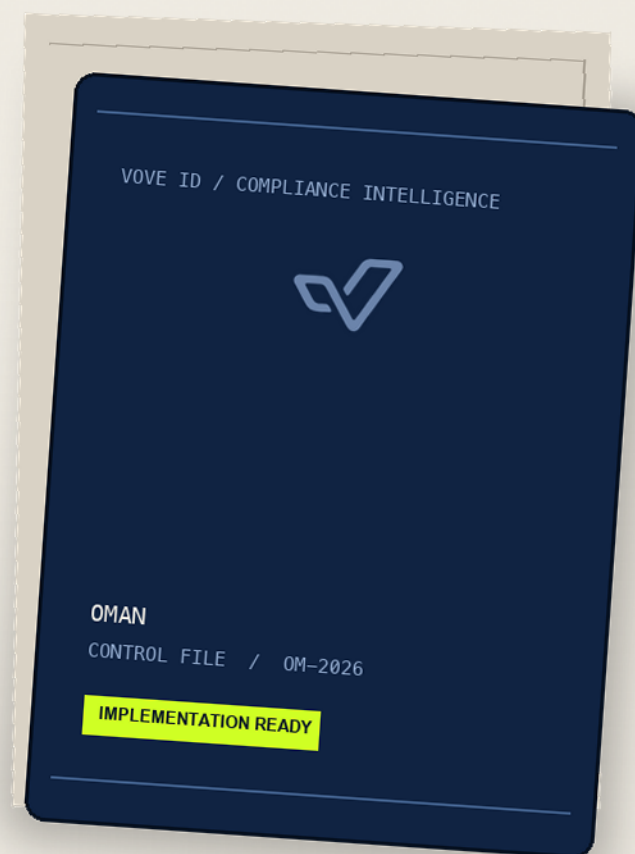


# OMAN



OMAN / OM



KYC / KYB / AML

## COMPLIANCE CHECKLIST

**2026 EDITION**

IMPLEMENTATION CHECKLIST / NOT LEGAL ADVICE



# Oman KYC, KYB & AML Compliance Checklist

Implementation checklist for Oman CDD, beneficial ownership, suspicious reporting, sanctions, privacy, payments and virtual-asset controls.

|                                |                                                                    |
|--------------------------------|--------------------------------------------------------------------|
| Primary AML law                | <b>Royal Decree 30/2016</b>                                        |
| FIU                            | <b>National Centre for Financial Information</b>                   |
| STR timing                     | <b>Immediately; CBO outer limit 48 hours, FSA sectors 24 hours</b> |
| CBO occasional-transaction CDD | <b>OMR 5,000 or more, including linked operations</b>              |
| CBO occasional wire CDD        | <b>OMR 350 or equivalent</b>                                       |
| Financial-sector retention     | <b>At least 10 years under applicable instructions</b>             |
| Beneficial ownership           | <b>25% is a starting point; control still requires analysis</b>    |
| FATF public lists              | <b>Not listed at 19 June 2026</b>                                  |

## Scope and legal framework

Royal Decree 30/2016 promulgates the AML/CFT Law. CBO Circular BM 1187 and the 2022 CBO Guidelines apply to CBO-supervised financial institutions; FSA and other supervisory instructions apply by activity. Banking Law 2/2025 modernises the financial-services perimeter.

## FATF context

Oman was absent from the FATF increased-monitoring and call-for-action lists dated 19 June 2026. The FATF/MENAFATF 2024 mutual evaluation identified effectiveness and beneficial-ownership priorities. Absence from a public list is not a low-risk classification.

### IMPORTANT

General information, not legal advice. Reviewed 2 October 2026. Confirm controlling Arabic text, current sector instructions, NCFI filing specifications, beneficial-owner procedure, sanctions directions, privacy permits and licensing with the competent authority and qualified Oman 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 activity and supervisor first.

| CONTROL                                                                | IMPLEMENTATION ACTION                                                                                                                    | EVIDENCE                                                | SOURCE                                                                                   |
|------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|------------------------------------------------------------------------------------------|
| <b>Determine the reporting-entity category.</b>                        | Map services and Oman nexus to the financial-institution, DNFBP, non-profit and other covered categories.                                | Perimeter memo, service map and authority confirmation. | <a href="#">Royal Decree 30/2016</a>                                                     |
| <b>Obtain every licence before regulated activity.</b>                 | Classify banking, payments, money services, finance, securities, insurance, fintech and virtual-asset features under current sector law. | Licence matrix, approvals and conditions.               | <a href="#">Banking Law 2/2025</a> ; <a href="#">National Payment Systems Law 8/2018</a> |
| <b>Use the current sector instruction and controlling Arabic text.</b> | Track BM 1187, FSA decisions and later circulars for the exact licence.                                                                  | Source inventory, translations and change log.          | <a href="#">CBO AML/CFT Guidelines 2022</a> , sections 1.1-1.3                           |

