

TANZANIA



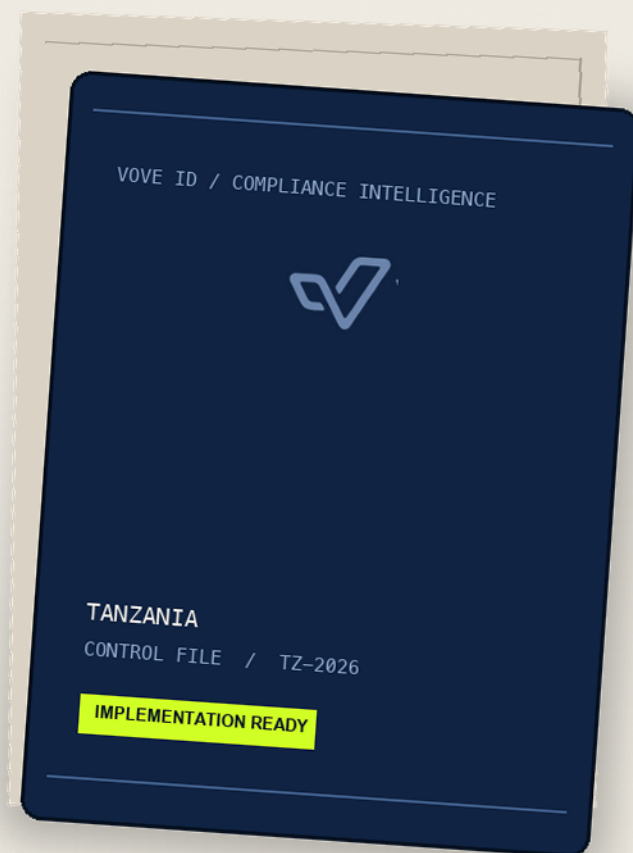
TANZANIA / TZ

KYC / KYB / AML

COMPLIANCE CHECKLIST

2026 EDITION

IMPLEMENTATION CHECKLIST / NOT LEGAL ADVICE



[READ THIS FIRST](#)

Tanzania KYC, KYB & AML Compliance Checklist

A territory-aware implementation checklist for regulated fintechs and reporting persons operating in Mainland Tanzania, Tanzania Zanzibar, or both.

AML authorities	FIU Tanzania; Zanzibar FIU functions under the Zanzibar framework
Payments authority	Bank of Tanzania; NPS Act applies in Mainland and Zanzibar
Company registries	BRELA (Mainland); BPRA (Zanzibar)
STR channel	FIU goAML / prescribed FIU channel
Mainland threshold reports	Cash >= USD 10,000; EFT >= USD 1,000; file within 5 working days
AML retention	Generally 10 years, measured from the applicable statutory trigger
Data protection	PDPA 2022; in Zanzibar only for Union matters
FATF status	Not under increased monitoring since June 2025

Scope and legal framework

Anti-Money Laundering Act, Cap. 423 R.E. 2023 (Mainland); Anti-Money Laundering and Proceeds of Crime Act, No. 10 of 2009 as amended (Zanzibar); applicable AML regulations; Prevention of Terrorism (General) Regulations, 2022 as amended in 2023 and 2024; National Payment Systems Act, 2015 and implementing regulations; Companies Act and beneficial-ownership rules applicable in each territory; Personal Data Protection Act, 2022.

FATF context

Tanzania was removed from FATF increased monitoring in June 2025. Risk controls must still reflect the business, customer, product, delivery-channel and geographic risk profile.

IMPORTANT

Educational implementation checklist, not legal advice. Tanzania has separate Mainland and Zanzibar company and AML frameworks. Confirm territorial scope, reporting-person status, sector rules, licence conditions, FIU instructions and later amendments with Tanzanian counsel and the relevant authority 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.

