



**GUIDANCE ON THE IMPLEMENTATION OF  
TARGETED FINANCIAL SANCTIONS  
FOR  
REPORTING INSTITUTIONS**

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## ACCRONYMS AND ABBREVIATIONS

DNFBPs	Designated Non-Financial Businesses and Professions
DPRK	Democratic People’s Republic of Korea
ISIL	Islamic State of Iraq and the Levant
POTA	Prevention of Terrorism Act (Cap. 59B)
POT-PFR	The Prevention of Terrorism (Implementation of the United Nations Security Council Resolutions on Prevention, Suppression and Disruption of Proliferation Financing) Regulations, 2023
POT-TFR	The Prevention of Terrorism (Implementation of the United Nations Security Council Resolutions on the Suppression of Terrorism) Regulations, 2024
TFS	Targeted Financial Sanctions
UN	United Nations
UNSC	United Nations Security Council
UNSCR	United Nations Security Council Resolution

## DEFINITION OF TERMS

Act:	The Prevention of Terrorism Act (Cap. 59B)
Committee:	The Counter Financing of Terrorism Inter-Ministerial Committee established under section 40D (1) of the Act
Dealing:	Receiving, acquiring, transacting, representing, concealing, disposing, converting, transferring or moving, using as security or providing financial services
Delisting:	The removal of the name and other identification information of a designated person or entity from the domestic list or the sanction list
Designated Non-Financial Businesses or Profession:	Meaning assigned to it under Section 2 of the Proceeds of Crime and Anti-Money Laundering Act (Cap. 59A)
Designated Person or Entity:	A person or entity designated pursuant to the Prevention of Terrorism (Implementation of the United Nations Security Council Resolutions on the Suppression of Terrorism) Regulations, 2024 or the applicable United Nations Security Council Resolutions adopted under Chapter VII of the United Nations Charter
Designation or Listing:	The identification of a person, organization, association or group of persons that is subject to targeted sanctions pursuant to the applicable United Nations Security Council Resolutions
Domestic List:	The list compiled and maintained by the Committee under Regulation 20 of the Prevention of Terrorism (Implementation of the United Nations Security Council Resolutions on the Suppression of Terrorism) Regulations, 2024
Economic Resources:	Assets of every kind, whether movable or immovable, tangible or intangible, actual or potential, which are not funds and which may be used to obtain funds, goods or services

Extraordinary Expenses:	Fees to pay professional fees or costs relating to legal services rendered or other extraordinary expenses within reasonable limits or fees for services relating to safekeeping or management of frozen funds
Financial Institution:	Meaning assigned to it under Section 2 of the Proceeds of Crime and Anti-Money Laundering Act (Cap. 59A
Financial Reporting Centre:	The Financial Reporting Centre established under Section 21 of the Proceeds of Crime and Anti-Money Laundering Act (Cap. 59A)
Freeze:	To prevent or restrain specific property or funds from being used, transferred, transacted, converted, altered, concealed, moved or disposed of without affecting the ownership thereof
Funds:	Assets of every kind, whether corporeal or incorporeal, tangible or intangible, movable or immovable, however acquired, and legal documents or instruments in any form, including electronic or digital, evidencing title to, or interest in, such assets.
Person:	A natural person or legal person
Proliferation Financing:	Meaning assigned to it under Section 4B of the Act
Property:	Assets of every kind, whether corporeal or incorporeal, moveable or immovable, tangible or intangible, and legal documents or instruments evidencing title to, or interest in such assets and includes funds
Reporting Institution:	Meaning assigned to it under Section 2 of the Proceeds of Crime and Anti-Money Laundering Act (Cap. 59A)
Resolution, 1267/1989:	Resolutions 1267 (1999) and 1989 (2011) and 2253 (2015) of the United Nations Security Council and includes its successor resolutions
Resolution, 1267:	Resolution 1267 (1999) of the United Nations Security Council and includes its successor resolutions
Resolution, 1373:	Resolution 1373 of the United Nations Security Council and includes its successor resolutions

Resolution, 1718:	Resolution 1718 (2006) of the United Nations Security Council and includes its successor resolutions
Resolution, 1988:	Resolution 1988 (2011) of the United Nations Security Council and includes its successor resolutions
Resolution:	A resolution of the United Nations Security Council and includes its successor resolution
Sanctions Committee:	A Committee of the Security Council of the United Nations established under a Resolution of the Security Council
Sanctions List:	The ISIL (Da'esh) & Al-Qaida Sanctions list (1267/1989) sanctions list, 1988 sanctions list, 1718 sanctions list or other similar list issued by the Security Council
Secretary to the Committee:	Director General of the Financial Reporting Centre as provided under section 40D (2) (j) of the Act
Security Council:	Security Council of the United Nations established under Article 7 of Chapter III of the United Nations Charter
Self-Regulatory Body:	Meaning assigned to it under Section 2 of the Proceeds of Crime and Anti-Money Laundering Act (Cap. 59A)
Supervisory body:	Meaning assigned to it under Section 2 of the proceeds of Crime and Anti-Money Laundering Act (Cap. 59A)
Targeted Financial Sanctions:	Both asset freezing and prohibitions to prevent funds or other assets from being made available, directly or indirectly, for the benefit of designated persons and entities
Terrorism Financing Without Delay	Offence specified under Sections 5 and 5A of the Act Within twenty-four hours of a designation by the United Nations Security Council or its relevant Sanctions Committee or within twenty-four hours of designation by the Committee

## **PART I: PRELIMINARY**

### **1.1 Title**

Guidance on the Implementation of Targeted Financial Sanctions for Reporting Institutions.

### **1.2 Authorization**

This Guidance is issued under section 24A of the Proceeds of Crime and Anti-Money Laundering Act (Cap. 59A), which empowers the Financial Reporting Centre to issue guidance to reporting institutions.

### **1.3 Application**

This Guidance applies to all reporting institutions as defined in the Proceeds of Crime and Anti-Money Laundering Act (Cap. 59A).

## **PART II: STATEMENT OF POLICY**

### **2.1 Purpose and Scope**

The purpose of this Guidance is to provide practical and actionable instructions to reporting institutions on implementing the legal framework for targeted financial sanctions in compliance with: -

- i. United Nations Security Council resolutions relating to the prevention and suppression of terrorism and terrorist financing; and
- ii. United Nations Security Council resolutions relating to the prevention, suppression and disruption of proliferation of weapons of mass destruction and its financing.

The Guidance aims to enhance the capacity of reporting institutions in implementing preventive measures, that are both necessary and unique, to stopping the flow of funds or other assets intended for terrorism financing or proliferation financing. This, in turn, will help prevent the exploitation of the private sector by terrorist networks and proliferators, as required by the United Nations Security Council.

