EASTERN AND SOUTHERN AFRICA ANTI-MONEY LAUNDERING GROUP

Anti-Money Laundering and Counter Terrorist financing measures

RWANDA

2nd Enhanced Follow-up Report and 1st Technical Compliance Re-rating

August 2025

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ESAAMLG members and observers are committed to the effective implementation and enforcement of internationally accepted standards against money laundering and the financing of terrorism and proliferation, in particular the FATF Recommendations.

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RWANDA'S 2nd ENHANCED FOLLOW-UP REPORT & 1st REQUEST FOR RE-RATING

I. INTRODUCTION

1. The mutual evaluation of Rwanda was conducted by the ESAAMLG, and the mutual evaluation report (MER) was approved by the ESAAMLG Council of Ministers in July 2024. This follow up report analyses the progress of Rwanda in addressing the technical compliance (TC) deficiencies identified in its MER. Re-ratings are given where sufficient progress has been made. Overall, the expectation is that countries will have addressed most if not all TC deficiencies by the end of the third year from the adoption of their MER. This report does not address what progress Rwanda has made to improve its effectiveness. The assessment of Rwanda's request for TC re-ratings and the preparation of this report were undertaken by the following experts (supported by the ESAAMLG Secretariat: Mr. Simon Ogwal Kajura, Chris Likomwa, Estazia Wilson and Bhushan Jomadar:
   - Mrs. Abby Dinka (Ethiopia);
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   - Mr. Deng Philip Ton (South Sudan)

2. Section III of this report highlights the progress made by Rwanda and analysis undertaken by the Reviewers. Section IV sets out the conclusion and a table showing which Recommendations have been recommended for re-rating.

II. KEY FINDINGS OF THE MUTUAL EVALUATION REPORT.

3. The MER[1] rated Rwanda's technical compliance as set out in Table 2.1 below. In light of these results, Rwanda was placed in the enhanced follow-up process[2].

[1] Mutual Evaluation Report (MER) on Botswana, May 2017, https://esaamlg.org/reports/MER%20of%20Botswana%20-%20Council.pdf

[2] Enhanced follow-up is based on the traditional ESAAMLG policy for members with significant shortcomings (in technical compliance or effectiveness) in their AML/CFT systems, and involves a more intense follow-up process.

Table 1. Technical compliance ratings[3], July 2024

R 1	R 2	R 3	R 4	R 5	R 6	R 7	R 8	R 9	R 10
LC	PC	LC	LC	PC	PC	PC	NC	C	LC
R 11	**R 12**	**R 13**	**R 14**	**R 15**	**R 16**	**R 17**	**R 18**	**R 19**	**R 20**
LC	PC	LC	PC	PC	LC	LC	LC	LC	C
R 21	**R 22**	**R 23**	**R 24**	**R 25**	**R 26**	**R 27**	**R 28**	**R 29**	**R 30**
C	PC	LC	PC	PC	LC	LC	PC	LC	C
R 31	**R 32**	**R 33**	**R 34**	**R 35**	**R 36**	**R 37**	**R 38**	**R 39**	**R 40**
PC	C	PC	PC	PC	PC	PC	LC	PC	PC

III. OVERVIEW OF PROGRESS IN TECHNICAL COMPLIANCE

4. Progress in resolving the technical compliance deficiencies identified in the MER/FUR. Since the adoption of its MER in July 2024, this is the 2nd follow-up report and 1st re-ratings request of Rwanda.

5. ESAAMLG welcomes further steps that Rwanda has taken to improve its technical compliance with Recommendations 2, 5, 12 and 14. Following this progress, Rwanda has been re-rated Compliant with Recommendation 2 and 12 and rated Largely Compliant with Recommendations 5 and 14. The PC rating for Recommendations 15, 22 and 35 are retained.

Recommendation 2- National Coordination and Cooperation (Previously rated PC, now re-rated to C)

	Year	Rating
MER	**2024**	**PC**
FUR 1	**2025**	**↑C (re-rated from PC)**

6. ***Criterion 2.1 - (Met)*** - This criterion was rated Met in the MER and the position remains the same. Rwanda adopted its National Policy for Combatting Money Laundering, Financing of Terrorism and Financing of Proliferation of Weapons of Mass Destruction in March 2023. The policy describes the priorities and strategic objectives in preventing and fighting financial crimes, and assists Rwanda to meet its international AML/CFT/CPF obligations and it is informed

[3] Four technical compliance ratings are available: compliant (C), largely compliant (LC), partially compliant (PC), and non-compliant (NC).

by the risks identified in the 2017-2018 NRA on ML/TF. The Policy will be reviewed every four years.