# Governance and risk assessment

Governance must be risk-based and demonstrably effective.

| CONTROL                                                         | IMPLEMENTATION ACTION                                                                      | EVIDENCE                                           | SOURCE                                                         |
|-----------------------------------------------------------------|--------------------------------------------------------------------------------------------|----------------------------------------------------|----------------------------------------------------------------|
| <b>Maintain enterprise and customer risk assessments.</b>       | Assess customers, countries, products, channels, technology, sanctions and emerging risks. | Methodology, assessment, approvals and updates.    | <a href="#">Royal Decree 30/2016; CBO Guidelines chapter 2</a> |
| <b>Maintain proportionate controls.</b>                         | Document CDD, monitoring, reporting, records, sanctions, training and escalation.          | Approved framework, procedures and issue register. | <a href="#">CBO BM 1187</a>                                    |
| <b>Appoint compliance leadership and independent assurance.</b> | Preserve authority, resources, senior access and periodic testing.                         | Appointment, board reports, audit and remediation. | <a href="#">Royal Decree 30/2016; CBO BM 1187</a>              |

### 3. NATURAL-PERSON IDENTIFICATION

## Natural-person identification

CDD covers customers, beneficial owners and representatives.

| CONTROL                                                                    | IMPLEMENTATION ACTION                                                                                                                              | EVIDENCE                                         | SOURCE                                                         |
|----------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|----------------------------------------------------------------|
| <b>Apply CDD before a relationship and at every trigger.</b>               | Identify and verify relevant persons, understand purpose, and refresh for suspicion, doubt or change.                                              | Trigger analysis, identity record and timestamp. | <a href="#">Royal Decree 30/2016 article 33</a>                |
| <b>Apply the CBO OMR 5,000 occasional-transaction threshold correctly.</b> | For a customer without a relationship, complete CDD for a single or linked operation at or above OMR 5,000; do not treat it as a universal report. | Aggregation logic and samples.                   | <a href="#">BM 1187 article 6; CBO Guidelines 3.2.2 note 2</a> |
| <b>Apply the separate CBO occasional-wire threshold.</b>                   | Complete CDD before an occasional wire at OMR 350 or equivalent and apply wire-data controls.                                                      | Transfer samples and message fields.             | <a href="#">CBO Guidelines 3.2.2 note 3</a>                    |
| <b>Use reliable independent identity evidence.</b>                         | Validate current civil, passport, registry or other authoritative evidence.                                                                        | Attributes, provenance and fraud checks.         | <a href="#">Royal Decree 30/2016 article 33</a>                |
| <b>Validate representatives and authority.</b>                             | Verify the person and mandate before accepting instructions.                                                                                       | Representative KYC and mandate.                  | <a href="#">CBO BM 1187 CDD provisions</a>                     |
| <b>Do not proceed when CDD cannot be completed.</b>                        | Decline or end the relationship and consider an NCFI report without tipping off.                                                                   | Failure, restriction and report assessment.      | <a href="#">Royal Decree 30/2016; CBO Guidelines 3.2-3.3</a>   |

## KYB and beneficial ownership

Verify legal existence, ownership and effective control.

| CONTROL                                                        | IMPLEMENTATION ACTION                                                                               | EVIDENCE                                               | SOURCE                                                                                      |
|----------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|--------------------------------------------------------|---------------------------------------------------------------------------------------------|
| <b>Verify the legal person and understand its structure.</b>   | Collect commercial registration, constitutional documents, managers and reliable registry evidence. | Extract, documents and discrepancy record.             | <a href="#">Royal Decree 30/2016 article 33</a>                                             |
| <b>Identify natural persons who ultimately own or control.</b> | Trace direct, indirect, layered, nominee and control arrangements.                                  | Ownership chart, calculations and verified identities. | <a href="#">CBO Guidelines 3.2.4</a>                                                        |
| <b>Use 25% as a starting point, not a safe harbour.</b>        | Identify aggregate interests of 25% or more and assess concert parties, control and lower holdings. | Calculations and control rationale.                    | <a href="#">CBO Guidelines 3.2.4</a>                                                        |
| <b>Maintain current BO information and filings.</b>            | Reconcile internal CDD with the commercial register and use the live MOCIIP change procedure.       | BO register, filings, receipts and changes.            | <a href="#">Commercial Companies Law 18/2019;</a><br><a href="#">FATF/MENAFATF MER 2024</a> |

# PEPs, EDD, and remote onboarding

Apply enhanced measures to PEPs and higher risks.