The Guidance does not replace or override any legal or regulatory requirements and should be read in line with the provisions of the Prevention of Terrorism Act (Cap. 59B)



(POTA) and the attendant Regulations, the Prevention of Terrorism (Implementation of the United Nations Security Council Resolutions on the Suppression of Terrorism) Regulations, 2024 and the Prevention of Terrorism (Implementation of the United Nations Security Council Resolutions on Prevention, Suppression and Disruption of Proliferation Financing) Regulations, 2023.

## 2.2 Responsibility

Reporting institutions have the responsibility to ensure compliance with this Guidance and the existing legal framework on the implementation of targeted financial sanctions obligations related to terrorism financing and proliferation financing.

## 2.3 Review

The Guidance shall be subject to continuous review and may be updated from time to time, as may be appropriate.

# PART III: OVERVIEW OF SANCTIONS MEASURES

## 3.1 United Nations Sanctions Measures

Under Article 41 of the United Nations (UN) Charter, the United Nations Security Council (UNSC) may outline measures that do not involve the use of armed force and call upon UN member states to apply such measures to give effect to its decisions in response to threats to international peace, breaches of the peace, and acts of aggression.

These measures, commonly referred to as sanctions, focus on the political settlement of conflicts, nuclear non-proliferation, and countering terrorism to maintain and restore international peace and security. Sanctions mandated by various UN Security Council Resolutions (UNSCRs) are binding international legal obligations for all UN Member States under Chapter VII of the UN Charter.

The sanctions measures range from comprehensive economic sanctions and a cease of diplomatic relations to more targeted measures such as arms embargoes, travel bans, and financial or commodity restrictions that apply only to a subset of the population such as state and non-state entities or individuals.

The UNSC, through its United Nations Security Council Resolutions (UNSCRs) and Sanctions Committees, mandates the implementation of sanctions measures related to, among others: -

A. Terrorism and terrorism financing pursuant to:

- a. UNSCR 1267 (1999), 1989 (2011) and their successor resolutions in relation to Islamic State in Iraq and the Levant (Da'esh), Al-Qaida, and associated individuals, groups, undertakings, and entities.
- b. UNSCR 1988 (2011) and its successor resolutions in relation to the Taliban, and associated individuals, groups, undertakings, and entities.
- c. UNSCR 1373 (2001) which requires UN member states, including Kenya, to designate individuals and entities involved in terrorism and the financing of terrorism.

The sanction measures under these regimes include asset freezes, travel bans, and/or arms embargoes. The aim to prevent and disrupt terrorism financing by freezing the funds and assets of designated individuals and entities and prohibiting the provision of financial services, funds and assets being made available to designated persons.

B. The proliferation of weapons of mass destruction and its financing pursuant to:

- a. UNSCR 1718 (2006) and its successor resolutions in relation to Democratic People's Republic of Korea (DPRK) on nuclear-related, other weapons of mass destruction-related, and ballistic missile-related programs.

The sanction measures under this regime include arms and related materiel embargoes; non-proliferation measures; actions targeting proliferation networks; interdiction and transportation restrictions; provision of bunkering services; asset freezes; disposal of seized items; travel bans; financial measures; specialized teaching and training; scientific and technical cooperation; bans on coal, minerals, and other sectoral bans; ban on exports of condensates and natural gas ban to the DPRK; ban on all refined petroleum products; restrictions on the supply, sale, or transfer of crude oil; seafood ban; ban on textile exports from the DPRK; bans on DPRK workers abroad; fuel ban; luxury goods ban; and other bans such as statues, new helicopters, and vessels. They aim to address illicit procurement and proliferation financing related to the DPRK, and their implementation contributes to a stronger counter-proliferation financing regime, despite some measures requiring alternative approaches by the public and private sectors beyond targeted financial sanctions.

### 3.2 Targeted Financial Sanctions Measures

Targeted Financial Sanctions (TFS) refer to a subset of sanctions measures contained in both the terrorism financing and the proliferation financing sanctions regimes that involve asset freezing and prohibitions to prevent funds or other assets from being made available, either directly or indirectly, for the benefit of designated persons or entities associated with terrorism or the proliferation of weapons of mass destruction and their financing.

## **PART IV: THE LEGAL FRAMEWORK FOR IMPLEMENTING TARGETED FINANCIAL SANCTIONS**

### 3.1 The United Nations Charter

Article 2(5) of the Kenyan Constitution states that the general rules of international law form part of the law of Kenya. By ratifying the UN Charter, Kenya is obligated to implement UN sanctions, under Article 2(6) of the Kenyan Constitution, which stipulates that any treaty or convention ratified by Kenya becomes part of its domestic law. Consequently, Kenya is legally bound to enforce UN Security Council resolutions, including sanctions, within its jurisdiction, as mandated by Article 41 of the Charter of the United Nations.

### 3.2 The Prevention of Terrorism Act (Cap. 59B)

The Prevention of Terrorism Act (Cap. 59B) is the primary Act that provides for the implementation of targeted financial sanctions pursuant to UNSCRs 1267/1989, 1373, 1718 and 1988, resolutions relating to the suppression of terrorism financing and the prevention, suppression and disruption of the proliferation of, and financing of, dealings with weapons of mass destruction and such other related resolutions in accordance with this Act.

The Act establishes the Counter Financing of Terrorism Inter-Ministerial Committee (the Committee), which is tasked with the implementation of targeted financial sanctions related to terrorism financing and proliferation financing by: -

- i. providing guidance, including issuance of directives, guidelines, rules or instructions on compliance with the relevant UN sanctions lists and the domestic list;

- ii. identifying persons or entities for the purpose of designation;
- iii. monitoring the freezing of assets and the prohibition of financial services to designated entities or individuals;
- iv. considering requests for the delisting of a designated person or entity; and
- v. addressing challenges related to effective implementation of targeted financial sanctions and coordinating with relevant competent authorities in performing its functions.

### 3.2.1 The Prevention of Terrorism (Implementation of the United Nations Security Council Resolutions on Suppression of Terrorism) Regulations, 2024

The Prevention of Terrorism (Implementation of the United Nations Security Council Resolutions on Suppression of Terrorism) Regulations, 2024 (POT-TFR) provides for specific rules on implementing the targeted financial sanctions relating to the suppression of terrorism and terrorism financing pursuant to UNSCRs 1267/1989, 1988 and 1373 and successor resolutions. The POT-TFR serves as a critical tool in preventing terrorism by targeting financial and material support to terrorist organizations and individuals.

The POT-TFR requires freezing of funds, property and other assets belonging to individuals and entities designated pursuant to UNSCRs 1267/1989, 1988 or UNSCR 1373. Any person, including reporting institutions, are required not to avail any funds or other assets, economic resources or financial or other related services for the designated persons or entities.

