IHC SECTOR INTELLIGENCE

SI 99 Of 2026 FACTSHEET

Virtual Asset Service Providers Registration Regulations

WHAT IS SI 99 OF 2026

- There was an introduction of a formal registration & supervisory framework for Virtual Asset Service Providers (VASPs) under SI 99 of 2026.
- It was gazetted on 10 June 2026 under section 103 read with section 3A(1)(a) of the Money Laundering & Proceeds of Crime Act [Chapter 9:24], as amended by the Finance Act 7 of 2025.
- The Financial Intelligence Unit (FIU) is designated as the supervisory authority for all VASPs in Zimbabwe.
- Registration is mandatory for any entity providing virtual asset services commercially in or from Zimbabwe.

This regulatory development indicates the intent to formalize the Zimbabwean digital asset sector & align with FATF AML/CFT standards. Essentially, for fintech, remittance & digital payment opportunities, VASP registration status is now a bankability prerequisite. Investors should treat FIU registration as a minimum compliance threshold. Not as evidence of full regulatory clearance.

This factsheet is for informational purposes only & does not constitute legal or investment advice. Seeking specialist counsel regarding your specific circumstances is advised. The core data source for this factsheet is the Money Laundering & Proceeds of Crime (Virtual Asset Service Providers Registration) Regulations, 2026 - SI 99 of 2026.

US$0 Application Fee Not Cost To Apply
US$500 Issuance Fee Annual Registration
US$400 Renewal Fee Per 12-Month Cycle
US$50 000 Maximum Civil Fine Key Obligation Breaches
90 Days Decision Window From Complete Application

REGULATORY PRINCIPLES UNDERLYING SI 99 OF 2026

SI 99 of 2026 establishes 8 founding principles for VASP regulation in Zimbabwe. These principles highlight government's intent to balance investor protection & responsible innovation.

MARKET INTEGRITY

CUSTOMER PROTECTION

FINANCIAL STABILITY

INNOVATION ENABLEMENT

TRANSPARENCY & ACCOUNTABILITY

RISK MANAGEMENT

GLOBAL INTEROPERABILITY

TRUST & CONFIDENCE

WHAT CONSTITUTES A VASP UNDER SI 99 OF 2026

A VASP is any natural or legal person that, as a business or for commercial benefit, provides one or more of the following services relating to virtual assets:

- [x] Exchange between virtual assets & fiat currencies
- [x] Exchange between one or more forms of virtual assets
- [x] Transfer of virtual assets
- [x] Safekeeping or administration of virtual assets or instruments enabling control over virtual assets
- [x] Participation in & provision of financial services related to an issue's offer or sale of a virtual asset

EXTENDED DEFINITION (DeFi & PROTOCOL OPERATORS)

Critically, the Regulations extend the VASP definition to entities that exercise control over, or provide the essential means for, the operation of a software protocol, smart contract, decentralized application, or similar arrangement. "Control" is broadly defined & includes the ability to:

- [x] Initiate, modify or upgrade the operational logic of a protocol
- [x] Withdraw or reallocate substantial assets held within the protocol
- [x] Determine or materially change fees, rewards, or economic parameters
- [x] Direct governance decisions of the protocol
- [x] Commercially market or present oneself as the provider or operator

REGISTRATION REQUIREMENTS

The eligibility & structure is as follows:

LEGAL ENTITY ● Must be incorporated or registered in Zimbabwe as a legal entity
MULTINATIONAL GROUPS ● Must operate through a Zimbabwe-registered subsidiary; cannot register foreign parent directly
AUTHORIZED REPRESENTATIVE ● Foreign-group subsidiaries must appoint a Zimbabwe-resident authorized representative who meets fit & proper person criteria
PHYSICAL PRESENCE ● Must have a registered office or place of business in Zimbabwe with records accessible on-site
RESIDENT DIRECTORS ● Minimum of 2 resident directors at all times
COMPLIANCE OFFICER ● Must appoint a Zimbabwe-resident AML/CFT compliance officer with authority & independence

DOCUMENTATION REQUIRED FOR APPLICATION

The application must be submitted in the prescribed VASPR Form with the following supporting documents:

☑ Certified copy of Certificate of Incorporation or establishing documents	☑ Detailed description of the business i.e. nature, size, scope, complexity, technology used, virtual assets to be offered
☑ Certified ID documents & proof of residence for all beneficial owners, directors & principal officers	☑ Proof of physical business premises & head office address
☑ Zimbabwe Republic Police clearance certificates (dated within 6 months) for the persons above	☑ Written entity-specific AML/CFT/CPF risk assessment (identifying, assessing, monitoring & mitigating risks
☑ Completed Fit & Proper Person Declaration (Part C of VASPR Form) for each individual	☑ Written AML/CFT/CPF compliance policy
☑ Ownership structure chart or diagram (including indirect holdings through trusts or intermediaries)	☑ Name & qualification of proposed compliance officer
☑ Valid tax clearance certificate (ZIMRA)	☑ Name & address of all affiliated entities (local & international)
☑ Data protection, security & confidentiality policies & procedures ☑ Documented cybersecurity safeguards ☑ Proof of source of funds	

The registration fee of US$500 is payable only upon approval. Renewal applications must be submitted no later than 90 days before expiry of the current registration.

APPROVAL PROCESS & TIMELINES

1️⃣ **SUBMISSION** ● Submit VASPR Form with full documentation

2️⃣ **FIU REVIEW WINDOW** ● 90 days from receipt of complete application

3️⃣ **INCOMPLETE APPLICATIONS** ● FIU notifies applicants to provide missing information within a set period; failure = application deemed abandoned & rejected within 90 days of initial receipt

4️⃣ **DECISION NOTIFICATION** ● FIU notifies in writing of approval or rejection with reasons

5️⃣ **CERTIFICATE ISSUANCE** ● Upon payment of US$500 issuance fee; registration is allocated a unique number & entered in a public Register

KEY TO NOTE

🟡 **CERTIFICATE VALIDITY** ● One year from date of issuance; non-transferable

🟡 **RENEWAL APPLICATION WINDOW** ● Must be submitted within 90 days prior to expiry

🟡 **RENEWAL FEE** ● US$400 per 12-month cycle

🟡 Registration certificate must be displayed prominently in both physical & digital form at all places of business. Where services are offered online, a QR code linking to the FIU registry entry is required

ONGOING OBLIGATIONS OF REGISTRANTS

GENERAL COMPLIANCE OBLIGATIONS

- Maintain beneficial owners & principal officers who are fit & proper at all times
- Appoint & retain a Zimbabwe-resident AML/CFT compliance officer with operational independence
- Maintain no fewer than 2 resident directors at all times
- Notify FIU in writing immediately of any material change in ownership, control, management or compliance status
- Ensure all associated persons comply with the Act, FIU directives & guidance
- Pay all prescribed feeds on time
- Notify FIU of change in registered office within 7 days
- Report material changes in information provided to FIU within 48 hours of becoming aware

TRAVEL RULE OBLIGATIONS

Part V of SI 99 introduces Zimbabwe's Travel Rule which requires VASPs to obtain, verify & transmit originator & beneficiary information for all virtual asset transfers. Using the IVMS 101 data standard:

- Ordering VASPs must obtain full legal name, wallet address, physical address or national ID/passport & date/place of birth of originators. Plus, full name, wallet address & country/city of beneficiary
- All originator information must be KYC-verified before a transfer is executed
- Beneficiary VASPs must verify received information against their own client records
- Transfers to self-hosted wallets require Wallet Ownership Proof for transactions exceeding US$1000 (e.g. "Satoshi Test" or cryptographic signature verification)
- Enhanced monitoring must be applied to all self-hosted wallet transactions to detect sanctions evasion

CUSTOMER CARE DUE DILIGENCE OBLIGATIONS

These requirements apply to all transactions equal to or exceeding US$1000 (or equivalent). Key obligations include:

Identification & Verification

Verify each customer’s identity using reliable, independent sources. Identify beneficial owners where a customer acts on behalf of another. Obtain information on the purpose & nature of the business relationship.

Ongoing Monitoring

Conduct continuous transaction monitoring aligned to customer risk profile. Apply enhanced due diligence to higher-risk customers, jurisdictions or transaction patterns. Keep customer information current & re-verify periodically.