7. ***Criterion 2.2 - (Met)*** – This criterion was rated Met in the MER and the position remain the same. Art 3 of the Presidential Order No 100/01 of 26/08/2021 provides that the National Coordination Council has been designated as an authority that is responsible for developing, monitoring and coordinating national AML/CFT policies within Rwanda.

8. ***Criterion 2.3 - (Met)*** – This criterion was rated Met in the MER and the position remain the same. The National Coordination Council (NCC) established under Art 3 of the Presidential Order No 100/01 of 26/08/2021 provides a platform for the FIC, LEAs, supervisors and other relevant authorities to interact on issues related to AML/CFT policies. At the operational level, the technical committee of the Coordination Council constituted under Art 10 of the same Presidential order that guides the NCC on the implementation of the policies. While there are various cooperation platforms/forums for policy makers and operations involving LEAs, supervisors and key competent authorities cooperate and coordinate at their respective forums.

9. ***Criterion 2.4 - (Met)*** – This criterion was rated Partially Met in the MER. It was found that the National Coordination Council (NCC) and the National Technical Committee to Coordination Committee (NTCCC) are responsible for cooperation on proliferation financing matters at policy level. However, Assessors concluded that the authorities that are directly related to PF are not constituted under the NCC or the NTCCC. The Rwanda Investigations Bureau (RIB) is a member of both the NCC and NTCCC. The RIB is the authority directly responsible for CPF. Article 2 (8º) of Presidential Order No. 100/01 of 26/08/2021 provides for composition of the NCC and among others, the Council is composed of, the "Director General in charge of Criminal Investigation in the Rwanda Investigation Bureau (RIB).", RIB has a unit in charge of Chemical, Biological, Radiological, Nuclear, and Explosives (CBRNE). Art 6 (1) of the Presidential Order provides that the Council may invite any resource person for purposes of clarifying and seeking advice on any issue. Since the RIB is a member of both the NCC and NTCCC and has the overall responsibility for CPF, therefore the requirement is met. Where necessary and in accordance with Art 6 (1) above, the NTCCC or the NCC can specifically request attendance of any officer from the responsible Unit.

10. ***Criterion 2.5 - (Met)*** – This criterion was rated Partially Met in the MER. It was found that while Rwanda has mechanisms for cooperation and coordination on AML/CFT/CPF, including laws on Data privacy and protection. Rwanda had

not provided evidence that such cooperation and coordination includes ensuring the compatibility of AML/CFT requirements with Data Protection and Privacy rules and other similar provisions (e.g., data security/localisation). Art 51 (5) and (7) of Law No 001/2025 of 22/01/2025 (AML/CFT Law 2025) provides for cooperation and coordination between relevant authorities to ensure compatibility of AML/CFT/CPF requirements with Data Protection and Privacy Rules. Further Art 46 of Data Protection and privacy Law data controllers are allowed to use, disclosure by transmission, share, transfer, or otherwise make available personal data, if the data controller executes a legal obligation to which he or she is a subject, and if it is necessary for the performance of a duty carried out in the public interest or in the exercise of official authority vested in the data controller.

Weighting and conclusion

11. Rwanda has addressed the deficiencies identified in the MER in criterion 2.4, and 2.5. Therefore, ***the Reviewers recommend that Recommendation 2 should be upgraded from PC to C***.

Recommendation 5 – Terrorist Financing Offence (Previously rated PC, now re-rated to LC)

