



**ANTI-MONEY LAUNDERING, COUNTERING
THE FINANCING OF TERRORISM AND
PROLIFERATION FINANCING
(AML/CFT/CPF) POLICY**

(2025 -2029)



ANTI-MONEY LAUNDERING, COUNTERING THE
FINANCING OF TERRORISM AND PROLIFERATION
FINANCING (AML/CFT/CPF) POLICY
(2025 -2029)

Table of Contents

LIST OF ACRONYMS	iii
1.0 INTRODUCTION	2
2.0 BACKGROUND	3
3.0 APPROACH	5
4.0 STRATEGIC GOALS	6
GOAL 1: Enhance Ghana's AML/CFT/CPF legal framework in the fight against ML/TF/PF and other financial crimes consistent with international standards for combatting ML/TF/PF.	8
GOAL 2: Improve effectiveness of ML/TF/PF Investigation, Prosecution, Confiscation and Asset Recovery.	8
GOAL 3: Strengthen Domestic and International Cooperation in the fight against ML/TF/PF.	9
GOAL 4: Enhance the National AML/CFT/CPF Database/Statistics.	9
GOAL 5: Strengthen the capacity and awareness creation of relevant public and private sector entities to combat ML/TF and PF.	10
5.0 LEGAL FRAMEWORK	8
6.0 NATIONAL COORDINATION	10
7.0 REGULATORY/COORDINATING FRAMEWORK	10
8.0 LAW ENFORCEMENT FRAMEWORK	11
9.0 ACCOUNTABLE INSTITUTIONS	11
10.0 NON-PROFIT ORGANISATIONS (NPOs) and CIVIL SOCIETY ORGANISATION	11
11.0 MONITORING AND EVALUATION	12
12.0 CONCLUSION	12
13.0 ACTION PLAN	13

LIST OF ACRONYMS

AI	Accountable Institutions
AML	Anti-Money Laundering
AMS	Asset Management System
AU	African Union
NIB	National Intelligence Bureau
BoG	Bank of Ghana
CDD	Customer Due Diligence
CFT	Countering the Financing of Terrorism
CSO	Civil Society Organisation
DNFBP	Designated Non-Financial Businesses and Professions
ECOWAS	Economic Community of West African States
EOCO	Economic and Organised Crime Office
EI	Executive Instrument
FATF	Financial Action Task Force
FIC	Financial Intelligence Centre
GIABA	Inter-Governmental Action Group Against Money Laundering in West Africa
GRA	Ghana Revenue Authority
IMC	Inter-Ministerial Committee
LEA	Law Enforcement Agencies
LI	Legislative Instrument
ME	Mutual Evaluation
MER	Mutual Evaluation Report
ML	Money Laundering
ML/TF/PF	Money laundering, Terrorism Financing and Proliferation Financing
MoU	Memorandum of Understanding
NACOC	Narcotics Control Commission
NGO	Non-Governmental Organisation
NIC	National Insurance Commission
NPO	Non-Profit Organisation
NPRA	National Pensions Regulatory Authority
NRA	National Risk Assessment
NS/AP	National Strategy/ Action Plan
NSCS	National Security Council Secretariat
OSP	Office of the Special Prosecutor
PEP	Politically Exposed Persons
TF	Terrorism Financing

NPOS	NPO Secretariat
CPF	Countering the Proliferation Financing
GoldBod	Gold Board
MLA	Mutual Legal Assistance
MoF	Ministry of Foreign Affairs
Mol	Ministry of the Interior
ORC	Office of the Registrar of Companies
RSB	Regulatory/Supervisory Bodies
VAs	Virtual Assets
VASPs	Virtual Assets Service Providers
WMD	Weapons of Mass Destruction

FOREWORD

Ghana reaffirms its unwavering commitment to safeguarding the integrity of its financial system through the implementation of a coordinated, risk-based national response to Money Laundering (ML), Terrorist Financing (TF), and Proliferation Financing (PF). This 2025–2029 National AML/CFT Policy and Action Plan is a strategic roadmap that builds on the findings of the 2024 National Risk Assessment (NRA), sectoral risk assessments on virtual assets and virtual assets service providers (VAs/VASPs) as well as environmental and natural resource crimes, findings of the Second (2nd) Round Mutual Evaluation and a gap analysis which assess the current AML/CFT/CPF regime.

This policy reflects a decisive shift towards a more adaptive and intelligence-led approach, anchored in an enhanced understanding of the risks the country faces. It articulates Ghana's determination to tackling ML/TF/PF risks by strengthening institutional capacity, improving legal and regulatory frameworks and promoting effective inter-agency coordination. The policy is guided by the vision of building a secure, transparent and resilient financial ecosystem that can support economic growth and foster investor confidence. The key objectives of the National AML/CFT/CPF Policy is to prevent, detect, investigate and prosecute ML/TF/PF related offences and their associated predicate crimes; preserve the stability and reputation of Ghana's financial and non-financial sectors by reducing vulnerabilities to abuse; and ensure full compliance with international standards, consolidate and sustain the progress made in exiting the FATF grey list.

This new policy cycle is anchored by strong political commitment, well-defined institutional roles, and a collaborative, multi-stakeholder approach to reform. It prioritizes proactive risk mitigation, strengthened supervisory mechanisms, more effective use of financial intelligence, asset recovery and deeper engagement with public-private partnerships. Furthermore, the government remains dedicated to implementing the Action Plan's priorities and fostering a culture of sustained compliance across all sectors.

As Ghana continues to play a leading role in the global fight against illicit finance, the government stands ready to collaborate with domestic stakeholders, regional bodies such as GIABA, and international partners including the Financial Action Task Force (FATF) and the EGMONT Group to ensure a coordinated and effective response.

The successful implementation of this Policy and Action Plan is not only vital for protecting Ghana's economy and national security, it is also a cornerstone in advancing inclusive development, strengthening financial integrity, and reinforcing Ghana's role as a committed partner in the global fight against financial and economic crimes including money laundering, terrorism financing and proliferation financing.



