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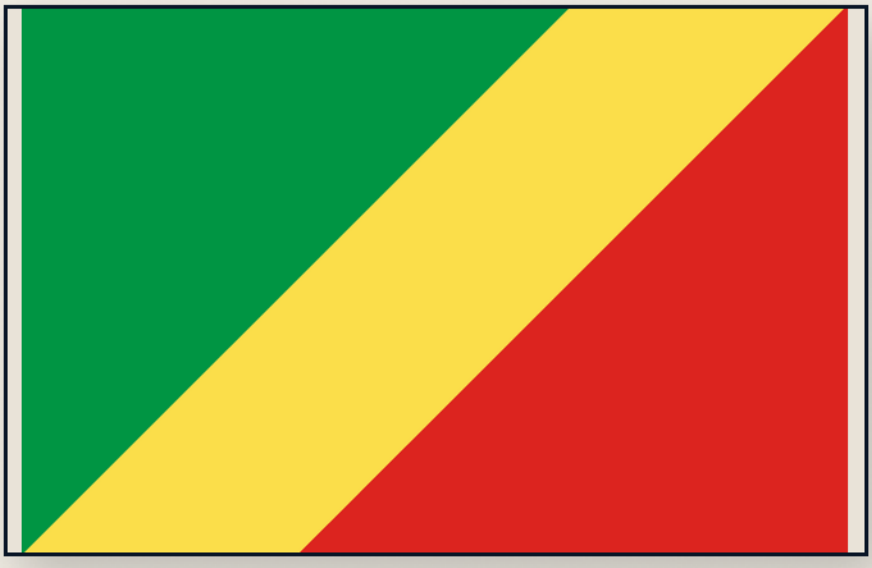
VOVE COUNTRY CONTROL FILE

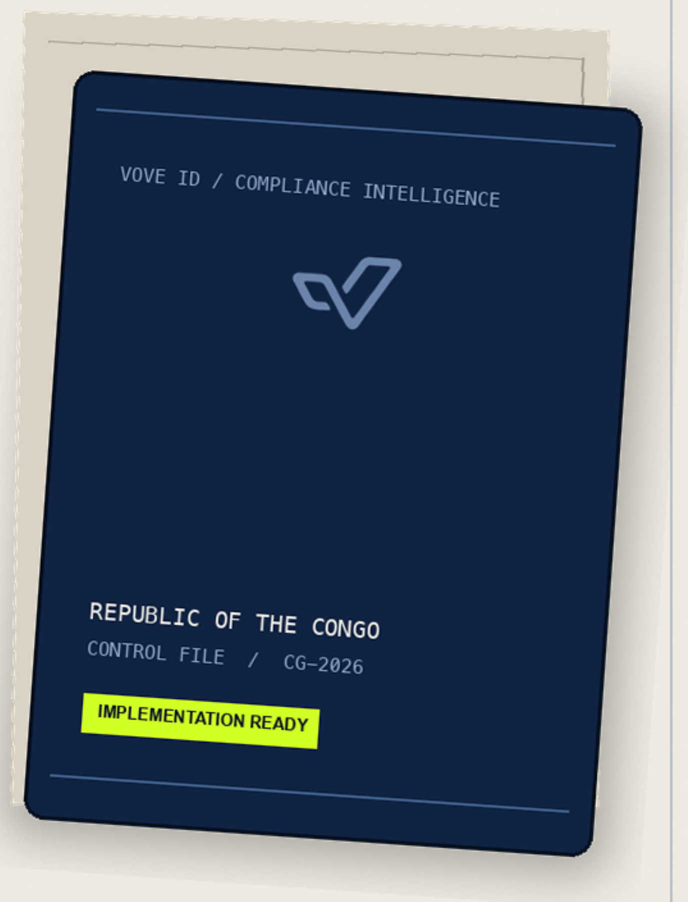
KYC / KYB / AML

2026 EDITION

REPUBLIC OF THE CONGO



REPUBLIC OF THE CONGO / CG



KYC / KYB / AML

COMPLIANCE CHECKLIST

2026 EDITION

IMPLEMENTATION CHECKLIST / NOT LEGAL ADVICE

READ THIS FIRST

Republic of the Congo KYC, KYB & AML Compliance Checklist

An implementation checklist for the Republic of the Congo's CEMAC AML/CFT/CPF framework, ANIF reporting, beneficial ownership, sanctions, records, personal-data protection and regulated payment activities.