1. SCOPE, LICENSING AND ACCOUNTABILITY

Scope, licensing and accountability

Map the legal entity, territory, regulated activity and reporting-person category before configuring controls. Mainland and Zanzibar do not share one company or general AML statute.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Document territorial and regulatory scope	For each entity and product, record whether operations, incorporation, customers and regulated activities fall in Mainland Tanzania, Tanzania Zanzibar, or both. Map the applicable AML statute, sector regulator, FIU reporting route and registry.	Approved scope memorandum; entity-product-territory matrix; legal advice and regulatory correspondence.	AML Cap. 423 R.E. 2023; AMLPOCA No. 10 of 2009 as amended [01][02][03]
Confirm licences before launch	Do not operate a payment system, issue a payment instrument or issue electronic money without the licence or approval required by the Bank of Tanzania. Map licence conditions, renewals, agents, outsourcing and material-change approvals.	BoT licence or approval; regulatory-perimeter analysis; conditions register; renewal calendar.	National Payment Systems Act 2015 ss. 5, 15 and 24; Licensing and Approval Regulations 2015 [12][13][14]
Maintain a risk-based AML/CFT/CPF programme	Approve an enterprise risk assessment and proportionate controls covering customers, beneficial owners, products, channels, geography, transactions, agents and new technology. Refresh after material change and when risk intelligence changes.	Board-approved risk assessment; methodology; residual-risk decisions; control map; review log.	AML Cap. 423 R.E. 2023; AML Regulations 2022 as amended [01][04][05]
Appoint accountable compliance leadership	Appoint an eligible, sufficiently senior and independent compliance officer or MLRO; define direct escalation, access to records, reporting authority, training, independent testing and board oversight.	Appointment and FIU/regulator filing where required; role profile; board minutes; training and audit plans.	AML and applicable AML regulations [01][04][05]

2. CUSTOMER DUE DILIGENCE AND ENHANCED DUE DILIGENCE

Customer due diligence and enhanced due diligence

CDD must establish who the customer and ultimate beneficial owner are, why the relationship exists and whether activity remains consistent with the known risk profile.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Apply CDD at every statutory trigger	Identify and verify the customer and ultimate beneficial owner before establishing a relationship or carrying out a covered occasional transaction, and again where ML/TF/PF is suspected, prior information is doubtful, or risk materiality requires it.	Trigger matrix; identity records; verification results; customer and beneficial-owner profiles; refresh log.	AMLA Cap. 423 R.E. 2023 s. 16 [01]
Understand purpose, ownership and control	For natural persons capture reliable identity, address, occupation, source-of-funds context and purpose. For legal persons and arrangements verify legal existence, powers, directors or equivalent controllers, ownership chain and the natural persons who ultimately own or control them.	CDD/KYB file; registry extracts; constitutional documents; ownership chart; control analysis; source-of-funds evidence.	AMLA Cap. 423 R.E. 2023 s. 16; AML Regulations 2022 as amended [01][04][05]
Apply PEP and high-risk controls	Use risk-management systems to identify domestic, foreign and international-organisation PEPs, family members and close associates. Obtain senior-management approval, establish source of wealth and funds, apply enhanced monitoring, and use enhanced measures for other high-risk relationships.	PEP screening; approval; source-of-wealth/funds assessment; enhanced-review and monitoring records.	AMLA Cap. 423 R.E. 2023 s. 16 [01]
Constrain deferred verification	Allow commencement before verification completes only for proven low-risk customers and under adopted risk-management procedures governing use before verification. Statutorily permitted activity includes opening an account and allowing an initial deposit, or depositing funds for new or existing low-risk services. As additional risk controls, set a short completion deadline, prevent withdrawals or higher-risk use, and stop the relationship if verification fails.	Proven low-risk assessment; adopted pre-verification procedure; permitted-activity rules; deadline and stop controls; exception log.	AMLA Cap. 423 R.E. 2023 s.16; GN 853E of 2023 reg.8(3) [01][05]
Stop and report failed CDD	Where CDD cannot be completed, do not commence the relationship or transaction, or terminate an existing relationship as applicable, and submit an STR to the FIU. This refusal-or-termination and reporting outcome is mandatory.	Rejected or exited case; mandatory STR decision and receipt; access-controlled audit trail.	AMLA Cap. 423 R.E. 2023 s.16 [01]
Apply the tipping-off safeguard as FATF guidance	Where there is suspicion and the firm reasonably believes continuing CDD would tip off the customer, use the FATF Recommendation 10 interpretive guidance to stop that CDD process and file an STR. Label this as international guidance rather than a separate rule attributed solely to AMLA section 16.	Tipping-off assessment; MLRO approval; STR receipt; restricted case record.	FATF Recommendation 10 Interpretive Note [21]

