



BE RWANDA WISE · DOING BUSINESS IN RWANDA

The guide for foreign and Rwandan investors

Chapter 6 of 11

Banking, Foreign Exchange & Repatriation

Rwanda lets capital flow freely across its borders but insists that business inside the country is priced and paid in Rwandan francs, and since May 2025 it has enforced that rule with fines of up to the whole amount transacted. This chapter sets out the banking, foreign exchange, borrowing, repatriation, payments, anti-money-laundering and capital market rules as they stand at 10 October 2026, after a new central bank law in July 2026, a new banking law in 2024, a new anti-money-laundering law in January 2025 and a series of directives on foreign currency in 2025 and 2026.

Reviewed 10 October 2026. Prepared by a commercial lawyer with over 30 years' international experience. Legal and tax information, not legal advice. Rates, thresholds and procedures change: confirm anything important with the relevant authority or an advocate registered with the Rwanda Bar Association before you act. Laws are published in Kinyarwanda, English and French in the Official Gazette; check the official text before relying on a translation.

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Legal and tax information, not legal advice. Rates, thresholds and procedures change: confirm anything important with the relevant authority or an advocate registered with the Rwanda Bar Association before you act. Laws are published in Kinyarwanda, English and French in the Official Gazette; check the official text before relying on a translation.

Banking, Foreign Exchange & Repatriation

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AT A GLANCE

Governing law

- [Law N° 033/2026 of 24/07/2026 governing the National Bank of Rwanda \(in force on publication in the Official Gazette of 24 July 2026\)](#)
- [Law N° 044/2024 of 30/05/2024 governing banks](#)
- [Regulation N° 42/2022 of 13/04/2022 governing foreign exchange operations, as amended by Regulations N° 89/2025 of 23/05/2025](#)
- [Directive N° 4230/2025-00042 \[613\] of 17/09/2025 governing persons authorized to transact in foreign currencies and the requirements for obtaining authorization](#)
- [Directive N° 46/2026 of 08/04/2026 on lending in foreign currency](#)
- [Law N° 001/2025 of 22/01/2025 on the prevention and punishment of money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction](#)
- [Law N° 006/2021 of 05/02/2021 on Investment Promotion and Facilitation \(Article 12, repatriation\)](#)

Who you will deal with

- National Bank of Rwanda (BNR): monetary policy, the foreign exchange market, licensing and supervision of banks, microfinance institutions, insurers, pension schemes, forex bureaus, payment service providers, non-deposit-taking lenders and trust and company service providers, and the Deposit Guarantee Fund
- Capital Market Authority (CMA): securities, collective investment schemes, trusts business, the central securities depository framework and, since May 2026, virtual asset businesses
- Financial Intelligence Centre (FIC): suspicious transaction and cash transaction reports, anti-money-laundering regulations and targeted financial sanctions
- Rwanda Revenue Authority (RRA): withholding tax on dividends, interest, fees and branch profits, and tax clearance certificates
- Rwanda Development Board (RDB) and Rwanda Finance Limited: investment certificates and recommendations that open the door to foreign-currency authorisation, and promotion of the Kigali International Financial Centre (KIFC)
- Rwanda Inspectorate, Competition and Consumer Protection Authority (RICA), the Rwanda National Police and local authorities: enforcement of the foreign-currency rules together with the BNR

What changed in 2024–26

- 22 January 2025: Law N° 001/2025 replaced the 2023 anti-money-laundering law, and the

Key figures

Pricing in foreign currency without permission	RWF 5,000,000 fine; RWF 10,000,000 for a repeat
Transacting in foreign currency without permission	50% of the amount; 100% for a repeat
BNR decision on an application to transact in foreign currency	20 working days, extendable once by 10; silence then means approval
Withholding tax on dividends, interest and repatriated branch profits	15%, reduced by treaties and the Investment Code
Related-party interest limitation	Interest non-deductible on loans above 4 times paid-up equity
Foreign-currency loans from Rwandan banks	Borrower's foreign-currency cash flow at least 120% of annual debt service
Bank ownership cap and minimum capital	25% per shareholder group; RWF 20 billion paid-up cash capital for a commercial bank
Deposit guarantee and cash declaration	RWF 1,000,000 per depositor; cash of RWF 10,000,000 or more declared at the border

Financial Intelligence Centre law was amended; new FIC regulations on due diligence and sanctions followed on 22 June 2026.

- 30 May 2025: Regulations N° 89/2025 of 23/05/2025 were published, defining pricing and transacting in foreign currency, permitting foreign-currency payment for imports and exports, and setting fines of RWF 5 million to 100% of the amount transacted.
- 17 September 2025: Directive N° 4230/2025-00042 listed the businesses deemed authorised to transact in foreign currency and set a 20-working-day procedure for everyone else; the six-month transition for existing contracts has since expired.
- 7 November 2025: Regulations N° 93/2025 set deposit guarantee cover at RWF 1,000,000 per depositor, including foreign-currency deposits paid out in Rwandan francs.
- 4 May 2026: Directive N° 46/2026 on lending in foreign currency took effect on signature, with 120% cash-flow and collateral tests and BNR non-objection for large bank loans.
- 24 July 2026: Law N° 033/2026 replaced the 2017 central bank law and restated that obligations in Rwanda are presumed to be expressed and settled in Rwandan francs unless other laws provide otherwise.