	Year	**Rating**
MER	**2024**	**PC**
FUR 1	**2025**	**↑LC (re-rated from PC)**

12. ***Criterion 5.1 - (Mostly Met)*** – This criterion was rated Mostly Met in the MER. It established that Rwanda has ratified the Protocol for the Suppression of Unlawful Acts against the Safety of Fixed Platforms located on the Continental Shelf; however, it had not domesticated the Protocol. In terms of the weighting, the MER concluded that since Rwanda is a landlocked country, the Protocols would not have a significant impact in terms of materiality. Art 57 (1) of AML/CFT Law 2025 as read with Art 2(h) criminalises TF in line with Article 2(1)(a) of the Convention. It is an offence for any person who by any means willfully commit any terrorist financing acts as defined under Article 2(h) of the AML/CFT Law of 2025 and upon conviction such person is liable to imprisonment for a term of not less than 20 years but not more than 25 years and a fine of 3 to 5 times the value of the financing given. In the AML/CFT Law 2025, Paragraph 11 in the Preamble confirms the ratification of the Convention. However, the authorities have not demonstrated whether *the Protocol for the*

Suppression of Unlawful Acts against the Safety of Fixed Platforms Located on the Continental Shelf, adopted in Rome, Italy, on 10/03/1988, has been domesticated.

13. ***Criterion 5.2 - (Met)*** – This criterion was rated Met in the MER. Although the law has changed, the criterion will remain Met since Article 2(h)(i) and Art 57 of the AML/CFT Law 2025 extends TF offences to any who by any means wilfully provides, collects or manages any funds or other assets whether from legitimate or illegitimate source, directly or indirectly, or attempts to do so, with the unlawful intention that they should be used or in the knowledge that they are to be used in whole or in part to carry out a terrorist act; or by an individual terrorist or by a terrorist organization.

14. ***Criterion 5.2bis - (Met)*** – This criterion was rated Met in the MER. Although the law has changed, the criterion will remain Met since Article 2(h)(ii) and Art 57 of the AML/CFT Law 2025 extends to any person who by any means wilfully offers advice, finances, teaching or training in order to acquire skills and knowledge knowing or having reasonable grounds to know that they may be used, or intended to be used for terrorism act and the financing of travelling of individuals who travel to States other than their States or their States of residence for the purpose of the perpetration, planning or preparation of, or participation in terrorist acts, or the providing or receiving of terrorist training.

15. ***Criterion 5.3 - (Met)*** – This criterion was rated Met in the MER. Although the law has changed, the criterion will remain Met. In accordance with Art 2(h)(i) and Art 57 of the AML/CFT Law 2025, TF offences extend to any funds or other assets whether from a legitimate or illegitimate source.

16. ***Criterion 5.4 (a)&(b) - (Met)*** – This criterion was rated Met in the MER. Although the law has changed, the criterion will remain Met since Art 57 (4) (a) of the AML/CFT Law 2025 states that TF offence is committed even if the funds were not actually used to commit or attempt a terrorist act. In addition, Art 57 (4) (b) of the AML/CFT Law 2025 states that TF offence is committed even if a terrorist act does not occur or is not attempted.

17. ***Criterion 5.5 - (Met)*** – This criterion was rated Met in the MER. Although the law has changed, the criterion will remain Met since Art 70 of the AML/CFT Law 2025 provides for the intent and knowledge required to prove TF offence to be inferred from objective factual circumstances.

18. ***Criterion 5.6 - (Met)*** – This criterion was rated Met in the MER. Although the law has changed, the criterion will remain Met since Art 57 (1) of the AML/CFT Law 2025 provides for proportionate and dissuasive criminal sanctions to

natural persons who are convicted of TF. The punishment ranges from between 20- and 25-years imprisonment and a fine of 3 to 5 times the value of the financing given.

19. ***Criterion 5.7 - (Met)*** – This criterion was rated Met in the MER. Although the law has changed, the criterion will remain Met since Art 62 (1) of the AML/CFT Law 2025 allows Rwanda to apply criminal liability and sanctions to legal persons convicted of TF to a fine of 10 to 20 times the value of the financing given. In addition to the fine, an order may be made for dissolution (Art 62 (2) (a)), permanent closure of the establishments (Art 62 (2) (b)), and the publication of the court decision in the newspaper or through any other means used by the media (Art 62 (2) (c)). Hence, the sanctions are considered both dissuasive and proportionate.

20. ***Criterion 5.8(a) - (Met)*** – This criterion was rated Met in the MER. Although the law has changed, the criterion will remain Met since Art 64 of the AML/CFT Law 2025 criminalises attempt to commit the TF offences.

21. ***Criterion 5.8(b) - (Met)*** – This criterion was rated Met in the MER. Although the law has changed, the criterion will remain Met since an accomplice in a TF offence remain criminalized in terms of Article 84 of the Act No.68/2018 on determining offences and penalties in general.