Record Keeping

Retain all identification documents, verification data and transactions records for a minimum of 5 years after cessation of the business relationship. Records must be readily available to competent authorities.

Suspicious Transaction Reporting (STR)

Promptly file STRs with the FIU upon detection of unusual or suspicious activity. Train staff to recognize red flag indicators.

Compliance & Oversight

Establish internal AML/CFT policies, procedures & controls. Designate the compliance officer for oversight & reporting. Subject systems to independent audit & regulatory review.

SUSPENSION, REVOCATION & PENALTIES

GROUNDS FOR REVOCATION

The FIU may revoke a VASP's registration for any of the following:

- Commission of a money laundering, terrorist financing or proliferation financing offence
- Failure to meet requirements of the Act or FIU directives
- Materially false or misleading information provided at application
- Failure to satisfy registration conditions
- Contravention of the Act or SI 99 Regulations
- Cessation of operations for more than 30 days
- Entry into liquidation, winding up or dissolution
- No longer a fit & proper person
- Conducting business in a manner detrimental to the public interest

VASPs have 7 days to submit written representations opposing a proposed revocation. The FIU may revoke without notice if in the public interest. Public notice of suspension will be published by the Director General.

PENALTY SCHEDULE

OFFENCE	MAXIMUM FINE	KEY TO NOTE
False or misleading application declaration	**US$10 000**	Plus 6-month bar on re-application & registration revoked
Failure to maintain fit & proper owners or officers, compliance officer or 2 resident directors	**US$50 000**	Sections 10(1)(a), (b), (c)
Failure to ensure associated persons comply with Act	**US$50 000**	Section 10(1)(f)
Failure to maintain registered office in Zimbabwe or keep records accessible	**US$50 000**	Section 12
Failure to notify FIU of material change within 48 hours	**US$50 000**	Sections 13(1) & (2)
Late renewal application	**Level 6 (standard scale)**	Zimbabwean penalty scale

FIT & PROPER PERSON ASSESSMENT

The FIU assesses fitness & probity for all beneficial owners, directors, principal officers & persons with significant interest (10%+ shareholding or voting rights). Assessment criteria include:

- Financial standing
- Relevant education, qualifications & experience
- Ability to discharge functions properly, efficiently, honestly & fairly
- Reputation, character, financial integrity & reliability
- Criminal record (any jurisdiction)
- Prior regulatory sanctions, investigations or license revocations in Zimbabwe or elsewhere
- Prior insolvency or bankruptcy
- Prior disqualification from directorship
- Conflicts of interest

IMPORTANT DISTINCTION

FIU registration is a supervisory AML/CFT measure only. It does NOT constitute authorization to conduct business in Zimbabwe. VASPs must also obtain applicable licenses or approvals from the Reserve Bank of Zimbabwe (RBZ), the Securities and Exchange Commission of Zimbabwe (SECZ) and any other competent authority relevant to their activities. Thus, due diligence will seek to verify both FIU registration & sector-specific licensing status.

IMPORTANT RISK NOTE FOR INVESTORS

The FIU explicitly cautions that virtual assets remain high-risk products. Risks include extreme price volatility & permanent loss of funds (e.g. from cyberattacks, insolvency of VASPs or loss of private keys). Additional risks are the prevalence of Ponzi & phishing schemes and limited consumer recourse. Other risks are cross-border enforcement challenges & evolving regulatory treatment. We recommend that investors must seek independent professional advice before entering any virtual asset-related transaction.

About Investor Hosting Centre (IHC) www.investorhosting.com

Investor Hosting Centre (IHC) is a premier data-driven digital investment facilitation platform, connecting global investors with bankable opportunities across Africa's diverse economies, with a focus on high-potential sectors like Mining, Agriculture, and Real Estate.

As a one-stop shop, IHC provides seamless end-to-end hosting services for governments, private sector players, development partners, and individuals. From travel facilitation, transfers, and accommodation to meetings, conferences, and events, IHC ensures a streamlined investor journey. Leveraging cutting-edge technology and data-driven insights, we empower investors to make informed decisions and unlock Africa's vast economic potential, transforming opportunities into actionable investments.