

MOZAMBIQUE



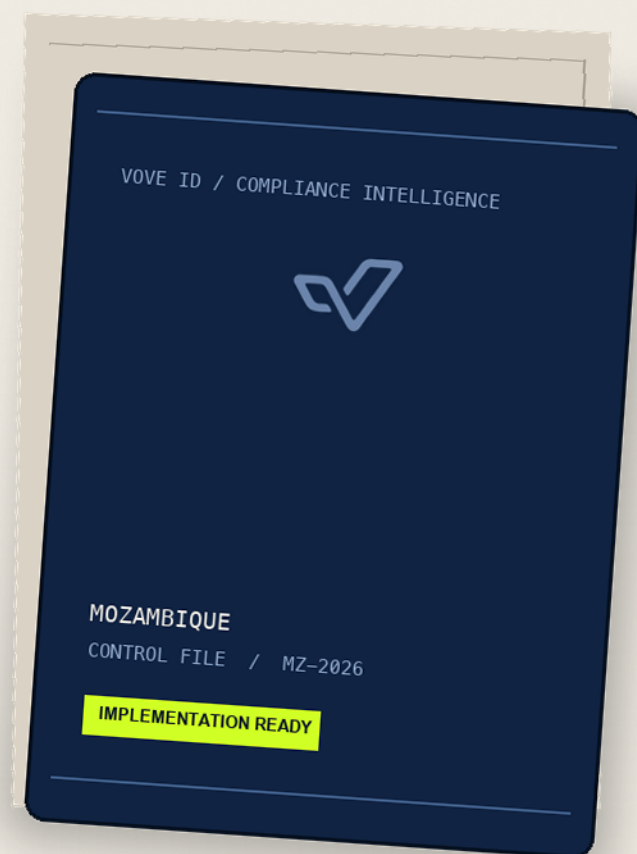
MOZAMBIQUE / MZ

KYC / KYB / AML

COMPLIANCE CHECKLIST

2026 EDITION

IMPLEMENTATION CHECKLIST / NOT LEGAL ADVICE



Mozambique KYC, KYB, AML, CFT and CPF Compliance Checklist 2026

Operational evidence prompts for Mozambique's amended AML/CFT/CPF framework, GIFiM reporting, customer and beneficial-owner due diligence, CREL declarations, sanctions, payments, e-money, agents, VASPs and the current privacy and FATF position.

Financial intelligence unit	GIFiM
Principal AML law	Law 14/2023, as amended by Law 3/2024
STR timing and method	Electronic filing under GIFiM procedures within 24 hours of detection or execution; if impossible, no later than 3 working days; physical only exceptionally where technical conditions are unavailable
Threshold reports	Cash at or above MZN 250,000; other transactions at or above MZN 750,000; aggregate fractionation daily, weekly and monthly and report on the aggregate
Occasional-transaction CDD	At or above MZN 900,000, plus every statutory non-value trigger
Beneficial-owner indicator	Law 14/KYB/CREL: at least 10%; Decree 53 Article 13 indicator: more than 10%; always test other control and use fallback only after exhausting all possible means with no suspicion
General AML retention	10 years after account closure or end of the relationship
Targeted sanctions	Freeze immediately, no later than 24 hours after dissemination, and report to GIFiM within the same 24-hour period
FATF status	Not under increased monitoring or a call for action at 15 July 2026; removed 24 October 2025

Scope and legal framework

The principal preventive framework is Law 14/2023 of 28 August, as amended by Law 3/2024 of 22 March, and its Regulation under Decree 53/2023 of 31 August. Banco-supervised institutions also apply Notice 10/GBM/2024. Targeted financial sanctions are governed by Law 14/2023 Article 63, Law 15/2023 Articles 39-40, as amended by Law 4/2024, and Decree 54/2023. Legal-entity and beneficial-owner registration is governed by Decree-Law 1/2024. Financial and payment activity must also be assessed under Law 20/2020 and Decree 50/2024. Notice 1/GBM/2026 created the instant-payments system, entered into force on 2 March 2026 and expressly relies on Law 2/2008, supporting Law 2/2008's continuing role. The 2026 National Payments System measure remains labelled a bill/proposal because no promulgation and commencement evidence was identified.