22. ***Criterion 5.8(c) - (Met)*** – This criterion was rated Not Met in the MER as the MER found a deficiency in that the legal framework did not have an express provision that criminalized organizing or directing others to commit a TF offence in line with this sub-criterion. With the enactment of the 2025 AML/CFT Act, Art 2 (h) (iii) as read with Art 57 (1) of the law provides that TF includes any person who willfully *organizes or directs others to commit a terrorist financing offence or attempted offence; and contributes to the commission of one or more terrorist financing acts or attempted offence, by a group of persons acting with a common purpose".*

23. ***Criterion 5.8(d) - (Met)*** – This criterion was rated Not Met in the MER as the MER found a deficiency in that the legal framework does not have a clear provision that criminalises the contribution to the commission of one or more TF offences by a group of persons acting with a common purpose. With the enactment of the 2025 AML/CFT Act, Art 2 (h) (iii) as read with Art 57 (1) of the AML/CFT Law of 2025 provides that TF includes any person who willfully (iii) *(iii) organizes or directs others to commit a terrorist financing offence or attempted offence; and contributes to the commission of one or more terrorist financing acts or attempted offence, by a group of persons acting with a common purpose".*

24. ***Criterion 5.9 - (Met)*** – This criterion was rated Met in the MER. Although the law has changed, the criterion will remain Met since Art 2 (k) of the AML/CFT Law 2025 provides in the definition section that TF is a predicate offence to ML. A predicate offence has been defined as any offense generating illicit funds which can be laundered to become a money laundering offence.

25. ***Criterion 5.10 - (Met)*** – This criterion was rated Met in the MER. Although the law has changed, the criterion will remain Met since Art 57 (4) (c) of the AML/CFT Law 2025 provides for the extra territorial jurisdiction. It allows the authorities to exercise jurisdiction over a TF offence regardless of whether the person alleged to have committed the offence(s) is in the same country or a different country from the one in which the terrorist(s)/terrorist organisation(s) is located or the terrorist act(s) occurred/will occur.

Weighting and conclusion

26. Rwanda has mainly addressed the deficiencies identified in the MER in criterion 5.8 which weighed heavily as some of the categories of the TF offences were not criminalized. However, a minor deficiency remains in that although "Rwanda has ratified the Protocol for the Suppression of Unlawful Acts against the Safety of Fixed Platforms located on the Continental Shelf; it is yet to domesticate the Protocol. Therefore, ***the Reviewers recommend that Recommendation 5 should be upgraded from PC to LC***.

Recommendation 12- Politically Exposed Persons (Previously rated PC, now re-rated to C)

	Year	Rating
MER	**2024**	**PC**
FUR 1	**2025**	**↑C (re-rated from PC)**

27. ***Criterion 12.1(a) - (Met)*** - This criterion was rated Met in the MER and Rwanda has enacted a new AML/CFT Law in January 2025. Under Art 22(1) of the AML/CFT Law 2025 a reporting person is required to put in place risk management systems to determine whether a customer or beneficial owner is a PEP (whether foreign or domestic). In addition, Art 2(bb) of the AML/CFT law 2025 adequately defines a PEP and includes an individual who is or has been entrusted with prominent public functions by the Republic of Rwanda, by a foreign country or by an international organisation, including his or her family members and close associates.

28. ***Criterion 12.1(b) - (Met)*** -This criterion was rated Partly Met since the approval of PEP business relationships were not required to be approved by senior management. This deficiency was addressed as under Article 22(2)(a) of the AML/CFT Law, 2025, which provides in addition to performing the CDD measures under Art 18 of the AML/CFT law 2025, in case of a business relationship with a foreign PEP this requires approval of senior management before establishment or continuation of such business relationship for existing customer.

29. ***Criterion 12.1(c) - (Met)*** - This criterion was rated Partly Met in the MER since reporting persons were not required to establishment of the source of wealth. Article 22(2)(b) of the AML/CFT Law, 2025 now requires reporting person in addition to performing CDD under Art 18 to take reasonable measures to establish the source of wealth and the source of funds of customers and beneficial owners identified as PEPs.

