

CIRCULAR

TO: AML/CFT Compliance Officers/Principal Officers - Non-Bank Financial Institutions

FROM: Non-Bank Financial Institutions Regulatory Authority (NBFIRA)

DATE: August 4, 2026

SUBJECT: NATIONAL REGISTRATION ACT IMPLEMENTATION GUIDANCE NOTE

1. Reference is made to the above.
2. The Non-Bank Financial Institutions Regulatory Authority ("the Authority" or "NBFIRA") as a supervisory authority under the Financial Intelligence Act, 2022 (FI Act) (as amended) hereby presents a guidance note to supervised entities on conducting an institutional proliferation financing risk assessment.
3. This guidance note is as per section 49(1)(c) of the FI Act which obligates supervisory authorities, in consultation with the Financial Intelligence Agency (FIA) to establish and issue guidance notes to help specified parties comply with the FI Act.
4. NBFIRA, through this communication disseminates guidance on "***National Registration Act Implementation Guidance Note***" for supervised entities's adoption.
5. Supervised entities are to contact the AML/CFT Department at amlcft@nbfira.org.bw should they require further clarification on the matter.