Who this applies to. Rwanda's banking and foreign exchange rules turn on residence and on the activity, not on nationality. A company incorporated or registered in Rwanda, or effectively managed there, is a resident whoever owns it, and it faces the same Rwandan-franc rule, the same fines and the same bank due diligence as a Rwandan-owned company. The differences for foreign investors lie in the cross-border flows: capital, loans, dividends, interest and fees move through licensed banks against documents, and payments abroad bear 15% withholding tax unless a treaty, an exemption or the Investment Code reduces it. Since May 2025, residents of other East African Community states are no longer treated as Rwandan residents for foreign exchange purposes. Foreign banks need home-supervisor consent to open a subsidiary or branch, and no shareholder, foreign or Rwandan, may hold more than 25% of a bank without BNR authorisation.

How money is regulated in Rwanda

The **National Bank of Rwanda (BNR)** sits at the centre of the system. Law N° 033/2026 of 24/07/2026 governing the National Bank of Rwanda, which came into force on its publication in the Official Gazette of 24 July 2026 and repealed the 2017 central bank law except the article establishing the Bank, makes it responsible for monetary policy, the foreign exchange market, the supervision of financial institutions, trust and company service providers and payment systems, and the management of the official reserves. The English text of the new law calls the Bank "NBR"; the Kinyarwanda text and this guide use BNR. The Bank licenses banks under Law N° 044/2024 of 30/05/2024 governing banks, which caps any shareholder group at 25% of a bank unless the Bank authorises more, and it also supervises microfinance institutions, insurers, pension schemes, forex bureaus, payment service providers and non-deposit-taking lenders.

Other regulators share the field. The Capital Market Authority (CMA) regulates securities, collective investment schemes, trusts business and, under a law of May 2026, virtual asset businesses. The Financial Intelligence Centre (FIC) receives suspicious and cash transaction reports and runs targeted financial sanctions. The Rwanda Revenue Authority (RRA) collects withholding tax on money leaving the country, and the Rwanda Development Board (RDB) and Rwanda Finance Limited issue the certificates and recommendations that allow certain businesses to deal in foreign currency. The regulators, the banks and the deposit guarantee are described in [The financial system and regulators](#).

Foreign exchange: open at the border, Rwandan francs at home

Rwanda's exchange control regime is liberal for cross-border flows. Regulation N° 42/2022 of 13/04/2022 governing foreign exchange operations describes direct investment as fully liberalised and portfolio investment as liberalised, allows residents and non-residents to hold foreign-currency accounts, permits residents to borrow abroad freely and lets banks pay imports, dividends, interest, royalties and fees abroad against supporting documents. There is no approval regime for inward investment or external loans.

Inside the country the rule is the opposite. Article 39 of the 2026 central bank law presumes every monetary obligation or transaction in Rwanda to be expressed and settled in Rwandan francs, and **Regulations N° 89/2025 of 23/05/2025** turned that presumption into an enforceable regime. Displaying, quoting, advertising, invoicing or fixing a contract price in foreign currency is "pricing in foreign currency"; receiving payment on such a price is "transacting". Without BNR permission, pricing costs RWF 5 million (RWF 10 million on a repeat) and transacting costs 50% of the amount (100% on a repeat). Payment in foreign currency for exports and imports is permitted, and Directive N° 4230/2025-00042 of 17/09/2025 deems a list of businesses authorised, from RDB-licensed tourism entities and KIFC entities to mining operators trading in minerals and international schools; everyone else applies through the BNR's e-correspondence portal for a decision within 20 working days. The detail, the fines and the application procedure are in [Foreign exchange rules](#).

Bank accounts and borrowing

A foreign-owned company needs a Rwandan bank account to receive its share capital, pay tax and payroll and send money abroad, because all payments to non-residents must pass through a licensed intermediary or the BNR. Banks open accounts under the customer due diligence rules of Law N° 001/2025 of 22/01/2025 on money laundering: they identify the company, understand its ownership and control, identify every beneficial owner holding 25% or more, verify the signatories and record the purpose of the relationship, and they must refuse the account if due diligence cannot be completed. See [Opening corporate bank accounts](#).

Residents may borrow in foreign currency from non-resident banks, international financial institutions and other non-residents without BNR approval; banks simply record repayments. The constraints are fiscal and prudential. Interest paid abroad bears 15% withholding tax unless the lender is an exempt foreign development finance institution, a treaty reduces the rate or the borrower holds an Investment Code incentive; interest on related-party loans above four times paid-up equity is not deductible; and since 4 May 2026, Directive N° 46/2026 allows Rwandan banks to lend in foreign currency only to borrowers that earn it or are authorised to transact in it, with foreign-currency cash flow of at least 120% of annual debt service. See [Offshore loans and external borrowing](#).