FIU	**Agence Nationale d'Investigation Financiere (ANIF)**
Primary AML rule	**CEMAC Regulation No. 02/24**
Suspicion reporting	**Forthwith to ANIF; oral or electronic reports require written confirmation within 48 hours**
Cash reporting	**CFA 5,000,000 or more, single or apparently linked, subject to stated exceptions**
Core retention	**10 years for financial-institution CDD and transaction records**
FATF status	**Not named on FATF public lists as at 19 June 2026**

Scope and legal framework

CEMAC Regulation No. 02/24/CEMAC/UMAC/CM of 20 December 2024 is the operative regional AML/CFT/CPF rule and repealed the 2016 Regulation. CEMAC Regulation No. 04/24 governs targeted financial sanctions. National and sector overlays include the Republic of the Congo's ANIF framework, COBAC and BEAC rules, OHADA company law and Law No. 29-2019 on personal-data protection.

FATF context

Congo is assessed through GABAC. It was not named on FATF's high-risk or increased-monitoring lists current at the 19 June 2026 plenary. Absence from those lists is not a low-risk finding; the 2022 mutual evaluation found low effectiveness across all eleven Immediate Outcomes, and the March 2026 second enhanced follow-up records continuing technical deficiencies.

IMPORTANT	General regulatory information, not legal advice or a licence determination. Reviewed as applicable on 21 August 2026. Confirm reporting-entity status, sector rules, current ANIF Transact filing specifications, the operational beneficial-owner register, national sanctions machinery, the national data-protection authority procedures and product licensing with the competent authority and qualified Congolese 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.

Scope, authorities, and licensing

Resolve the entity, activity and supervisor before launch.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Determine whether each activity is a CEMAC reporting entity.	Map every entity, product, channel and agent to the financial-institution or DNFBP categories and identify ANIF and the competent sector supervisor.	Applicability memo, product map and accountable-owner register.	CEMAC Regulation No. 02/24, Articles 6-7
Treat ANIF as the Republic of the Congo's financial intelligence unit.	Register required correspondents, obtain the current ANIF Transact or other prescribed reporting format directly from ANIF and test a controlled filing path before operations begin.	Correspondent notice, channel test, procedure and access approvals.	CEMAC Regulation No. 02/24, Articles 86-97 and 107-109; Decree No. 2008-64
Obtain authorisation before regulated financial activity.	Classify banking, microfinance, insurance, payment, exchange and other financial services with the competent national authority, COBAC, BEAC or other supervisor and obtain every approval before launch.	Perimeter analysis, authority correspondence and licence register.	Applicable CEMAC, COBAC, BEAC, CIMA and national sector rules

Governance and risk assessment

The programme must be documented, risk-based and independently tested.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain an enterprise-wide ML/TF/PF risk assessment.	Assess customers, products, channels, geography, cash, agents, technology and proliferation risk before launch and on material change.	Approved methodology, risk assessment, controls and version history.	CEMAC Regulation No. 02/24, risk-based obligations
Maintain written controls and an empowered compliance function.	Assign senior accountability, confidential ANIF reporting authority, resources, training and independent testing.	Appointments, policies, training, testing and remediation log.	CEMAC Regulation No. 02/24, internal-control and correspondent provisions
Assess new technology before use.	Identify and mitigate ML/TF/PF risks before launching a new product, distribution mechanism or technology.	Pre-launch assessment, approval, tests and residual-risk acceptance.	CEMAC Regulation No. 02/24, Article 25

3. NATURAL-PERSON IDENTIFICATION

Natural-person identification

CDD uses reliable, independent evidence and continues through the relationship.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Identify and verify customers and representatives.	Verify the customer with reliable independent evidence; identify anyone acting for the customer and verify their authority.	Identity file, source provenance, mandate and verification result.	CEMAC Regulation No. 02/24, Articles 20 and 29-30
Understand purpose and expected activity.	Record the relationship purpose, products, expected volumes, counterparties, geography and source of funds sufficient for risk rating and monitoring.	Customer profile, expected-activity baseline and approval.	CEMAC Regulation No. 02/24, Article 21
Do not proceed where mandatory CDD fails.	Do not open or execute, or terminate as applicable, when required identification cannot be completed; consider and confidentially file an STR.	Decline or exit decision, investigation and restricted STR record.	CEMAC Regulation No. 02/24, Article 41