FATF context

Mozambique was removed from FATF increased monitoring on 24 October 2025 after completing its action plan. It is absent from both FATF public statements dated 19 June 2026. This does not remove ESAAMLG follow-up or the need for customer-, product-, channel- and geography-specific risk assessment.

IMPORTANT

Prepared and reviewed on 15 July 2026 for operational compliance planning. It is not legal advice. Confirm the current consolidated Portuguese legislation, sector directions, sanctions lists, licensing perimeter, gazette status of the proposed national payments law, status and transition terms of the personal-data protection bill, and FATF statements before implementation. Thresholds and procedures in this guide are scope-specific and must not be generalized across sectors.

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

Start with the regulated activity, reporting-entity category and responsible supervisor. AML duties do not replace market-entry authorization.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Classify the entity and activity under the AML law	Map every product and service to the financial-entity or designated non-financial category in Articles 4-5, including real estate, casinos, precious metals/stones, vehicles, legal/accounting and trust/company services where applicable.	Perimeter memorandum, product inventory, legal-entity chart, reporting-entity classification and approval record.	Law 14/2023, Articles 4-5
Map GIFiM and the competent supervisor	Treat GIFiM as the FIU and identify the Article 55 supervisor: Banco de Moçambique for its financial sectors, the insurance supervisor, Inspeção-Geral de Jogos, a professional order, responsible ministry, or GIFiM where no other supervisor exists.	Supervisor map, registrations, regulatory contacts, filing credentials and inspection correspondence.	Law 14/2023, Articles 55-60 ; Law 2/2018 ; GIFiM official mandate
Obtain authorization before regulated financial or payment activity	Classify banking, credit, e-money, funds-transfer and payment-aggregation models and obtain Banco authorization before incorporation or operation as required.	License or authorization, application pack, Banco correspondence, approved business plan and conditions register.	Law 20/2020, Article 16 ; Decree 50/2024, Articles 52-59 ; Banco licensing portal
Separate sandbox testing from production authorization	Use Banco's regulatory sandbox only within approved test conditions and establish an authorized-partner or licensing route before production launch.	Sandbox approval, test scope, participant safeguards, exit plan, partner license or production authorization.	Banco de Moçambique regulatory sandbox official pages

Governance and risk-based controls

Controls must reflect documented ML, TF and PF risk rather than a threshold-only compliance model.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain an enterprise ML/TF/PF risk assessment	Assess customers, products, services, transactions, channels, technology and geographies; document inherent risk, controls, residual risk and mitigation.	Approved risk assessment, methodology, source data, risk appetite, action plan and review minutes.	Law 14/2023, Articles 12-13; Decree 53/2023, Articles 4-9
Maintain governance, compliance and independent review	Assign accountable senior management and compliance responsibility, maintain proportionate internal controls and test their design and operation independently.	Governance charter, appointments, management reports, compliance plan, independent-review reports and remediation evidence.	Law 14/2023, Articles 46-50; Notice 10/GBM/2024 for Banco-supervised institutions
Train relevant personnel and agents	Deliver role-based training on CDD, beneficial ownership, PEPs, monitoring, reporting, sanctions and confidentiality, with sector-specific agent controls.	Curriculum, attendance, assessments, role matrix, refresher calendar and agent training records.	Law 14/2023, Article 51; Notice 10/GBM/2024, Articles 121-126
Apply the Banco sector overlay only where applicable	For Banco-supervised institutions, map Notice 10/GBM/2024 requirements to controls, including governance, annual reporting, transfers, agents, e-money and VASPs.	Obligations register, Notice-to-control mapping, annual return and supervisory submissions.	Notice 10/GBM/2024, which repealed Notice 5/GBM/2022

