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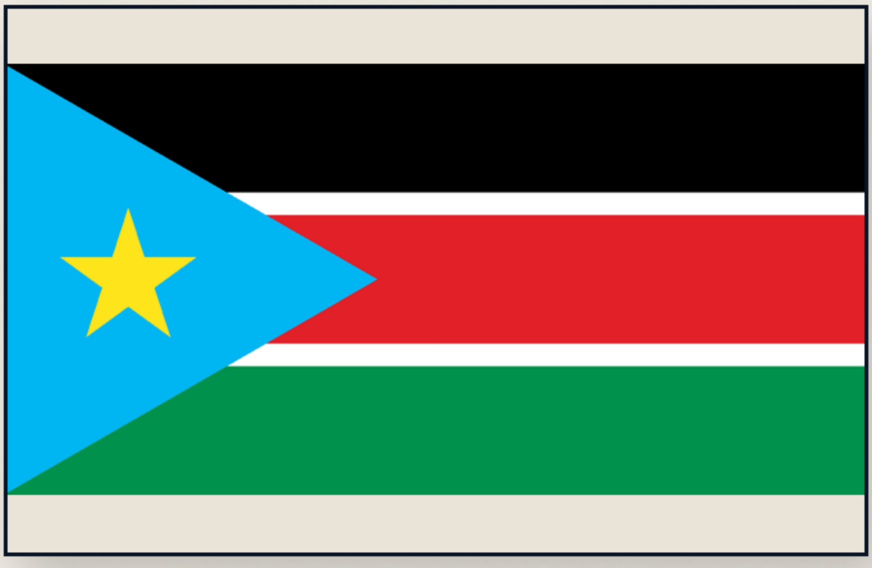
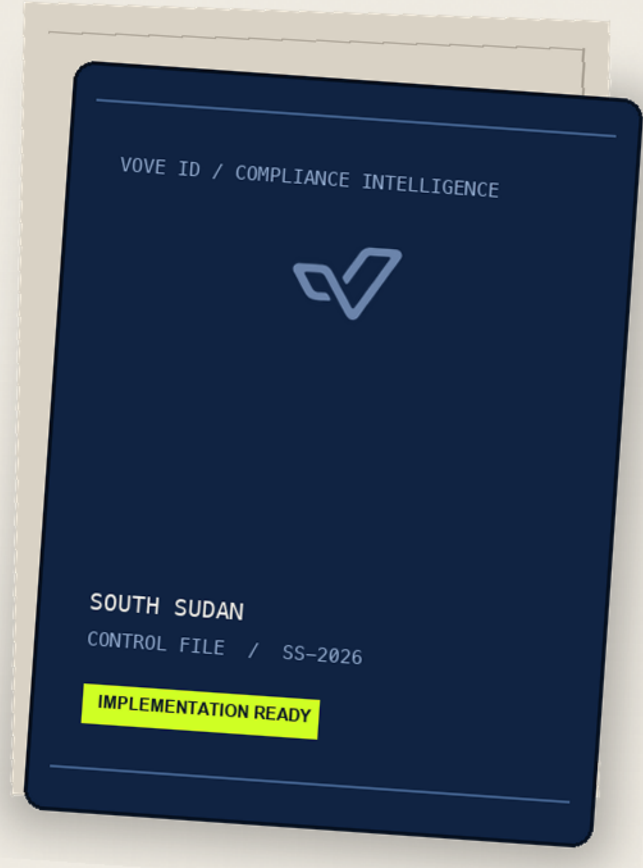
KYC / KYB / AML

2026 EDITION

SOUTH SUDAN



SOUTH SUDAN / SS



KYC / KYB / AML

COMPLIANCE CHECKLIST

2026 EDITION

IMPLEMENTATION CHECKLIST / NOT LEGAL ADVICE

READ THIS FIRST

South Sudan KYC, KYB & AML Compliance Checklist

An implementation checklist for customer identification, ownership and control, suspicious reporting, records, banking, payments, sanctions and privacy under South Sudan's current and developing framework.

