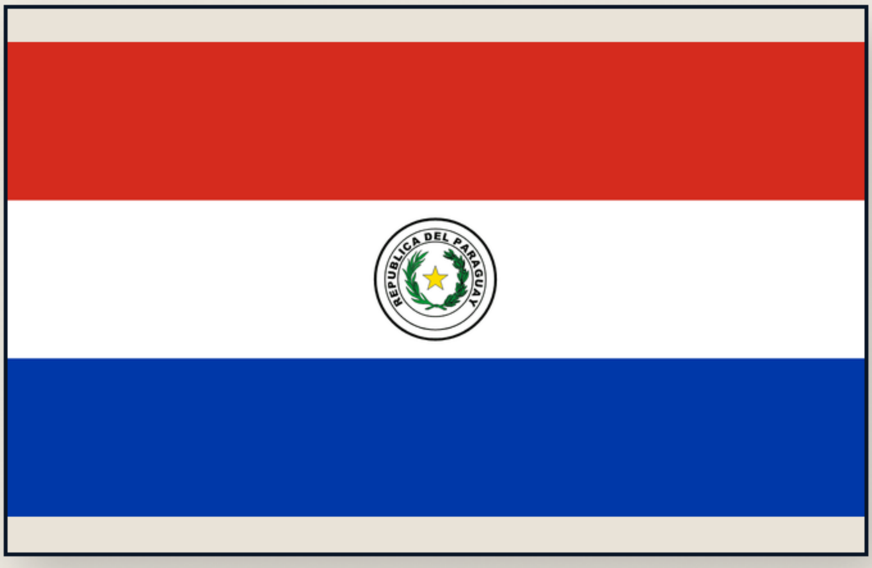
PARAGUAY



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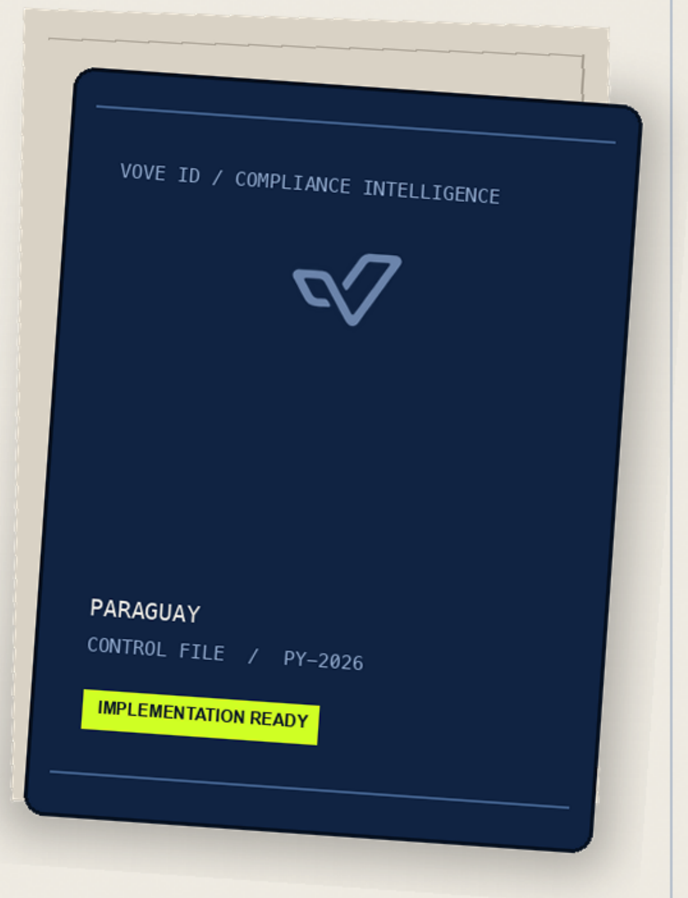

KYC / KYB / AML

COMPLIANCE CHECKLIST

2026 EDITION

IMPLEMENTATION CHECKLIST / NOT LEGAL ADVICE

READ THIS FIRST

Paraguay KYC, KYB & AML Compliance Checklist

An implementation checklist for Paraguay's risk-based AML/CFT/CPF framework, SEPRELAD reporting, beneficial ownership, targeted sanctions, records, privacy, payments and virtual-asset perimeter decisions.