The POT-TFR allows access to frozen funds or other assets necessary for: -

- a) basic expenses such as payments for foodstuffs, rent or mortgage, medicines and medical treatment, taxes, insurance premiums and public utility charges,
- b) expenses exclusively for payment of reasonable professional fees, or reimbursement of incurred expenses associated with the provision of legal services,
- c) certain types of fees or service charges for routine holding or maintenance of frozen funds or other financial assets or economic resources, and
- d) extraordinary expenses,

under strict oversight, ensuring that human rights are observed and that humanitarian needs are met without compromising security.

Any person, including reporting institutions, should report any funds or assets frozen or any other action taken in compliance with the relevant prohibition requirements, including attempted transactions, within 24 hours to the Committee, through its Secretary (the Financial Reporting Centre), using a reporting template that is circulated alongside the Notice of any updates to the relevant UN Sanctions Lists or the Domestic List. Additionally, reporting institutions are required to monitor transactions and business relationships, on an on-going basis, against updated domestic list or relevant UN sanctions lists to mitigate terrorism financing risks.

### 3.2.2 The Prevention of Terrorism (Implementation of the United Nations Security Council Resolutions on Prevention, Suppression and Disruption of Proliferation Financing) Regulations, 2023

The Prevention of Terrorism (Implementation of the United Nations Security Council Resolutions on Prevention, Suppression and Disruption of Proliferation Financing) Regulations, 2023 (POT-PFR), sets out specific rules for implementing targeted financial sanctions related to proliferation financing, including those issued under UNSCR 1718 and its successor resolutions, and any future resolutions concerning the Democratic People's Republic of Korea (DPRK), or any other resolution in the context of proliferation financing.

The POT-PFR require among others, the freezing of funds and other assets belonging to individuals and entities designated pursuant to UNSCR 1718 and prohibition to making funds or other assets, economic resources or financial or other related services available to or for the benefit of the designated persons or entities. The aim is to ensure that designated persons and entities are identified, deprived of resources and prevented from raising, moving and using funds or other assets for the financing of proliferation in connection to DPRK.

The POT-PFR allows access to frozen funds for:

- i. basic expenses;
- ii. extraordinary expenses;
- iii. funds or assets that are subject to judicial, administrative or arbitral lien or judgement;

- iv. funds or assets that are required to carry out activities by the DPRK's mission to the United Nations and its specialized agencies and related organizations or other diplomatic and consular missions of the DPRK;
- v. funds or assets that the Sanctions Committee determines in advance on a case-by-case basis and which are required for the delivery of humanitarian assistance, denuclearization or any other purposes consistent with the objectives of Resolution 2270 (2016); and
- vi. financial transactions with the DPRK Foreign Trade Bank or the Korea National Insurance Corporation if such transactions are solely for the operation of diplomatic or consular missions in the DPRK or humanitarian assistance activities that are undertaken by, or in coordination with, the United Nations.

The POT-PFR permits the addition to the to the accounts frozen pursuant to UNSCR 1718 of interests or other earnings due on those accounts or payments due under contracts, agreements or obligations that arose prior to the date on which those accounts became subject to the provisions of this resolution, provided that any such interest, other earnings and payments continue to be subject to these provisions and are frozen.

Any person, including reporting institutions, should report any funds or assets frozen or any other action taken in compliance with the relevant prohibition requirements, including attempted transactions, within 24 hours to the Committee, through its Secretary (the Financial Reporting Centre), using a reporting template that is circulated alongside the Notice of any changes to the 1718 Sanctions List. Additionally, reporting institutions are required to monitor transactions and business relationships, on an on-going basis, against updated 1718 Sanctions list to mitigate proliferation financing risks.

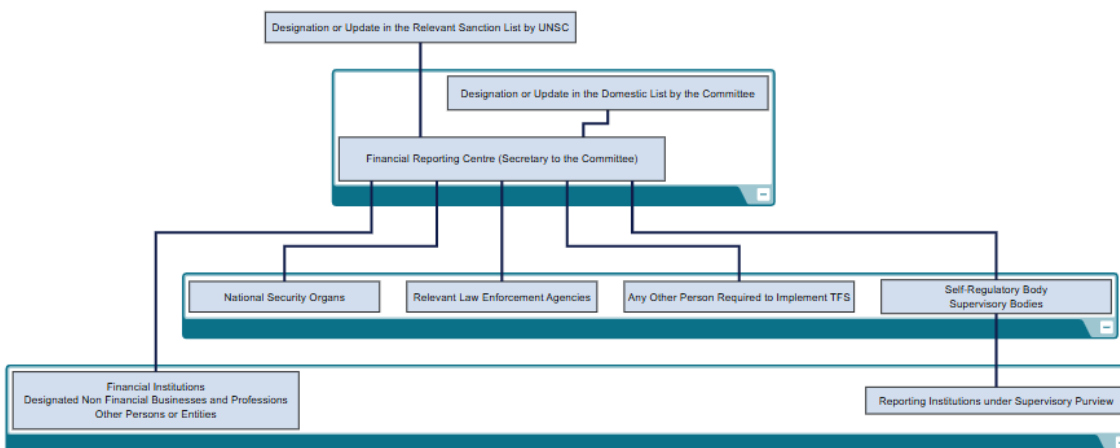
## **PART V: COMMUNICATION OF DESIGNATION, AMENDMENTS OR DELISTING**

The Secretary to the Committee (the Financial Reporting Centre) monitors, on a daily basis, updates to the relevant UNSC Sanctions Lists (i.e. ISIL (Da'esh) & Al-Qaida Sanctions list, 1988 Sanctions List and the 1718 Sanctions List), and on behalf of the Committee circulates the updates whether new listing, amendments or delisting to reporting institutions, other relevant persons, including the general public through a Targeted Financial Sanctions Notice.

Updates to the Domestic List regarding designations of persons or entities by the Committee under resolution 1373 are also circulated in a similar manner through a Targeted Financial Sanctions Notice, by the Secretary to the Committee, upon designation, enactment of amendments or delisting.

The Targeted Financial Sanctions Notice is shared with reporting institutions electronically through a variety of mechanisms. Therefore, a reporting institution is required to take action upon receipt of the Targeted Financial Sanctions Notice by whichever means, which may include: -

- i. goAML system (primary communication channel for reporting institutions).
- ii. publication on the Financial Reporting Centre's website (communication channel for the public)
- iii. circulation through the supervisory bodies and self-regulatory bodies (an interim communication channel with an aim of reaching out as many reporting institutions as possible, especially those that are not registered in goAML)
- iv. email (a communication channel for institutions that have requested to be included in the TFS mailing list, enabling them to receive updates directly to their dedicated email for timely action on their part)



**Figure 1. Flow Chart Illustrating the Circulation Mechanism.**

Regardless of the communication receipt channel, a reporting institution is required to implement its TFS obligations in accordance with the guidance provided in the Targeted Financial Sanctions Notice. All reporting institutions are reminded of their obligation under Section 47A of the Proceeds of Crime and Anti-Money Laundering Act to register

with the Centre to ensure timely receipt of communications. As goAML is the primary communication channel, any delay in receiving updates through alternative channels shall not constitute a sufficient defense by a reporting institution.