DR. CASSIEL ATO FORSON, MP
Minister of Finance

Chairman, Inter-Ministerial Committee (IMC)

1.0 INTRODUCTION

Money laundering remains a going concern for the West African sub-region because it facilitates and conceals crime and can distort markets and the broader financial system. Ghana's position in the sub region exposes it to a wide range of financial crime threats, given our role as a financial hub in West Africa and our proximity to countries facing terrorist activities and political instability.

Across the globe and within West Africa, financial crimes have grown increasingly sophisticated, fueled by digital innovation, porous borders, and expanding trade networks. The sub-region is also saddled with rising threats from terrorism, cross-border money laundering, and cyber fraud.

Over the years, Ghana continues to demonstrate that combatting money laundering and terrorist financing is a national priority with the view to protect not only Ghana, but also to lend Ghana's experience with the global community in dealing with these activities, including its effective implementation of prevention and detection mechanisms in the context of Ghana, the West African sub-region, Africa and the international community. In response to the emerging ML/TF/PF threats, the Financial Action Task Force (FATF) in collaboration with Inter-Governmental Action Group against Money Laundering in West Africa (GIABA) continues to work to identify national-level vulnerabilities with the aim of protecting the international financial system from misuse.

Recommendation 2 of the revised FATF Recommendations (2012) requires countries to develop national AML/CFT/CPF policies, informed by the risks identified, which should be regularly reviewed, and designate an authority or have a coordination or other mechanism that is responsible for implementing such policies.

It also requires countries to ensure that policy-makers, the Financial Intelligence Unit (FIU), Law Enforcement Agencies (LEAs), Supervisors and other relevant competent authorities, at the policymaking and operational levels, have effective mechanisms in place to enable them cooperate and where appropriate, coordinate domestically with each other concerning the development and implementation of policies and activities to combat Money Laundering, Terrorist Financing and the Financing of Proliferation of Weapons of Mass Destruction (ML/TF &P).

An effective AML/CFT/CPF regime is the cornerstone of every country's ML/TF/PF risk governance. The 2025-2029 National AML/CFT/CPF Policy is therefore expected to comprehensively address the major structural vulnerabilities identified in the National Risk Assessment (NRA) and sectoral risk assessments which would lead to a robust AML/CFT/CPF regime in Ghana.

2.0 BACKGROUND

At the May 2014 GIABA Plenary held in Niamey, Niger, a directive was issued for all member States to undertake and complete their respective National Risk Assessments (NRA) before the Second Round of Mutual Evaluation. The NRA was intended to provide guidance on the conduct of identifying and assessing threats and vulnerabilities of a country at national level and relates especially to key requirements set out in FATF Recommendation 1. Following a directive issued by GIABA requiring all member States to undertake and complete their respective NRA before the Second Round of Mutual Evaluation, Ghana launched its AML/CFT National Risk Assessment in September 2014 and published the report in August 2016. Thus, Ghana became the first country in the West African sub-region to have conducted its NRA exercise in compliance with Recommendation 1 of the Revised FATF Recommendations (2012).

The NRA assisted in the prioritization and efficient allocation of resources to key stakeholder institutions which helped to address the AML/CFT deficiencies identified in the various sectors of the economy.

Consequently, at the 25th GIABA Technical Commission/Plenary meetings held in May 2016 in Praia, Cabo Verde, Ghana was selected as the first country in the sub-region to undergo the Second Round (2nd) of Mutual Evaluation in September 2016. Accordingly, Ghana conducted its Second Round (2nd) of Mutual Evaluation exercise and the report was adopted at the GIABA Plenary in May 2017. The Mutual Evaluation Report (MER) identified some strategic deficiencies in Ghana's AML/CFT regime and made some recommendations to rectify the deficiencies which included the update of the 2016 NRA. Subsequently, Ghana finalized and issued the updated NRA report in 2018.

The updated National Risk Assessment of Ghana considered some sectors which were not included in the 2016 NRA but were deemed critical in the overall assessment of the country. Also, Ghana conducted sectoral risk assessments for Non-Profit Organisations (NPOs) and Legal Persons and Arrangements. Consequently, Ghana developed and implemented the National AML/CFT Policy for 2019-2022 to address the deficiencies identified in the NRA and Second (2nd) MER. The identified deficiencies included the lack of statistics on ML/TF&P, low level of ML/TF investigations, prosecutions, convictions, asset recovery, lack of transparency of legal persons and arrangements and the ineffective supervision of the DNFBPs.

It is however important to state that, the successful implementation of the 2019-2022 National AML/CFT&P Policy resulted in the passage of new laws, guidelines and policies including the Anti-Money Laundering Act, 2020 (Act 1044), Real Estate Agency Act, 2020 (Act 1047), Companies Act, 2019 (Act 992), Insurance Act, 2021 (Act 1061), Companies Regulations 2023 (L.I.2473) and Narcotics Control Commission Act, 2020 (Act 1019). The Bank of Ghana (BoG) and Securities and Exchange Commission (SEC) updated their AML/CFT/CPF sectoral guidelines and administrative sanctions. Ghana also established the Beneficial Ownership regime, developed the Counter-Terrorism Policy and Implementation framework, Financial Sector Strategic Plan, National Financial Inclusion Policy, Directive for the Management of NPOs Operations in Ghana and National NPO Policy. The NPO Secretariat (NPOS) and Real Estate Agency Council have been established for the monitoring of NPOs and the supervision of real estate agents/brokers/ professionals respectively. Similarly, a special taskforce comprising competent authorities was established for asset recovery and management.

The implementation of the 2019-2022 National AML/CFT&P Policy has also increased the AML/CFT awareness among NPOs, civil society organisations (CSOs), DNFBPs including the real estate agents/brokers/professionals and dealers in precious metals and stones, financial institutions, supervisory bodies, law enforcement agencies (LEAs), and other stakeholders in the criminal justice system. Capacity building programmes including virtual assets investigations and terrorism financing investigations were organised for relevant competent authorities.