KYB, registries, and beneficial ownership

Registry evidence does not replace natural-person ownership and control analysis.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Verify legal existence, governance and authority.	Obtain current RCCM, constitutional, address, director, signatory, tax and licence evidence and reconcile inconsistencies.	RCCM extract, statutes, powers, tax record and licence file.	CEMAC Regulation No. 02/24, Article 31; OHADA Uniform Acts
Identify natural-person beneficial owners through ownership, control and fallback tests.	Identify the natural persons with ultimate controlling interests, then control by other means, and use the principal-manager fallback only where no person is identified under the first two tests.	Ownership chart, source records, control analysis and verified identities.	CEMAC Regulation No. 02/24, Article 33
Apply the register disclosure test separately from AML CDD.	For the CEMAC register, capture declared beneficial owners; if none is declared, apply the Regulation's more-than-25% and specified control or officeholder rules. Do not substitute this fallback for Article 33 CDD.	Register filing, calculation, officeholder record and reconciliation.	CEMAC Regulation No. 02/24, Articles 76-82

PEPs, EDD, and remote onboarding

Higher-risk and remote relationships require enhanced controls.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Detect PEP exposure in customers and beneficial owners.	Use appropriate systems to identify domestic, foreign and international-organisation PEP exposure and connected-person risk.	Screening, relationship map, match decision and refresh log.	CEMAC Regulation No. 02/24, Articles 23 and 67
Apply PEP approval, provenance and monitoring measures.	Obtain senior-management approval, take reasonable measures to establish source of funds or assets, and conduct enhanced ongoing monitoring.	Approval, provenance analysis and monitoring plan.	CEMAC Regulation No. 02/24, Article 23
Control non-face-to-face risk.	Apply enhanced identity, fraud, device, liveness and exception controls proportionate to the remote channel and data used.	Remote-onboarding assessment, vendor review, tests and exceptions.	CEMAC Regulation No. 02/24, Article 22; Law No. 29-2019

Monitoring and suspicious reporting

ANIF reporting is prompt, traceable and confidential.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Monitor activity against the current customer profile.	Examine unusual, complex, linked or apparently purposeless activity and preserve a reasoned conclusion.	Alerts, investigation, disposition and rule governance.	CEMAC Regulation No. 02/24, Articles 21 and 63-64
Report suspicious and attempted transactions forthwith to ANIF.	File when the entity knows, suspects or has good reason to suspect criminal proceeds or ML/TF/PF; confirm a telephone or electronic report in writing within 48 hours.	Decision chronology, report, receipt and supplemental-information log.	CEMAC Regulation No. 02/24, Articles 105 and 109
Prevent tipping off.	Restrict access and do not disclose an STR, its content or ANIF action to the customer or unauthorised third parties.	Access logs, confidentiality procedure and training.	CEMAC Regulation No. 02/24, Article 110

Payments, wires, thresholds, and agents

Payment controls preserve required data and apply scoped objective reporting.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Report covered cash transactions of CFA 5,000,000 or more.	Aggregate single and apparently linked cash transactions and report to ANIF, applying only the express business-use and BEAC-counter exceptions while retaining enhanced scrutiny.	Aggregation tests, exception basis, filing and receipt.	CEMAC Regulation No. 02/24, Article 18
Preserve required wire-transfer information.	Carry required originator and beneficiary data through the payment chain; seek missing data and, if not obtained within three days, refrain from execution and inform ANIF.	Message sample, exception workflow, request and ANIF notice.	CEMAC Regulation No. 02/24, Articles 36-38
Retain accountability for agents and outsourcing.	Verify permissions, diligence providers, contract for security and record access, train agents, monitor performance and test retrieval.	Due diligence, contract, training, monitoring and retrieval test.	CEMAC Regulation No. 04/18 and applicable COBAC rules