3. BUSINESS VERIFICATION AND BENEFICIAL OWNERSHIP

Business verification and beneficial ownership

Registry duties are territorial. BRELA requirements below apply to companies incorporated or registered in Mainland Tanzania; Zanzibar entities use BPRA and the Zanzibar Companies Act.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Verify the business independently	Obtain a current registry extract, legal name, number, status, registered office, constitutional documents, business activity, licences, directors and authorised signatories from BRELA for Mainland entities or BPRA for Zanzibar entities. Reconcile discrepancies before approval.	Dated registry extract; licence checks; constitutional documents; authority matrix; discrepancy resolution.	Companies Act Cap. 212 and BRELA rules (Mainland); Zanzibar Companies Act No. 15 of 2013 and BPRA (Zanzibar) [06][07][08]
Identify every ultimate natural-person owner or controller	Trace direct and indirect ownership and control through each layer. Record natural persons who ultimately own, exercise substantial control or influence, receive substantial economic benefit, or on whose behalf an arrangement is conducted. Do not stop at a nominee or corporate shareholder.	Ownership chart; declarations; shareholder and control records; corroborating registry or source documents.	AMLA Cap. 423 R.E. 2023 s. 16; Companies (Beneficial Ownership) Regulations 2021 (Mainland) [01][07]
Maintain and file Mainland BO information	For a Mainland company, maintain the statutory BO register and file Form 14b particulars as required. Apply the Regulations' 30-day periods to the specific events they cover: cessation notices, declarations of beneficial interest and changes, company returns after receiving declarations, and changes of beneficial owners. Do not treat every initial submission as subject to one generic 30-day clock.	BO register; Form 14b and event-specific forms; filed acknowledgements; event/deadline matrix; reconciliation record.	Companies (Beneficial Ownership) Regulations 2021 regs.3-5 (Mainland only) [07]
Apply Zanzibar company rules separately	For a Zanzibar company, obtain and maintain company and ownership information under the Zanzibar Companies Act and BPRA process. Do not treat the Mainland BRELA beneficial-ownership forms or 30-day filing rule as automatically applicable.	BPRA extract and filings; Zanzibar legal analysis; ownership records; periodic refresh.	Zanzibar Companies Act No.15 of 2013; Companies Regulations 2017; BPRA [08][20]

4. ONGOING MONITORING AND SUSPICIOUS TRANSACTION REPORTING

Ongoing monitoring and suspicious transaction reporting

Monitoring must use the customer's expected profile and all available information. STR obligations are separate from automatic threshold-reporting rules.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Monitor relationships continuously	Scrutinise transactions throughout the relationship for consistency with customer knowledge, business, risk profile and source of funds where necessary. Keep CDD data current, with more frequent reviews for higher-risk customers.	Monitoring scenarios; expected-activity profile; alerts and investigations; periodic and event-driven reviews.	AMLA Cap. 423 R.E. 2023 s. 16; AML amendment regulations 2023 reg. 8A [01][05]
File STRs through the prescribed FIU channel	After forming suspicion, submit the STR to the FIU within 24 hours and, wherever possible, before the transaction is carried out. Cover proposed and attempted transactions as well as completed activity. Ascertain the purpose of the funds, property, transaction, or proposed or attempted transaction; the origin and ultimate destination; and the identity and address of every ultimate beneficiary, without tipping off the customer, and retain the findings.	Suspicion timestamp; inquiry record; proposed, attempted or completed transaction details; goAML filing and receipt; 24-hour SLA evidence.	AMLA Cap. 423 R.E. 2023 s.18 [01]
Prevent tipping off and preserve confidentiality	Restrict STR and investigation information to authorised personnel, suppress customer-facing signals, and train staff not to disclose that an STR is contemplated or filed.	Role-based access; confidentiality policy; training; communication controls; audit logs.	AMLA Cap. 423 R.E. 2023 and applicable regulations [01][04]
Keep decision quality auditable	Record facts considered, typologies, linked activity, customer explanation, risk indicators, decision-maker, timing and follow-up for both filed and closed alerts.	Investigation file; rationale template; QA review; management information and escalation record.	AMLA ss. 16-18; AML Regulations 2022 as amended [01][04][05]