Even though the previous policy was expected to last between 2019-2022, Ghana continued to implement some of the action points in the policy between 2023 to the end of 2024 to ensure continuity until the adoption of the new 2025-2029 policy.

In 2024, Ghana conducted another National Risk Assessment with a wider scope including proliferation financing, legal persons and arrangement, NPOs, other sectors of importance such as hotels, cocoa sector and second-hand car dealers. Additionally, the country conducted its maiden sectoral risk assessments on virtual assets and virtual assets service providers (VAs/VASPs) and environmental and natural resource crimes. These risk assessments though highlighted some significant improvements Ghana has made over the period, particularly after the Second Round (2nd) of Mutual Evaluation Exercise, some deficiencies still exist. Key deficiencies identified in these risk assessment reports included:

1. Inadequate resources for the Securities and Exchange Commission (SEC), National Insurance Commission (NIC), Real Estate Agency Council (REAC), Gaming Commission, Minerals Commission/ Gold Board to ensure effective AML/CFT/CPF measures.
2. Lack of legal framework for BO disclosure by Legal Arrangements and inability of trustees to maintain accurate and up-to-date records of settlors, beneficiaries and assets.

3. Lack of robust framework, clear guidelines, mandatory registration/licensing and stringent AML/CFT/CPF compliance requirements for VASPs.

Thus, the development and publication of the National AML/CFT Policy for period 2025-2029 would further strengthen Ghana's fight against ML/TF/PF. The Policy is based on the findings of the 2024 NRA and the sectoral risk assessment reports to address Ghana's major structural vulnerabilities and strategic deficiencies in its AML/CFT/CPF deficiencies.

The National AML/CFT/CPF Policy is grounded on six (6) key thematic areas (goals) which would be implemented over a period of four (4) years (2025-2029).

Ghana is committed to ensuring adequate resources (including financial, technical and logistical) to the implementation of this Policy to protect the economy from the scourge of money laundering, terrorist financing, proliferation financing and transnational organised crime for the enhancement of national and global economic stability and growth.

3.0 APPROACH

Ghana has developed its National AML/CFT/CPF Policy (2025-2029) to mitigate the identified ML/TF/PF risks in the 2024 National Risk Assessment, sectoral risk assessment on VAs/VASPs and Environmental and Natural Resource Crimes as well as findings of the Second (2nd) Round Mutual Evaluation. In addition, a gap analysis was conducted in consultation with all key stakeholder institutions to assess the current AML/CFT/CPF

regime by taking into consideration the legal and institutional framework.

This led to the formulation of strategic goals and core objectives that would help mitigate the ML/TF/PF risks and address the identified deficiencies to further strengthen the AML/CFT/CPF regime of Ghana.



4.0 STRATEGIC GOALS

1

Enhance Ghana's AML/CFT/CPF legal framework in the fight against ML/TF/PF and other financial crimes consistent with international standards for combatting ML/TF/PF



2

Improve the effectiveness of ML/TF/PF investigations, prosecutions, convictions and asset recovery



3

Strengthen domestic and international cooperation in the fight against ML/TF/PF



4

Enhance the national AML/CFT/CPF database



5

Strengthen the capacity and awareness creation of relevant public and private sector entities to combat ML/TF and PF



CORE OBJECTIVES

GOAL 1

Core Objectives:

1. Amend existing legislation to be consistent with international standards and best practices.
2. Passage of new legislation.
3. Develop sector specific AML/CFT/CPF Guidelines and Administrative Sanctions/ Penalties.
4. Ensure effective monitoring and supervision of the DNFBP sector.
5. Enhance the transparency of legal persons and arrangements.

GOAL 2

Core Objectives:

1. Enhance capacity of Law Enforcement Agencies (LEAs) on AML/CFT/CPF investigations and Asset Recovery.
2. Provide adequate financial resources and logistics to the FIC to enhance its operational capabilities.
3. Enhance capacity of the Attorney General's Department and the Judiciary on AML/CFT/ CPF.
4. Enhance Asset Management System

GOAL 3

Core Objectives:

1. Enhance the exchange of information and intelligence to support ML/TF/PF investigation and prosecution.
2. Strengthen the feedback mechanism among LEAs in order to enhance information sharing on ML/TF investigation and Prosecution.
3. Strengthen regular consultative fora/mechanism to facilitate communication between supervisors and the private sector. Strengthen the collaboration and cooperation among Regulatory/Supervisory Bodies, LEAs and Private Sector.

GOAL 4:

Core Objectives

1. Enhance the mechanism for all LEAs and Competent Authorities to collect and maintain accurate statistics relevant to the AML/CFT/CPF.
2. Enhance the ML/TF/PF national database accessible by the FIC and other Competent Authorities.
3. Enhance information security of all AML/CFT/CPF statistics.

GOAL 5

Core Objectives

1. Deepen AML/CFT/CPF awareness among stakeholders including the general public.
2. Improve risk-based supervision capacity of regulatory and supervisory bodies.
3. Enhance the identification and reporting of ML/TF/PF related STRs.
4. Strengthen the feedback and collaboration mechanism between FIC, LEAs, regulators and accountable institutions.

5.0 LEGAL FRAMEWORK

Ghana's National AML/CFT/CPF Strategy is governed by the following national and international legislations, conventions, protocols and resolutions, among others:

A: National Legislations

- i. 1992 Constitution of the Republic of Ghana
- ii. Anti-Money Laundering Act, 2020 (Act 1044)
- iii. Anti-Money Laundering Regulations 2011, (L.I.1987)
- iv. Anti-Terrorism Act, 2008 (Act 762)
- v. Anti-Terrorism (Amendment) Act, 2012 (Act 842)
- vi. Anti-Terrorism (Amendment) Act, 2014 (Act 874)
- vii. Banks and Specialized Deposit-Taking Institutions Act, 2016 (Act 930)
- viii. Borrowers and Lenders Act, 2020 (Act 1052)
- ix. Chartered Accountants Act, 1963 (Act 170)
- x. Companies Act, 2019 (Act 992)
- xi. Companies Regulations, 2023 (L.I. 2473)
- xii. Courts Act, 1993 (Act 459)
- xiii. Credit Reporting Act, 2007 (Act 726)
- xiv. Criminal Offences Act, 1960 (Act 29)
- xv. Criminal Offences Amendment Act, 2012 (Act 849)
- xvi. Criminal and Other Offences (Procedure) Act, 1960 (Act 30)
- xvii. Criminal and Other Offences Procedure Act 1960 (Act 30)
- xviii. Customs, Excise and Preventive Service (Management) Act, 1993 (Act 330)
- xix. Cybersecurity Authority Act, 2020 (Act 1038)
- xx. Data Protection Act, 2012 (Act 843)
- xxi. Economic and Organised Crime Office (Operations) Regulations 2012 (L.I. 2183)
- xxii. Economic and Organised Crime Office Act, 2010 (Act 804)
- xxiii. Executive Instrument 2
- xxiv. Extradition Act, 1960 (Act 22)
- xxv. Fisheries Act, 2002 (Act 625)
- xxvi. Foreign Exchange Act, 2006 (Act 723)
- xxvii. Ghana Gold Board Act, 2025 (Act 1140)

- xxviii. Ghana Insurance Act, 2021 (Act 1061)
- xxix. Ghana Investment Promotion Act, 2013 (Act 865)
- xxx. Ghana Revenue Authority Act, 2009 (791)
- xxxi. Ghana Standards Authority Act, 2022 (Act 1078)
- xxxii. Immigration Act, 2000 (Act 573)
- xxxiii. Immigration Service Act 2016, (Act 908)
- xxxiv. Incorporated Private Partnerships Act, 1962 (Act 152)
- xxxv. Insolvency Act 2006 (act 708)
- xxxvi. Interpretation Act, 2009 (Act 792)
- xxxvii. Land Act, 2020 (Act 1036)
- xxxviii. Legal Profession Act, 1960 (Act 32)
- xxxix. Mutual Legal Assistance Act, 2010 (Act 807)
- xl. Narcotics Control Commission Act, 2020 (Act 1019)
- xli. National Signals Bureau Act, 2020 (Act 1040)
- xlii. Payment Systems and Services Act, 2019 (Act 987)
- xliii. Police Service Act, 1970 (Act 350)
- xliv. Professional Bodies Registration Decree, 1973 (NRCD 143)
- xlvi. Public Procurement Act, 2003 (Act 663) as amended
- xlvi. Public records and Administration Act, 1997 (Act 535)
- xlvi. Real Estate Agency Act, 2020 (Act 1047)
- xlvi. Registration of Business Names Act, 1962 (Act 151)
- xlix. Right to Information Act, 2019 (Act 989)
- l. Securities Industries Act 2016 (Act 929)
- li. Stamp Duty Act, 2005 (Act 689)
- lii. Security and Intelligence Agencies Act, 2020 (Act 1030)
- liii. Transfer of Convicted Persons Act, 2007 (Act 743)
- liv. Trustees (Incorporation) Act, 1962 (Act 106)
- lv. Whistleblower Act, 2006 (Act 720)

B: International Conventions, Protocols and Resolutions

- i. 1988 United Nations Convention against Illicit Trafficking in Narcotics and Psychotropic Substances (the Vienna Convention)
- ii. United Nations Convention against Transnational Organized Crime (Palermo Convention), 2000

- iii. International Convention for the Suppression of the Financing of Terrorism (CFT Convention), 1999
- iv. ECOWAS/GIABA Statute aimed at combating money laundering and terrorist financing in the West African Region, 2006
- v. Protocol to Prevent, Suppress and Punish Trafficking in Persons especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime
- vi. AU Convention on the Prevention and Combating of Terrorism, 1999
- vii. The Plan of Action for the Prevention and Combating of Terrorism adopted by AU in 2002 at Algiers
- viii. UN Security Council Resolution 1267, 1373 and 1737
- ix. ECOWAS Protocol on Mutual Legal Assistance
- x. Harare Scheme on Mutual Legal Assistance in Criminal Matters

6.0 NATIONAL COORDINATION

The Inter-Ministerial Committee (IMC) on Anti-Money Laundering and Countering the Financing of Terrorism and Proliferation of Weapons of Mass Destruction is primarily responsible for the overall coordination of AML/CFT/CPF matters in Ghana. The IMC is comprised of the following:

- i. The Minister of Finance – Chairman
- ii. The Minister for Foreign Affairs and Regional Integration
- iii. The Minister for the Interior
- iv. The Attorney-General and Minister for Justice
- v. The National Security Coordinator
- vi. The Deputy Chief of Staff of the President
- vii. The Governor of the Bank of Ghana

7.0 REGULATORY/COORDINATING FRAMEWORK

The under listed competent authorities among others, have the mandate to regulate/coordinate AML/CFT/CPF activities:

- i. Financial Intelligence Centre (FIC)
- ii. Bank of Ghana (BoG)
- iii. Securities and Exchange Commission (SEC)
- iv. National Insurance Commission (NIC)
- v. Gaming Commission

- vi. Minerals Commission
- vii. Ghana Gold Board
- viii. Real Estate Agency Council
- ix. Non-Profit Organisations Secretariat
- x. National Pensions Regulatory Authority (NPRA) Self-Regulatory Bodies (SRBs)
- xi. Office of the Registrar of Companies (ORC)
- xii. Ghana Revenue Authority (GRA)

8.0 LAW ENFORCEMENT FRAMEWORK

The following agencies, among others have the mandate to enforce law and order:

- i. National Security Council Secretariat
- ii. National Intelligence Bureau
- iii. Economic and Organised Crimes Office
- iv. Ghana Police Service
- v. Ghana Immigration Service
- vi. Narcotics Control Commission (NACOC)
- vii. Ghana Revenue Authority
- viii. Office of the Special Prosecutor (OSP)

9.0 ACCOUNTABLE INSTITUTIONS

The Anti-Money Laundering Act, 2020 (Act 1044) identifies the following as accountable institutions:

- i. Banks and Non-Bank Financial Institutions
- ii. Market Operators
- iii. Insurance Companies
- iv. Designated Non-Financial Businesses and Professions
- v. Virtual Assets Service Providers

10.0 NON-PROFIT ORGANISATIONS (NPOs) and CIVIL SOCIETY ORGANISATION

All NPOs and Civil Society Organisations are involved in raising public awareness about money laundering, terrorist financing and proliferation financing.