Natural-person customer due diligence

CDD is event-driven. Values below a threshold do not override suspicion, transfer, relationship or data-quality triggers.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Trigger CDD at every statutory event	Complete CDD when establishing a relationship; for an occasional transaction at or above MZN 900,000; for any domestic or international transfer; on suspicion regardless of value; or where prior identification data are doubtful.	Trigger matrix, system rules, linked-transaction aggregation, onboarding record and exception logs.	Law 14/2023, Article 15(1)-(2)
Collect prescribed natural-person data	Capture name/signature, birth details, nationality, sex, marital status/regime, physical address, contacts, parentage, employment/profession and income, identity-document details, NUIT and the nature and amount of income.	Completed customer profile, source documents, NUIT, address and occupation/income evidence.	Decree 53/2023, Article 10(1)
Verify identity using valid authoritative evidence	Verify with a valid document issued by a competent authority and containing a current photograph where applicable; authenticate documents and resolve inconsistencies.	Document image, authenticity result, issuer/expiry data, discrepancy resolution and reviewer audit trail.	Decree 53/2023, Article 11(1)-(2)
Control any low-risk alternative identification	Use the two-witness/community-authority alternative only where Article 11's low-risk conditions are satisfied and the rationale is documented; never use it to bypass suspicion or higher risk.	Low-risk assessment, witness identities and standing, authority confirmation, approval and enhanced follow-up where needed.	Decree 53/2023, Article 11(2)(a)(xi)

KYB, CREL and beneficial ownership

The customer file must explain the entity's existence, purpose, authority, ownership and ultimate natural-person control and reconcile that analysis with CREL.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Identify and verify the legal person	Obtain name, seat/main establishment, contacts, senior managers, NUIT, purpose, activity/group, holders of at least 10% of capital or voting rights, representatives and powers; verify through CREL/public and constitutive records.	Current CREL certificate, statutes/formation instrument, NUIT, licenses, management record, mandates and foreign-document authentication where applicable.	Law 14/2023, Article 15(2)(f), as amended; Decree 53/2023, Articles 10(3) and 11(3)-(5)
Identify the ultimate beneficial owner	Apply Law 14's at-least-10% direct/indirect ownership or control test, including collective-investment units, and control by other means. Separately record Decree 53 Article 13's more-than-10% ownership indicator. Current official CREL implementation guidance uses at least 10%. For trusts, identify settlor, trustee, protector if any, beneficiaries/classes and other ultimate controllers.	Dated ownership chart, registry/share records, voting/control agreements, separate threshold calculations, identity verification and trust instrument.	Law 14/2023, Article 3 and annexed glossary definition of 'beneficiário efectivo,' plus Article 22; Decree 53/2023, Articles 10 and 13; official CREL beneficial-owner implementation guidance, pending primary full-text confirmation for the registry element
Use the senior-manager fallback correctly	Record a senior managing official only after exhausting all possible means, where there is no suspicion, and no natural person has been identified or doubts remain that an identified person is the beneficial owner.	Exhaustive search steps, negative or doubtful findings, no-suspicion conclusion, control analysis, escalation approval and senior-manager identity verification.	Decree 53/2023, Article 13(1)(d)
Follow and reconcile current CREL beneficial-owner implementation guidance	Current official registry guidance instructs filing at incorporation, annually in the month of incorporation and within 30 days of a change. Treat the annual and 30-day periods as implementation guidance pending confirmation from a working official primary full-text copy, not as independently verified statutory deadlines. Capture the requested identity, NUIT, contact, percentage/type of control, effective date and supporting documents.	CREL declaration and receipt, guidance-based calendar, change log, beneficial-owner register, primary-source confirmation tracker and reconciliation to the KYC file.	Official CREL beneficial-owner implementation guide; article-level Decree-Law 1/2024 confirmation pending