30. ***Criterion 12.1(d) - (Met)*** - This criterion was rated Met in the MER. With the enactment of the AML/CFT 2025, Art 22(2)(c) of the AML/CFT law 2025 requires in addition to performing the CDD measures required under Art 18 of the same law, reporting institutions should conduct enhanced ongoing monitoring of the relationship with the foreign PEP.

31. ***Criterion 12.2(a) - (Met)*** - This criterion was rated Met in the MER. With the enactment of the AML/CFT 2025, Art 22(3) of the AML/CFT law 2025 requires a reporting institution prior to entering into a business relationship with a domestic PEP or an international organization PEP, the reporting person in addition to the normal due diligence measures, obtain senior management approval prior to establishing or continuing business relationship, take reasonable measures to establish the source of wealth and funds of customers and beneficial owners identified as PEP and conduct enhanced ongoing monitoring of the business relationship.

32. ***Criterion 12.2(b) - (Met)*** - This criterion was rated Met in the MER. With the enactment of the AML/CFT 2025, Art 22(3) of the AML/CFT law 2025 now provides that in case of a business relationship with a domestic or international organization PEP, a reporting person, in addition to performing the normal due diligence measures, the reporting person should apply the measures provided under Art 22(2) of the same Act in case of a higher risk business relationship with such a person.

33. ***Criterion 12.3 - (Met)*** - This criterion was rated Partly Met in the MER since approval of PEP relationships were not required to be undertaken by senior management and there was no requirement for reporting persons to

establishing the source of wealth. With the enactment of the AML/CFT 2025, Art 2(bb) of the AML/CFT law 2025, there's an adequate definition of a PEP that includes an individual who is or has been entrusted with prominent public functions by the Republic of Rwanda, by a foreign country or by an international organisation, including his or her family members and close associates.

34. ***Criterion 12.4 - (Met)*** - This criterion was rated Met in the MER. With the enactment of the AML/CFT 2025, Art 22(4) of the AML/CFT Act 2025, the law provides that a long-term insurer must take reasonable measures to determine, prior to the pay-out of the policy proceeds, whether the beneficiary of a long-term insurance or other investment-related insurance policy or the beneficial owner of the beneficiary of such a policy is a politically exposed person and, in case of a higher risk, the reporting person must: (a) inform senior management before the pay-out of the policy proceeds; and (b) conduct enhanced scrutiny on the whole business relationship with the policyholder and file a report to the FIU.

Weighting and conclusion

35. Rwanda has addressed the deficiencies identified in the MER in criterion 12.1, 12.2, 12.3 and 12.4. Therefore, ***the Reviewers recommend that Recommendation 12 should be upgraded from PC to C***.

Recommendation 14- Money or Value Transfer Services (Previously rated PC, now re-rated to LC)

	Year	Rating
MER	**2024**	**PC**
FUR 1	**2025**	**LC (re-rated from PC)**

36. ***Criterion 14.1 - (Met)*** - This criterion was rated Met in the MER. With the enactment of the AML/CFT 2025, in Rwanda, a reporting person or his or her agent that provides money or value transfer services is required to be registered or licensed in accordance with the relevant laws under Art 24(1) of the AML/CFT act 2025.

37. ***Criterion 14.2 - (Partly Met)*** - This criterion was rated Partly Met in the MER. Art 50 of law no 061/2021 of 14/10/2021 governing payment system requires any person operating payment system or acts as a service provide should obtain a licence from the BNR and there are criminal sanctions upon conviction under

the same provision. Rwanda has not informed the type of action they have undertaken to identify the natural or legal persons carrying out unlicensed/unregistered MVTS and has not subjected them to effective, proportionate and dissuasive sanctions. BNR has identified a person that has been operating as an agent of a payment service provider and has instructed the payment service provider to delist or terminate the services of the agents involved in illegal activities as per the BNR notice. Despite that the payment system law provide for dissuasive and proportionate criminal sanctions, BNR has not considered the application of these sanctions and the reviewers are of the view that the sanctions are not proportionate and dissuasive.

38. ***Criterion 14.3 - (Met)*** - This criterion was rated Met in the MER. With the enactment of the AML/CFT 2025, an MVTS is categorized as a financial institution and they are reporting persons under Art 8 of the AML/CFT Act 2025, and reporting persons required to implement the AML/CFT obligations required under the 2025 law and hence they are subject to AML/CFT monitoring.

