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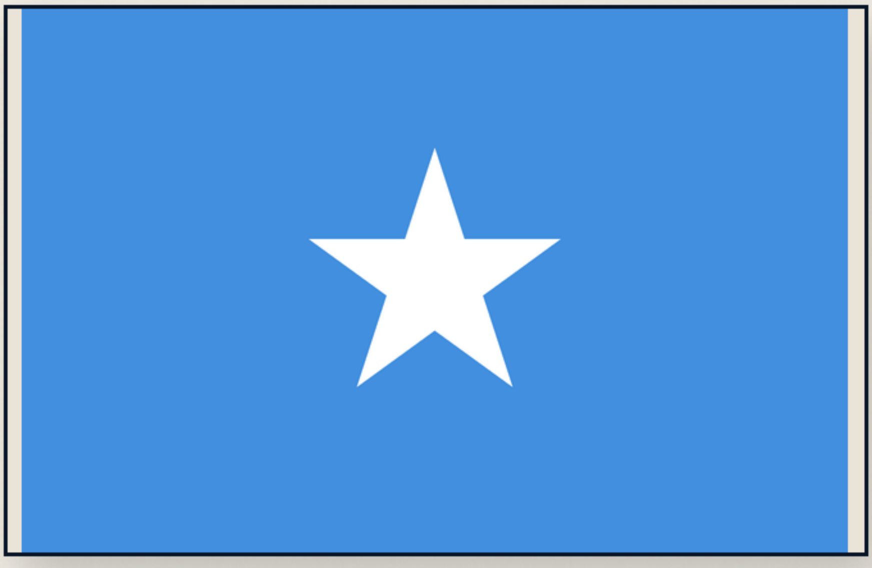
VOVE COUNTRY CONTROL FILE

KYC / KYB / AML

2026 EDITION

SOMALIA



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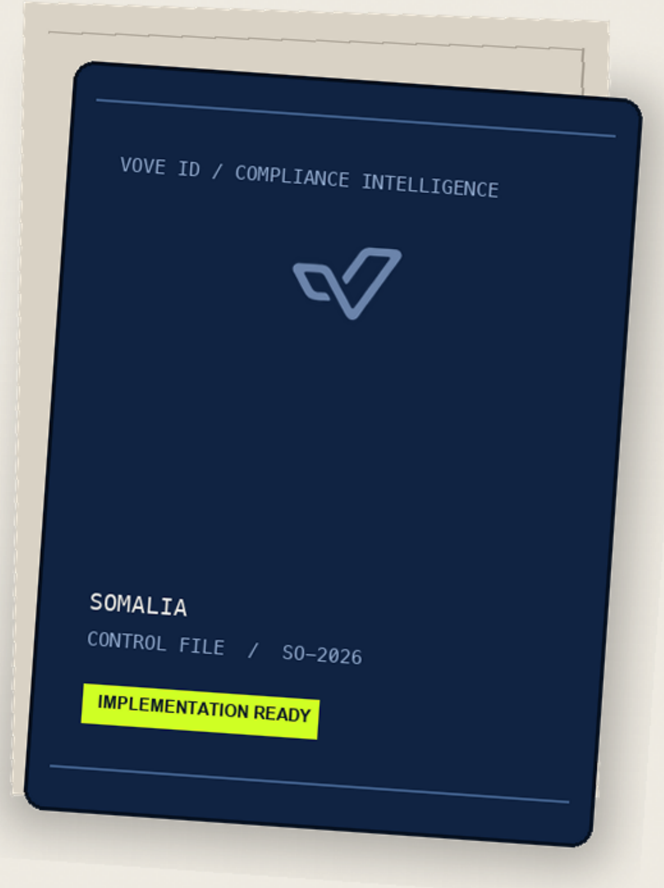

KYC / KYB / AML

COMPLIANCE CHECKLIST

2026 EDITION

IMPLEMENTATION CHECKLIST / NOT LEGAL ADVICE

READ THIS FIRST

Somalia KYC, KYB & AML Compliance Checklist

An implementation checklist for customer and beneficial-owner diligence, suspicious and threshold reporting, payments, sanctions, records and privacy under Somalia's current federal framework.

