

Issued: 9th February 2026



CENTRAL BANK OF SEYCHELLES

Anti-Money Laundering and Countering the Financing of Terrorism Act, 2020

Directive No. 1 of 2026

To all Banks

Directive - National Money Laundering and Terrorism Financing (ML/TF) Risk Assessment Recommended Actions

Reference is made to the National ML/TF Risk Assessment performed by Seychelles Authorities, pursuant to section 30(1) of the Anti-Money Laundering and Countering the Financing of Terrorism Act, 2020 (AML/CFT Act), with the findings published on February 06, 2025.

In light of the observations outlined in the report, several recommended actions have been identified in relation to the banking sector. Accordingly, all banks are hereby directed pursuant to section 57(2) of the AML/CFT Act, to implement the following action points within the stipulated timeframes. The banks shall pay particular attention to the necessary submissions that are required to be made to the Central Bank of Seychelles (CBS).

1) Establishment of an appropriate and effective training programme

Recommended Action (1a)

Banks shall have in place a training programme which, at a minimum, includes;

- Identification of areas requiring AML/CFT training or awareness sessions
- Timeline for trainings/awareness sessions
- Targeted staff levels

Recommended Action (1b)

Banks are required to include the following in their respective AML/CFT policy manual or training manual;

- Requirement to conduct testing of staff knowledge following training sessions or on a periodic basis to assess the current level of understanding. The outcome of tests conducted should be appropriately documented and maintained on record.
- Requirement to maintain a comprehensive training plan that is reviewed and approved by management, updated on a periodic basis, at a minimum, annually and kept on record.
- Requirement to conduct trainings and awareness sessions in the event of major changes in the institution's and/or country's AML framework, including changes in legislation, supervisory guidance, or identified ML risks etc.
- Requirement to keep records of all training conducted, including all training materials used. At a minimum, the records shall include:
 - The date the training was conducted;
 - The organiser/presenter;
 - The staff in attendance, their position, and the line of defence to which they belong; and
 - The topics covered.

2) Enhancement of the Suspicious Activity Monitoring and Reporting framework

Recommended Action (2a)

Banks are required to design training programmes that cover the monitoring, identification, and reporting of suspicious transactions. These programmes should be incorporated into the bank's annual training plan.

Recommended Action (2b)

Banks are required to ensure that all necessary customer information is adequately captured in their automated systems to enable effective monitoring of transactions against the customer's profile.

Recommended Action (2c)

Banks are required to:

- Ensure that electronic records contain complete and accurate details of transactions.
- Ensure adherence to documented processes vis-à-vis Politically Exposed Persons (PEPs) screening.
- Strengthen alert review processes and reporting mechanisms.

Recommended Action (2d)

Banks are required to review their AML/CFT automated systems and monitoring tools to ensure proper calibration of parameters and scenarios.

Recommended Action (2e)

Banks are required to:

- Review their AML/CFT policy manuals and other relevant documents to ensure that the software/tools used, as well as the related processes, are properly documented.
- Ensure that documented processes for Suspicious Transaction Reporting (STR) align with the requirements of the AML/CFT Act, including adherence to the mandatory reporting timeframes.

3) Enhance Compliance function framework**Recommended Action (3a)**

Banks are required to ensure that their ML risk factors are clearly identified, understood, and assessed, and that customers are appropriately risk-profiled and classified to support an accurate institutional risk assessment.

Recommended Action (3b)

Banks are required to undertake a staffing needs assessment to determine whether the current staffing level are sufficient to ensure that the compliance function operates efficiently and effectively. The assessment must be documented and maintained on record. Based on the outcome, banks shall recruit additional staff where capacity gaps are identified.

Recommended Action (3c)

Banks are required to review their automated systems to ensure that the necessary software and hardware are in place to effectively support compliance-related activities. The review must be documented and maintained on record.

Recommended Action (3d)

Banks are required to conduct periodic internal or external audits of their compliance function to ensure adequate assurance of its effectiveness.

Timeframe: This action should be implemented immediately and subsequently on an annual basis.

4) Integrity of Banks' Staff**Recommended Action (4a)**

Banks are required to;

- Ensure that staff screening is performed for all prospective employees prior to onboarding and continued on an ongoing basis thereafter; and
- Ensure that all breaches of conduct or compliance are recorded, including details of the breach and any remedial and/or disciplinary actions taken.

Recommended Action (4b)

Banks are required to ensure that the requirement for staff screening is clearly reflected in a documented policy.

Recommended Action (4c)

Banks are required to ensure that appropriate mechanisms (such as a whistleblowing framework) are in place to protect staff from any negative consequences arising from the reporting of suspicious transactions or from undertaking other actions in compliance with AML obligations.

Deadline: The recommended actions shall be commenced immediately, completed by September 30, 2026, and, where applicable, applied on an ongoing basis thereafter. This includes submission of documented evidence, where applicable.



Brian Commettant

9/02/2026 | 10:30 MUT

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First Deputy Governor