Getting money out

Article 12 of Law N° 006/2021 of 05/02/2021 on Investment Promotion and Facilitation entitles an investor, upon fulfilling tax obligations in Rwanda, to repatriate capital, profits, debt and interest on foreign loans, liquidation proceeds and other assets. In practice the right is exercised through a bank, which asks for supporting documents showing the source of the funds before it transfers dividends, interest or sale proceeds. Withholding tax of 15% applies to dividends, to profits repatriated by a branch and to retained earnings converted into shares, with lower rates for listed securities and 0% for payments by entities on the Investment Code's 3% regimes and on its 15% regime for licensed financial-services firms; capital gains on share sales are taxed separately at 10%. The document trail, the tax and the timing are in [Repatriating profits and capital](#), read with [Withholding taxes and tax treaties](#).

Payments, compliance and capital markets

Rwanda is a mobile-money economy: the BNR reports mobile-money transfers of RWF 24,931 billion in its 2024/25 financial year, up 56% on the year before. Payment service providers are licensed under Law N° 061/2021 of 14/10/2021 governing the payment system and Regulation N° 74/2023 of 18/09/2023 in four categories, with minimum capital from RWF 30 million for money remittance to RWF 300 million for a large electronic money issuer; see [Payments, currency and mobile money](#). Banks, lawyers, accountants, real estate agents, dealers in precious metals and stones, casinos, trust and company service providers and virtual asset service providers are reporting persons under the 2025 anti-money-laundering law, with suspicious transactions reported to the FIC and sanctions-related freezes made within 24 hours; Rwanda was not on the FATF list of jurisdictions under increased monitoring of 19 June 2026. See [Anti-money-laundering and sanctions compliance](#).

The capital market is regulated by the CMA under a 2011 law that a draft bill published in August 2025 would replace, alongside 2021 laws on collective investment schemes, trusts and foundations, a 2025 law on the central securities depository and a 2025 directive allowing securities denominated in foreign currency. The Investment Code offers a 3% corporate income tax rate to qualifying pure holding companies and collective investment schemes and 15% to fund managers, private banks and similar KIFC businesses, with 0% withholding tax on their payouts. See [Capital markets, project finance and KIFC funds](#) and [Kigali International Financial Centre](#).

How to use this chapter

Every investor should read [Foreign exchange rules](#) before signing a contract, publishing a price list or opening a showroom, because the fines for pricing or taking payment in foreign currency are calculated on the amount of the deal and fall on the business that quotes the price, not only on the customer. [The financial system and regulators](#) explains who licenses what and how far deposits are protected. Read [Opening corporate bank accounts](#) while the company is being registered, since the account is needed to receive capital, and [Offshore loans and external borrowing](#) before a shareholder loan or bank facility is drawn. [Repatriating profits and capital](#) explains how to take money out and why the evidence of the original investment matters. [Payments, currency and mobile money](#) covers the payment system and fintech licensing, [Anti-money-laundering and sanctions compliance](#) the duties that apply to banks and to many other businesses, and [Capital markets, project finance and KIFC funds](#) the routes for raising money locally and for fund and holding structures. Each section ends with the related Be Rwanda Wise FAQs, the official sources and a question you can put to Rwandabot, the AI legal-information chatbot, about your own facts. Figures are stated at 10 October 2026. The central bank law is only weeks old and many BNR instruments still cite the repealed 2017 laws, so watch for replacement regulations, and check the position again before relying on it for a later transaction.

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The financial system and its regulators: the National Bank of Rwanda under Law N° 033/2026, the 2024 banking law with its 25% ownership cap and licensing conditions, RWF 20 billion minimum capital for a commercial bank, the RWF 1,000,000 deposit guarantee, non-bank lenders and payment providers, and the roles of the Capital Market Authority and the Financial Intelligence Centre

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WHAT YOU NEED TO KNOW

- Law N° 033/2026 of 24/07/2026 governing the National Bank of Rwanda came into force on publication in the Official Gazette of 24 July 2026, repealed Law N° 48/2017 except the article establishing the Bank (Article 74), and makes the National Bank of Rwanda (BNR) responsible for monetary policy, the foreign exchange market, financial institutions, trust and company service providers and payment systems (Article 7).
- Under Law N° 044/2024 of 30/05/2024 governing banks, only authorised entities may take deposits (Article 5), a foreign bank's subsidiary or branch needs consolidated home supervision and a non-objection from its home supervisor (Article 9), and a licence may be revoked if the bank has not started operations within six months (Article 14).
- No person, with related parties, may own more than 25% of a bank's shares unless the BNR authorises a reputable financial institution, public company, foreign government, international institution or other person to do so; a shareholding held in breach is void and carries no voting or dividend rights (Article 20), and a significant holding acquired without the BNR's prior authorisation is void (Article 21).
- Regulation N° 2310/2018-00013 of 27/12/2018 on licensing conditions of banks requires paid-up cash capital of at least RWF 20 billion for a commercial bank, RWF 50 billion for a development bank and RWF 10 billion for a cooperative or mortgage bank, a licence fee of RWF 5 million and an annual supervision fee of 0.5% of gross income (minimum RWF 5 million), falling to 0.05% on gross income above RWF 20 billion.
- Regulations N° 93/2025 of 07/11/2025 on operations of the deposit guarantee fund cover deposits up to RWF 1,000,000 per depositor, aggregated across accounts held in the same capacity and including foreign-currency deposits paid in Rwandan francs (Articles 3 and 4), funded by a premium of 0.1% of eligible deposits a year (Article 6), with claims made within two years of the declaration of liquidation (Article 15).