FIU	**SEPRELAD**
Primary framework	**Law 1015/1997 as amended, including Law 6497/2019**
Suspicion reporting	**Completed or attempted suspicious operations, regardless of amount, to SEPRELAD under the applicable sector rule**
Beneficial ownership	**Natural-person ownership or control; Law 6446 administrative registers**
Retention	**Five years after the relationship ends or occasional transaction**
FATF status	**Not named on FATF public lists reviewed 12 August 2026**

Scope and legal framework

Law 1015/1997, as amended principally by Laws 3783/2009, 6497/2019 and 6960/2022, establishes Paraguay's preventive AML/CFT framework and SEPRELAD. Sector regulations issued by SEPRELAD and natural supervisors apply according to the entity and activity. Laws 6419/2019, 6446/2019 and 7593/2025 separately govern targeted financial sanctions, administrative beneficial-ownership registers and general personal-data protection.

FATF context

Paraguay is a GAFILAT member. It was not named on FATF's call-for-action or increased-monitoring lists reviewed 12 August 2026. FATF public-list absence is not a finding that customer or country risk is low; recheck the live lists before reliance.

IMPORTANT	General regulatory information, not legal advice or a licence determination. Reviewed and legally scoped as applicable on 12 August 2026. Confirm the entity, activity, current sector resolution, SIRO filing specification, objective-report threshold, beneficial-owner access, sanctions procedure, Law 7593 implementation and product licensing with SEPRELAD, the competent supervisor and qualified Paraguayan counsel before launch.

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

Resolve the exact legal entity, activity and supervisor before applying a sector rule.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Determine whether each activity is within the reporting-entity sectors in Law 1015.	Map products, customers and delivery channels to article 13 and the current SEPRELAD or natural-supervisor rule; document uncertain scope.	Applicability memo, product map and authority or counsel confirmation.	Law 1015 art. 13, as amended by Law 6960
Treat SEPRELAD as the FIU and national AML/CFT application authority.	Complete applicable registration, nominate authorised users and maintain tested access to the live reporting channel.	Registration, user approvals, access test and reporting procedure.	Law 1015 arts. 25 and 28, as amended
Obtain authorisation before regulated financial, payment, remittance, credit or virtual-asset activity.	Classify the model with BCP, SEPRELAD and any other competent supervisor and secure required licences or registrations before launch.	Perimeter analysis, authority correspondence and licence register.	Law 1015 art. 13; applicable sector legislation

Governance and risk assessment

Governance must reflect the entity's sector, products, customers, channels and geography.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain written risk-based AML/CFT/CPF policies and controls.	Approve risk assessment, CDD, monitoring, reporting, sanctions, training, audit and remediation arrangements and update them for legal change.	Board approvals, manual, risk assessment, testing and remediation log.	Law 1015 arts. 15-16 and 21, as amended by Law 6497
Designate an empowered compliance officer when required by the applicable rule.	Verify eligibility, independence, access, resources and any registration or approval requirement for the sector.	Appointment, role profile, authority filing and board minutes.	Law 1015 art. 35; applicable SEPRELAD sector resolution

Natural-person identification

CDD must use reliable independent documents, data or information.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Identify and verify the customer and understand the relationship purpose.	Collect identity, address, activity, purpose and expected activity; authenticate evidence before service where required.	Identity file, verification output, profile and approval.	Law 1015 art. 15, as amended by Law 6497
Identify the person acting for a customer and verify authority.	Verify the representative and customer, authenticate powers and resolve discrepancies.	Identity results, power, registry evidence and approval.	Law 1015 arts. 15-16
Do not start or continue when required CDD cannot be completed.	Refuse the operation or relationship, document the decision and assess a confidential ROS without tipping off.	Decline or exit record, investigation and ROS decision.	Law 1015 art. 15, as amended by Law 6497