FIU	**Financial Reporting Center (FRC)**
Primary AML rule	**AML/CFT Amendment Act, 2025**
Suspicion reporting	**Promptly to FRC, including attempts and regardless of amount**
CDD thresholds	**USD 10,000 occasional/linked; USD 1,000 occasional wire**
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

The Anti-Money Laundering and Countering the Financing of Terrorism Amendment Act, 2025 is the current federal preventive framework, read with the Targeted Financial Sanctions Act 2023 and regulations, the Financial Institutions Law 2025, Central Bank sector rules, the Company Law 2019 and Data Protection Act No. 005 of 2023.

FATF context

Somalia was not named in FATF's high-risk or increased-monitoring statements dated 19 June 2026. Somalia is preparing for a MENAFATF mutual evaluation; 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 9 September 2026. Confirm commencement and official-language reconciliation of the 2025 AML/CFT amendments, current FRC reporting thresholds and goAML specifications, beneficial-owner registry procedures, sanctions-list operations, Data Protection Authority regulations and product-specific permissions with the competent federal authority and qualified Somali 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 federal coverage, supervisor and licensing before launch.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Map each entity and activity to the reporting-entity perimeter.	Classify financial institutions, covered DNFBPs and virtual-asset service providers under Article 4 and identify the FRC and designated competent supervisor for each activity.	Applicability memo, entity and product map, supervisor matrix and accountable owner.	AML/CFT Amendment Act 2025, Articles 4 and 23
Register and report through the current FRC channel.	Register the reporting organisation and authorised users in the production goAML portal, follow current FRC guidance and preserve submission acknowledgements.	goAML registration, reporter mandate, access controls, channel test and receipts.	AML/CFT Amendment Act 2025, Articles 14 and 21; FRC goAML portal
Obtain approval before regulated financial or payment activity.	Classify banking, money transfer, mobile money, payment, microfinance, takaful, agent, outsourcing and virtual-asset activities and obtain every applicable federal licence or approval before launch.	Perimeter analysis, CBS or other licence, conditions, agent approvals and renewal calendar.	Financial Institutions Law 2025; CBS regulatory guidelines; AML/CFT Amendment Act 2025, Article 4

Governance and risk assessment

Controls must be approved, risk-based, resourced and independently tested.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain a written AML/CFT programme.	Implement senior-management-approved policies, a sufficiently senior and resourced compliance officer, employee screening, documented training and independent audit.	Signed policy suite, officer mandate, resources, screening, training and audit reports.	AML/CFT Amendment Act 2025, Article 17
Assess institutional risk at least annually.	Document customer, geography, product, service, transaction, delivery-channel and technology risks annually, before new-product launch, on material change and when required by the supervisor.	Risk methodology, annual assessment, launch assessments, approvals and remediation.	AML/CFT Amendment Act 2025, Articles 9 and 9A
Control group, agent and outsourced implementation.	Apply group-wide information-sharing and control standards where applicable; contract, train and monitor agents and outsourced providers without transferring accountability.	Group policy, contracts, agent register, monitoring, retrieval tests and exceptions.	AML/CFT Amendment Act 2025, Article 17; CBS Mobile Money Regulation, regulation 32-33

Natural-person identification

Identify and verify customers and representatives at every statutory trigger.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Identify and verify customers from reliable independent evidence.	Capture identity attributes, verify them using reliable independent documents, data or information, and record purpose and intended nature before establishing the relationship.	CDD file, evidence provenance, purpose, expected activity and decision timestamp.	AML/CFT Amendment Act 2025, Article 5(1)
Apply CDD to occasional and linked transactions at USD 10,000.	Aggregate apparently linked operations and complete CDD at or above USD 10,000 equivalent; apply CDD regardless of amount for suspicion or doubt about prior identification data.	Threshold table, aggregation logic, alerts, CDD timestamps and exchange-rate record.	AML/CFT Amendment Act 2025, Article 5(2)(b), (c) and (e)
Apply CDD to occasional wire transfers at USD 1,000.	Identify and verify for occasional wire transfers at or above USD 1,000 equivalent and do not treat the threshold as a monitoring safe harbour.	Wire trigger rule, identity evidence, aggregation and transaction record.	AML/CFT Amendment Act 2025, Article 5(2)(d)
Verify representatives and authority.	Identify and verify each person acting for a customer and validate the mandate before allowing activity.	Identity evidence, mandate, authority verification and expiry control.	AML/CFT Amendment Act 2025, Article 5(1)(b)