5. MAINLAND REPORTING AND WIRE CONTROLS

Mainland reporting and wire controls

This section implements the 2019 Electronic Funds Transfer and Cash Transaction Reporting Regulations, which expressly apply to Mainland Tanzania.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Report Mainland threshold transactions	Report a single currency transaction of USD 10,000 equivalent or more and a single electronic funds transfer of USD 1,000 equivalent or more, using the official BoT exchange rate at transaction time. Submit no later than five working days after the transaction.	Threshold engine; exchange-rate snapshot; report file and FIU receipt; exception log.	EFT and Cash Transaction Reporting Regulations 2019 regs. 2, 5 and 12 (Mainland only) [09]
Aggregate related activity precisely	Treat two or more currency transactions or EFTs within 24 hours as one reportable transaction when they total at least USD 10,000 equivalent and are conducted by or on behalf of the same person or entity, or are destined to the same recipient. Do not aggregate different originators solely because they send to the same recipient.	24-hour aggregation logic; originator and recipient linkage; exception tests; filed reports.	EFT and Cash Transaction Reporting Regulations 2019 reg. 11 (Mainland only) [09]
Preserve ordering-institution information	Ensure every EFT carries the required originator and beneficiary information. An ordering institution must retain it for ten years and must not execute a transfer that lacks the required information.	Payment-message schema; completeness validation; rejected-transfer logs; ten-year archive.	EFT and Cash Transaction Reporting Regulations 2019 regs. 4 and 9 (Mainland only) [09]
Apply intermediary-institution controls	As an intermediary, retain accompanying originator and beneficiary information, keep information received from upstream institutions for at least ten years, identify deficient transfers, and use risk-based rules to execute, reject or suspend them and determine follow-up.	Intermediary rules; payment records; deficiency alerts; execute/reject/suspend decisions; follow-up cases.	EFT and Cash Transaction Reporting Regulations 2019 reg. 10 (Mainland only) [09]
Assess Zanzibar payment-reporting duties separately	Do not extend the Mainland 2019 threshold and wire-transfer regulation to Zanzibar by assumption. Map Zanzibar AMLPOCA rules, FIU directions and any BoT payment-system licence conditions that apply to the Zanzibar operation.	Zanzibar reporting matrix; legal advice; regulator instructions; configured jurisdictional rules.	AMLPOCA framework and scope of GN 420 of 2019 [02][03][09]

6. TARGETED FINANCIAL SANCTIONS

Targeted financial sanctions

Use the 2022 Prevention of Terrorism (General) Regulations together with both the 2023 and 2024 amendments. Screening alone is not compliance: matching, freezing and reporting must be operational.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Ingest and screen current designations	For a UN Security Council designation or update, ensure FIU circulation occurs within 12 hours. Implement the communicated measure within 12 hours of receipt and, in every case, within 24 hours of the UN designation or update. Keep automated intake, escalation and timestamp evidence.	UN/FIU source inventory; circulation receipt; ingestion and implementation timestamps; customer, BO and transaction screening logs; SLA tests.	POTA General Regulations 2022 reg.4 as amended in 2023 and 2024 [10][11][11B]
Freeze without delay and without prior notice	On a confirmed match, prohibit dealing, block availability of funds, assets and related services, and freeze all covered directly or indirectly owned, jointly owned, controlled, derived or directed assets without delay and without notifying the designated party in advance.	Match decision; asset map; freeze timestamp; blocked transactions; legal and compliance approvals.	Prevention of Terrorism (General) Regulations 2022 regs. 19-20 [10]
Complete the prescribed reporting chain	When a funds or asset freeze is effected, notify the Minister and copy the Police Force and FIU within 24 hours of implementation. Separately, under amended regulation 20(4), report without delay any freeze effected, attempted or other transaction, and action taken to comply with the prohibition. For domestic designations, report covered funds or assets to the Committee without delay under regulation 12.	Minister, Police and FIU notices and receipts; Committee report; freeze and attempted-transaction report; complete timeline.	POTA General Regulations 2022 regs.12 and 20, as amended in 2023 and 2024 [10][11][11B]
Control false positives, delisting and authorised access	Use documented match-resolution criteria, keep assets frozen while a true match remains designated, and implement variation, mistaken-identity and delisting decisions only through the competent process.	False-positive rationale; escalation; variation or delisting authority; unfreeze approval and timestamp.	Prevention of Terrorism (General) Regulations 2022 regs. 15, 21 and 24 [10]