| CONTROL                                            | IMPLEMENTATION ACTION                                                                                                              | EVIDENCE                                           | SOURCE                                                                                 |
|----------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|----------------------------------------------------------------------------------------|
| <b>Identify PEPs, family and close associates.</b> | Apply required approval, source-of-wealth, source-of-funds and enhanced monitoring under the sector rule.                          | Screening, approval and corroboration.             | <a href="#">Royal Decree 30/2016 article 36</a> ; <a href="#">CBO Guidelines 3.2.7</a> |
| <b>Apply EDD to higher-risk relationships.</b>     | Obtain additional customer, purpose, wealth and funds information.                                                                 | Risk trigger, additional CDD and approval.         | <a href="#">CBO Guidelines 3.2.7</a>                                                   |
| <b>Control digital onboarding.</b>                 | CBO licensees must use the National Digital Onboarding Registry as instructed while retaining responsibility for accuracy and EDD. | Method assessment, registry result and exceptions. | <a href="#">CBO BM 1191</a>                                                            |

## Monitoring and suspicious reporting

Ongoing scrutiny supports immediate NCFI reporting.

| CONTROL                                                         | IMPLEMENTATION ACTION                                                                                                                     | EVIDENCE                                 | SOURCE                                          |
|-----------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|-------------------------------------------------|
| <b>Monitor and refresh on a risk basis.</b>                     | Compare activity with purpose, expected behaviour, risk and source of funds.                                                              | Scenarios, alerts and refresh records.   | <a href="#">CBO Guidelines 3.2.6 and 3.3</a>    |
| <b>Escalate suspicion without waiting for proof.</b>            | Assess transactions and attempts promptly and record grounds and formation time.                                                          | Chronology, information and decision.    | <a href="#">Royal Decree 30/2016</a>            |
| <b>Notify NCFI immediately and obey the sector outer limit.</b> | File immediately; CBO-supervised entities must not exceed 48 hours and FSA capital-markets or insurance sectors must not exceed 24 hours. | Suspicion timestamp, report and receipt. | <a href="#">CBO Guidelines 3.3.4</a>            |
| <b>Prevent tipping off.</b>                                     | Restrict report knowledge and customer communications.                                                                                    | Access controls, training and incidents. | <a href="#">Royal Decree 30/2016 article 49</a> |

# Payments, wires, thresholds, and virtual assets

Apply activity-specific licensing and transfer controls.

| CONTROL                                                 | IMPLEMENTATION ACTION                                                                                      | EVIDENCE                                      | SOURCE                                             |
|---------------------------------------------------------|------------------------------------------------------------------------------------------------------------|-----------------------------------------------|----------------------------------------------------|
| <b>Carry required wire information.</b>                 | Transmit prescribed originator and beneficiary fields and risk-manage missing data.                        | Field matrix, samples and repair queue.       | <a href="#">CBO BM 1187 articles 31-40</a>         |
| <b>Obtain payment or money-service approval.</b>        | Map wallets, acquiring, remittance, exchange and ancillary activity to current CBO rules.                  | Product memo, licence and safeguarding tests. | <a href="#">Banking Law 2/2025; BM 1192</a>        |
| <b>Treat virtual-asset exposure as a distinct risk.</b> | Apply EDD to elevated exposure and confirm the current VASP registration and licensing path before launch. | Feature map, perimeter analysis and approval. | <a href="#">CBO Circular BDD/AML /CB/2020/4480</a> |

## 8. TARGETED FINANCIAL SANCTIONS

# Targeted financial sanctions

Use current UN and Oman directions.

| CONTROL                                                                 | IMPLEMENTATION ACTION                                                                    | EVIDENCE                                           | SOURCE                                                          |
|-------------------------------------------------------------------------|------------------------------------------------------------------------------------------|----------------------------------------------------|-----------------------------------------------------------------|
| <b>Screen designations and ownership or control.</b>                    | Screen relevant parties at onboarding, transactions and list updates.                    | List versions, tests and decisions.                | <a href="#">NCCT Decision 1/2022</a>                            |
| <b>Freeze without delay and notify.</b>                                 | Prevent dealing or asset availability on a true match and notify through the live route. | Match analysis, restriction time and notification. | <a href="#">NCCT Decision 1/2022</a> ; <a href="#">MER 2024</a> |
| <b>Use licences, delisting or release only under written authority.</b> | Apply designation-specific procedure and conditions.                                     | Analysis, permission and release record.           | <a href="#">NCCT Decision 1/2022</a>                            |

## Records and regulator access

Apply the exact sector retention rule.

