VOVE ID

VOVE COUNTRY CONTROL FILE

KYC / KYB / AML

2026 EDITION

SÃO TOMÉ AND PRÍNCIPE

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COMPLIANCE CHECKLIST

2026 EDITION

IMPLEMENTATION CHECKLIST / NOT LEGAL ADVICE

READ THIS FIRST

São Tomé and Príncipe KYC, KYB & AML Compliance Checklist

An implementation checklist for customer and beneficial-owner diligence, suspicious reporting, payments, sanctions, records and privacy under São Tomé and Príncipe's current framework.

FIU	**Unidade de Informação Financeira (UIF)**
Primary AML rule	**Law No. 8/2013 of 15 October 2013**
Suspicion reporting	**Immediately, including attempted transactions, regardless of amount**
Automatic cash report	**No general cash-transaction report identified in the 2024 GIABA assessment**
Core AML retention	**At least 5 years under record-specific clocks**
FATF status	**Not named on FATF public lists at 19 June 2026**

Scope and legal framework

Law No. 8/2013 is the core AML/CFT preventive law, read with Law No. 3/2018 on terrorism and terrorist financing, Central Bank Permanent Application Standards, Law No. 17/2018 and Decree-Law No. 16/2019 for payment services, and Law No. 3/2016 on personal-data protection.

FATF context

São Tomé and Príncipe was not named in FATF's high-risk or increased-monitoring statements dated 19 June 2026. GIABA's 2024 mutual evaluation remains the latest located comprehensive assessment. Absence from FATF public lists is not a low-risk finding.

IMPORTANT	General regulatory information, not legal advice or a licence determination. Reviewed as applicable on 8 September 2026. Confirm current Central Bank instruments, FIU institutional filing access, sanctions-gazette workflow, company-register practice, personal-data authority procedures and product-specific permissions with the competent authority and qualified São Toméan 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 covered activity and competent supervisor before launch.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Map each entity and activity to the AML/CFT perimeter.	Classify financial institutions and designated non-financial businesses and professions under Law No. 8/2013, including relevant agents and branches, and identify the FIU and sector supervisor.	Applicability memo, entity and product map, supervisor matrix and accountable owner.	Law 8/2013, Articles 2-3; GIABA MER 2024, Recommendations 10 and 22
Establish the institutional FIU reporting route.	Authorise named reporters, obtain the current reporting form and access route directly from the FIU, test secure transmission and preserve institutional acknowledgements; do not use the public tip-off channel as a substitute without FIU confirmation.	Reporter mandate, FIU instructions, channel test and receipt log.	Law 8/2013, Article 21; UIF legislation and contact pages
Obtain approval before regulated financial or payment activity.	Classify banking, foreign exchange, money transfer, payment, e-money, agent, outsourcing and other regulated services and obtain Central Bank or other competent approval before launch.	Perimeter analysis, licence, conditions, agent approvals and renewal calendar.	Law 17/2018; Decree-Law 16/2019; GIABA MER 2024, Recommendation 14

Governance and risk assessment

Controls must be documented, risk-based and independently tested.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain approved AML/CFT controls.	Adopt controls for CDD, beneficial ownership, PEPs, monitoring, reporting, sanctions, records, training and assurance proportionate to the institution's risk and sector rules.	Policy suite, governance approvals, control inventory, training and testing.	Law 8/2013; NAP 10/2015; GIABA MER 2024, Recommendations 18 and 23
Assess customer, product and delivery risk.	Document ML/TF risks across customers, beneficial owners, countries, products, cash exposure, technologies, agents and delivery channels before launch and after material change.	Risk methodology, assessment, inputs, approvals and remediation plan.	Law 8/2013, Article 11; GIABA MER 2024, Recommendation 1
Govern third parties and outsourcing.	Confirm reliance eligibility, obtain CDD information without delay, contract for document access, test retrieval and retain ultimate responsibility for customer identification and verification.	Due diligence, agreement, retrieval tests, monitoring and exceptions.	Law 8/2013, Article 17; GIABA MER 2024, Recommendation 17