7. RECORD KEEPING AND RETRIEVABILITY

Record keeping and retrievability

Retention clocks differ by record type. A single generic 'ten years from creation' rule is not sufficient.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Apply statutory ten-year trigger dates	Retain transaction and linked-series records for ten years from completion or last activity; relationship and CDD records for ten years from formal termination; and analysis or risk-assessment records for ten years from completion. Extend retention where a report, investigation or authority requires it.	Retention schedule by record class; trigger-date fields; legal holds; deletion approvals.	AMLA Cap. 423 R.E. 2023 s. 17 [01]
Keep records complete and rapidly retrievable	Preserve identity and beneficial-owner evidence, account files, correspondence, transaction data, payment messages, monitoring and investigation records, reports and training evidence in a form sufficient to reconstruct activity and respond promptly to lawful requests.	Indexed archive; reconstruction test; access controls; authority-request log; backup and integrity evidence.	AMLA Cap. 423 R.E. 2023 s. 17; applicable AML regulations [01][04]
Reconcile overlapping payment retention	For Mainland EFTs, also preserve ordering and intermediary originator/beneficiary information for the specific ten-year periods required by the 2019 regulation. Apply the longer or more specific lawful rule where obligations overlap.	Payment retention map; message archive; tested retrieval; conflict-resolution record.	EFT and Cash Transaction Reporting Regulations 2019 regs. 9-10 (Mainland only) [09]

8. PAYMENT-SYSTEM AND ELECTRONIC-MONEY CONTROLS

Payment-system and electronic-money controls

The National Payment Systems Act applies to Mainland Tanzania and Tanzania Zanzibar. Detailed licence conditions and later BoT instruments must be checked for the specific service.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Map each payment activity to BoT permission	Classify payment-system operation, payment instruments, switching or processing, money transfer, e-money issuance and agent activity. Obtain the corresponding licence or approval and do not rely on a partner's permission unless the structure is expressly authorised.	Activity-permission matrix; licence or approval; partner responsibility map; launch gate.	National Payment Systems Act 2015 ss. 2, 5, 15 and 24; Licensing Regulations 2015 [12][13]
Protect e-money and customer funds	Where issuing e-money, implement the required eligible entity structure, trust or special-account arrangements, safeguarding, redemption, reconciliation, liquidity, agent, reporting and governance controls.	E-money approval; trust documents; daily reconciliations; safeguarding and redemption tests; returns.	National Payment Systems Act 2015 Part VI-VII; Electronic Money Regulations 2015 [12][14]
Maintain operational, security and consumer controls	Implement secure and resilient systems, incident management, records, customer-information protection, complaint handling, transparent terms and charges, agent oversight, business continuity and regulatory returns required by the Act, regulations, licence and current BoT instruments.	Security and continuity tests; incident register; complaints MI; disclosures; agent monitoring; returns.	National Payment Systems Act 2015 ss. 43-53; Licensing Regulations 2015; current BoT publications [12][13][15]

9. PERSONAL DATA PROTECTION

Personal data protection

The Personal Data Protection Act 2022 applies in Mainland Tanzania and, in Tanzania Zanzibar, only to Union matters. Confirm whether each Zanzibar processing activity is a Union matter before relying on this framework.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Register and assign privacy accountability where required	Determine controller or processor status, complete PDPC registration and renewals where applicable, appoint privacy responsibility, and keep an inventory that labels Zanzibar Union-matter scope.	Registration certificate; renewal calendar; DPO or privacy appointment; processing inventory and scope analysis.	Personal Data Protection Act 2022 ss. 2 and 14; 2023 Regulations [16][17]
Use a lawful, fair and purpose-limited basis	Document the lawful basis, purpose, necessity, proportionality, transparency, accuracy, minimisation, security and retention for KYC, screening, biometrics, monitoring and regulatory reporting. In Zanzibar, apply this statutory control only where the processing concerns a Union matter, while assessing other Zanzibar law separately.	Privacy notice; lawful-basis register; data map; DPIA for high-risk processing; retention decision.	Personal Data Protection Act 2022, including territorial scope in s. 2 [16]
Enable rights and processor governance	Operate authenticated workflows for applicable data-subject rights and complaints. Bind processors by written instructions, confidentiality, security, assistance, deletion or return, audit and subprocessor terms.	Rights procedure and request log; processor agreements; due diligence; complaint records.	Personal Data Protection Act 2022 and 2023 Regulations [16][17]
Control security incidents and cross-border transfers	Maintain proportionate technical and organisational security, breach detection and the applicable notification process. Before an international transfer, document the statutory transfer ground, safeguards and PDPC process. Apply the Zanzibar Union-matter qualification.	Security controls; incident plan; breach register and notices; transfer assessment; contracts and approvals.	Personal Data Protection Act 2022 and 2023 Regulations [16][17]