11.0 MONITORING AND EVALUATION

The National AML/CFT/CPF Policy (2025-2029) was developed under the auspices of the IMC. The IMC has the overall responsibility to coordinate, monitor and evaluate the implementation of this Policy.

At the operational level, each responsible agency identified within the Action Plan would implement their respective action points and provide periodic updates on the implementation.

FIC, acting as the lead agency appointed by IMC, will be responsible for overseeing the progress and review of these period updates.

Additionally, insights and feedback gathered during implementation would help track how well the strategic goals and objectives are being met and guide decisions on how best to allocate resources effectively and efficiently.

Feedback from the implementation process would be used to monitor progress towards the strategic goals and objectives and to make informed decisions about the most effective and efficient way of allocating resources to achieve value for money.

12.0 CONCLUSION

The Government of Ghana is committed to ensuring a safe and sound financial system by putting in place measures to adequately address the threats posed by ML/TF/ PF.

The Government through the IMC seeks to achieve the above by the effective implementation of this National AML/CFT/CPF Policy (2025-2029). The implementation of the Policy would deepen collaboration among stakeholders, strengthen the AML/CFT/CPF supervisory regime, enhance the capacity of LEAs and other competent authorities which would lead to an increase in ML/TF/PF prosecutions, confiscations and asset recovery. Further, this would enhance AML/CFT/CPF awareness among public and private sector players including the general public.

It is important to note that the implementation of the Policy requires a multi-dimensional/multi-agency approach to achieve the desired results. It is the expectation of government that all stakeholders would collaborate effectively to successfully implement this policy.

Adequate resources would also be committed to implementing the Policy to address all vulnerabilities and identified strategic deficiencies within the AML/CFT/CPF regime.

Ghana would continue to collaborate with FATF, GIABA and other technical partners in its effort to safeguard the domestic and international economy from the threats of Money Laundering, Terrorism Financing and Proliferation Financing.

ACTION PLAN

GOAL 1: ENHANCE GHANA'S AML/CFT/CPF LEGAL FRAMEWORK IN THE FIGHT AGAINST ML/TF/PF AND OTHER FINANCIAL CRIMES CONSISTENT WITH INTERNATIONAL STANDARDS FOR COMBATTING ML/TF/PF

ACTION POINT	LEAD INSTITUTION	SUPPORTING INSTITUTION(S)	TIMEFRAME	INDICATOR	EXPECTED OUTCOME
Core Objective 1: Amend existing legislation to be consistent with international standards and best practices.					
1.1 Amend the Anti-Money Laundering Act, 2020 (Act 1044) to among others: - Allow the lower courts (Circuit and District) jurisdiction to adjudicate ML related cases. - Provide for non-conviction-based Prosecution and civil forfeitures.	FIC	IMC MoF AG	December, 2025	The Anti-Money Laundering Act, 2020 (Act 1044) amended	Enhanced prosecutions to meet international standards.
1.2 Amend the Extradition Act, 1960 (Act 22) to: - Make express provision such as dual criminality is satisfied where both countries criminalise the conduct underlying the offence. - Make provision for simplified mechanisms for extradition.	AG	IMC MoF MoI	December 2025	Extradition Act, 1960 (Act 22) amended	An extradition law consistent with FATF Recommendation 3.
1.3 Amend the Mutual Legal Assistance Act, 2010 (Act 807) to among others: - Make express provision that requires competent authorities to refuse to provide information if the requesting competent authority cannot protect the information effectively. - Make express provision for competent authorities to provide feedback to foreign counterparts - Make express provision in law that allows financial supervisors to conduct inquiries to allow for foreign counterparts - Make provision that permit competent authorities to exchange information indirectly with non-counterparts. - Make express provision for competent authority to provide assistance for non-conviction based confiscation.	AG	IMC MoF	December 2025	Mutual Legal Assistance Act, 2010 (Act 807) amended	An MLA Act consistent with FATF Recommendation 40.

ACTION POINT	LEAD INSTITUTION	SUPPORTING INSTITUTION(S)	TIMEFRAME	INDICATOR	EXPECTED OUTCOME
1.4 Amend the Anti-Terrorism Act, 2008 (Act 762) to among others: • Include financing the travel of Foreign Terrorist Fighters in the definition of TF offences. • Make express provision that allows for TF offence to be established in the absence of a link to specified terrorist act or acts. • Allow for the proportionate and dissuasive criminal sanctions to be applied to legal persons.	AG	IMC MoF	December, 2025	Anti-Terrorism Act, 2008 (Act 762) amended	An Anti-Terrorism Act, 2008 (Act 762) consistent with FATF Recommendation 5.
Core Objective 2: Passage of New Legislation					
2.1 Enact a law to regulate the VAs/VASPs	BoG SEC	IMC MoF FIC	December 2025	A law to regulate the activities of VASPs enacted.	To bring Ghana in line with FATF Recommendation 15.
2.2 Enact a law to regulate the NPO sector in line with Recommendation 8. The law among other things to strengthen the activities within the NPO sector • Make necessary provisions to enforce CFT obligations by high risk NPOs. • Grant the designated supervisory body the powers to monitor the activities of high risk NPOs. • Grant the designated regulatory body the mandate to issue AML/CFT/CPF Guidelines and Directives necessary for the enforcement of CFT obligations within the context of Recommendation 8 Make provisions for an AML/CFT/CPF Administrative Sanctions regime for the sector.	Ministry of Gender and Social Protection	IMC MoF NPO Secretariat ORC FIC	December 2025	A law to regulate and monitor the operations of NPOs enacted	To ensure effective monitoring of NPOs consistent with FATF Recommendation 8.
2.3 Enact a law to regulate Trust activities to among others: • Allow for beneficial ownership disclosure by Legal Arrangements. • Allow for Trustees to maintain accurate and up-to-date records of settlors, beneficiaries and assets.	ORC AG	IMC MoF FIC	December, 2025	A law to regulate Trust activities enacted.	To bring Ghana in line with International standards.