## PART VI: TARGETED FINANCIAL SANCTIONS OBLIGATIONS OF REPORTING INSTITUTIONS

All natural and legal persons, including reporting institutions are required to comply with targeted financial sanctions obligations to ensure compliance with the relevant UNSCRs on prevention of terrorism and terrorism financing and the proliferation of weapons of mass destruction and its financing. The obligations include: -



**Figure 2. Targeted Financial Sanctions Obligations.**

### 4.1 Monitoring Communications and Consulting the Relevant UNSC Sanction Lists and the Domestic List

All persons, including reporting institutions are required to monitor the circulation of Targeted Financial Sanctions Notices communicated by the Secretary to the Committee regarding updates to the relevant UNSC Sanction Lists and the Domestic List to ensure timely implementation of the targeted financial sanctions.

Upon receipt of the Targeted Financial Sanctions Notice, reporting institutions are required to access and maintain up to date relevant UNSC Sanction Lists and Domestic List on designated persons and entities for purposes of identifying targeted funds or other assets. The lists are accessible in the Financial Reporting Centre's website, Targeted Financial Sanctions Tab, with links to the Sanctions List Materials by relevant Sanctions Committee and the Domestic List.



The lists under terrorism financing targeted financial sanctions regimes include: -

- a) **ISIL (Da'esh) & Al-Qaida Sanctions List** comprising of individuals, groups, undertakings, and entities designated pursuant to the United Nations Security Council Resolutions (UNSCR) 1267 (1999), 1989 (2011) and its successor resolutions in relation to Islamic State in Iraq and the Levant (Da'esh), Al-Qaida. The list is available at the following link, and there is an option to download it in the following formats: .xml, .html and .pdf.

[https://main.un.org/securitycouncil/en/sanctions/1267/aq\\_sanctions\\_list](https://main.un.org/securitycouncil/en/sanctions/1267/aq_sanctions_list)

- b) **1988 Sanctions List** comprising of individuals, groups, undertakings, and entities designated pursuant to the United Nations Security Council Resolutions 1988 (2011) and its successor resolutions in relation to the Taliban. The list is available at the following link, and there is an option to download it in the following formats: .xml, .html and .pdf.

<https://main.un.org/securitycouncil/en/sanctions/1988/materials>

- c) **Domestic List** comprising of individuals and entities designated by the Counter Financing of Terrorism Inter-Ministerial Committee (Committee) for being involved in terrorism and terrorism financing pursuant to United Nations Security Council Resolution 1373. The list will from time to time be posted on the Financial Reporting Centre's website.
- d) **Any other list that may be issued pursuant to any other United Nation Security Council Resolutions (UNSCR)** imposing targeted financial sanctions in the context of terrorism and terrorism financing. The relevant list will be posted on the Financial Reporting Centre's website.

The lists under proliferation financing targeted financial sanctions regime include: -

- a) **1718 Sanctions List** comprising of individuals, entities and other groups designated pursuant to the United Nation Security Council Resolutions 1718 (2006) and its successor resolutions in relation to Democratic People's Republic of Korea (DPRK) on nuclear-related, other weapons of mass destruction-related, and ballistic missile-related programs. The list is available at the following link, and there is an option to download it in the following formats: .xml, .html and .pdf.

<https://main.un.org/securitycouncil/en/sanctions/1718/materials>

- b) **Any other list that may be issued pursuant to any other United Nation Security Council Resolutions (UNSCR)** imposing targeted financial sanctions in the context of proliferation financing. The relevant list will be posted on the Financial Reporting Centre's website.

The United Nations Security Council maintains a consolidated list comprising of all individuals and entities subject to measures imposed by the Security Council, including those related to ISIL (Da'esh) & Al-Qaida Sanctions, 1988 and 1718 Sanctions regimes, in one list to facilitate the implementation of the measures. The list is available at the following link, and there is an option to download it in the following formats: xml, .html and .pdf.

<https://main.un.org/securitycouncil/en/content/un-sc-consolidated-list>

## 4.2 Identification of Targeted Funds or Other Assets

Reporting institutions are required to put in place measures to regularly review the domestic or relevant UNSC sanction lists and monitor transactions in relation to entities specified in the relevant UNSC sanction list and the Domestic List on an on-going basis to mitigate against the risks of the occurrence of the financing of terrorism and proliferation financing.

### 4.2.1 Sanctions Targets

#### **What and who are the sanctions targets?**

##### a. Designated Individuals and Entities:

- Persons and entities listed by the UNSC (e.g., under UNSCR 1267/1989 for ISIL/Al-Qaida, 1988 for the Taliban, 1718 in relation to North Korea as well as persons designated under the domestic regime).
- Persons and entities associated with designated individuals or entities, including shareholders, beneficiaries, or business partners.

##### b. Beneficial Owners:

- Persons who own or control, directly or indirectly, a significant share in an entity that appears on a sanctions list.

- Hidden or layered ownership structures, especially in high-risk jurisdictions, must be examined.

c. Affiliates and Networks:

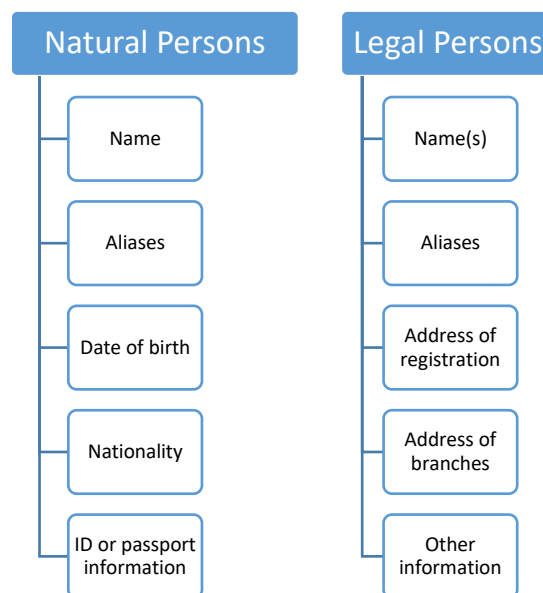
- Close associates, or representatives acting on behalf of designated individuals/entities.
- Groups or organizations that support or facilitate terrorism indirectly, even if not directly listed.

Reporting institutions should therefore sanction screen their potential customers, existing customers, including beneficial owners, affiliates and networks and parties in any transactions against the relevant UNSC sanction lists and the Domestic List to establish direct and indirect ties to designated persons and entities.