PEPs, enhanced due diligence and remote onboarding

Higher-risk relationships require a reasoned escalation, not merely a screening flag.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Identify PEP exposure across the relationship	Screen customers, representatives and beneficial owners for domestic, foreign and international-organization PEP status, including family members and close associates.	List sources, screening timestamps, match adjudication, relationship mapping and review history.	Law 14/2023, Articles 23-24; Decree 53/2023, Article 44
Apply PEP approval, source and monitoring controls	Obtain senior-management approval before starting or continuing the relationship, establish and evidence source of wealth and source of funds, and apply permanent enhanced monitoring.	Approval, wealth/funds evidence, plausibility assessment, EDD plan, alerts and periodic review.	Law 14/2023, Article 23, as amended by Law 3/2024
Do not auto-expire PEP controls	Recognize the statutory 2-year formal post-office period, then continue proportionate measures while residual PEP risk remains.	Office-leaving date, 2-year review, residual-risk assessment, approval to retain or reduce controls.	Law 14/2023, Article 23(3)-(4)
Control non-face-to-face onboarding	For financial institutions, complete all statutory CDD remotely using permitted secure identification/authentication methods, assess channel risk and require in-person identification where a discrepancy arises.	Remote CDD policy, consent where applicable, identity/liveness results, device/channel data, discrepancy and in-person resolution record.	Decree 53/2023, Article 48
Apply documented EDD to higher risk	Investigate purpose, frequency, complexity, economic rationale, amounts, source/destination, geography, payment means and profile; obtain additional verification, higher approval, intensified monitoring and shorter refresh where required.	EDD questionnaire, source evidence, transaction rationale, approval, review frequency and enhanced-monitoring results.	Law 14/2023, Article 21; Decree 53/2023, Article 18

Monitoring, failed CDD and GIFiM reporting

Monitoring must join customer context, threshold aggregation, suspicious-activity escalation and confidential reporting.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Monitor the relationship and refresh CDD	Compare activity with known business, risk and source of funds; update immediately on doubt or suspicion and at intervals not exceeding 1 year for high-risk and 3 years for low-risk customers.	Expected-activity profile, monitoring rules, alert/case history, refresh calendar, updated documents and reviewer sign-off.	Law 14/2023, Article 15; Decree 53/2023, Articles 15 and 41
Stop or exit when CDD cannot be completed	Where identification or verification duties cannot be completed, refuse to establish the business relationship or carry out the occasional transaction or operation; terminate an existing relationship where the identified risk cannot otherwise be managed; record the written conclusions; and submit an STR to GIFiM. Consult the competent judicial or police authorities before termination where it could prejudice an investigation. Stop further CDD where continuing would risk tipping off the customer.	System stop, refusal/exit decision, written conclusions, declined-operation log, authority-consultation record and STR receipt.	Law 14/2023, Articles 15(6) and 41; Decree 53/2023, Article 21
Submit STRs electronically under GIFiM procedures	Escalate immediately and submit through the registered goAML channel within 24 hours of detecting suspicion or executing the transaction. If that is impossible, submit no later than 3 working days from detection or execution. Use physical documents only exceptionally where electronic technical conditions are unavailable and follow GIFiM procedures.	Detection/execution time, internal escalation, case analysis, goAML receipt/reference, impossibility rationale and exceptional physical-submission evidence where used.	Law 14/2023, Article 44(1)-(2); Decree 53/2023, Articles 26-27; GIFiM goAML portal
Submit statutory threshold reports	Report cash transactions at or above MZN 250,000 and other transactions at or above MZN 750,000, whether single or fractionated. Detect and aggregate fractionation daily, weekly and monthly and report when the aggregate reaches the threshold. Use an extended arrangement only with supervisor authorization after GIFiM consultation and never beyond 6 months.	Daily/weekly/monthly aggregation logic, completeness reconciliation, submitted report and receipt, plus supervisor authorization, GIFiM consultation and duration where extended.	Law 14/2023, Article 44(3); Decree 53/2023, Article 24(3)-(5)
Preserve abstention and tipping-off controls	Where founded suspicion requires abstention, stop execution and notify the Public Prosecutor and GIFiM immediately. Never reveal an STR, related communication or consideration to the customer or a third party.	Confidential abstention log, authority communication, suspension instruction, role-based access and neutral customer communication.	Law 14/2023, Articles 42 and 53; Decree 53/2023, Articles 22-23