FIU	**Financial Intelligence Unit established under the 2012 Act**
Primary AML rule	**AML/CTF Act No. 29 of 2012**
Suspicion reporting	**Within 24 hours after suspicion; before execution where possible**
Universal CDD threshold	**No current amount verified; identify customers under section 16**
Core AML retention	**At least 5 years from completion**
FATF status	**Increased monitoring at 19 June 2026**

Scope and legal framework

The Anti-Money Laundering and Counter Terrorist Financing Act No. 29 of 2012 is the core preventive law. It is supplemented for banks by the Banking Act No. 22 of 2012 and Bank of South Sudan rules and circulars, while the Companies Act 2012 governs company records and filings. Material beneficial-ownership, targeted-financial-sanctions and supervisory gaps remain under South Sudan's FATF action plan.

FATF context

South Sudan remained under FATF increased monitoring on 19 June 2026. FATF reported limited progress, all action-plan deadlines expired, and continuing work on risk-based supervision, beneficial ownership, an operational independent FIU, targeted financial sanctions and risk-based NPO monitoring. FATF does not call for automatic enhanced due diligence solely because a jurisdiction is listed; apply a documented risk-based response.

IMPORTANT	General regulatory information, not legal advice or a licence determination. Reviewed as applicable on 11 September 2026. Confirm current FIU independence, reporting forms and secure channel, ministerial thresholds and orders, Bank of South Sudan directions, company-registry practice, sanctions implementation, privacy and cyber rules, and product-specific permissions with the competent authority and qualified South Sudanese 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 reporting-person perimeter, competent authority and product permissions before launch.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Map each entity and activity to the reporting-person perimeter.	Classify banks, financial and microfinance institutions, cash dealers, insurers and intermediaries, securities and futures businesses, money transmitters, gaming operators, foreign-exchange bureaux, accountants, real-estate agents, precious-metal and stone dealers, customs officers, and in-scope legal professionals; confirm later Gazette designations.	Entity and activity map, statutory category, supervisor, legal opinion and accountable owner.	AML/CTF Act 2012, section 5 definition of reporting person
Confirm the competent FIU reporting arrangement before go-live.	Obtain current written FIU instructions for registration, form, secure delivery, acknowledgement, information requests and confidentiality; do not assume an online portal or receipt workflow where none is officially confirmed.	Authority correspondence, reporter mandate, channel test, access controls and current instructions.	AML/CTF Act 2012, sections 6 and 8
Obtain every sector licence or approval before regulated activity.	Classify banking, foreign exchange, money transfer, electronic money, mobile money, microfinance, insurance, payment, agent and outsourced activity and obtain current Bank of South Sudan or other authority approval before launch.	Perimeter memo, licence, conditions, approvals, agent register and renewal calendar.	Banking Act 2012; Foreign Exchange Business Act 2012; Bank of South Sudan regulations and licensing materials

Governance and risk assessment

Governance should meet the Act, sector rules and the risk-based direction of current supervision.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain internal suspicious-reporting procedures.	Designate an officer, give that officer reasonable access to relevant information, require employees to escalate suspicion and require the designee to file qualifying reports.	Board-approved procedure, officer mandate, access design, escalation tests and filing log.	AML/CTF Act 2012, section 19
Train relevant employees.	Provide role-based training on applicable law, internal procedures, identifying suspicious activity, secure escalation and tipping-off restrictions, with refreshers proportionate to risk.	Training content, attendance, assessments, refresh schedule and remediation.	AML/CTF Act 2012, section 20(1)
Document institutional risk and control effectiveness.	Assess customer, geography, product, channel, transaction, agent and technology risks before launch and periodically; record enhanced measures for higher risks and independent control testing as a prudent response to South Sudan's FATF action plan and BoSS risk-based supervision.	Risk methodology, assessment, approvals, monitoring, test report and remediation.	BoSS 2025 monetary and banking policy; FATF South Sudan statement, 19 June 2026; operational risk control

