THIS FIRST

Lebanon KYC, KYB & AML Compliance Checklist

Implementation checklist for Lebanese customer due diligence, beneficial ownership, suspicious reporting, sanctions, records, payments, company verification and data governance.

Primary AML law	**Law No. 44 of 2015**
FIU	**Lebanese Special Investigation Commission**
Suspicious reporting	**Immediately, including attempted transactions**
Beneficial ownership	**20% ownership, then other control, then senior-management fallback**
Records	**At least five years from relationship end or transaction completion**
Payments	**BDL authorization under the current product framework**
Privacy	**Law No. 81 of 2018 governs electronic transactions and personal data**
FATF status	**Increased monitoring at 30 October 2026**

Scope and legal framework

Anti-Money Laundering and Terrorism Financing Law No. 44 of 2015, BDL Basic Circular 83 and SIC guidance, 2025 SIC targeted-financial-sanctions guidance and sector instruments form the core framework. Current Arabic texts and later instruments control.

FATF context

Lebanon remained under FATF increased monitoring in the statement dated 30 October 2026, with an updated action-plan statement.

IMPORTANT

General information, not legal advice. Reviewed 16 November 2026. Confirm controlling Arabic texts, amendments, current sector and professional overlays, current FIU forms, sector rules, sanctions procedures, licensing and data requirements with the competent authority and qualified Lebanese 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 competent supervisor before launch.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Determine reporting-entity status.	Map each financial, payment, exchange, securities, insurance, real-estate, legal, accounting, precious-metals or other designated activity to Law No. 44 and current sector rules.	Perimeter memo and dated source set.	AML/CFT Law No. 44 of 2015, Articles 1 and 12
Obtain required licences and approvals.	Confirm the BDL or relevant sector-authority route before providing a regulated product, including electronic payment and money-transfer services.	Licence matrix, decisions and conditions.	Applicable sector law; Basic Decision No. 13790 of 9 January 2026
Maintain FIU reporting access.	Keep current forms, secure submission channels, delegated users and escalation contacts for the Lebanese Special Investigation Commission.	Registration, access review and test record.	Law No. 44, Articles 6-8

2. GOVERNANCE AND RISK ASSESSMENT

Governance and risk assessment

The programme must be risk-based, governed and tested.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Assess ML/TF/PF risk.	Assess customers, geographies, products, channels, transactions, agents and technology and refresh after material change.	Methodology, assessment and approval.	Law No. 44, Articles 9-12; Basic Circular 83
Maintain internal controls.	Document governance, compliance responsibility, screening, training, escalation, quality assurance and independent testing proportionate to risk.	Policies, appointment, training and audit reports.	Law No. 44, Articles 12-14
Control groups and third parties.	Apply lawful group standards and oversee agents, outsourcers and vendors; document gaps and additional measures.	Contracts, oversight and remediation.	Law No. 44 and applicable BDL sector controls

3. NATURAL-PERSON IDENTIFICATION

Natural-person identification

CDD applies at onboarding and statutory risk triggers.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Identify and verify customers.	Collect required identity particulars and verify them using reliable independent documents, data or information.	Identity record and verification provenance.	Law No. 44, Article 4; BDL Basic Circular 83
Verify representatives.	Identify and verify each person acting for a customer and confirm authority.	Representative KYC and mandate.	Law No. 44, Article 4; BDL Basic Circular 83
Understand purpose and monitor.	Record purpose and intended nature, risk-rate the relationship, scrutinize activity and keep CDD current.	Profile, monitoring and refresh history.	Law No. 44, Article 4; BDL Basic Circular 83 and continuing CDD provisions
Control failed CDD.	Do not establish or continue a relationship where required CDD cannot be completed; assess immediate STR filing without tipping off.	Failure decision and reporting assessment.	Basic Circular 83; Law No. 44, Articles 4-7