#### 4.2.2 Sanction Screening

Sanction screening measures involves comparing information gathered about an individual, entity, or transaction against the relevant UNSC sanction lists and the Domestic List to detect, prevent and report any financial activity or dealings involving individuals, entities, or organizations designated under these lists, thereby disrupting their ability to finance terrorism or proliferation of weapons of mass destruction.

The key identifiers for natural persons and legal persons to be compared include the following: -



**Screening should be done at least in the following circumstances:**

- a. Upon receipt of updates to the relevant UNSC sanctions list or Domestic List. In such cases screening must be conducted without delay to ensure compliance with implementing asset freezing measures;
- b. During onboarding of new customers or before facilitating single or once-off transactions;
- c. When customer information changes or is being updated; or
- d. During processing of payments and value transfers, including wire transfers.

### 4.2.3 Handling Matches

#### 4.2.3.1 Positive Matches

In cases of “positive matches” or “true positives” or “target match” or “confirmed matches”, i.e. the identifiers of an individual, entity or group matches most, if not all of the key identifiers of an entry on the relevant UNSC Sanctions List or Domestic List, a reporting institution shall apply targeted financial sanctions measures. In case the match relates to a potential customer, a reporting institution shall reject the relationship or transaction and report the case. Application of targeted financial sanctions measures and reporting are further explained in the proceeding sections.

**Example of a Positive Match**

A customer’s name, date of birth, nationality, ID number fully match with the identifiers of a designated person on the relevant UNSC sanction lists or the domestic list, but the residential address is different.

#### 4.2.3.2 Potential Matches

In the process of sanction screening, a reporting institution may identify “potential matches” or “partial name match” where the identifiers on the relevant UNSC Sanctions List or the Domestic List partially matches with the information available about an individual or entity.

**Example of a Potential Match**

A customer’s name and date of birth matches with the identifiers of a designated person on the relevant UNSC sanction lists or the domestic list but the nationality differs, and there is a slight difference in name spelling.

Such instances do not necessarily mean that the individual, entity, or group one is dealing with is subject to TFS. In such a case, a reporting institution should first carry out internal

checks to establish whether the “partial match” or “potential match” refers to the same designated person or entity or not. The checks should take into consideration the knowledge of the customer, potential customer, beneficial owner, or transaction, obtained through customer due diligence measures and/or using reasonable information (e.g., open-source information or other databases, etc.).

If the reporting institution is satisfied that the “potential match” is a “target match”, a reporting institution shall apply targeted financial sanctions measures and report the freezing measure or action taken as elaborated in the proceeding sections.

If the reporting institution is satisfied that the “potential match” is not the target individual or entity or is a “false positive” (not subject to targeted financial sanctions) after performing internal checks, then the business relationship or transaction may be allowed to continue with internal case records maintained.

#### **Example of a False Positive**

A customer’s name fully matches that of a designated person on the relevant UNSC sanctions list or the domestic list; however, there is a 20-year age difference and their nationality and ID number differ.

If a reporting institution is unable to internally verify whether the “potential match” is a “false positive” or a “confirmed match”, it should suspend the transaction or engagement and report to the committee promptly via email to [tfs@frc.go.ke](mailto:tfs@frc.go.ke) i.e. within a matter of hours.

## **4.2 Application of Targeted Financial Sanction Measures**

The following targeted financial sanctions measures shall be applied upon identification of sanction targets and these measures must remain in place until the person or entity is de-listed from the relevant UNSC sanctions list or the domestic list. No legal actions shall be initiated against any entity, including reporting institutions regarding the execution or enforcement of an order that designates a person or freezes the funds or other assets of a designated entity in good faith under the POT-TFR and POT-PFR.

### **4.2.1 Freezing of all Funds or other Assets Without Delay and Without Prior Notice**

All natural and legal persons within Kenya are obligated to freeze, without delay and without prior notice, the funds or other assets of designated persons and entities.

Freezing means to prevent or restrain specific property or funds from being used, transferred, transacted, converted, altered, concealed, moved, or disposed of without affecting the ownership thereof. The phrase "without delay and without prior notice" indicates that the freezing action should occur within 24 hours of a designation by the United Nations Security Council or its relevant Sanctions Committee or by the Committee without informing the designated individual or entity that such action is about to take place.

The definition of funds, property or other assets to be frozen includes: -

- i. all funds or other assets that are owned or controlled by the designated person or entity, and not just those that can be tied to a particular terrorist act, plot or threat;
- ii. those funds or other assets that are wholly or jointly owned or controlled, directly or indirectly, by designated persons or entities;
- iii. the funds or other assets derived or generated from funds or other assets owned or controlled directly or indirectly by designated persons or entities; and
- iv. funds or other assets of persons and entities acting on behalf of, or at the direction of, designated persons or entities.

**Examples of the application of freezing measures:**

For financial institutions, freezing measures can be denying access to funds in bank accounts, blocking transactions or providing financial services to individuals or entities listed under the relevant UNSC sanctions regime or the domestic regime. All transactions on frozen accounts must be suspended while a freezing measure is in effect. Additionally, designated individuals are prohibited from receiving payments via payment instruments, and cash cannot be transferred to them.

For DNFBPs, freezing measures can be stopping the facilitation of or blocking the transfer of ownership of immovable or movable assets. Any commercial relationship with a designated individual or entity should not be accepted. For instance, an advocate may decline to execute a contract for the transfer of property from the designated individual to another individual.

Additional examples for different sectors are provided in the Annexes.

Access to frozen funds or other assets is exempted from the freezing order in the circumstances listed under section 3.2.1 and 3.2.2 of this Guidance.

In such circumstances, the Committee shall issue an authorization and notify or direct the persons or entities holding funds or other assets, subject to access granted, in writing in the event of any exemption that is specified above. No frozen funds or other assets

shall be released to a designated person or entity in absence of an authorization from the Committee.

#### 4.2.2 Prohibition to Make Funds, Assets, Economic Resources or Financial and Other Related Services Available

It is strictly prohibited to make available any funds, assets, economic resources, or financial and other related services, directly or indirectly, wholly or jointly, for the benefit of designated persons and entities, entities owned or controlled, directly or indirectly, by designated persons or entities, and persons and entities acting on behalf of, or at the direction of designated persons or entities unless licensed, authorized or otherwise notified in accordance with the relevant UNSCR.

##### **Examples of prohibition measures:**

For financial institutions, the measures can include prohibition in offering banking or transactional services or once the property or funds of the designated person or entity have been frozen, institutions are obliged to refrain from providing any financial or other services or funds or other property to or for the benefit of natural persons or collectives, groups, organizations, and entities list pursuant to the relevant UNSC sanctions regime or the domestic regime.