39. ***Criterion 14.4 - (Met)*** - This criterion was rated Met in the MER. With the enactment of the AML/CFT 2025, under Art 24(1) of the AML/CFT law 2025 a reporting person that provides MVTS services or his or her agent is required to be registered or licensed in accordance with the relevant laws.

40. ***Criterion 14.5 - (Met)*** - This criterion was rated Met in the MER. With the enactment of the AML/CFT 2025, money or value transfer services providers that use agents must include them in their anti-money laundering and counter-terrorist financing programmes and monitor them for compliance with such programmes under Art 24(3) of the AML/CFT law 2025.

Weighting and conclusion

41. Rwanda has addressed the deficiencies identified in criterion 14.1, 14.3, 14.4 and 14.5. Although, BNR has identified an MVTS agent that has been operating without licence/registration, Rwanda has not applied appropriate effective, proportionate and dissuasive sanctions to the unauthorized agent of the MVTS. . In view of the moderate deficiencies, the ***Reviewers recommend that the ratings of Recommendation 14 be upgraded from PC to LC.***

Recommendation 15- New Technologies (Previously rated PC, ratings maintained)

	Year	Rating
MER	**2024**	**PC**
FUR 1	**2025**	**PC (PC ratings maintained)**

42. ***Criterion 15.1 - (Partly Met)*** - This criterion was rated Partly Met in the MER. Although Rwanda has identified and assessed the ML/TF risks that may arise in relation to the development of new products and new business practices, including new delivery mechanisms and the use of new or developing technologies for both new and pre-existing products, the FIs have not carried out their institutional risks assessment at this stage.

43. ***Criterion 15.2(a) - (Met)*** - This criterion was rated Met in the MER. With the enactment of the AML/CFT 2025, under Art 25(2)(a) of the AML/CFT law a reporting person is required to undertake the risk assessments prior to the launch or use of new products and new business practices, including new delivery mechanisms, and the use of new technologies for both new and preexisting products.

44. ***Criterion 15.2(b) - (Met)*** - This criterion was rated Met in the MER. With the enactment of the AML/CFT 2025, under Art 25(2)(b) of the AML/CFT law 2025 a reporting institution is required to take appropriate measures to manage and mitigate the risks.

45. ***Criterion 15.3(a-c) - (Partly Met)*** - This criterion was rated Not Met in the MER. Rwanda has identified and assessed the ML/TF risk emerging from virtual assets activities and the activities or operations of VASPs. The NRA does not have clear identification of the threats and vulnerabilities linked to existing VASPs operating in Rwanda (p 77 of the NRA). In addition, there are no key recommended actions that requires VASPs to take appropriate steps to identify, assess, manage and mitigate their ML and TF risks.

46. ***Criterion 15.4 – 15.10 - (Not Met)*** - These criteria were rated Not Met in the MER. These deficiencies have not yet been addressed as the legal and regulatory framework for regulation of VASPs has not yet been enacted.

47. ***Criterion 15.11 - (Met)*** - This criterion was rated Not Met in the MER. This deficiency has been addressed under Article 26 (b) of the AML/CFT Law, 2025, which now requires the competent authorities and supervisors to provide international cooperation to their foreign counterparts in relation to ML, related predicate offences and TF related to VASPs and VAs.

Weighting and conclusion

48. Rwanda has addressed the deficiencies identified in the MER for criterion 15.2 and 15.3. However, there are still moderate deficiencies since FIs are yet to identify and assess the ML/TF risks in relation to new technologies and Rwanda is yet to enact legal and regulatory framework for the regulation and supervision of VAs and VASPs. In view of the moderate deficiencies, the ***Reviewers recommend that Recommendation 15 be maintained at PC***.

Recommendation 22- Designated Non-Financial Businesses and Professions (DNFBPs): Customer Due Diligence (Previously rated PC, ratings maintained)

	Year	Rating
MER	**2024**	**PC**
FUR 1	**2025**	**PC (PC ratings maintained)**

Criterion 22.1 – (Partly Met)

49. ***Criterion 22.1(a) – (Partly Met)*** - This criterion was rated Mostly Met in the MER. With the enactment of the AML/CFT 2025, casinos in Rwanda are classified as reporting institutions under the AML/CFT Act 2025 and are subject to comply with the CDD requirements under Art 12(1) of the AML/CFT Act 2025, however, the threshold is yet to be prescribed by the FIC.