Payments, wires, thresholds, agents and VASPs

Payment architecture changes both licensing and transaction-data obligations. Sector rules are additional to general AML duties.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Carry exact international wire-transfer information	Include originator name, account if used, address, national-ID or customer-ID number, date and place of birth; beneficiary name and account if used; beneficiary bank; and transaction value. Use a unique traceable reference where no account exists and keep the message attached through the chain.	Exact-field message mapping, required-field validation, unique-reference logic, intermediary preservation and sampled transfer record.	Decree 53/2023, Articles 49(6), 50, 52 and 54.
Constrain the reduced-information wire rule	For cross-border transfers below MZN 30,000, retain the originator and beneficiary names plus both account numbers, or a unique transaction reference where no account exists. At MZN 30,000 or more, apply the full Article 50 information requirements and verify the beneficiary where required. Suspicion overrides reduced-information treatment.	Below-MZN-30,000 boundary rule, minimum-field test, full-information boundary, beneficiary verification, suspicion override and transfer record.	Decree 53/2023, Articles 49(6), 50, 52 and 54.
Treat missing wire information by institution role	The originating bank must abstain from execution where required information is absent. Intermediary and beneficiary banks must detect missing information and use effective risk-based rules to execute, reject or suspend and determine follow-up. At MZN 30,000 or more, the beneficiary bank verifies the beneficiary if not previously verified and retains the information.	Originator hard stop, intermediary and beneficiary exception queues, risk disposition, follow-up, beneficiary verification and retained record.	Decree 53/2023, Articles 49(6), 50, 52 and 54.
Control payment and e-money agents	Perform fit-and-proper and risk assessment, impose contractual controls, train and monitor agents, maintain a current list and report suspension/termination as required; terminate transfer/e-money agent contracts where AML/CFT/CPF training has not occurred for more than 1 year; retain principal responsibility for agent activity.	Agent due diligence, contract, risk score, training, monitoring, current list, annual assessment and termination/report record.	Decree 50/2024, Article 53; Notice 10/GBM/2024, Articles 121-126, specifically Article 122(2) for the training termination rule
Obtain VASP authorization and registration	Before providing exchange, transfer, custody/administration or covered issuer-related virtual-asset services, obtain Banco authorization/registration and assess local scope for foreign services offered to residents.	Perimeter analysis, Notice 4 application, registration/authorization, controller and governance files, local representation and product inventory.	Law 14/2023, Articles 25-26; Notice 4/GBM/2023; Notice 10/GBM/2024, Articles 143 onward
Keep cross-border cash rules distinct	For travellers or logistics, check the current exchange/customs declaration law. AT's portal currently displays values above MZN 10,000 national currency and USD 10,000 foreign currency; do not use these as customer-reporting thresholds.	Current AT check, declaration, currency/value record and customs receipt where applicable.	Law 14/2023, Article 45; Autoridade Tributária e-Viajante portal

8. TARGETED FINANCIAL SANCTIONS

Targeted financial sanctions

Targeted financial sanctions require immediate list ingestion, screening, freezing and reporting, independent of ordinary transaction monitoring.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Screen current UN and national designations	Screen customers, beneficial owners, representatives, counterparties and transactions using current UN consolidated and nationally disseminated lists, including change-triggered rescreening.	List source/version/time, ingestion log, population coverage, screening results and match decisions.	Law 15/2023, as amended by Law 4/2024; Decree 54/2023; GIFiM TFS pages
Freeze immediately and without prior authorization	Freeze designated funds and other assets without delay and without prior notice or authorization; complete the statutory process within 24 hours after communication of an international list or dissemination of a national list.	International-list communication or national-dissemination time, alert time, asset block time, asset inventory and decision record.	Law 15/2023, Articles 39-40, as amended by Law 4/2024; Decree 54/2023
Notify all required authorities and report freeze details	On identifying linked assets, notify the Procurador-Geral da República, competent supervisor and GIFiM immediately. Within 24 hours of freezing or unfreezing, report to GIFiM the amount, asset type, date and time, including measures involving transactions or attempts.	Notices to PGR, supervisor and GIFiM; GIFiM receipt; amount/type/date/time schedule; attempted-transaction details and follow-up correspondence.	Law 14/2023, Article 63; Law 15/2023, Articles 39-40; Law 4/2024; Decree 54/2023
Control false positives and unfreezing	Keep assets blocked while the match is unresolved and unfreeze only through the prescribed verification/authority process, retaining the full rationale and authorization.	Match analysis, identifiers compared, authority contact, unfreeze authorization, time stamps and customer communication review.	Law 15/2023, Articles 30 and 39-42, as amended by Law 4/2024; Decree 54/2023