Who regulates money in Rwanda

The **National Bank of Rwanda (BNR)** is the central bank, the foreign exchange authority and the prudential supervisor of almost every financial business in the country. Its constitution is now **Law N° 033/2026 of 24/07/2026 governing the National Bank of Rwanda** (the Central Bank Law), published in the Official Gazette n° Special of 24/07/2026 and in force from that day (Article 76). It repeals Law N° 48/2017 of 23/09/2017 except Article 1, the provision that established the Bank, so the institution continues without a break (Article 74). In the English text of the new law the Bank calls itself the "NBR"; the Kinyarwanda text, which is the version adopted by Parliament, keeps *Banki Nkuru y'u Rwanda* (BNR), and this guide uses BNR throughout.

Article 7 lists the Bank's responsibilities: defining and implementing monetary policy; organising and supervising the foreign exchange market; supervising financial institutions; supervising trust and company service providers; supervising and overseeing payment systems; conducting financial stability assessments; setting policy for clearing and settlement; managing the currency and the official foreign exchange reserves; acting as State Cashier; compiling monetary and financial statistics; and protecting the interests of customers and depositors. Under Article 45 the Bank organises and manages the foreign exchange market and issues the regulations and directives that govern it, which is the source of the foreign-currency rules described in [Foreign exchange rules](#). In practice the BNR licenses and supervises banks, deposit-taking microfinance institutions, insurers, pension schemes, forex bureaus, payment service providers, non-deposit-taking lenders and trust and company service providers, and it manages the Deposit Guarantee Fund.

Most of the instruments investors deal with day to day, among them Regulation N° 42/2022 of 13/04/2022 governing foreign exchange operations, the 2018 bank licensing regulation and the 2025 and 2026 directives on foreign currency, were made under the repealed 2017 laws. The BNR continues to publish them on its website as current law, and they are applied in practice; the provisions of the 2026 law reviewed for this guide contain no express clause saving them, so investors should expect them to be replaced or restated under the new law over the coming months and should check the BNR's website before relying on an older instrument for a significant transaction.

The other regulators

The **Capital Market Authority (CMA)**, established by Law N° 057/2021 bis of 18/09/2021, regulates the issue and trading of securities under Law N° 01/2011 of 10/02/2011 regulating capital market in Rwanda, as modified by Law N° 45/2018 of 13/08/2018, together with collective investment schemes, trusts business and the central securities depository framework. Since Law N° 023/2026 of 25/05/2026 regulating virtual asset business, published on 28 May 2026, the CMA is also the regulator of virtual asset service providers. The capital market rules and the fund vehicles promoted through the Kigali International Financial Centre (KIFC) are in [Capital markets, project finance and KIFC funds](#).

The **Financial Intelligence Centre (FIC)**, governed by Law N° 045/2021 of 18/08/2021 as amended by Law N° 002/2024, receives suspicious transaction reports and cash transaction reports, issues anti-money-laundering regulations and administers targeted financial sanctions under Law N° 001/2025 of 22/01/2025 on the prevention and punishment of money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction; see [Anti-money-laundering and sanctions](#)

compliance. The Rwanda Revenue Authority (RRA) collects withholding tax on payments abroad and issues tax clearance certificates, which banks and the BNR ask to see. The Rwanda Development Board (RDB) issues investment certificates and the recommendations that support an application to transact in foreign currency, and Rwanda Finance Limited recommends entities for the KIFC regime. Enforcement of the foreign-currency rules is shared between the BNR, the Rwanda Inspectorate, Competition and Consumer Protection Authority (RICA), the Rwanda National Police and local authorities under Article 11 of Directive N° 4230/2025-00042 of 17/09/2025.

The banking law: deposits, activities and licences

Law N° 044/2024 of 30/05/2024 governing banks (the Banking Law), published in the Official Gazette n° 24 Bis of 10/06/2024, replaced Law N° 47/2017 of 23/09/2017 (Article 113). Its starting point is a monopoly: no one may accept deposits from the public unless authorised to do so, the exceptions being the BNR itself, deposit-taking microfinance institutions and others authorised by law (Article 5). A bank's core business is accepting deposits and lending on its own account, and Article 6 lists the other activities a bank may carry on: issuing guarantees, issuing, managing, buying and selling money market instruments, payment and financial management services, private banking, foreign exchange transactions, issuing or administering means of payment such as cheques, cards and travellers' cheques, representing a foreign bank or financial institution, holding securities for third parties and other activities the BNR approves. The categories of bank, such as commercial, development, cooperative and mortgage banks, are set by BNR regulation (Article 4).

A banking licence is issued by the BNR (Article 7). Article 8 lists the preconditions: the required paid-up capital; shareholders able to provide additional financial support if needed; disclosure of the **beneficial owners** with documents the BNR accepts; compliance with the Banking Law; a documented financial projection; directors and senior managers with relevant experience and integrity; a transparent management structure that does not obstruct supervision; shareholders of sound reputation with no record of money laundering, terrorist financing or other financial crime; and an internal structure suited to the planned business. A subsidiary or branch of a foreign bank must also show, under Article 9, that the parent is licensed in its home country, that the home supervisor exercises consolidated supervision, and that the parent has obtained a non-objection from that supervisor and consented to information-sharing and cooperation with the BNR. Financial holding companies and banking groups need their own licence (Article 10), branches of foreign banks are subject to specific BNR rules (Article 11), and a foreign bank may open a **representative office** only with BNR authorisation (Article 12). The BNR publishes the list of licensed banks, holding companies and representative offices, and each must display its licence at its principal place of business (Article 13).