4. KYB AND BENEFICIAL OWNERSHIP

KYB and beneficial ownership

Verify legal existence, ownership, authority and actual control.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Verify legal persons and arrangements.	Obtain legal form, existence, governing documents, address, activity, directors and authorized persons and corroborate through the registry or other reliable sources.	Registry extract and constitutional documents.	Law No. 44, Article 4; Lebanese Commercial Code and registry rules
Identify beneficial owners.	Apply the current natural-person ownership and control cascade, take reasonable verification measures and document any senior-management fallback.	Ownership chart, control analysis and verified identities.	Law No. 44, Article 4; BDL Basic Circular 83
Separate registry and AML tests.	Use company-member and director records as evidence, not as a substitute for analysis of ultimate natural-person control.	Reconciliation and discrepancy log.	Lebanese Commercial Code; 2023 MENAFATF MER

5. PEPS, EDD, AND REMOTE ONBOARDING

PEPs, EDD, and remote onboarding

Higher-risk relationships require additional controls.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Identify PEP exposure.	Screen customers and beneficial owners for domestic, foreign and international-organisation PEP status, family and close associates.	Screening and classification.	Law No. 44, Article 4; BDL Basic Circular 83; BDL Basic Circular 83 PEP provisions
Apply PEP controls.	Obtain required senior approval, establish source of wealth and funds, and apply enhanced ongoing monitoring.	Approval, corroboration and plan.	BDL Basic Circular 83, PEP provisions
Mitigate remote-onboarding risk.	Use approved identity methods and proportionate fraud, device, liveness, session and monitoring controls.	Method assessment and session logs.	Basic Circular 83 and applicable BDL digital-onboarding controls

6. MONITORING AND SUSPICIOUS REPORTING

Monitoring and suspicious reporting

Detection and filing must be immediate and confidential.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Examine unusual activity.	Investigate complex, unusual, large or pattern-inconsistent transactions and attempted transactions and document findings.	Alert, analysis and decision.	Law No. 44, Articles 4-7
Report suspicion immediately.	Immediately report any suspicious or attempted transaction involving suspected money laundering or terrorist financing to the Lebanese Special Investigation Commission.	Trigger timestamp, report, receipt and chronology.	Law No. 44, Articles 6-7
Use the live FIU route.	Use the current prescribed form and secure channel and preserve submission and receipt evidence.	Submitted form and receipt.	Special Investigation Commission suspicious-transaction reporting guidance
Prevent tipping off.	Restrict access to STR existence, contents, analysis and authority communications.	Access logs and training.	Law No. 44 confidentiality provisions

7. TRANSFERS, PAYMENTS, AND AGENTS

Transfers, payments, and agents

Product and transaction rules are sector-specific.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Do not invent a universal threshold.	Attach the current sector instrument to each threshold, aggregation rule, report and product; escalate uncertainty before deployment.	Versioned threshold register and tests.	Law No. 44 and current BDL sector controls
Carry required transfer information.	Capture required originator and beneficiary data, identify missing fields, and apply the current repair, reject, return and reporting rules.	Field matrix and sample tests.	Law No. 44; Basic Circular 83
License electronic payments.	Obtain the applicable BDL licence and approvals before providing payment, wallet, acquiring, processing or transfer services.	Product classification and BDL decision.	Basic Decision No. 13790 of 9 January 2026
Oversee agents and outsourcing.	Perform due diligence, contract controls, training, monitoring and termination procedures for agents and service providers.	Agent file, contract and monitoring.	Current BDL payments and AML controls

8. TARGETED FINANCIAL SANCTIONS AND CPF

Targeted financial sanctions and CPF

Use current national and UN 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 continuously.	List version, logs and decisions.	Law No. 44; 2025 SIC targeted-financial-sanctions guidance
Freeze and report without delay.	Freeze assets when the operative Lebanese or UN-based procedure requires, prohibit dealing, and report through the current competent-authority route.	Match, freeze timestamp, inventory and report.	Law No. 44 and current national targeted-financial-sanctions procedure
Control PF exposure.	Apply current PF designations, ownership/control analysis, false-positive handling and release controls.	Procedure and authority decisions.	2025 SIC targeted-financial-sanctions guidance