For DNFBPs, the measures can include prohibition to provide any services, such as legal services to transfer asset ownership, buying or selling real estate, selling jewellery, precious metals, natural resources, etc.

Additional examples for different sectors are provided in the Annexes.

#### 4.3. Reporting Obligation

Within 24 hours of taking action or freezing funds or other assets, the person who effected the freezing shall file a report to the Committee through the Secretary via:

*Email: [tfs@frc.go.ke](mailto:tfs@frc.go.ke)*

A reporting institution is required to use a prescribed reporting template, specifying the assets frozen or actions taken, including any attempted dealings with property or funds against which a freezing action has been taken.

In the broader context of countering the financing of terrorism and counter proliferation financing, a reporting institution will be required to submit a suspicious transaction or

activity report in accordance to Section 44 of the Proceeds of Crime and Anti-Money Laundering Act (Cap. 59A).

#### 4.4. Unfreezing Obligation

The persons or entities holding targeted funds or other assets shall, immediately, unfreeze the funds or other assets frozen under the following circumstances: -

- i. Where funds or other assets may have been inadvertently or mistakenly frozen due to similarity in name with a designated person or entity on a domestic list upon: -
  - a. confirming that the name was not a “target match” and getting an approval from the Committee; or
  - b. the committee approving an application that the person or entity involved is not the designated person or entity and communicating its decision.
- ii. Upon receipt of a notification and directive from the committee regarding a *bona fide* third-party claim to funds or assets frozen following an approval of such application by the Committee.
- iii. Upon de-listing of a designated person or entity by the relevant UNSC Sanctions Committee or the Counter Financing of Terrorism Inter-Ministerial Committee and the Committee circulates the notification of de-listing.
- iv. Where the Committee authorizes access to frozen funds or other assets pursuant to the domestic listing and a clear guidance has been provided by the Committee to facilitate access to the funds or assets to cover: -
  - a. necessary and basic expenses, including payments for rent or mortgage, foodstuffs, monthly family expenses, medicines and medical treatment, taxes, insurance premiums and public utility charges;
  - b. expenses exclusively for payment of reasonable professional fees, or reimbursement of incurred expenses associated with the provision of legal services;
  - c. fees or service charges for routine holding or maintenance of frozen funds or other financial assets or economic resources; and
  - d. necessary for extraordinary expenses provided that such request is assessed by the Committee and if favourably considered, forwarded to the relevant Sanctions Committee for its approval.



## PART V: LEGAL LIABILITY

Any person who violates the targeted financial sanctions obligations as stipulated in the POT-TFR and POT-PFR commits an offense and shall be subject, upon conviction, to a fine not exceeding three million shillings or imprisonment for a term not exceeding seven years.

Reporting institutions are subject to supervision on targeted financial sanctions implementation, and in case of non-compliance the relevant supervisory authority (Financial Reporting Centre, relevant supervisory body or self-regulatory body) can apply enforcement actions which may include: -

- a) a warning letter
- b) administrative monetary penalty of up to 3 million Kenyan shillings for each violation
- c) debarment from employment in a specific sector
- d) suspension of persons responsible of the violation
- e) suspension or restriction of a specific activity or
- f) cancelation of license,

Any person or entity, including Reporting Institutions acting in good faith, in respect of implementing targeted financial sanctions obligations are protected from liability.

## PART VI: EFFECTIVE DATE

The effective date of this Guidance shall be **7 July 2025**.

## PART VII: ENQUIRIES

For more information or queries regarding the Guidance, you can reach the Financial Reporting Centre through:

**The Director General, Financial Reporting Centre & Secretary to the Counter Financing of Terrorism Inter-Ministerial Committee**

**Postal Address:** P.O. Box Private Bag - 00200 Nairobi

**Tel:** +254 709 858 000

**E-mail:** [tfs@frc.go.ke](mailto:tfs@frc.go.ke)

**Physical address:** Old Mutual Tower, 13<sup>th</sup> Floor, Upper Hill Road

## Annex 1: Asset Freezing Examples for Designated Non-Financial Businesses and Professions (DNFBPs)

### ✦ Example 1: Asset Freeze and Reporting Procedure for a Real Estate Agency

A real estate agency receives a Targeted Financial Sanctions Notice concerning a designated person listed under the ISIL (Da'esh) & Al-Qaida Sanctions List through goAML. The agency screens its prospective vendors and confirms that one of the vendors, whom the agency was in the process of linking with a prospective purchaser, positively matches a person on the sanctions list.

In this case, the real estate agency should:

1. Immediately apply targeted financial sanctions measures by blocking the transaction—this includes halting the listing, advertising, negotiation, or conclusion of any agreements related to the sale of the property.
2. Refrain from offering any services to the vendor, including marketing, client referrals, or property viewings.
3. Complete the reporting template by providing all relevant details and submit it to the Committee through the Secretary to the Committee by emailing [tfs@frc.go.ke](mailto:tfs@frc.go.ke).
4. Maintain all records and documentation related to the transaction as required.
5. Await further instructions from the Committee before taking any further action.

The real estate agency should not proceed with the transaction unless officially authorized to do so.

### ✦ Example 2: Asset Freeze and Reporting Procedure for an Advocate in a Conveyancing Transaction

An advocate representing a client in a property purchase and transfer transaction receives a Targeted Financial Sanctions Notice concerning a designation of an individual by the Counter Financing of Terrorism Inter-Ministerial Committee pursuant to United Nations Security Council Resolution 1373. Upon screening, the advocate realizes the client matches the details of the designated individual.

In this scenario, the advocate should:

1. Immediately decline the transaction by freezing the process—this includes declining to execute any sale agreements, transfer documents, or registration procedures related to the conveyance.
2. Refrain from preparing any documentation or carrying out the transaction on behalf of the client
3. Complete the prescribed reporting template with all relevant transaction and client details, and submit it to the Committee through the Secretary to the Committee via email at [tfs@frc.go.ke](mailto:tfs@frc.go.ke).
4. Maintain all client and transaction records, including correspondence, agreements, and identification documents, in compliance with record-keeping obligations.
5. Await further instructions from the Committee before resuming or taking any action regarding the conveyance.

The advocate should not proceed with the transaction or transfer unless officially authorized to do so.

### ✦ Example 3: Asset Freeze and Reporting Procedure for a Casino

A licensed casino identifies that one of its high value patrons, registered for VIP gaming services, has been designated by the Counter Financing of Terrorism Inter-Ministerial Committee pursuant to United Nations Security Council Resolution 1373 and his name has been included in the Domestic List.