50. ***Criterion 22.1(b) – (Met)*** - This criterion was rated Met in the MER. With the enactment of the AML/CFT 2025, real estate agents are required to undertake CDD requirements when they are involved in transactions for a client concerning the buying and selling of real estate in an amount equal to or above the threshold set by the FIC, whether conducted as a single transaction or several transactions that appear to be linked pursuant to Art 12(1)(d)(i) of the AML/CFT Act 2025.

51. ***Criterion 22.1(c) – (Partly Met)*** - This criterion was rated Met in the MER. With the enactment of the AML/CFT 2025, DPMS are reporting entities under the AML/CFT law of 2025 and are required to undertake CDD requirements when they engage in an amount equal to or above the threshold set by the FIC, whether conducted as a single transaction or several transactions that appear to be linked with a customer pursuant to Art 12(1)(d)(i) of the AML/CFT Act 2025, however, the threshold are yet to be prescribed by the FIC.

52. ***Criterion 22.1(d) – (Met)*** - This criterion was rated Met in the MER. With the enactment of the AML/CFT 2025, Lawyers, notaries and other independent legal professional and accountants are reporting entities under the AML/CFT law of 2025 and are required to undertake CDD requirements when they engage in an amount equal to or above the threshold set by the FIC, whether conducted as a single transaction or several transactions that appear to be linked, when they engage in the activities listed under sub-criterion 22(1)(d) with a customer pursuant to Art 12(1)(d)(i) of the AML/CFT Act 2025.

53. ***Criterion 22.1(e) – (Met)*** - This criterion was rated Met in the MER. With the enactment of the AML/CFT 2025, Trust and company service providers are reporting entities under the AML/CFT law of 2025 and are required to undertake CDD requirements when they engage in an amount equal to or above the threshold set by the FIC, whether conducted as a single transaction or several transactions that appear to be linked, when they engage in the activities in the sub-criterion 22.1(e) with a customer pursuant to Art 12(1)(d)(i) of the AML/CFT Act 2025.

54. ***Criterion 22.2 – (Met)*** - This criterion was rated Mostly Met in the MER. With the enactment of the AML/CFT 2025, this deficiency has been addressed by expanding Article 21 of the AML/CFT Law, 2025, to include the requirement to keep the records for at least 10 years from the date of termination of the business relationship.

55. ***Criterion 22.3 – (Met)*** - This criterion was rated Partly Met in the MER. The reviewers analysed Rec 12 above and noted that Rwanda has addressed the deficiencies identified in the MER and has been re-rated Compliant.

56. ***Criterion 22.4 – (Partly Met)*** - This criterion was rated Mostly Met in the MER. The authorities have informed that the institutional risk assessments are currently in progress and the deficiencies in Rec 15 will also apply here.

57. ***Criterion 22.5 – (Met)*** - This criterion was rated Mostly Met in the MER. Art 28(3) of the AML/CFT Law 2025 requires DNFBPs which are reporting person in Rwanda to have regards to information on the level of country risk when determining in which countries the third party that meets the conditions can be based.

Weighting and conclusion

58. Rwanda has addressed the deficiencies identified in the MER for criterion 22.2, 22.3 and 22.5. However, although casinos and DPMS are classified as reporting institutions in Rwanda the country is yet to proclaim the threshold for engaging

in financial transactions in respect of casinos and DPMS respectively. Therefore, the ***Reviewers recommend that the rating for Recommendation 22 is maintained at PC.***

Recommendation 35- Sanctions (Previously rated PC, ratings maintained)

	Year	Rating
MER	**2024**	**PC**
FUR 1	**2025**	**PC (PC ratings maintained)**

59. ***Criterion 35.1 – (Partly Met)*** - This criterion was rated Partly Met in the MER. With the enactment of the AML/CFT 2025, Art 63 thereof provides that reporting persons, a member of its board of directors, senior manager or other employees who commits offences as specified under paragraphs (a-g) of article 61, upon conviction, he/she is liable to imprisonment for a term of not less than 2 years but not more than 5 years and a fine of not less than RWF 2,000,000 (USD 1,400) but not more than RWF 5,000,000 (USD 3,500).
Art 6 of the same act provides that any reporting persons that fail to comply with preventive measures outlined in the AML/CFT law 2025 upon conviction, is liable to imprisonment for a term of not less than 1 year but not more than 3 years and a fine of not less than RWF 1,000,000 (USD 705) but not more than RWF 5,000,000 (USD 3,500).