Retention and regulator access

Records must be complete, reconstructable, confidential and promptly retrievable for competent authorities.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Retain the general AML file for 10 years	Keep customer, representative and beneficial-owner identification, risk assessments, reconstructable transactions, correspondence, reports and analyses for 10 years after account closure or relationship end.	Retention schedule, closure/end date, immutable archive, sample retrieval and deletion hold.	Law 14/2023, Article 43; Decree 53/2023, Articles 29-30
Support extensions and legal holds	Prevent deletion where a competent authority requires longer retention or an investigation, litigation or sanctions hold applies.	Legal-hold policy, authority request, affected-record inventory, release approval and audit log.	Law 14/2023, Article 43
Preserve separate statutory record classes	Track sector-specific and document-specific clocks, including specified 5-year training/internal-review and trust-administration records, without shortening the general 10-year customer and transaction file.	Record-class inventory, legal mapping, minimum period, system rule and disposal approval.	Law 14/2023, Articles 43, 48 and 51; Decree 53/2023
Provide timely competent-authority access	Index records so transactions, ownership/control, CDD decisions, reports and control operation can be produced promptly while restricting unauthorized access.	Retrieval test, regulator response pack, access logs, chain of custody and confidentiality approvals.	Law 14/2023, Articles 22, 43 and 55-60

Personal data and privacy status

The review found constitutional and electronic-transactions protections but no confirmed comprehensive personal-data protection act in force. The March 2026 instrument is a bill.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Apply operative constitutional protections	Respect Article 71 restrictions and access/rectification protections for personal data while documenting the statutory basis for AML collection, screening, retention and authority disclosure.	Data inventory, purpose/legal-basis mapping, notice, access/rectification workflow and disclosure register.	Constitution in force, Assembly of the Republic official page, Article 71
Secure electronic records and transactions	Protect systems and data against unauthorized access and apply authentication, access control, logging, integrity and incident-response measures appropriate to the service.	Security policy, access matrix, authentication configuration, logs, vulnerability remediation and incident records.	Electronic Transactions Law 3/2017
Do not overstate unconfirmed general privacy duties	Do not label GDPR-style controller registration, DPIA, breach-notification or international-transfer deadlines as generally enacted Mozambican requirements without a current sector-specific or enacted primary source.	Current-law check, sector mapping, legal advice where needed and product requirement traceability.	INTIC proposal updates dated 5 March, 28 May and 29 May 2026
Track the personal-data protection bill	Monitor parliamentary passage, promulgation, gazette publication, commencement and transitional periods, then update controls only against the enacted text. INTIC's May updates still described the comprehensive measure as a proposal under parliamentary consideration.	Legislative tracker, official gazette check, impact assessment and approved implementation plan.	INTIC official March and May 2026 proposal-status updates

Evidence packs and assurance

A defensible program links each legal obligation to a control, owner, record and tested outcome.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain a customer and KYB evidence pack	Bundle verified identity, authority, purpose, expected activity, ownership/control, CREL reconciliation, risk rating, source evidence and approvals with timestamps and provenance.	Indexed customer file and completeness checklist.	Law 14/2023, Articles 15 and 22; Decree 53/2023, Articles 10-18
Maintain reporting and sanctions evidence packs	Preserve alert-to-decision timelines, STR and threshold receipts, non-report rationale, abstention records, list versions, freeze timestamps and GIFiM notifications.	Case file, goAML receipt, threshold reconciliation, sanctions file and authority correspondence.	Law 14/2023, Articles 42-45 and 53; Law 15/2023; Decrees 53/2023 and 54/2023
Test data and control completeness	Sample onboarding, refresh, monitoring, wires, reporting, sanctions, retention and agent controls; reconcile source populations to processed and reported outcomes.	Test plan, samples, findings, root-cause analysis, action owner and closure proof.	Law 14/2023, Articles 46-51; Notice 10/GBM/2024 where applicable
Track date-sensitive legal transitions	Recheck FATF statements, sanctions lists, National Payments System bill promulgation/commencement, privacy-bill enactment, sector notices and thresholds before launch and at periodic legal review.	Legal inventory, source URLs, last-check date, change assessment, approvals and dataset revision log.	FATF statements dated 24 October 2025 and 19 June 2026; Assembly and INTIC official status pages