3. NATURAL-PERSON IDENTIFICATION

Natural-person identification

Apply identification and verification at every statutory trigger.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Identify and verify customers before establishing a relationship.	Capture identity attributes, verify them from reliable independent evidence, record purpose and intended nature and establish an expected activity profile.	CDD file, evidence provenance, purpose, expected activity and risk decision.	Law 8/2013, Article 10(2)-(3); NAP 10/2015
Apply CDD at occasio nal-transaction and risk triggers.	Apply CDD to occasional or apparently linked transactions at or above STN 245,000, and regardless of amount where suspicion arises or prior identification data is doubtful; treat the statutory threshold as a trigger, not a safe harbour.	Trigger matrix, aggregation logic, alerts and CDD timestamps.	Law 8/2013, Article 10(2); GIABA MER 2024, criterion 10.2
Verify representatives and their authority.	Identify and verify each person acting for a customer and validate the mandate before permitting activity.	Identity evidence, mandate, authority verification and expiry control.	Law 8/2013, Article 10(12)

KYB, registries, and beneficial ownership

Verify legal existence, authority, ownership and ultimate natural-person control.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Verify legal-person identity and authority.	Obtain current commercial-register evidence, constitutional documents, registered office, business address, directors, licences and mandates, and resolve inconsistencies.	DGRN/GUE extract, statutes, officer list, licences, mandate and discrepancy log.	Law 8/2013, Article 10; DGRN GUE requirements
Identify and verify the beneficial owner.	Use reliable evidence to identify the natural person who ultimately owns or effectively controls the customer; document ownership and control separately and apply a conservative senior-manager fallback where no owner or controller can be identified.	Ownership chart, control analysis, verified identities and fallback rationale.	Law 8/2013, Article 10(2)-(3); GIABA MER 2024, criteria 10.5 and 10.10
Do not treat the company register as a complete BO register.	Reconcile registry records, customer declarations and independent evidence, refresh on ownership or control changes and record discrepancies; the 2024 GIABA assessment found no general legal-person BO filing duty or central BO register.	Registry evidence, declarations, corroboration, refresh log and discrepancies.	GIABA MER 2024, Recommendation 24
Identify foreign-trust role holders and control.	Where a foreign trust operates, holds assets or has a trustee in the jurisdiction, identify the persons who own or control it and document settlor, trustee, protector, beneficiaries and other effective controllers as a risk-based evidence standard.	Trust instrument, role register, identity files and control analysis.	Law 8/2013, Article 10(3); GIABA MER 2024, Recommendation 25

5. PEPS, EDD, AND FAILED CDD

PEPs, EDD, and failed CDD

Higher-risk relationships require approval, source evidence and enhanced monitoring.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Detect PEP exposure.	Use reasonable measures to determine whether customers and beneficial owners are foreign, domestic or international-organisation PEPs and map family members and close associates.	Screening, relationship map, match decision and refresh history.	Law 8/2013, Article 12; NAP 10/2015; GIABA MER 2024, Recommendation 12
Apply senior approval, source and monitoring controls.	For PEP and other high-risk relationships, obtain senior approval, establish source of wealth and source of funds and apply enhanced ongoing monitoring.	Approval, source analysis, corroboration and monitoring plan.	Law 8/2013, Articles 11-12
Stop activity where required CDD cannot be completed.	Do not open or execute and address existing relationships consistently with current FIU and supervisory instructions; consider an STR and protect confidentiality.	Decline, restriction or exit decision, investigation and reporting record.	Law 8/2013, Article 10(4); GIABA MER 2024, criterion 10.19