3. NATURAL-PERSON IDENTIFICATION

Natural-person identification

Section 16 requires reliable official identity evidence and does not establish a verified monetary safe harbour.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Identify every customer using official evidence.	Before a continuing relationship or transaction, obtain an official record reasonably capable of establishing true identity, including a birth certificate or affidavit and a passport or other official identification as applicable; verify authenticity and resolve inconsistencies.	Identity record, verification result, provenance, discrepancy log and decision timestamp.	AML/CTF Act 2012, section 16(1)-(3)
Do not invent a universal CDD threshold.	Apply identification to relationships and transactions within section 16 and obtain any current ministerial or supervisory threshold in writing before configuring amount-based exceptions or simplified measures.	Current legal instruction, threshold configuration, version history and approval.	AML/CTF Act 2012, sections 16 and 28
Identify persons acting for another.	Determine whether a customer acts for another person, verify the representative and mandate, and establish the true identity of the person for whose account or ultimate benefit the transaction is conducted.	Representative identity, authority instrument, verification and ultimate-benefit analysis.	AML/CTF Act 2012, section 16(3)-(5)
Prevent anonymous or disguised accounts.	Block false, disguised and anonymous names and test account-opening and migration controls for circumvention.	System rule, rejected cases, migration review and test results.	AML/CTF Act 2012, section 20(1)

KYB, registries, and beneficial ownership

Verify legal existence and ultimate benefit while treating the national beneficial-ownership framework as incomplete.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Verify corporate identity from current registry evidence.	Obtain the memorandum and articles, certificate of incorporation, latest annual reports certified by the Directorate of Business Registry, registered office, directors, members and authorised signatories; reconcile all records.	Certified registry pack, constitutional documents, officer and member lists, mandates and discrepancy log.	AML/CTF Act 2012, section 16(2)(c); Companies Act 2012
Identify persons behind nominees, agents and trustees.	Take reasonable measures to establish the true identity of each person on whose behalf or for whose ultimate benefit the customer acts, including through trustee, nominee or agent arrangements.	Ownership and control chart, declarations, corroboration, verified identities and rationale.	AML/CTF Act 2012, section 16(3)-(5)
Do not apply an unsupported beneficial-owner percentage.	Use ownership, voting, contractual and other-control evidence to identify ultimate natural persons and escalate unresolved control; do not present a shareholder-register entry as verified beneficial ownership or invent a percentage threshold.	Layered ownership chart, control analysis, source documents, escalation and senior approval.	AML/CTF Act 2012, section 16(4); FATF South Sudan statement, 19 June 2026
Maintain and reconcile company records.	Collect current registered-office, member, director, share-register and accounting records required by the Companies Act and monitor changes using the current registry process.	Registry extracts, statutory registers, corporate records, change receipts and reconciliation history.	Companies Act 2012, sections 154-160

PEPs, EDD, and failed CDD

Foreign PEPs carry express controls; domestic and international-organisation exposure should be addressed through documented risk controls pending updated law.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Detect foreign PEP exposure.	Use appropriate risk-management systems to determine whether the customer is a foreign PEP and screen relevant persons throughout the relationship.	Screening configuration, match decision, relationship map and refresh log.	AML/CTF Act 2012, sections 5 and 16(1)(b)
Apply foreign-PEP approval, source and monitoring measures.	Obtain senior-management approval, take reasonable measures to establish source of wealth and source of funds, and conduct enhanced ongoing monitoring.	Approval, source analysis, corroboration and monitoring plan.	AML/CTF Act 2012, section 16(1)(b)
Control other higher-risk public-function exposure.	As a risk-based control, identify domestic PEPs, international-organisation PEPs, family members and close associates and apply proportionate approval, source and monitoring measures; distinguish this control from the narrower express statutory definition.	Policy basis, screening, relationship analysis, risk decision and approvals.	FATF Recommendation 12; operational risk control
Stop when identity or authority cannot be established.	Do not onboard or transact where true identity, representation or ultimate benefit cannot be established; assess whether the facts create suspicion and document the report decision.	Restriction, failed-verification record, escalation, decision and any STR receipt.	AML/CTF Act 2012, sections 16 and 18; operational risk control