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 14/2023 of 28 August: AML/CFT/CPF preventive law

Banco de Moçambique / Boletim da República · Primary legislation

[Open official source](#)

Law 3/2024 and Law 4/2024 amendments

Banco de Moçambique / Boletim da República · Amending legislation

[Open official source](#)

Decree 53/2023 and Decree 54/2023 regulations

Banco de Moçambique / Boletim da República · Regulations

[Open official source](#)

Notice 10/GBM/2024 AML/CFT/CPF directives

Banco de Moçambique · Financial-sector notice

[Open official source](#)

GIFiM mandate

GIFiM · Official authority page

[Open official source](#)

goAML reporting portal

GIFiM · Official reporting channel

[Open official source](#)

Law 15/2023 on terrorism and targeted financial sanctions

Banco de Moçambique / Boletim da República · Primary legislation

[Open official source](#)

GIFiM targeted-financial-sanctions documents

GIFiM · Official sanctions resource

[Open official source](#)

United Nations Security Council consolidated sanctions list

United Nations Security Council · Official sanctions list

[Open official source](#)

CREL beneficial-owner filing guide

Legal Entities Registry service · Official registry guidance

[Open official source](#)

Banco de Moçambique institution licensing

Banco de Moçambique · Official licensing page

[Open official source](#)

Decree 50/2024 regulating credit institutions and financial companies

Banco de Moçambique / Boletim da República · Prudential and licensing regulation

[Open official source](#)

Notice 4/GBM/2023: VASP registration requirements

Banco de Moçambique · Virtual-asset sector notice

[Open official source](#)

Banco de Moçambique regulatory sandbox Banco de Moçambique · Official fintech page Open official source
National payments law proposal approved for submission to Parliament, 18 February 2026 Government of Mozambique · Official legislative-status page Open official source
Constitution of the Republic of Mozambique Instituto Nacional de Segurança Social de Moçambique · Constitution Open official source
Electronic Transactions Law 3/2017 Instituto Nacional das Comunicações de Moçambique · Primary legislation Open official source
Personal-data protection bill sent for parliamentary debate INTIC · Official legislative-status notice Open official source
Personal-data protection proposal remains before Parliament, 28 May 2026 INTIC · Official legislative-status update Open official source
INTIC privacy-law status update, 29 May 2026 INTIC · Official legislative-status update Open official source
Law 20/2020 on credit institutions and financial companies Banco de Moçambique / Boletim da República · Primary legislation Open official source
Notice 1/GBM/2026 creating the Mozambique Instant Payments System Banco de Moçambique / Boletim da República · Payments regulation Open official source
Autoridade Tributária e-Viajante currency declaration portal Autoridade Tributária de Moçambique · Official declaration portal Open official source
FATF Mozambique removal from increased monitoring, 24 October 2025 Financial Action Task Force · Official public statement Open official source
FATF jurisdictions under increased monitoring, 19 June 2026 Financial Action Task Force · Official public statement Open official source
FATF high-risk jurisdictions subject to a call for action, 19 June 2026 Financial Action Task Force · Official public statement Open official source

Document control

Version 1.8 / Published 15 July 2026 / Last reviewed 15 July 2026 / Owner: VOVE ID Compliance Research

Prepared and reviewed on 15 July 2026 for operational compliance planning. It is not legal advice. Confirm the current consolidated Portuguese legislation, sector directions, sanctions lists, licensing perimeter, gazette status of the proposed national payments law, status and transition terms of the personal-data protection bill, and FATF statements before implementation. Thresholds and procedures in this guide are scope-specific and must not be generalized across sectors.