| CONTROL                                                                                  | IMPLEMENTATION ACTION                                                                        | EVIDENCE                                     | SOURCE                               |
|------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|----------------------------------------------|--------------------------------------|
| <b>Retain CDD and relationship records for at least ten years where CBO rules apply.</b> | Run the period from the correct relationship or transaction event and preserve longer holds. | Schedule, trigger and deletion approval.     | <a href="#">CBO BM 1187</a>          |
| <b>Retain transaction and wire data for at least ten years under CBO rules.</b>          | Keep enough information to reconstruct transactions and payment messages.                    | Samples, archive and retrieval test.         | <a href="#">CBO Guidelines 3.2.5</a> |
| <b>Produce records promptly to authorities.</b>                                          | Preserve controlled access, legal holds and production audit trails.                         | Access matrix, retrieval and production log. | <a href="#">Royal Decree 30/2016</a> |

## Privacy, biometrics, breaches, and transfers

Apply the 2022 law and 2024 regulation subject to scope and exemptions.

| CONTROL                                            | IMPLEMENTATION ACTION                                                                                                     | EVIDENCE                                                | SOURCE                                                                 |
|----------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|------------------------------------------------------------------------|
| <b>Map processing conditions and transparency.</b> | Inventory processing, provide notices, support rights and maintain the processing record and policy.                      | Data map, notices, rights and record.                   | <a href="#">Royal Decree 6/2022</a> ; <a href="#">Decision 34/2024</a> |
| <b>Obtain the Article 5 permit when required.</b>  | Before biometric, genetic, health and other listed sensitive processing, complete the MTCIT permit process unless exempt. | Classification, permit and conditions.                  | <a href="#">Royal Decree 6/2022 article 5</a>                          |
| <b>Control processors, breaches and transfers.</b> | Appoint a DPO, contract processors, assess recipient protection and make required notifications.                          | Appointment, contracts, assessment and incident record. | <a href="#">Decision 34/2024</a> ; <a href="#">MTCIT guidance</a>      |

## Practical evidence packs

Evidence must reconstruct decisions end to end.

| CONTROL                                        | IMPLEMENTATION ACTION                                                                             | EVIDENCE                                    | SOURCE                                                                        |
|------------------------------------------------|---------------------------------------------------------------------------------------------------|---------------------------------------------|-------------------------------------------------------------------------------|
| <b>Maintain an onboarding pack.</b>            | Bundle identity, authority, KYB, BO, PEP, sanctions, purpose, risk, privacy and approvals.        | Complete sample and retrieval result.       | <a href="#">Operational control supporting Royal Decree 30/2016</a>           |
| <b>Maintain NCFI and sanctions case packs.</b> | Link activity, suspicion time, report, receipt, confidentiality, restrictions and communications. | Case pack, timeline and access record.      | <a href="#">Royal Decree 30/2016;</a><br><a href="#">NCCT Decision 1/2022</a> |
| <b>Maintain a launch and change pack.</b>      | Record perimeter, licences, reporting, sanctions, privacy, vendors, tests and uncertainties.      | Signed pack, source register and approvals. | <a href="#">Official sources listed below</a>                                 |

# 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.

## AML/CFT Law - Royal Decree 30/2016

Central Bank of Oman · Primary legislation and official register

[Open official source](#)

## CBO Instructions implementing Royal Decree 30/2016 - BM 1187

Central Bank of Oman · Binding instructions

[Open official source](#)

## AML/CFT Guidelines for Financial Institutions

Central Bank of Oman · Official guidance

[Open official source](#)

## Digital Onboarding and e-KYC - BM 1191

Central Bank of Oman · Official instructions

[Open official source](#)

## Payment Service Providers Policy - BM 1192

Central Bank of Oman · Official licensing policy

[Open official source](#)

## Banking Law 2/2025 and current perimeter

Central Bank of Oman · Primary legislation and official summary

[Open official source](#)

## Virtual Assets and VASPs circular

Central Bank of Oman · Official circular

[Open official source](#)

## AML/CFT portal, NCCT Decision 1/2022 and sanctions guidance

Central Bank of Oman · Official register

[Open official source](#)

## Personal Data Protection Law - Royal Decree 6/2022

MTCIT · Primary legislation

[Open official source](#)

## Personal Data Protection Executive Regulation - Decision 34/2024

MTCIT · Primary regulation

[Open official source](#)

## Personal Data Protection guidance and forms

MTCIT · Official guidance

[Open official source](#)

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**Oman Mutual Evaluation Report 2024**

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](#)

## Document control

Version 1.0 / Published 2 October 2026 / Last reviewed 2 October 2026 / Owner: VOVE ID Compliance Research

General information, not legal advice. Reviewed 2 October 2026. Confirm controlling Arabic text, current sector instructions, NCFI filing specifications, beneficial-owner procedure, sanctions directions, privacy permits and licensing with the competent authority and qualified Oman counsel.