KYB, registries, and beneficial ownership

Verify existence, authority, ownership, control and registry filings.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Verify legal-person identity and authority.	Obtain current Company Registry evidence, proof of existence, legal form, governing powers, registered and principal addresses, senior managers, licences and mandates, and resolve inconsistencies.	Registry extract, constitutional documents, officer list, licences and discrepancy log.	AML/CFT Amendment Act 2025, Article 5(7); Company Law 2019
Apply the statutory beneficial-owner cascade.	Identify and verify the natural person exercising ultimate control through ownership; if none or doubt remains, identify control through other means; if no natural person is identified, record the relevant senior managing official.	Ownership chart, control analysis, verified identities and fallback rationale.	AML/CFT Amendment Act 2025, Article 5(8)(a)
Identify trust and arrangement role holders.	Identify and verify settlor, trustees, protector if any, beneficiaries or class, and every other natural person exercising ultimate effective control.	Trust instrument, role register, verified identities and control analysis.	AML/CFT Amendment Act 2025, Article 5(8)(b)-(c)
Reconcile beneficial-owner registry information.	Obtain the customer's electronic Company Registry and beneficial-owner filings, compare them with declarations and independent evidence, and investigate discrepancies.	Registry evidence, declarations, corroboration and discrepancy resolution.	AML/CFT Amendment Act 2025, Article 23C(1)-(3); MOCI Beneficial Ownership Registry
Control one-month registry change deadlines.	For Somali legal persons, file basic and beneficial-owner changes electronically as soon as reasonably practicable and within one month, and notify reporting entities of BO changes within one month of awareness.	Change chronology, electronic filing, receipt and customer notification.	AML/CFT Amendment Act 2025, Article 23C(1)(b), (e) and (h)

PEPs, EDD, and failed CDD

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

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Detect PEP exposure for customers and beneficial owners.	Use appropriate risk systems to identify foreign, domestic and international-organisation PEPs and relevant family members and close associates.	Screening, relationship map, match decision and refresh history.	AML/CFT Amendment Act 2025, Article 10(1)-(2)
Apply approval, source and monitoring controls.	For foreign PEPs and higher-risk domestic or international PEP relationships, obtain senior approval, establish source of wealth and source of funds, review relevant information and conduct enhanced ongoing monitoring.	Approval, source analysis, corroboration and monitoring plan.	AML/CFT Amendment Act 2025, Article 10(2)
Apply enhanced measures to higher-risk activity.	Document proportionate enhanced measures for higher-risk relationships, complex or unusually large transactions, purposeless patterns and designated higher-risk jurisdictions.	Risk rationale, enhanced measures, transaction review and approval.	AML/CFT Amendment Act 2025, Articles 8 and 11
Stop or terminate when required CDD cannot be completed.	Do not open, commence or perform the occasional transaction, or terminate the relationship, and submit an STR to the FRC while protecting confidentiality.	Restriction or exit decision, investigation, STR and receipt.	AML/CFT Amendment Act 2025, Article 5(10)

Monitoring and suspicious reporting

FRC reporting must be prompt, complete, confidential and traceable.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Monitor activity against the customer profile.	Scrutinise transactions throughout the relationship for consistency with known business, risk profile and source of funds, keeping higher-risk CDD current.	Alerts, investigation notes, supporting data, dispositions and refresh history.	AML/CFT Amendment Act 2025, Article 5(1)(e)
Report suspicion and attempts promptly.	Timestamp when suspicion or reasonable grounds arose and promptly report all relevant details to the FRC, including attempted transactions and regardless of amount.	Decision chronology, STR, goAML delivery evidence and receipt.	AML/CFT Amendment Act 2025, Article 14(1)
Report suspected structuring promptly.	Detect and report transactions, attempts or series designed to evade statutory or regulatory reporting requirements.	Aggregation rules, alert, analysis, report and receipt.	AML/CFT Amendment Act 2025, Article 14(2A)
Prevent tipping off.	Restrict report access and do not disclose that an STR or related information has been or is being reported to the FRC or competent supervisor.	Need-to-know access, communications controls, training and audit log.	AML/CFT Amendment Act 2025, Article 15(2)