Under Article 14 the BNR may revoke a licence if, among other grounds, the bank has not started operations within **six months** of the licence, has ceased operations for more than one month, obtained the licence on false information, no longer meets the licensing criteria, is used for money laundering or terrorist financing, or conducts business against the interests of depositors and the public.

Licensing a bank: capital, fees and timelines at 10 October 2026

Item	Requirement	Source
Minimum paid-up cash capital: commercial bank	RWF 20,000,000,000	Regulation N° 2310/2018-00013 of 27/12/2018
Minimum paid-up cash capital: development bank	RWF 50,000,000,000	Regulation N° 2310/2018-00013
Minimum paid-up cash capital: cooperative bank or mortgage bank	RWF 10,000,000,000	Regulation N° 2310/2018-00013
Licence fee	RWF 5,000,000	Regulation N° 2310/2018-00013
Annual supervision fee	0.5% of gross income of the previous financial year (minimum RWF 5,000,000), 0.05% on gross income above RWF 20 billion, paid within four months after the year end	Regulation N° 2310/2018-00013
Completeness letter after filing	Within 10 working days of receipt (Article 13)	Regulation N° 2310/2018-00013
Decision on a complete application	Within one month; if delayed, reasons given within 15 days and a final decision within three months (Article 15)	Regulation N° 2310/2018-00013
Start of operations	Within six months of the licence, or the licence may be revoked	Article 14, Law N° 044/2024
Ownership	No shareholder group above 25% without BNR authorisation; prior authorisation for any significant holding	Articles 20 and 21, Law N° 044/2024

Owning a bank: the 25% cap, significant holdings and dividends

Article 20 of the Banking Law is the provision that shapes every bank investment. A natural person with related parties, or a body corporate with related parties or entities controlled by the same person, must not directly or indirectly own or acquire more than **25% of the shares** of a bank, unless it is a reputable financial institution, a reputable public company, a foreign government, an international institution or another person authorised by the BNR on conditions the Bank sets. The cap does not apply to the Government of Rwanda and its organs. Shares held in breach of the cap give no right to vote or to receive dividends. In practice a foreign banking group acquiring or establishing a Rwandan subsidiary seeks the BNR's authorisation to exceed 25% as part of the licence or acquisition approval, and a private equity investor or family office should expect to be held to the cap unless it can show it falls within one of the categories.

Article 21 adds a separate approval for changes of control. No one may acquire or transfer, directly or indirectly, a **significant holding** or controlling interest in a bank without the BNR's prior authorisation; a holding acquired without approval is void, and the acquirer loses its rights to dividends, votes and other rights attached to the shares. Under Article 22 the bank itself must obtain prior authorisation where a

transfer or increase would take a holding to or beyond the supervisory thresholds set by BNR regulation, and under Article 23 the BNR may reject a proposal that would compromise the bank's management or soundness, give rise to undue influence or substantially lessen competition, jeopardise depositors or hinder effective supervision. The acquisition of a payment service provider or payment system operator has its own regime under Regulations N° 94/2026 of 11/05/2026. Any acquisition plan therefore needs the regulatory timetable built into the share purchase agreement as a condition precedent; the wider deal process is in [Acquiring a Rwandan company](#).

Two further rules matter to shareholders. Under Article 28, a bank may not declare, pay or transfer abroad a dividend until its capitalised and preliminary expenses have been written off, its capital buffers have been considered and adequate provisions have been made for non-performing loans to the satisfaction of the BNR; bonus shares issued out of profits count as dividends, and every proposed dividend must be notified to the BNR. Under Article 29, transactions with related parties must be on the same terms the bank offers the public, and Article 30 prevents a bank lending to a shareholder against the security of that shareholder's own shares in the bank.

The market in 2026

The BNR's list of supervised banks, last published in 2024, names I&M Bank, Bank of Kigali, BPR, GT Bank, Ecobank, Access Bank, Equity Bank, Bank of Africa and NCBA as commercial banks, the Development Bank of Rwanda (BRD) as the development bank and Zigama CSS as the cooperative bank; the list is the authoritative source and should be checked on the BNR's website before choosing a bank, since banks merge and change names. A United States government guide of March 2026 reports that the five largest banks hold about three-quarters of banking assets. The BNR's Financial Stability Report of June 2026 describes a well-capitalised and liquid system: a capital adequacy ratio of 21.9% against what the report calls a regulatory minimum of 15%, a non-performing loan ratio of 2.5% at December 2025, domestic deposits funding 80.3% of bank liabilities, and foreign-currency loans making up 27.6% of loans in March 2026 with a non-performing ratio of only 0.2%.