In this case, the casino should:

1. Immediately freeze funds or any assets associated with the patron. This includes halting access to gaming chips, cash balances in player accounts, loyalty rewards, or pending withdrawals.
2. Cease all services to the designated individual, including participation in gaming activities, purchase of gaming chips or hospitality privileges such as complimentary lodging or dining.
3. Complete the prescribed reporting template with all relevant transaction and client details, and submit it to the Committee through the Secretary to the Committee via email at [tfs@frc.go.ke](mailto:tfs@frc.go.ke).
4. Maintain all records and documentation such as identity verification documents, transaction logs, surveillance footage and communications, in accordance with record-keeping requirements.
5. Refrain from resuming any services to the patron unless and until the Committee issues express authorization to do so.

The casino should ensure strict compliance with the sanctions measures in place and avoid any action that could be interpreted as facilitating financial or material support to a designated individual.

### ✦ Example 4: Asset Freeze and Reporting Procedure for an Accounting Firm

A company client in the transport and logistics industry approaches an accounting firm licensed by the Institute of Certified Public Accountants of Kenya (ICPAK) to provide outsourced accounting services, including bookkeeping, payroll processing and preparation of management accounts. The referral comes from an existing client whose payroll services are currently managed by the firm.

As part of its on-boarding process, the accounting firm conducts customer due diligence (CDD) and sanctions screening on the company's shareholders, directors and beneficial owners. During this process, the firm identifies that one of the beneficial owners of the company, who is also a beneficial owner of the existing client has been recently listed on the ISIL (Da'esh) & Al-Qaida Sanctions List.

In this scenario, the accounting firm should: -

1. Immediately freeze the engagement to provide outsourced accounting services to the potential client, and freeze any funds or other assets held on behalf of the existing client or suspend any ongoing services connected to the existing client as well.
2. Refrain from providing any further financial or accounting services, such as bookkeeping, payroll processing, or financial management, to both entities, regardless of the service stage (e.g., proposal, on-boarding or active engagement), for as long as the sanctions remain in effect.
3. Complete the prescribed reporting template with all relevant transaction and client details, and submit it to the Committee through the Secretary to the Committee via email at [tfs@frc.go.ke](mailto:tfs@frc.go.ke).
4. Maintain all records related to the due diligence, transactions, engagement and correspondence, in accordance with record-keeping requirements.
5. Await further instructions from the Committee before resuming or taking any action regarding the provision of accounting services to both entities

The accounting firm should neither deal with the frozen funds or other assets, continue offering payroll services to the existing client, nor engage with the potential client to provide accounting services, unless officially authorized to do so.

#### ✦ Example 5: Asset Freeze and Reporting Procedure for a Dealer in Precious Metals and Stones (DPMS)

During routine screening of clients using a sanctions screening tool, a DPMS confirms that a potential client, who was in the process of purchasing high-value jewellery, positively matches a designated person on the 1988 Sanctions List.

In this case, the DPMS should:

1. Immediately apply targeted financial sanctions by halting the sale of the jewellery. This includes refusing to sell, deliver, or transfer any precious metals or stones to the designated individual or entity.
2. Refrain from any dealing with the individual regarding offering of any services, including the sale or purchase of jewellery to the client, including future purchases, valuation services, or storage of assets.
3. Complete the prescribed reporting template with all relevant transaction and client details (including attempted transactions), and submit it to the Committee through the Secretary to the Committee via email at [tfs@frc.go.ke](mailto:tfs@frc.go.ke).
4. Maintain all relevant records and documentation, in accordance with record-keeping requirements.
5. Await further instructions from the Committee.

The DPMS should ensure strict compliance with the sanctions measures in place and avoid any action that could be interpreted as facilitating financial or material support to a designated individual.

#### ✦ Example 6: Asset Freeze and Reporting Procedure for a Trust and Company Service Provider (TCSP)

A TCSP is approached by an international intermediary to establish a multi-jurisdictional company structure for a new client (Person A), whose identity is initially presented through nominee intermediaries. The proposed structure includes a holding company incorporated in an offshore jurisdiction, subsidiaries in foreign jurisdiction, use of nominee directors and shareholders, a discretionary trust to hold shares of the parent company to facilitate international trade.

During enhanced due diligence and mandatory sanctions screening, the TCSP identifies that Person A, the ultimate beneficial owner (UBO) of the proposed company, is a national of the Democratic People's Republic of Korea (DPRK) and is listed under the United Nations Security Council Resolution (UNSCR) 1718 Sanctions Regime for involvement in prohibited financial activities related to the North Korean government.

In this case, the TCSP should take the following actions:

1. Immediately halt all actions or services related to the formation of the structure, including cancelling the incorporation of all planned entities, halting the appointment of nominee directors, shareholders and trustees and terminating any advisory or consultancy services related to the formation of the company.
2. Refrain from providing any services in relation to Person A or any entity ultimately controlled by him.
3. Complete the prescribed reporting template with all relevant information, including full identification details of Person A, including nationality, passport information and any known aliases, a detailed description of the intended company structure (e.g., jurisdictions involved, layers of ownership, purpose of the trust), the nature of the intermediary's involvement as well as any communications, contracts, or corporate service requests received. The report is to be submitted to the Committee through the Secretary to the Committee via email at [tfs@frc.go.ke](mailto:tfs@frc.go.ke).
4. Maintain all documentation, including Copies of identification and due diligence documents, Corporate structure charts and draft agreements, Emails, letters of intent, and instructions from intermediaries, Internal compliance notes and sanctions screening results, in accordance with record-keeping requirements.
5. Await further instructions from the Committee.

Under no circumstances should the TCSP proceed with the establishment or facilitation of the structure unless specifically authorized by the Committee.

## Annex 2: Asset Freezing Examples for Financial Institutions

### ★ Example 1: Asset Freeze and Reporting Procedure for a Deposit Taking Financial Institution

A deposit taking financial institution receives a Targeted Financial Sanctions Notice concerning a designated person listed under the ISIL (Da'esh) & Al-Qaida Sanctions List through goAML. It updates its sanction screening lists and on screening the customer database, the institution identifies a confirmed match (Person A) who is the sole signatory and beneficial owner of a business account held at the institution, Person A is listed in the ISIL (Da'esh) & Al-Qaida Sanctions List for his links with the Al-Qaeda group.

The financial institution had just received instructions relating to Person A to transfer Kes 500,000.00 from the business account to a foreign account.

In this situation, the deposit taking financial institution must take the following immediate actions:

1. Freeze the Funds (or other Assets) Immediately
  - a. Place a hold on the entire account balance to prevent movement of funds.
  - b. Block all transactions related to Person A's accounts, including:
    - i. Outgoing wire transfers
    - ii. Debit transactions
    - iii. Internet banking access
2. Refrain from providing any further banking services such as processing standing orders, cheques, card issuance, currency exchange etc.
3. Complete the reporting template by providing all relevant details on the freezing action taken or any other action taken, and submit it to the Committee through the Secretary to the Committee by emailing [tfs@frc.go.ke](mailto:tfs@frc.go.ke).
4. Maintain all customer and transaction records for the client, including all customer due diligence documents, copies of sanction match confirmation, account statements and transaction logs, internal emails and compliance notes, in accordance with record keeping requirements.
5. Await further instructions from the Committee before taking any further action.