Monitoring and suspicious reporting

FIU reporting must be immediate, complete and confidential.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Monitor activity against the customer profile.	Review transactions for consistency with known business, risk and source of funds and document investigation of complex, unusual or apparently purposeless activity.	Alerts, investigation notes, supporting data and dispositions.	Law 8/2013, Articles 10-11; NAP 11/2015
Report suspicion and attempts immediately.	Timestamp when suspicion or reasonable grounds arose and immediately report to the FIU, including attempted transactions and regardless of amount, through the current institutional route.	Decision chronology, STR, delivery evidence and receipt.	Law 8/2013, Article 21; GIABA MER 2024, Recommendation 20
Prevent tipping off.	Restrict report access and do not inform customers or third parties that a report or related information was or will be sent, or that an ML/TF investigation exists.	Need-to-know access, communications controls, training and audit log.	Law 8/2013, Article 22(1)
Use the current FIU form and preserve supplements.	Obtain the institutional COS form and filing instructions directly from the FIU, submit complete supporting information and preserve later supplements and FIU communications.	Current form, filing package, supplements, correspondence and acknowledgement.	UIF documents and contact pages; NAP 11/2015

Payments, wires, thresholds, and agents

Keep CDD thresholds, sector triggers and reporting duties distinct.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Do not invent a general cash-transaction report.	Apply CDD, monitoring and STR duties to cash activity, but do not configure an automatic general cash-report threshold unless the FIU or competent supervisor confirms a current instrument; GIABA found no such general duty in 2024.	Legal register, authority confirmation, monitoring rules and change control.	GIABA MER 2024, paragraph 342
Apply sector-specific DNFBP triggers.	Confirm current redenominated amounts before implementation; the 2024 assessment records casino CDD at STN 50,000 and dealer-in-precious-metals/stones cash CDD at STN 245,000, alongside activity-based duties for real-estate and professional services.	Sector applicability memo, current-value confirmation, aggregation tests and CDD records.	Law 8/2013, Articles 3 and 10; GIABA MER 2024, criterion 22.1
Carry required wire information and control deficient transfers.	Apply Law No. 8/2013 and current Central Bank rules to originator and beneficiary information, retention and risk-based execute, reject, suspend and follow-up decisions; do not rely on the high statutory threshold as a risk safe harbour.	Field matrix, validation, repair queue, samples and decisions.	Law 8/2013, Article 15; GIABA MER 2024, Recommendation 16
Control payment agents and providers.	Verify licensing and agent authority, contract for AML, records, audit, privacy and incident controls, monitor performance and retain provider accountability.	Central Bank approvals, agent register, contracts, monitoring and incidents.	Law 17/2018; Decree-Law 16/2019

Targeted financial sanctions

Screen continuously while controlling the known national implementation delay.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Screen authoritative UN designations and national notices.	Screen customers, beneficial owners, controllers, representatives and relevant transactions at onboarding, before activity and on list updates using current UN and national sources.	List inventory, update log, screening configuration, alerts and dispositions.	Law 3/2018; UN consolidated list; GIABA MER 2024, Recommendations 6 and 7
Escalate potential matches immediately.	Block execution while confirming a potential match, obtain current legal directions from the competent authority and document the treatment of assets and prohibited availability.	Alert chronology, escalation, authority direction, asset record and controls.	Law 3/2018; GIABA MER 2024, Recommendations 6 and 7
Do not represent gazette publication as FATF-standard immediacy.	Maintain a rapid operational process but record that GIABA found the national gazette-dependent mechanism did not implement UN targeted financial sanctions without delay; confirm the current designation, reporting, false-positive and release procedure.	Gap assessment, authority confirmation, timestamps, reports and release decision.	GIABA MER 2024, criteria 6.4 and 7.4