Payments, wires, thresholds, and agents

Keep CDD, cash-reporting, border and wire thresholds distinct.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Implement the current FRC large-cash reporting rule.	Obtain the current threshold, scope, aggregation, form and deadline from FRC regulations and LCTR guidance before configuration; do not infer the amount from the USD 10,000 CDD or border-declaration thresholds.	Current instrument, configuration approval, LCTR or NIL reports and receipts.	AML/CFT Amendment Act 2025, Article 14(2)-(3); FRC LCTR guidance
Declare cross-border cash and bearer instruments at USD 10,000.	Inform relevant travellers and logistics operations that USD 10,000 or more, or equivalent, entering or leaving Somalia by person, mail, courier or otherwise requires a truthful written customs declaration.	Travel or shipment procedure, declaration, supporting records and escalation.	AML/CFT Amendment Act 2025, Article 18(1)
Carry complete originator and beneficiary wire information.	Collect and include the statutory names, account or unique reference, originator address or alternative identifier and beneficiary information; verify the originator at or above USD 1,000 unless already verified in an existing relationship.	Field matrix, validation rules, identity evidence and transfer samples.	AML/CFT Amendment Act 2025, Article 19(1)-(2)
Control deficient wire transfers.	Detect missing information, seek and verify repair data, and apply documented execute, reject, suspend, follow-up and reporting decisions.	Repair queue, decision rules, samples, escalations and STRs.	AML/CFT Amendment Act 2025, Article 19(3)-(6)
Control mobile-money and money-transfer agents.	Verify provider and agent authority, contract for AML, records, audit, privacy and incident controls, continuously monitor agents and retain provider responsibility.	CBS approvals, agent register, contracts, training, monitoring and incidents.	CBS Mobile Money Regulation 2020, regulations 32-33; MTB Operations Regulation 2016

Targeted financial sanctions

Use current UN and Somali lists and act without delay.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Screen UN and national designations continuously.	Screen customers, beneficial owners, controllers, representatives and relevant transactions at onboarding, before activity and on updates against current UN and FRC/NAMLC lists.	List inventory, update log, screening configuration, alerts and dispositions.	Targeted Financial Sanctions Act 2023; FRC targeted-sanctions regulations and lists
Freeze designated property and prevent availability.	Freeze property owned or controlled by designated persons or entities without delay and prevent direct or indirect funds, assets or services from being made available, subject to current legal instructions.	Alert chronology, ownership/control analysis, freeze record and blocked-availability controls.	Targeted Financial Sanctions Act 2023; FRC targeted-sanctions regulations
Report matches immediately and preserve review rights.	Immediately send the required report to FRC through the current route, retain all supporting information, and apply current false-positive, delisting, exemption and release procedures.	Report, receipt, authority correspondence, review and release decision.	FRC Financial Sanctions Targets List; FRC account-freezing guideline

Records and regulator access

Records must reconstruct customers, transactions, analysis and decisions.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Retain transaction records for at least five years.	Apply a transaction-date clock to domestic and international transaction records sufficient to reconstruct amounts, currencies and parties.	Retention schedule, archive sample, reconstruction test and legal holds.	AML/CFT Amendment Act 2025, Article 13(1)
Retain CDD and analysis for at least five years after the relationship or occasional transaction.	Preserve customer and account files, business correspondence and analysis under the correct relationship-end or occasional-transaction clock.	Archive configuration, closure trigger, deletion control and retrieval log.	AML/CFT Amendment Act 2025, Article 13(2)
Apply the separate ten-year company and trust clocks.	Somali legal persons, Registry and relevant custodians must preserve specified basic and BO information for ten years after dissolution; professional trustees retain specified trust information for ten years after involvement ceases.	Corporate and trust retention mapping, archive samples and dissolution records.	AML/CFT Amendment Act 2025, Articles 23C(5) and 23D(1)(e)
Provide records promptly under proper authority.	Authenticate requests, protect STR confidentiality, produce controlled records to FRC and competent supervisors or authorities and log scope, approval, delivery and receipt.	Request register, authority check, production index and acknowledgement.	AML/CFT Amendment Act 2025, Articles 13(3), 21 and 23B