KYB, registries, and beneficial ownership

Registry evidence supports but does not replace independent ownership and control analysis.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Verify legal existence, purpose, address, governance and authority.	Obtain current registry, constitutive, tax, director, signatory and power evidence.	Registry extract, constitutive documents, RUC evidence and powers.	Law 1015 arts. 15-16; Law 6446
Identify and reasonably verify the natural-person beneficial owner.	Trace every ownership and control layer and apply the Law 6446 ownership, voting, benefit, appointment and other-control conditions without collapsing them into one test.	Ownership chart, source records, control analysis and verified identities.	Law 1015 arts. 15-16; Law 6446
Confirm required communications to the administrative legal-person and beneficial-owner registers.	Obtain current SIARA evidence, monitor changes and annual confirmation duties, and escalate discrepancies.	Registry communications, receipts, refresh log and discrepancy decision.	Law 6446; current MEF/DGPEJBF rules
Use beneficial-owner information only through authorised access.	Record the legal basis for registry access and do not describe the detailed register as an unrestricted public database.	Access approval, query log and customer evidence.	Law 6446 arts. 8-10; Decree 3241/2020

PEPs, EDD, and remote onboarding

Higher risk requires enhanced evidence and oversight.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Detect PEPs and apply enhanced measures under the current sector rule.	Screen customers, beneficial owners and connected persons; obtain senior approval, source-of-wealth and source-of-funds evidence and enhanced monitoring where required.	Screening, match decision, approval, provenance and monitoring plan.	Law 1015 arts. 15-16; applicable SEPRELAD sector resolution
Control non-face-to-face onboarding risk.	Use proportionate authentication, liveness, device, fraud and exception controls and validate their effectiveness.	Remote-onboarding assessment, test results and exceptions.	Law 1015 arts. 15-16; applicable sector rule

Monitoring and suspicious reporting

Suspicion is independent of amount and reporting is confidential.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Monitor transactions against the customer's profile.	Detect and investigate unusual, complex, linked and attempted activity and preserve a reasoned conclusion.	Alerts, investigation, disposition and rule governance.	Law 1015 arts. 15, 17 and 19
Report completed or attempted suspicious operations to SEPRELAD regardless of amount.	Apply the live sector analysis and filing timetable and submit through SIRO or the prescribed channel with supporting information.	ROS decision, chronology, submission and acknowledgement.	Law 1015 art. 19, as amended by Law 6497; applicable sector resolution
Prevent tipping off and protect ROS confidentiality.	Restrict access, exclude ROS information from customer disclosures and train staff and providers.	Access logs, procedure and training.	Law 1015 arts. 19-20 and 32

Payments, wires, thresholds, and agents

Objective reports, thresholds and deadlines are sector-specific.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Configure only the objective reports applicable to the entity's current rule.	Confirm amount, currency, aggregation, period, negative-report duty and deadline from the current resolution before configuration.	Rule copy, mapping, tests and receipts.	Applicable SEPRELAD sector resolution and SIRO manual
Preserve originator and beneficiary traceability for transfers.	Validate required data and apply risk-based reject, suspend or escalation rules for missing information.	Payment message, validation and exception decision.	Law 1015 arts. 17-18; applicable BCP/SEPRELAD rule
Retain accountability for agents and outsourced providers.	Perform diligence, contract for security and record access, monitor performance and test retrieval.	Due diligence, contract, monitoring and retrieval test.	Law 1015 arts. 15-18 and 21