Records and regulator access

Records must reconstruct customers, transactions and decisions.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Retain CDD records for at least five years after relationship end or an occasional transaction.	Apply the correct relationship or occasional-transaction clock to customer, representative and beneficial-owner evidence and preserve legal holds.	Retention schedule, archive sample, deletion control and hold log.	Law 8/2013, Article 20(1)(a)
Retain transaction and attempted-transaction records for at least five years.	Apply a transaction-based clock and preserve domestic and international transaction records and commercial correspondence in reconstructable form.	Archive configuration, reconstruction test and retrieval log.	Law 8/2013, Article 20(1)(b); GIABA MER 2024, Recommendation 11
Provide records promptly under proper authority.	Authenticate requests, protect STR confidentiality, produce controlled records to the FIU and competent authorities and log approval, scope, delivery and receipt.	Request register, authority check, production index and acknowledgement.	Law 8/2013, Articles 20 and 22

Privacy, biometrics, and transfers

AML processing remains subject to Law No. 3/2016.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Document purpose, proportionality, accuracy and retention.	Inventory identity, ownership, screening, biometric, monitoring and reporting data; record the lawful basis, purpose, recipients, access and retention and keep data accurate and no longer than necessary subject to AML clocks.	Processing register, basis assessment, notice, access matrix and retention mapping.	Law 3/2016, Articles 5-6 and 18
Apply the statutory regime to sensitive and biometric data.	Complete a specific legal and security assessment before collecting biometrics, national identifiers, offence data or other sensitive information and obtain any required authority approval.	Data classification, legal assessment, authority record, security design and access review.	Law 3/2016
Control disclosures and cross-border transfers.	Map hosting, support and recipient locations, document the statutory transfer basis and safeguards and obtain any required authority authorisation before exporting personal data.	Transfer map, contracts, safeguards, authority record and access logs.	Law 3/2016, cross-border transfer provisions

Practical evidence packs

Maintain concise packs that reproduce decisions and support supervision.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain a reconstructable onboarding pack.	Bundle identity, KYB, beneficial ownership, screening, risk, approvals, privacy records and exceptions under stable identifiers.	Complete sampled onboarding pack.	Operational control supporting Law 8/2013, Articles 10-20
Maintain a reconstructable monitoring and reporting pack.	Link transactions, alerts, analysis, approvals, FIU reports, delivery evidence and post-filing controls while protecting confidentiality.	Complete sampled case pack and access log.	Operational control supporting Law 8/2013, Articles 21-22
Maintain a launch and legal-change pack.	Record licensing, thresholds, sanctions, registry and privacy procedures, testing and authority confirmations before launch and material changes.	Signed launch pack, source register, uncertainty log and change approvals.	Official sources listed below

SOURCES AND FURTHER READING

Verify against current official material

Primary law and regulator guidance control. Contextual VOVE ID reading is included to help teams operationalize the requirements and is not legal authority.

Law No. 8/2013 on prevention and combating money laundering and terrorist financing
Financial Intelligence Unit of São Tomé and Príncipe · Primary legislation
Open official source

UIF legislation repository
Financial Intelligence Unit of São Tomé and Príncipe · Official FIU repository
Open official source

UIF suspicious-activity contact and COS form page
Financial Intelligence Unit of São Tomé and Príncipe · Official FIU procedure
Open official source

São Tomé and Príncipe 2024 Mutual Evaluation Report
GIABA · Authoritative regional assessment
Open official source

Law No. 3/2018 against terrorism and its financing
Financial Intelligence Unit of São Tomé and Príncipe · Primary legislation
Open official source

Law No. 17/2018 - legal regime of the national payment system
Central Bank of São Tomé and Príncipe · Primary legislation
Open official source

Decree-Law No. 16/2019 - payment service providers and system operators
Central Bank of São Tomé and Príncipe · Primary legislation
Open official source

Guiché Único business-registration requirements
Directorate-General of Registries and Notaries · Official registry guidance
Open official source

Law No. 3/2016 on protection of personal data
WHO Country Planning Cycle Database · Primary legislation copy
Open official source

FATF high-risk and monitored jurisdictions current at 19 June 2026
FATF · Authoritative current status
Open official source

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

Document control

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