All transactions on frozen accounts must be suspended while a freezing measure is in effect. Additionally, designated individuals are prohibited from receiving payments via payment instruments, and cash cannot be transferred to them.

### ★ Example 2: Asset Freeze and Reporting Procedure for a Non-Deposit Taking Lending Financial Institution

While performing routine sanctions screening during the on-boarding of a new loan applicant, a non-deposit taking lending financial institution identifies a confirmed match (Person A), a prospective borrower, listed under the Domestic List for supporting terrorist activities associated with Al-Shabaab. Person A has applied for a KES 1,500,000 business loan and submitted supporting documents indicating they operate a small logistics company.

In this case, the non-deposit taking lending financial institution should:

1. Immediately Block the Transaction
  - a. Reject the loan application and halt any processing or disbursement of funds.
  - b. If the loan had already been approved but not disbursed, ensure funds are not transferred to Person A.
  - c. If funds have already been disbursed but not yet withdrawn (e.g., on a loan account, loan wallet or digital account), the institution must freeze access to the funds immediately.

1. Refrain from Offering any additional financial services to Person A, including entering into or facilitating any new agreements with Person A or their business, releasing frozen funds, allowing transfers or letting a third party access funds.
2. Report the freezing action (or any other action), by completing the prescribed reporting template with all relevant transaction and client details, to the Committee through the Secretary to the Committee via email at [tfs@frc.go.ke](mailto:tfs@frc.go.ke).
3. Maintain all relevant records and loan documentation, in accordance with record-keeping requirements.
4. Await further instructions from the Committee.

The non-deposit taking lending financial institution should suspend all loan repayments while a freezing measure is in effect, unless authorization is granted. If a loan repayment has already been made and the funds are held in a suspense account, the funds should be frozen and not credited to the loan account.

### ★ Example 3: Asset Freeze and Reporting Procedure for a Life Insurance Company

A life insurance company, during routine customer database screening against updated Targeted Financial Sanctions (TFS) Lists received via goAML, identifies a confirmed match (Person A) who is listed under the 1718 Sanctions List, is recorded as the beneficiary of an active life insurance policy. The policy is currently in force, with regular premiums being paid by the policyholder. The sum assured is KES 10 million.

In this case, the insurance company should:

1. Immediately freeze the life insurance policy, including future premiums on receipt any interest due to the account and all associated funds or benefits. This includes blocking the payment of any claims, dividends, or bonuses due under the policy, without prior written authorization.
2. Cease all services related to the policy that would benefit the designated individual. This includes rejecting any requests for policy loans, beneficiary changes, surrenders, or any actions that could result in payment or financial gain to the designated person or on behalf of the designated person, even in the event of a valid claim.
3. Complete the prescribed reporting template with full details of the insurance agreement, including the policyholder, the designated beneficiary, policy number, premium payments, and any accrued benefits. Submit the report to the Committee through the Secretary via email at [tfs@frc.go.ke](mailto:tfs@frc.go.ke).
4. Maintain all records and documentation, such as identification documents of both the policyholder and beneficiary, policy contracts, payment records, correspondence and compliance screening results, in accordance with the record-keeping requirements.
5. Await further instructions from the Committee before taking any further action.

The life insurance company should ensure strict compliance with the applicable sanctions measures and avoid any action that could be interpreted as facilitating financial or material support to a designated individual.

### ★ Example 4: Asset Freeze and Reporting Procedure for a Brokerage Firm

A licensed brokerage firm identifies that one of its clients (Person A), who owns a stock portfolio and receives dividends through the firm, has been designated by the Counter Financing of Terrorism Inter-Ministerial Committee pursuant to United Nations Security Council Resolution 1373, and their name has been included in the Domestic List.

In this case, the brokerage firm should:

1. Immediately freeze the stock portfolio and all related assets. This includes halting any trading activity, blocking the sale or transfer of securities and suspending access to any cash or dividends credited to the account.

2. Cease all services to the designated person, including buying or selling of securities and participation in investment activities. However, any dividends due to the designated person's account should be credited as required, but ensure the account remains frozen. The brokerage firm must ensure that designated person cannot withdraw, transfer, or benefit from the dividends or the underlying assets in any way.
3. Complete the prescribed reporting template with relevant details, including the quantity and value of stocks held, any pending transactions, and the amount of dividends due or credited. Submit the report to the Committee through the Secretary via email at: [tfs@frc.go.ke](mailto:tfs@frc.go.ke).
4. Maintain all records and documentation, such as identity verification documents, portfolio statements, dividend payment records, trade history, and internal screening results, in accordance with the record keeping requirements.
5. Await further instructions from the Committee.

The brokerage firm should ensure strict compliance with sanctions obligations and take all necessary measures to avoid facilitating financial or material support to the designated individual in any form.

#### ★ Example 5: Asset Freeze and Reporting Procedure for a Money or Value Transfer Service Provider

A licensed Money or Value Transfer Service Provider identifies that one of its customers (Person A) has been designated by the Counter Financing of Terrorism Inter-Ministerial Committee (CFTIMC) pursuant to United Nations Security Council Resolution 1373, and their name has been included in the Domestic List. Person A is attempting to initiate a money transfer to another individual (Person B), who is not designated.

If Person A attempts to initiate a transfer (e.g. walks into a provider or tries via mobile app), and is identified before the funds are accepted, the provider should:

1. Reject the transaction.
2. Immediately freeze the process and not collect the funds from the designated person (e.g. no cash, no account debit).
3. Complete the reporting template by providing all relevant details and submit it to the Committee through the Secretary to the Committee by emailing [tfs@frc.go.ke](mailto:tfs@frc.go.ke).

If the funds were already collected (e.g. paid in cash or debited from a wallet) before the match was confirmed, then the provider:

1. Should freeze the funds immediately (e.g., hold them in a suspense or restricted account).
2. Cease all services to the designated person, including processing of new or pending money transfers, cash pick-ups, withdrawals or foreign exchange related to transfers
3. Complete the reporting template by providing all relevant details and submit it to the Committee through the Secretary to the Committee by emailing [tfs@frc.go.ke](mailto:tfs@frc.go.ke).

In both cases:

4. Refrain from providing any services to the designated individual unless and until the Committee provides explicit written authorization to do so.
5. Maintain all related records and documentation, such as customer due diligence documents, transaction logs, receipts, communications, and system screenshots, in accordance with record-keeping obligations.
6. Await further instructions from the Committee.

The Money or Value Transfer Service Provider should ensure strict compliance with the applicable sanctions measures and avoid any action that could be interpreted as facilitating financial or material support to a designated individual.