Outside the banks, the BNR supervises deposit-taking microfinance institutions under Law N° 072/2021 of 05/11/2021, insurers under Law N° 030/2021 of 30/06/2021, payment service providers under Law N° 061/2021 of 14/10/2021 governing the payment system and Regulation N° 74/2023 of 18/09/2023, and non-deposit-taking financial services providers under Regulations N° 96/2026 of 07/07/2026, published on 17 July 2026, which replaced the 2023 regulation and group them in three categories covering, among others, mortgage and development finance, credit guarantees, asset finance, finance leases, factoring, money lending, pawnshops, debt collection, credit intermediaries and peer-to-peer lending platforms. Trust and company service providers are supervised under Article 7(d) of the Central Bank Law. The BNR's Annual Report for 2024/25 counts 152 non-deposit-taking financial services providers, among them 110 lenders and 19 trust and company service providers, and 39 payment service providers. Payment licensing is covered in [Payments, currency and mobile money](#).

Deposit protection

Deposits with banks and deposit-taking microfinance institutions are protected by the Deposit Guarantee Fund under **Law N° 039/2024 of 22/03/2024 establishing the Deposit Guarantee Fund**, published on 9 April 2024, and **Regulations N° 93/2025 of 07/11/2025 on operations of the deposit**

guarantee fund, published on 25 November 2025, which replaced the 2016 regulation. The maximum cover is **RWF 1,000,000 per insured depositor**, aggregating all eligible deposits held in the same right or capacity, including accrued interest and after netting any amounts the depositor owes the failed institution (Article 3). Current, savings and term deposits are all covered. A foreign-currency account is insured up to the same limit, and compensation is paid in Rwandan francs at the BNR's average exchange rate on the date liquidation is declared (Article 4). Member institutions pay a premium of 0.1% of eligible deposits a year, in quarterly instalments of 0.025% within 15 days after each quarter (Articles 6 and 7), and a depositor must claim within two years of the declaration of liquidation unless prevented by reasons beyond its control (Article 15).

For a business the guarantee is a token: a company's operating balances will almost always exceed RWF 1,000,000, so its real protection lies in the soundness of the bank, the BNR's supervision and the ranking of deposits in a bank resolution, which the Banking Law addresses in its chapter on recovery and resolution. A treasury policy that spreads large balances across two or more banks, holds surplus funds in Treasury securities or uses the parent's own banks abroad for amounts not needed locally is a sensible response. Funds needed for imports and payments abroad may be held in a foreign-currency account in Rwanda, which is permitted for residents and non-residents alike (Opening corporate bank accounts).

Licensing a bank or other financial business: the sequence

1 Identify the activity and the regulator

Taking deposits needs a banking or deposit-taking microfinance licence from the BNR; lending without deposits falls under Regulations N° 96/2026; payments and e-money under Regulation N° 74/2023; securities, funds and virtual assets under the CMA.

2 Settle the ownership structure

Check the 25% cap in Article 20 of the Banking Law and, for a foreign bank, obtain the home supervisor's non-objection and consent to information-sharing required by Article 9.

3 Prepare the application file

Business plan and financial projections, proof of paid-up capital, beneficial ownership declarations, fit-and-proper information on shareholders, directors and senior managers, and the governance and internal control framework.

4 File and await the completeness letter

For a bank, the BNR replies within 10 working days stating whether the file is complete and setting a deadline to cure any gaps (Article 13 of Regulation N° 2310/2018-00013).

5 Assessment and decision

The BNR decides within one month of a complete application or explains the delay within 15 days, with a final decision within three months (Article 15); the licence fee is RWF 5 million.

6 Register, capitalise and open

Incorporate or register with RDB, pay in the capital, obtain any investment certificate, and start operations within six months of the licence to avoid revocation under Article 14 of the Banking Law.

7 Ongoing compliance

Pay the annual supervision fee within four months after the year end, report to the BNR, notify dividend proposals and seek prior approval for changes in significant holdings.

DECISION GUIDE

Which regulator licenses this activity?

A first screen for an investor planning a financial business in Rwanda. Answer in order and confirm with the regulator before committing capital.

Q1 Will the business accept deposits from the public?

Yes A banking licence under Law N° 044/2024 or a deposit-taking microfinance licence under Law N° 072/2021, both from the BNR, with minimum capital and the 25% ownership cap for banks.

No Continue to Q2.

Q2 Will it lend, lease, factor, guarantee credit or run a lending platform without taking deposits?

Yes A licence as a non-deposit-taking financial services provider from the BNR under Regulations N° 96/2026 of 07/07/2026.

No Continue to Q3.

Q3 Will it issue electronic money, acquire card payments, aggregate payments, remit money or offer payment initiation or account information services?

Yes A payment service provider licence from the BNR under Regulation N° 74/2023, in Category I to IV with minimum capital of RWF 30 million to RWF 300 million.

No Continue to Q4.

Q4 Will it issue or deal in securities, manage a collective investment scheme, act as a trustee business or run a virtual asset business?

Yes A licence or approval from the Capital Market Authority under the capital market, collective investment scheme, trusts or virtual asset laws.

No Continue to Q5.

Q5 Will it buy and sell foreign currency for customers?

Yes

Only licensed intermediaries may deal in foreign exchange: a bank, a deposit-taking microfinance institution or a forex bureau licensed under Regulation N° 2310/2018-00015.

No

No financial licence may be needed, but check whether the business prices or takes payment in foreign currency, which needs BNR authorisation unless it is a deemed dealer.