TFS (Rec 6)

Art 27 of the FIC regulations no 001/FIC/2025 of 15/01/2025 empowers supervisory authority to impose sanctions against a reporting person who does not comply or negligently failed to comply with requirements under this Regulation. By virtue of Article 26, without prejudice to criminal sanctions, a person who fails to comply with provisions of the regulation is liable to an administrative fine of not less than RWF 1,000,000 (USD 705) and not more than RWF 10,000,000 (USD 7,000). for making funds or other assets available to a designated person.

NPO (Rec 8)

By virtue of Article 66 of the AML/CFT Law 2025, any person which fails to comply with the requirements set out in relation thereto in the law commits a misconduct upon conviction, he/she is liable to imprisonment for a term of not less than 1 year but not more than 3 years and a fine of not less than RWF 1,000,000 (USD 705) but not more than RWF 5,000,000 (USD 3,500).

The MER 2024 provides that administrative sanctions for non-compliance of preventive measures sanctions are found in the AML/CFT regulations that are issued under the AML/CFT Act of 2023. With the enactment of the AML/CFT Act 2025, the AML/CFT regulations 2023 are now repealed since Rwanda is a civil law jurisdiction and there are no savings provision that informs the Reviewers that the 2023 regulations are still in force. Although there are criminal sanctions in the AML/CFT act 2025 these apply only for limited breaches of preventive measures.

60. ***Criterion 35.2 – (Not Met)*** - This criterion was rated Partly Met in the MER. With the enactment of the AML/CFT 2025, now there are no provisions in the AML/CFT law 2025 for the application of sanctions to directors and senior management of FIs and DNFBPs. In addition, the regulations provided are no longer in force since they were issued under the 2023 AML/CFT law that has been repealed on 22 Jan 2025 as witnessed under Art 75 of the AML/CFT law 2025.

Weighting and conclusion

61. Rwanda is yet to address the deficiencies identified in the MER, since the laws do not provide for the use of criminal or civil sanctions for failure to comply with all AML/CFT requirements. With the enactment of the AML/CFT Act 2025, there are no savings provision for the AML/CFT regulations 2023 which provides for administrative sanctions for non-compliance of preventive measures. In addition, the laws do not provide for sanctions to be extended to directors and senior managers. The ***Reviewers recommend that the rating for Recommendation 35 is maintained at PC.***

IV. CONCLUSION

62. Rwanda has made progress in addressing some of the technical compliance deficiencies identified in its MER. Reviewers considered information provided and are in support of the request for re-rating for Recommendations 2 and 12 from PC to Compliant and Recommendations 5 and 14 from PC to LC 24, but maintaining the rating of Recommendations 12, 22 and 35 at PC.

63. Considering the overall progress made by Rwanda since the adoption of its MER, its technical compliance with the FATF Recommendations has been revised as shown in Table 2 below.

Table 2: Technical Compliance Re-rating, August 2025

R.1	***R.2***	***R.3***	***R.4***	***R.5***	***R.6***	***R.7***	***R.8***	***R.9***	***R.10***
LC	***C***	*LC*	*LC*	***LC***	*PC*	*PC*	*NC*	*C*	*LC*
R.11	***R.12***	***R.13***	***R.14***	***R.15***	***R.16***	***R.17***	***R.18***	***R.19***	***R.20***
LC	***C***	*LC*	***LC***	***PC***	*LC*	*LC*	*LC*	*LC*	*C*
R.21	***R.22***	***R.23***	***R.24***	***R.25***	***R.26***	***R.27***	***R.28***	***R.29***	***R.30***
C	***PC***	*LC*	*PC*	*PC*	*LC*	*LC*	*PC*	*LC*	*C*
R.31	***R.32***	***R.33***	***R.34***	***R.35***	***R.36***	***R.37***	***R.38***	***R.39***	***R.40***
PC	*C*	*PC*	*PC*	***PC***	*PC*	*PC*	*LC*	*PC*	*PC*

64. Rwanda will remain in the enhanced follow up process and will continue to inform the ESAAMLG of the progress made in addressing its deficiencies identified in the MER.