ACTION POINT	LEAD INSTITUTION	SUPPORTING INSTITUTION(S)	TIMEFRAME	INDICATOR	EXPECTED OUTCOME
Core Objective 3: Develop and Adopt sector specific AML/CFT/CPF Guidelines and Administrative Sanctions/Penalties.					
3.1 Enhance the AML/CFT/CPF Guideline for the banking and securities sector to, among others, include the activities of VASPs	BoG SEC	IMC MoF FIC	November 2025	AML/CFT/CPF Guideline enhanced	Enhanced AML/CFT/CPF compliance within the banking and securities sector including the activities of VASPs.
3.2 Enhance the AML/CFT/CPF Administrative Sanctions/Penalties for the banking and securities sector to include the activities of VASPs	BoG SEC	IMC MoF FIC	November 2025	AML/CFT/CPF corresponding Administrative Sanctions/ Penalties enhanced	Enhanced AML/CFT/CPF compliance within the banking and securities sector including the activities of VASPs.
3.3 Adopt the AML/CFT/CPF Guideline for the Gaming Sector.	Gaming Commission	FIC	July 2025	AML/CFT/CPF Guideline adopted	Enhanced AML/CFT/CPF compliance within the Gaming Sector.
3.4 Develop and adopt AML/CFT/CPF Administrative Sanctions/ Penalties for the Gaming sector	Gaming Commission	FIC	September 2025	AML/CFT/CPF corresponding Administrative Sanctions/ Penalties developed	Enhanced AML/CFT/CPF compliance within the Gaming Sector.
3.5 Adopt the AML/CFT/CPF Guideline and Administrative Sanctions/ Penalties for the Dealers in Precious Metals and Stones.	Gold Board/ Minerals Commission	FIC	August 2025	AML/CFT Guideline and corresponding Administrative Sanctions/ Penalties adopted.	Enhanced AML/CFT/CPF compliance within the Minerals sector.

ACTION POINT	LEAD INSTITUTION	SUPPORTING INSTITUTION(S)	TIMEFRAME	INDICATOR	EXPECTED OUTCOME
3.6 Develop an AML/CFT/CPF Guideline and Administrative Sanctions/ Penalties for the Real Estate Sector.	REAC	FIC MoF Ministry of Works and Housing	October 2025	AML/CFT/CPF Guideline and corresponding Administrative Sanctions/ Penalties developed.	Enhanced AML/CFT/ CPF compliance within the Real Estate sector.
3.7 Adopt the AML/CFT/CPF Guideline and Administrative Sanctions/ Penalties for Accountants.	ICAG	FIC	July 2025	AML/CFT/ CPF Guideline adopted.	Enhanced AML/CFT/ CPF compliance within the Accounting Profession.
3.8 Develop an AML/CFT/CPF Administrative Sanctions/ Penalties for Accountants.	ICAG	FIC	September 2025	AML/CFT/CPF Administrative Sanctions/ Penalties developed.	Enhanced AML/CFT/ CPF compliance within the Accounting Profession.
3.9 Adopt the AML/CFT/CPF Guideline for Lawyers.	GLC GBA	FIC	August 2025	AML/CFT/CPF Guidelines adopted	Enhanced AML/ CFT/ CPF compliance within the Legal Profession.
3.10 Develop an AML/CFT/CPF Administrative Sanctions/ Penalties for Lawyers.	GLC GBA	FIC	September 2025	AML/CFT/CPF Administrative Sanctions/ Penalties developed	Enhanced AML/ CFT/ CPF compliance within the Legal Profession.
3.11 Develop guidance notes for targeted financial sanctions (TFS) for all accountable institutions (AIs)	FIC	MoF All regulatory bodies NSCS	August 2025	TFS Guidance notes developed	Enhanced AML/ CFT/ CPF compliance with TFS.

ACTION POINT	LEAD INSTITUTION	SUPPORTING INSTITUTION(S)	TIMEFRAME	INDICATOR	EXPECTED OUTCOME
Core Objective 4: Ensure effective supervision of VASPs					
4.1 Enhance the capacity of BoG and SEC to effectively regulate and monitor the activities of VASPs	BoG SEC	IMC MoF FIC	October 2025	Well-resourced AML Units to supervise VASPs activities.	Enhanced AML/CFT/CPF Supervision of VASPs.
Core Objective 5: Ensure effective monitoring and supervision of the DNFBP and NPO sectors.					
5.1 Enhance the AML Unit within all Regulators of DNFBPs and NPOs.	GC Gold Board/MC NPOS REAC GLC ICAG GRA	FIC MoF	September 2025	Well-resourced AML Units within all DNFBPs and NPOs.	Enhanced AML/CFT/CPF Supervision and monitoring among DNFBPs and NPOs.
5.2 Strengthen the FIC to supervise the activities of other sectors of importance identified in the NRA for AML/CFT/CPF purposes.	GRA	FIC IMC Cocoa Board Car Dealers Associations GTA	September 2025	AML Unit of GRA adequately resourced.	Other sectors of importance effectively supervised.