Targeted financial sanctions

Screening must lead to the statutory immobilisation and reporting process.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Screen applicable UN sanctions designations and national notices.	Screen customers, beneficial owners, counterparties and transactions on onboarding, list updates and before execution.	List source, update log, match logic and dispositions.	Law 6419 arts. 1-2
Immobilise covered funds or assets without delay and communicate immediately to SEPRELAD.	Prevent movement or availability, identify all assets and report the match, reasons and action timestamps through the prescribed route.	Match file, freeze timestamp, asset inventory and SEPRELAD communication.	Law 6419 art. 3
Release only under a legally sufficient authority process.	Document false-positive, exclusion or delisting analysis and authenticate the release instruction.	Authority decision and controlled release approval.	Law 6419

Records and regulator access

Records must reconstruct customers, operations, analyses and reports.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Retain operation records for five years from the operation or relationship end, as applicable.	Preserve complete transaction records in retrievable form and document the retention trigger.	Schedule, archive sample and deletion control.	Law 1015 art. 18, as amended by Law 6497
Retain CDD, files, correspondence and analysis for five years after relationship end or occasional transaction.	Link identity, ownership, monitoring and reporting support under stable identifiers.	CDD archive, case files and retrieval test.	Law 1015 art. 18, as amended by Law 6497
Respond to lawful SEPRELAD and supervisor requests.	Authenticate the request, preserve confidentiality, collect reproducibly and log production and receipt.	Request, legal review, production index and acknowledgement.	Law 1015 art. 22

Privacy, biometrics, and transfers

Law 7593/2025 supplies the general data-protection framework alongside sector secrecy and AML duties.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Process personal data on a documented legal basis and for defined purposes.	Map notices, rights, minimisation, security, retention and AML disclosure bases; record the legal applicability date.	Data inventory, notices, legal-basis record and rights procedure.	Law 7593/2025
Apply enhanced controls to sensitive and biometric data and transfers.	Minimise collection, restrict access, perform a risk assessment and confirm current implementing requirements with the National Personal Data Protection Agency.	Impact assessment, access controls, transfer analysis and authority check.	Law 7593/2025
Apply the separate credit-data regime where relevant.	Map Law 6534 rights, security and retention rules and BCP supervision to credit-data processing.	Credit-data inventory, rights workflow and retention rule.	Law 6534/2020

11. PRACTICAL EVIDENCE PACKS

Practical evidence packs

Keep concise packs that let a reviewer reproduce each decision.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain a reconstructable onboarding pack.	Bundle identity, KYB, beneficial ownership, screening, risk, approvals and exceptions.	Complete sampled onboarding pack.	Operational control supporting Law 1015 arts. 15-18
Maintain a reconstructable monitoring and reporting pack.	Link transactions, alerts, analysis, approvals, submissions and post-filing controls while protecting confidentiality.	Complete sampled case pack and access log.	Operational control supporting Law 1015 arts. 19-22

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.

Consolidated Law 1015/1997 - current AML framework
SEPRELAD · Primary legislation - consolidated
Open official source

Law 6497/2019 - principal preventive-framework amendments
SEPRELAD · Primary legislation
Open official source

SEPRELAD frequently asked questions
SEPRELAD · Official FIU guidance
Open official source

SEPRELAD resolutions inventory
SEPRELAD · Official regulatory inventory
Open official source

Law 6419 - targeted financial sanctions
Congressional legal database · Primary legislation
Open official source

Law 6446 - legal-person and beneficial-owner registers
Congressional legal database · Primary legislation
Open official source

DGPEJBF registry authority and current legal inventory
Ministry of Economy and Finance · Official registry authority
Open official source

Law 7593/2025 - general personal-data protection
Congressional legal database · Primary legislation
Open official source

Law 6534 - personal credit-data protection
Congressional legal database · Primary legislation
Open official source

Banco Central del Paraguay
BCP · Official financial supervisor
Open official source

FATF Paraguay mutual-evaluation page
FATF · Authoritative country assessment
Open official source

FATF black and grey lists
FATF · Authoritative current status
Open official source

Document control

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