WORKED EXAMPLE

Capital and recurring regulatory costs of a new commercial bank

A foreign banking group establishes a wholly owned commercial bank subsidiary in Kigali. Figures are illustrative.

Ownership	100% held by the group, above the 25% cap in Article 20, so the BNR must authorise the group as a reputable financial institution when it grants the licence.
Minimum paid-up cash capital	RWF 20,000,000,000, paid in cash before the licence is granted.
Licence fee	RWF 5,000,000.
Supervision fee in year 2, gross income RWF 12,000,000,000	$0.5\% \times \text{RWF } 12,000,000,000 = \text{RWF } 60,000,000$, paid within four months after the year end.
Supervision fee in year 5, gross income RWF 30,000,000,000	$0.5\% \times \text{RWF } 20,000,000,000 = \text{RWF } 100,000,000$, plus $0.05\% \times \text{RWF } 10,000,000,000 = \text{RWF } 5,000,000$; total RWF 105,000,000.
Deposit guarantee premium, eligible deposits RWF 200,000,000,000	0.1% a year = RWF 200,000,000, paid as 0.025% (RWF 50,000,000) within 15 days after each quarter.
Dividends	No dividend may be paid or transferred abroad until preliminary expenses are written off and NPL provisions are adequate (Article 28); dividends then bear 15% withholding tax unless reduced.

The capital figure is a minimum; the BNR may require more to support the planned balance sheet and its capital adequacy requirements.

Corporate income tax, withholding tax and the excise duty on financial transaction commissions are separate costs, covered in the tax chapter.

Questions investors ask

Who regulates banks in Rwanda?

The National Bank of Rwanda (BNR), under Law N° 033/2026 of 24/07/2026 governing the National Bank of Rwanda and Law N° 044/2024 of 30/05/2024 governing banks. It licenses and supervises banks, microfinance institutions, insurers, payment providers, non-deposit lenders, forex bureaus and trust and company service providers. The Capital Market Authority regulates securities, funds and virtual assets.

Can a foreign investor own 100% of a Rwandan bank?

Only with BNR authorisation. Article 20 of Law N° 044/2024 caps any shareholder group at 25% of a bank's shares unless the BNR authorises a reputable financial institution, reputable public company, foreign government, international institution or other approved person. Shares held in breach carry no voting or dividend rights.

What is the minimum capital for a bank in Rwanda?

Under Regulation N° 2310/2018-00013 of 27/12/2018, RWF 20 billion of paid-up cash capital for a commercial bank, RWF 50 billion for a development bank and RWF 10 billion for a cooperative or mortgage bank. The licence fee is RWF 5 million, and the annual supervision fee is 0.5% of gross income.

How much of a deposit is guaranteed if a Rwandan bank fails?

Up to RWF 1,000,000 per depositor, aggregated across accounts held in the same capacity, under Regulations N° 93/2025 of 07/11/2025. Foreign-currency deposits are covered within the same limit and paid in Rwandan francs at the BNR average rate on the date liquidation is declared. Claims must be made within two years.

Can a foreign bank open a branch or representative office in Rwanda?

Yes, with BNR authorisation. Under Article 9 of Law N° 044/2024 a subsidiary or branch needs a parent licensed at home, consolidated home supervision, a non-objection from the home supervisor and consent to information-sharing. A representative office needs separate authorisation under Article 12 and may not take deposits.

Is the 2026 central bank law a change for investors?

Law N° 033/2026 restates the BNR's powers and keeps the presumption that obligations in Rwanda are expressed and settled in Rwandan francs, now without the old exception for currency lawfully agreed between the parties. Existing BNR regulations still cite the 2017 laws, so replacement instruments are likely and should be watched.

THE 2027 HORIZON

- Law N° 033/2026 came into force on 24 July 2026 while the BNR's main regulations, including those on bank licensing and foreign exchange, were made under the repealed 2017 laws; watch the BNR's website and the Official Gazette for restated regulations, since a new licensing or capital regulation would change the figures in this section.
- The draft Capital Market Business Bill published in August 2025 would replace the 2011 capital market law, adding a regulatory sandbox, Islamic securities and recognition of foreign rating agencies; its enactment had not been confirmed at 10 October 2026.
- The 15% excise duty on amounts or commissions charged on financial transactions in Law N° 011/2025 of 27/05/2025 is reported by commercial sources to start on 1 July 2027 under ministerial guidance not published in the Gazette; banks' fee structures for corporate clients may change when it applies.
- The BNR's published documents include a National Financial Inclusion Roadmap for 2026 to 2030 and a central bank digital currency proof-of-concept report of February 2026; neither changes the licensing rules yet, but both point to further payment and fintech regulation.