Targeted financial sanctions

Use the current CEMAC sanctions framework and controlled national procedures.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Screen applicable UN, regional and national designations.	Screen customers, beneficial owners, controllers, representatives and transactions at onboarding, list updates and before relevant execution.	List inventory, update logs, screening configuration and dispositions.	CEMAC Regulation No. 04/24; UN Security Council Consolidated List
Freeze covered property without delay or prior notice.	Prevent prohibited movement or availability of covered funds and economic resources and escalate immediately under the competent national process.	Freeze procedure, timestamps, legal basis and authority communication.	CEMAC Regulation No. 04/24
Report and govern matches, false positives and release.	Make required reports within the applicable 24-hour and quarterly periods, file an STR where required, and release only on documented lawful authority.	Reports, ANIF receipt, match rationale, authority instruction and reconciliation.	CEMAC Regulation No. 04/24

Records and regulator access

Records must reconstruct the customer, ownership, transaction and decision.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Retain financial-institution CDD records for at least 10 years.	Retain identification and relationship records for at least 10 years after account closure or relationship end, subject to longer legal holds.	Schedule, configuration, archive sample and legal-hold log.	CEMAC Regulation No. 02/24, Article 39
Retain transaction records for at least 10 years.	Preserve transaction, accounting, correspondence and special-examination records for at least 10 years after the transaction.	Transaction reconstruction, storage control and retrieval test.	CEMAC Regulation No. 02/24, Articles 39-40 and 64
Respond securely to competent-authority requests.	Authenticate requests, protect STR confidentiality, produce reproducibly and log scope, timing and receipt.	Request, approval, production index and acknowledgement.	CEMAC Regulation No. 02/24, Articles 40 and 97

Privacy, biometrics, and transfers

The Republic of the Congo's personal-data law applies alongside AML secrecy and retention duties.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Document a lawful, necessary and transparent basis for identity processing.	Map purposes, data, notices, rights, recipients, security and retention under Law No. 29-2019 and applicable AML secrecy rules.	Data inventory, legal-basis assessment, notices and rights procedure.	Law No. 29-2019 on personal-data protection
Apply enhanced safeguards to biometric and sensitive data.	Minimise collection, restrict access, test security and document necessity and proportionality before biometric or sensitive-data use.	Impact assessment, security tests, access controls and approval.	Law No. 29-2019
Confirm current authority formalities, transfers and incident procedures before production use.	Obtain current implementing instruments and competent-authority instructions before configuring declarations, authorisations, international transfers or incident notices; do not invent a portal or deadline.	Dated legal update, authority guidance and implemented procedure.	Law No. 29-2019; applicable implementing instruments

Practical evidence packs

Maintain concise packs that reproduce decisions and support supervisory access.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain a reconstructable onboarding pack.	Bundle identity, KYB, beneficial ownership, screening, risk, approvals and exceptions under stable identifiers.	Complete sampled onboarding pack.	Operational control supporting CEMAC Regulation No. 02/24
Maintain a reconstructable monitoring and reporting pack.	Link transactions, alerts, analysis, approvals, reports and post-filing controls while protecting confidentiality.	Complete sampled case pack and access log.	Operational control supporting CEMAC Regulation No. 02/24, Articles 105-110

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.

CEMAC Regulation No. 02/24 - AML/CFT/CPF (English)
GABAC · Primary regional regulation
Open official source

CEMAC Regulation No. 04/24 - targeted financial sanctions
GABAC · Primary regional regulation
Open official source

Congo second enhanced follow-up report, March 2026
GABAC · Authoritative country assessment
Open official source

Congo mutual evaluation
GABAC · Authoritative country assessment
Open official source

Congo country assessment page
FATF · Authoritative country status
Open official source

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

ANIF Congo official site
ANIF Congo · Official FIU guidance
Open official source

COBAC regulations
BEAC · Official banking supervisor materials
Open official source

CEMAC payment-system regulations
BEAC · Official central-bank materials
Open official source

Law No. 29-2019 on personal-data protection and digital-sector legal framework
ARPCE Congo · Official national regulator publication
Open official source

Decree No. 2008-64 establishing and organising ANIF
ANIF Congo · Primary national decree
Open official source

Republic of the Congo RCCM information
OHADA · Official company-registry materials
Open official source

United Nations Security Council consolidated sanctions list
United Nations · Authoritative sanctions list
Open official source

Document control

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