10. LAUNCH AND ASSURANCE GATE

Launch and assurance gate

Translate legal requirements into tested evidence before onboarding customers or moving funds.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Complete pre-launch control testing	Test identity and business verification, beneficial-owner tracing, PEP and sanctions screening, deferred-verification restrictions, monitoring, STR escalation, Mainland threshold reporting, wire information, retention, privacy and payment licence gates with positive and negative cases.	Signed test plan; test data and results; defects and remediation; compliance launch approval.	Implementation synthesis [01]-[18]
Schedule independent assurance	Use independent compliance and technical testing proportionate to risk. Report findings, owners and deadlines to senior management or the board and verify closure.	Assurance report; board pack; remediation tracker; closure evidence.	Risk-based programme and governance duties [01][04][12]
Maintain a legal-change register	Monitor FIU, BoT, BRELA, BPRA, PDPC, Gazette and FATF publications. Record territorial impact, effective date, owner, control change and re-test decision.	Source register; alerts; impact assessments; version history; retraining and retest records.	Official publication channels [03][08][15][18]

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.

01

Tanzania FIU · Anti-Money Laundering Act, Cap.423 R.E.2023

[Open official source](#)**02**

Tanzania FIU · Zanzibar primary legislation

[Open official source](#)**03**

Tanzania FIU · Official legislation portal

[Open official source](#)**04**

Tanzania FIU · AML regulations 2022

[Open official source](#)**05**

Tanzania FIU · Mainland AML amendment regulations 2023 (GN 853E)

[Open official source](#)**06**

BRELA · Mainland company legislation and registry

[Open official source](#)**07**

BRELA · Companies (Beneficial Ownership) Regulations 2021

[Open official source](#)**08**

Zanzibar BPRA · Zanzibar Companies Act and registry

[Open official source](#)**09**

Tanzania FIU · Mainland EFT and Cash Transaction Reporting Regulations 2019

[Open official source](#)**10**

Tanzania FIU · Prevention of Terrorism (General) Regulations 2022

[Open official source](#)**11**

Tanzania FIU · Prevention of Terrorism (General) Amendment Regulations 2023

[Open official source](#)**12**

Bank of Tanzania · National Payment Systems Act 2015

[Open official source](#)**13**

Bank of Tanzania · Payment Systems Licensing and Approval Regulations 2015

[Open official source](#)

14

Bank of Tanzania · Electronic Money Regulations 2015

[Open official source](#)**15**

Bank of Tanzania · Current acts, regulations, circulars and guidelines

[Open official source](#)**16**

Personal Data Protection Commission · Personal Data Protection Act 2022

[Open official source](#)**17**

Personal Data Protection Commission · Privacy regulations and official guidance

[Open official source](#)**18**

Tanzania FIU · STR and goAML information

[Open official source](#)**11B**

Tanzania FIU · Prevention of Terrorism (General) Amendment Regulations 2024

[Open official source](#)**19**

Financial Action Task Force · Tanzania removed from increased monitoring, 13 June 2025

[Open official source](#)**20**

Zanzibar BPRA · Companies Regulations 2017

[Open official source](#)**21**

Financial Action Task Force · Current FATF Recommendations and Interpretive Notes

[Open official source](#)

Document control

Version 1.3 / Published 15 July 2026 / Last reviewed 15 July 2026 / Owner: VOVE ID Compliance Research

Educational implementation checklist, not legal advice. Tanzania has separate Mainland and Zanzibar company and AML frameworks. Confirm territorial scope, reporting-person status, sector rules, licence conditions, FIU instructions and later amendments with Tanzanian counsel and the relevant authority before launch.