ACTION POINT	LEAD INSTITUTION	SUPPORTING INSTITUTION(S)	TIMEFRAME	INDICATOR	EXPECTED OUTCOME
5.3 Enhance the capacity of DNFBP regulators and NPOS on risk-based supervision and monitoring.	GC Gold Board/MC NPOS REAC GLC ICAG GRA	FIC MoF	September 2025	Deepened AML/CFT/CPF knowledge of supervisors.	Well trained DNFBP supervisors and NPOS to carry out AML/CFT/CPF supervision and monitoring of AIs and NPOs.
Core Objective 6: Enhance the transparency of Legal Persons and Arrangements.					
6.1 Enhance public awareness on disclosure of BO information of LAs/ LPs and the risks associated with their misuse.	ORC	FIC	November 2025	Public awareness on BO disclosure enhanced.	Enhanced public awareness on disclosure of BO information of LPs/ LAs.
6.2 Enhance BO verification mechanism.	ORC	FIC	November 2025	BO verification mechanism enhanced.	Reliable BO verification mechanism.
6.3 Integrate BO disclosure regime in public procurement processes	PPA	FIC Other relevant Competent Authorities	November 2025	BO disclosure obligation integrated into public procurement.	Enhanced transparency of public procurement process.
6.4 Enhance the integration of BO into operational activities of LEAs and Prosecutors	AG	LEAs	November 2025	BO integrated into operations of LEAs.	Improved investigations and asset recovery.

GOAL 2: IMPROVE THE EFFECTIVENESS OF ML/TF/PF INVESTIGATION, PROSECUTION, CONFISCATION AND ASSET RECOVERY

ACTION POINT	LEAD INSTITUTION	SUPPORTING INSTITUTION(S)	TIMEFRAME	INDICATOR	EXPECTED OUTCOME
Core Objective 1: Enhance the capacity of Law Enforcement Agencies (LEAs) on ML/TF/PF investigations and Asset Recovery					
1.1 Enhance capacity of LEAs to improve their understanding of ML/TF/PF investigations.	FIC	LEAs OSP GIS CHRAJ	September 2025	Understanding of ML/TF/PF and asset recovery matters among LEAs deepened	Mechanisms for ML/TF/PF investigations and asset recoveries improved.
1.3 Strengthen the capacity of LEAs on Asset Recovery and Confiscation.	EOCO	GPS NACOC BNI FIC OSP CHRAJ Judiciary	September 2025	Capacity of LEAs on Asset Recovery and Confiscation enhanced.	Increase in Asset recovery and confiscations.
1.4 Prioritise the investigation and prosecution of prevalent predicate offenses	GRA	AG LEAs FIC	November, 2025	Investigation and prosecution of tax crimes prioritized.	Improved tax compliance.
1.5 Prioritise and integrate asset recovery in the operations of all LEAs including all relevant competent authorities.	LECOB	LEAs AG FIC OSP GRA Judiciary	November, 2025	Enhanced priority of asset recovery.	Asset recovery prioritized as a national policy.

ACTION POINT	LEAD INSTITUTION	SUPPORTING INSTITUTION(S)	TIMEFRAME	INDICATOR	EXPECTED OUTCOME
Core Objective 2: Provide adequate financial resources and logistics to the FIC to enhance its operational capabilities.					
2.1 Implement measures to increase STR reporting from the DNFBP sector.	FIC	GC Gold Board/MC NPOS REAC GLC ICAG GRA	August 2025	Increase number of STRs filed by DNFBPs	Unusual and complex transactions detected and reported.
2.2 Identify and register all VASPs	FIC	MoF BoG SEC	October 2025	VASPs identified and monitored	Enhanced AML/CFT/CPF compliance among VASPs.
2.3 Continuous capacity building programmes for staff of FIC on emerging ML/TF/PF risk as well as operational, tactical and strategic analysis.	FIC	MoF	December 2026	Employee education training programme developed and implemented.	Capacity of FIC staff enhanced on AML/ CFT/ CPF.
2.4 Enhance the feedback mechanism in relation to the STR reporting obligation.	FIC	All Accountable Institutions	Continuous	Timely and quality feedback provided to AIs.	Improved feedback mechanism.
Core Objective 3: Enhance capacity of the Attorney General's Department and the Judiciary on AML/CFT/CPF.					
3.1 Continuous capacity building for staff of the AG on AML/CFT/CPF.	AG	FIC	August 2026	AML/CFT/CPF training sessions organized for staff of AG	AML/CFT/ CPF awareness deepened among staff of AG.

ACTION POINT	LEAD INSTITUTION	SUPPORTING INSTITUTION(S)	TIMEFRAME	INDICATOR	EXPECTED OUTCOME
3.2 Enhance capacity building programmes for the Judiciary to improve their understanding on AML/CFT/CPF.	Judiciary	FIC	September 2025	AML/CFT/CPF trainings conducted for the Judiciary	Deepened understanding of AML/CFT/CPF among the Judiciary.
3.3 Undertake continuous capacity building programmes for the legal profession on AML/CFT/CPF.	Lawyers	FIC	December 2026	AML/CFT/CPF training sessions organized for lawyers.	AML/CFT/CPF awareness deepened among the legal profession
Core Objective 4: Enhance Asset Management System (AMS).					
4.1 Operationalize the Asset Recovery and Management Standard Operating Procedures.	EOCO	IMC AG FIC LEAs OSP	August 2025	Asset Recovery and Management Standard Operating Procedures gazetted and operationalized.	Enhanced AML/CFT/CPF compliance on asset recovery and management.
4.2 Provide adequate resources and logistics for the operationalization of the asset management system.	EOCO	IMC MoF LEAs OSP FIC	August 2025	Adequate resources and logistics provided.	AMS established and operationalised.

GOAL 3: STRENGTHEN DOMESTIC AND INTERNATIONAL COOPERATION IN THE FIGHT AGAINST ML/TF/PF

ACTION POINT	LEAD INSTITUTION	SUPPORTING INSTITUTION(S)	TIMEFRAME	INDICATOR	EXPECTED OUTCOME
Core Objective 1: Promote the exchange of information and intelligence to support ML/TF/PF investigation and prosecution.					
1.1 Regularly hold inter-agency meetings to enhance information sharing.	FIC	All Stakeholders	December 2026	Series of interagency meetings held.	Improved information sharing among all stakeholders.
1.2 Strengthen the activities of LECOB to, among others, facilitate the exchange of information among LEAs.	NSCS	LECOB FIC LEAs OSP	September 2025	Regular meetings of LECOB	LECOB strengthened.
Core Objective 2: Strengthen the feedback mechanism among LEAs in order to enhance information sharing on ML/TF/PF investigation and prosecution.					
2.1 Enhance the feedback on ML/TF/PF cases for all LEAs.	FIC	Judiciary LEAs OSP AG	August 2025	Feedback mechanism among LEAs enhanced	Feedback mechanism on ML/TF/PF enhanced.
Core Objective 3: Strengthen regular consultative fora/mechanism to facilitate communication between supervisors and the private sector.					
3.1 Organise periodic workshops/seminars for supervisors and the private sector.	FIC	BoG SEC NIC CSOs All Stakeholders	December 2025	Series of meetings between supervisors and private sector organised.	Communication between Regulators/ Supervisors and private sector enhanced.