Monitoring and suspicious reporting

Suspicion must reach the FIU within 24 hours and, where possible, before execution.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Monitor activity and investigate indicators.	Monitor transactions and attempted activity against identity, purpose, ownership, expected activity and risk; preserve the information supporting each disposition.	Monitoring rules, alerts, investigation notes, supporting data and dispositions.	AML/CTF Act 2012, sections 18-20; operational control
Report suspicion within 24 hours.	Timestamp when suspicion or reasonable grounds arise, ascertain the purpose, origin, destination and ultimate beneficiary so far as reasonable, and securely report the transaction or proposed transaction to the FIU within 24 hours and before execution wherever possible.	Suspicion chronology, analysis, STR, secure-delivery evidence and acknowledgement.	AML/CTF Act 2012, section 18(1)
Supply requested follow-up information.	Authenticate FIU or law-enforcement requests and provide further information about a reported transaction through the authorised secure route while preserving confidentiality.	Request, authority check, response package, delivery log and receipt.	AML/CTF Act 2012, section 18(2)
Prevent tipping off.	Restrict access and do not warn an involved person or unauthorised third party that an STR may be prepared, is being prepared or has been sent, or disclose related protected information.	Need-to-know controls, communications policy, training and access log.	AML/CTF Act 2012, section 21

Payments, wires, thresholds, and agents

Thresholds and payment permissions require current authority confirmation; the 2025 payment-system bill remained a draft in August 2026.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Obtain current transaction-record thresholds before configuration.	Request the current Gazette order prescribing the amount under section 17; apply full records where the threshold cannot be verified and never infer it from another requirement.	Gazette order or authority confirmation, configuration, version and approval.	AML/CTF Act 2012, section 17(1)(a)
Obtain the current cross-border cash threshold.	Confirm the ministerially prescribed amount and the September 2025 BoSS cash-movement directive before traveller or corporate cash movement; preserve customs declarations and supporting records.	Current directive, threshold table, declarations, source-of-funds support and escalation.	AML/CTF Act 2012, section 24; BoSS cash-movement directive, 17 September 2025
Preserve complete wire-transfer information.	Pending verified detailed national wire rules, collect and transmit reliable originator and beneficiary identity, account or reference, amount, currency, date and purpose; repair, reject or escalate deficient transfers according to documented risk.	Field matrix, validation rules, repair queue, decisions and transfer samples.	Banking Act 2012, section 77; operational risk control
Control electronic-money providers and agents.	Verify the provider's current BoSS authorisation and the applicable Electronic Money Regulation, including the 2025 amendment published in August 2026; confirm agent, safeguarding, outsourcing, customer and transaction limits before launch.	Licence, current regulation, agent approvals, contracts, limits, monitoring and incidents.	BoSS Electronic Money Regulation 2017 (Amendment) 2025; BoSS regulations and circulars
Do not treat the draft payment-system bill as enacted law.	Track enactment and commencement of the National Payment System Bill 2025 and document the present legal basis for each payment activity separately.	Legislative-status check, current-law memo, licence and change trigger.	BoSS validation workshop statement, 12 August 2026

Targeted financial sanctions

FATF still identifies South Sudan's targeted-financial-sanctions framework as incomplete; screening and escalation remain essential risk controls.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Screen current UN designations and any operative national directions.	Screen customers, beneficial owners, controllers, representatives and relevant transactions against the current UN consolidated list and any verified South Sudan direction at onboarding, before activity and on list updates.	List inventory, update log, screening configuration, alerts and dispositions.	UN Security Council consolidated list; FATF South Sudan statement, 19 June 2026
Escalate potential matches without inventing a local freeze deadline.	Immediately restrict disposition as permitted, escalate to legal and the competent authority, obtain current written freeze and reporting instructions, and preserve the chronology; do not state that the incomplete national framework supplies a verified automatic deadline.	Alert chronology, identity and ownership analysis, restriction, authority direction and report.	FATF South Sudan statement, 19 June 2026; applicable UN Security Council resolutions
Control false positives, exemptions and release.	Require documented authority or legal approval before releasing a sanctions-related restriction and preserve correspondence, licence or exemption and decision rationale.	Match analysis, authority correspondence, approval, release record and audit trail.	Operational control pending completed national TFS framework