Privacy, biometrics, and transfers

AML processing remains subject to the Data Protection Act 2023 and current regulations.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Register regulated processing roles where required.	Determine whether the organisation, processor and data protection officer require registration with the Somalia Data Protection Authority and complete current registration and renewal procedures.	Role analysis, registration, DPO mandate, renewal and correspondence.	Data Protection Act No. 005 of 2023; SDPA registration guidance
Document lawful, fair and proportionate processing.	Inventory identity, ownership, screening, biometric, monitoring and reporting data; record purpose, lawful basis, minimisation, accuracy, recipients, access and AML-aligned retention.	Processing register, basis assessment, notice, access matrix and retention mapping.	Data Protection Act No. 005 of 2023
Assess high-risk and sensitive processing.	Complete a data-protection impact and security assessment before biometric, national-identifier, criminal-offence or other high-risk processing and apply current DPA approval or DPO requirements.	Data classification, DPIA, DPO review, security design and authority record.	Data Protection Act No. 005 of 2023; SDPA guidance
Notify personal-data breaches through the current route.	Detect, contain, assess and document breaches and notify the DPA within the applicable 72-hour procedure where required, including delayed-notification reasons and affected-person communications.	Incident chronology, risk assessment, DPA notice, receipt and communications.	SDPA official breach service and guidance
Control processors, disclosures and cross-border transfers.	Map hosting and support locations, bind processors, document transfer conditions and safeguards, and obtain any required DPA authorisation before exporting personal data.	Processor diligence, contracts, transfer map, safeguards and authority record.	Data Protection Act No. 005 of 2023; SDPA cross-border guidance

11. PRACTICAL EVIDENCE PACKS

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 AML/CFT Amendment Act 2025, Articles 5-13
Maintain a reconstructable monitoring and reporting pack.	Link transactions, alerts, analysis, approvals, reports, delivery evidence and post-filing controls while protecting confidentiality.	Complete sampled case pack and access log.	Operational control supporting AML/CFT Amendment Act 2025, Articles 14-16
Maintain a launch and legal-change pack.	Record licensing, thresholds, sanctions, registry, privacy and local-authority procedures, testing and 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.

Anti-Money Laundering and Countering the Financing of Terrorism Amendment Act, 2025 - English translation
Central Bank of Somalia · Primary legislation
Open official source

AML/CFT laws, regulations, forms and reporting guidance
Financial Reporting Center · Official FIU repository
Open official source

Production goAML reporting portal and guidance
Financial Reporting Center · Official FIU procedure
Open official source

AML/CFT regulations for financial institutions
Financial Reporting Center · Official regulation
Open official source

Targeted financial sanctions regulations and national lists
Financial Reporting Center · Official sanctions framework
Open official source

Current banking, money-transfer, mobile-money and financial-sector laws and regulations
Central Bank of Somalia · Official regulator repository
Open official source

Mobile Money Services Regulation 2020, amended 2021
Central Bank of Somalia · Official regulation
Open official source

Licensing, company registration and Beneficial Ownership Registry
Ministry of Commerce and Industry · Official registry guidance
Open official source

Data Protection Act No. 005 of 2023 and regulatory guidance
Somalia Data Protection Authority · Primary legislation and authority guidance
Open official source

Data Protection Authority services and breach procedure
Somalia Data Protection Authority · Official privacy procedure
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

Version 1.0 / Published 9 September 2026 / Last reviewed 9 September 2026 / Owner: VOVE ID Compliance Research

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