ACTION POINT	LEAD INSTITUTION	SUPPORTING INSTITUTION(S)	TIMEFRAME	INDICATOR	EXPECTED OUTCOME
Objective 4: Strengthen collaboration and cooperation among Regulatory/Supervisory Bodies, LEAs and Private Sector					
4.1 Enhance the activities of the Regulators Forum.	BoG FIC	All Financial sector Regulators All DNFBP regulators NPOS FIC	October 2025	Regular meeting of the Regulators Forum.	Collaboration among regulators strengthened.
4.2 Enhance the activities of the Committee on Cooperation between Law Enforcement and Banks (COCLAB)	BoG	FIC LEAs	October 2025	Regular meetings of the COCLAB.	Enhanced collaboration among the Regulators, private sector and LEAs.

GOAL 4: ENHANCE NATIONAL AML/CFT/CPF DATABASE/STATISTICS.

ACTION POINT	LEAD INSTITUTION	SUPPORTING INSTITUTION(S)	TIMEFRAME	INDICATOR	EXPECTED OUTCOME
Core Objective 1: Enhance the mechanism for all LEAs and Competent Authorities to collect and maintain accurate AML/CFT/CPF related statistics					
1.1 Enhance the collection of data and submission of [quarterly] reports by LEAs and Competent Authorities to the FIC.	FIC	LEAs OSP GIS ORC All Regulators	December 2025	Periodic reports submitted.	Accurate and comprehensive data collected and submitted to the FIC on monthly basis.
Core Objective 2: Enhance ML/TF/PF database accessible to the FIC and other Competent Authorities					
2.1 Enhance the national database on ML/TF/PF.	FIC	LEAs OSP GIS ORC	December 2025	National database accessible to all competent authorities enhanced.	A comprehensive ML/TF/PF statistic maintained.
Core Objective 3: Ensure information security of all AML/CFT/CPF statistics					
3.1 Continuous capacity building programmes for LEAs on information security.	FIC	LEAs OSP GIS	December 2026	Stakeholders trained on information security.	Enhanced information security of all statistics.

GOAL 5: STRENGTHEN CAPACITY AND CREATE AWARENESS ON ML/TF & P AMONGST THE FIC, REGULATORS, REPORTING INSTITUTIONS, CIVIL SOCIETY ORGANISATIONS AND PRIVATE SECTOR.

ACTION POINT	LEAD INSTITUTION	SUPPORTING INSTITUTION(S)	TIMEFRAME	INDICATOR	EXPECTED OUTCOME
Core Objective 1: Deepen AML/CFT/CPF awareness among stakeholders including the general public.					
1.1 Deepen the AML/CFT/CPF among the general public.	FIC	NCCE CSOs Media	December 2026	Scheduled programme on AML/CFT/CPF implemented.	AML/CFT/CPF awareness deepened.
1.2 Review and issue public notices, flyers and other materials to facilitate awareness creation among the general public.	FIC	MoF	December 2026	Series of Public Notices and Flyers issued out.	AML/CFT/CPF awareness among the general public deepened.
Core Objective 2: Improve risk-based supervision capacity of Regulatory and Supervisory Bodies (RSBs).					
2.1 Finalise the risk-based supervision manuals to guide AML/CFT/CPF supervisors in the DNFBP sector.	All DNFBP Supervisors/Regulators NPOS	FIC	October 2025	Risk based Supervision manual developed for DNFBP Supervisors/Regulators	Enhanced supervision capacity of DNFBP Supervisors/Regulators.
2.2 Enhance capacity building programmes on risk -based supervision for all RSBs.	All Regulators NPOS	FIC	December 2026	Enhanced risk based capacity of supervisors.	RSBs carry out effective risk based supervision.

ACTION POINT	LEAD INSTITUTION	SUPPORTING INSTITUTION(S)	TIMEFRAME	INDICATOR	EXPECTED OUTCOME
2.3 RSBs to apply proportionate, dissuasive and effective administrative sanctions/penalties for all AML/CFT/CPF infractions.	All Regulators NPOS	FIC	December 2026	AML/CFT/CPF administrative sanctions applied.	All AML/CFT/CPF infractions sanctioned.
2.4 Continuous training on emerging trends and schemes in AML/CTF/CPF.	All Regulators NPOS	FIC	June 2026	Deepened AML/ CFT/CPF knowledge of supervisors	Well trained supervisors to carry out AML/CFT/CPF supervision of AIs.
2.5 Improve AML/CFT/CPF supervision by enhancing the human resource base of RSBs.	SEC NIC DNFBP Regulators/ Supervisors NPOS	IMC MoF FIC	December 2025	Human Resource base of the AML Units of SEC, NIC and DNFBP Regulators/ Supervisors enhanced.	Improved AML/CFT/CPF supervision.
Core Objective 4: Enhance the identification and reporting of ML/TF/PF related STRs.					
4.1 Deepen the awareness on the identification of ML/TF/PF red flags among AIs, Regulators and CSOs.	FIC	AIs RSBs CSOs	December 2027	Series of trainings conducted.	Capacity of AIs, Regulators and CSOs to identify ML/TF/PF red flags enhanced.
Core Objective 5: Strengthen the feedback and collaboration mechanism between the FIC, Regulators, and Accountable Institutions (AIs)					
5.1 Organise regular stakeholder meetings to facilitate the feedback mechanism.	FIC	All Regulators NPOS AIs	November 2025	Series of stakeholder meetings held.	Feedback mechanism enhanced.