Records and regulator access

Records must identify the parties and reconstruct transactions for at least five years from completion.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Retain AML identity and transaction records for at least five years.	Keep prescribed transaction details and the identity evidence or information enabling a copy to be obtained for at least five years from completion of the relevant business or transaction.	Retention schedule, completion trigger, archive sample, retrieval and deletion control.	AML/CTF Act 2012, section 17(1)-(3)
Retain copies and a register when originals are released.	Where law requires release of an original before five years elapse, retain a copy and maintain the prescribed released-document register.	Released-document register, copy, authority, custody trail and retrieval test.	AML/CTF Act 2012, section 17(4)
Meet separate company-record periods.	Map Companies Act records at the registered office, including seven-year and seven-accounting-period categories, separately from the five-year AML clock and preserve the longer applicable period.	Record-class schedule, statutory-register sample, archive and legal hold.	Companies Act 2012, sections 158-160
Respond securely to lawful inspections and requests.	Authenticate FIU, BoSS and other competent-authority requests, preserve STR confidentiality, control production and record delivery and acknowledgement.	Request register, authority check, approval, production index and receipt.	AML/CTF Act 2012, sections 8(c)-(d), 18(2), 21 and 22

Privacy, biometrics, and transfers

No comprehensive generally applicable data-protection statute or regulator was verified; use constitutional, sector and contractual controls without inventing statutory deadlines.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Map the lawful basis and necessity for identity processing.	Document the legal and operational basis for each identity, screening and biometric field, collect only what is necessary, give clear notice and restrict reuse while monitoring for new generally applicable privacy legislation.	Data map, legal-basis assessment, notice, field justification and change log.	Transitional Constitution 2011, Article 22; AML/CTF Act 2012, sections 16-18; operational privacy control
Protect identity and financial data.	Apply role-based access, encryption, logging, backup, vendor controls, testing and incident response proportionate to sensitivity; banks and credit-reporting participants must also map applicable BoSS data-security requirements.	Security standard, access review, encryption evidence, vendor assessment, tests and incident log.	BoSS Credit Reporting Systems Regulation 2014, sections 6-9; operational privacy control
Control biometrics and cross-border processing conservatively.	Before biometric collection or overseas hosting, complete a documented necessity, proportionality, security, vendor and transfer assessment and obtain current local advice; do not claim an unverified regulator approval or breach deadline.	Assessment, architecture, contract, security controls, approval and legal update check.	Transitional Constitution 2011, Article 22; operational privacy control

Practical evidence packs

Maintain concise packs that reproduce decisions and expose unresolved legal dependencies.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain a reconstructable onboarding pack.	Bundle identity, authority, KYB, ultimate-benefit analysis, screening, risk, approvals, privacy records and exceptions under stable identifiers.	Complete sampled onboarding pack.	Operational control supporting AML/CTF Act 2012, sections 16-20
Maintain a reconstructable reporting pack.	Link transactions, alerts, analysis, the 24-hour chronology, approvals, STR delivery, acknowledgement and follow-up while protecting confidentiality.	Complete sampled case pack and access log.	Operational control supporting AML/CTF Act 2012, sections 18-23
Maintain a launch and legal-change pack.	Record current thresholds, FIU procedure, licences, BoSS directions, registry evidence, sanctions instructions, privacy analysis, testing and confirmations before launch and on material change.	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 Counter Terrorist Financing Act No. 29 of 2012
Ministry of Justice and Constitutional Affairs · Primary legislation
Open official source

Banking Act No. 22 of 2012
Bank of South Sudan · Primary legislation
Open official source

Companies Act 2012 and national laws repository
Ministry of Justice and Constitutional Affairs · Primary legislation
Open official source

Bank of South Sudan regulations register
Bank of South Sudan · Official regulator repository
Open official source

Bank of South Sudan circulars register
Bank of South Sudan · Official regulator repository
Open official source

Electronic Money Regulation 2017 (Amendment) 2025
Bank of South Sudan · Official regulation
Open official source

Directive on movement of cash within and across South Sudan borders
Bank of South Sudan · Official directive
Open official source

Monetary and Banking Policy for 2025
Bank of South Sudan · Official policy
Open official source

Validation status of the draft National Payment System Bill 2025
Bank of South Sudan · Official legislative-status statement
Open official source

South Sudan increased-monitoring statement, 19 June 2026
FATF · Authoritative current status
Open official source

ESAAMLG official publications and regional updates
ESAAMLG · Authoritative regional body
Open official source

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

Document control

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