9. RECORDS AND AUTHORITY ACCESS

Records and authority access

Records must reconstruct identities, transactions and decisions.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Retain AML records at least five years.	Keep customer and beneficial-owner files and transaction records for at least five years from account closure or transaction completion, as applicable, and longer when lawfully directed.	Schedule, archive and retrieval test.	Law No. 44, Articles 4-7; BDL Basic Circular 83, Article 3(5)
Reconstruct decisions.	Preserve sufficient data to reconstruct onboarding, risk, monitoring, reporting and sanctions decisions.	Complete sample case.	Law No. 44, Articles 4-7
Produce records lawfully.	Use controlled retrieval and disclosure workflows for the Special Investigation Commission, BDL and other competent authorities.	Request, approval, production and receipt.	Law No. 44, Articles 6-8

10. DATA GOVERNANCE AND BIOMETRICS

Data governance and biometrics

Use constitutional privacy, electronic-record, secrecy, cybersecurity and sector rules.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Map lawful collection and disclosure.	Document purpose, necessity, access and authorized disclosure for identity, biometric, financial and screening data.	Data inventory and disclosure log.	Constitution Article 17; Law No. 81 of 2018; sector secrecy rules
Protect identity and biometric data.	Minimize collection, restrict access, secure storage and transmission, test incidents and assess vendors.	Security assessment, access logs and tests.	Law No. 81 of 2018 and applicable BDL cybersecurity controls
Assess hosting and transfers.	Obtain Lebanese counsel and supervisor confirmation on current hosting, localization, transfer, secrecy and breach duties before production use.	Dated assessment and contract controls.	Current Lebanese electronic-transactions, cybersecurity and sector rules

11. PRACTICAL EVIDENCE PACKS

Practical evidence packs

Evidence must reconstruct decisions end to end.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain onboarding packs.	Bundle identity, authority, KYB, beneficial ownership, PEP, sanctions, purpose, risk and approval evidence.	Complete sample and retrieval result.	Operational control supporting Law No. 44, Articles 4-7
Maintain reporting and sanctions packs.	Link trigger, analysis, decision time, filing, receipt, freeze and authority correspondence.	Case pack and timeline.	Law No. 44, Articles 4-7
Maintain a launch and legal-change pack.	Record perimeter, licences, thresholds, sanctions, privacy, vendors, source versions and control tests.	Signed pack and source register.	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 No. 44 of 2015 on Fighting Money Laundering and Terrorism Financing
Special Investigation Commission · Primary legislation - official English text
Open official source

BDL Basic Circular 83 - AML/CFT controls
Banque du Liban · Official consolidated banking regulation
Open official source

BDL Basic Circular 83 official index
Banque du Liban · Official regulatory index
Open official source

Reporting Suspicious Transactions to SIC
Special Investigation Commission · Official FIU guidance
Open official source

Guidance for Implementing Targeted Financial Sanctions - July 2025
Special Investigation Commission · Official sanctions guidance
Open official source

Electronic Payment Services Providers - Basic Decision No. 13790
Banque du Liban · Official payment regulation
Open official source

Electronic Payment Services Providers official index
Banque du Liban · Official licensing index
Open official source

Electronic Banking and Financial Operations - Basic Circular 69
Banque du Liban · Official digital-finance regulation
Open official source

Law No. 81 of 2018 on Electronic Transactions and Personal Data
Official Gazette of Lebanon · Primary legislation - English translation
Open official source

Republic of Lebanon Mutual Evaluation Report
MENAFATF · Authoritative mutual evaluation
Open official source

Ministry of Economy and Trade companies department
Ministry of Economy and Trade · Official company-registration guidance
Open official source

FATF increased-monitoring statement - 30 October 2026
FATF · Authoritative current public-list status
Open official source

Document control

Version 1.0 / Published 16 November 2026 / Last reviewed 16 November 2026 / Owner: VOVE ID Compliance Research

General information, not legal advice. Reviewed 16 November 2026. Confirm controlling Arabic texts, amendments, current sector and professional overlays, current FIU forms, sector rules, sanctions procedures, licensing and data requirements with the competent authority and qualified Lebanese counsel.