Terms you will meet in the documents

English	Kinyarwanda	French	Meaning
National Bank of Rwanda	<i>Banki Nkuru y'u Rwanda</i>	<i>Banque Nationale du Rwanda</i>	The central bank and prudential supervisor, governed by Law N° 033/2026; abbreviated NBR in the English text and BNR in Kinyarwanda.
Banking licence	<i>Uruhushya rwo gukora imirimo y'amabanki</i>	<i>Licence bancaire</i>	The BNR's authorisation to carry on banking business (Article 7 of Law N° 044/2024).
Significant holding	<i>Uruhare rugaragara</i>	<i>Participation significative</i>	A shareholding in a bank whose acquisition or transfer needs prior BNR authorisation (Article 21).
Representative office of a foreign bank	<i>Ibiro bihagarariye banki y'inyamahanga</i>	<i>Bureau de représentation d'une banque étrangère</i>	A non-deposit-taking office of a foreign bank, opened only with BNR authorisation (Article 12).
Subsidiary or branch of a foreign bank	—	<i>Filiale ou branche d'une banque étrangère</i>	A Rwandan bank owned by, or an establishment of, a foreign bank, licensed under the extra conditions of Article 9.
Deposit Guarantee Fund	<i>Ikigega cy'ubwishingizi bw'amafaranga yabikijwe</i>	<i>Fonds de garantie des dépôts</i>	The BNR-managed fund that compensates depositors up to RWF 1,000,000 when a member institution is liquidated.

English	Kinyarwanda	French	Meaning
Foreign exchange market	<i>Isoko ry'ivunjisha</i>	<i>Marché des changes</i>	The market the BNR organises and regulates under Article 45 of Law N° 033/2026.
Trust and company service providers	<i>Abatanga serivisi mu bwizerane no mu masosiyete y'ubucuruzi</i>	<i>Prestataires de services aux fiducies et aux sociétés</i>	Businesses forming and administering companies and trusts, supervised by the BNR (Article 7(d)).
Payment systems	<i>Uburyo bwo kwishyurana</i>	<i>Systèmes de paiement</i>	Clearing and settlement arrangements the BNR supervises and oversees (Article 7(e)).

FOREIGN V RWANDAN INVESTOR

The Banking Law applies the same licensing preconditions, capital requirements and 25% ownership cap to foreign and Rwandan investors alike; the only shareholder exempt from the cap is the Government of Rwanda and its organs. A foreign bank faces the additional conditions in Article 9, home-country licensing, consolidated supervision and the home supervisor's non-objection, because the BNR must be able to rely on and exchange information with the parent's supervisor. The provisions reviewed draw no separate distinction for nationals or banks of other East African Community or COMESA states, although EAC and other regional agreements may shape supervisory cooperation in practice. The deposit guarantee protects every insured depositor up to RWF 1,000,000 regardless of nationality or residence, including in foreign-currency accounts.

WATCH OUT FOR

- Buying more than 25% of a bank, or any significant holding, without prior BNR authorisation: the holding is void and carries no votes or dividends.
- Leaving large operating balances in one bank: the deposit guarantee covers only RWF 1,000,000 per depositor.
- Planning dividends from a new bank too early: Article 28 bars dividends and transfers abroad until preliminary expenses are written off and provisions are adequate.
- Delays in opening after licensing: a licence may be revoked if operations do not start within six months.
- Relying on a BNR regulation made under the repealed 2017 laws without checking whether it has been restated under Law N° 033/2026.
- Offering currency exchange, lending or payment services as a side line without the matching licence.

OFFICIAL SOURCES

- National Bank of Rwanda: Law N° 033/2026 of 24/07/2026 governing the National Bank of Rwanda — https://www.bnr.rw/documents/Law_governing_NBR_2026.pdf
- National Bank of Rwanda: Law N° 044/2024 of 30/05/2024 governing banks — https://www.bnr.rw/documents/Banking_Law_2024_yMYGT82.pdf
- National Bank of Rwanda: Regulation N° 2310/2018-00013 of 27/12/2018 on licensing conditions of banks — https://www.bnr.rw/documents/REGULATION_ON_LICENSING_CONDITIONS_OF_BANKS_.pdf
- National Bank of Rwanda: Regulations N° 93/2025 of 07/11/2025 on operations of the deposit guarantee fund — https://www.bnr.rw/documents/DGF_REGULATION_2025..pdf
- National Bank of Rwanda: Annual Financial Stability Report, June 2026 — https://www.bnr.rw/documents/Annual_Financial_Stability_Report__June_2026.pdf
- Capital Market Authority: laws governing the capital market — <https://www.cma.rw/regulatory-framework/laws>

Foreign exchange rules and the Rwandan-franc rule: a liberalised capital account under Regulation N° 42/2022, foreign-currency accounts, the 2025 ban on pricing and transacting in foreign currency inside Rwanda with fines of RWF 5 million to 100% of the amount, the businesses deemed authorised by Directive N° 4230/2025-00042, and how to apply to the BNR for permission

Reviewed 10 October 2026 · Prepared by a commercial lawyer with over 30 years' international experience · Legal and tax information, not legal advice · [How we check](#) · [Open in the app](#)

WHAT YOU NEED TO KNOW

- Under Article 39(6) of Law N° 033/2026 of 24/07/2026 governing the National Bank of Rwanda, any monetary obligation or transaction entered into in Rwanda is presumed to be expressed and settled in the Rwandan franc unless other laws provide otherwise; the previous allowance for a currency lawfully agreed between the parties no longer appears.
- Regulation N° 42/2022 of 13/04/2022 governing foreign exchange operations fully liberalises inward and outward direct investment and liberalises portfolio investment (Article 25), lets residents and non-residents open freely operated foreign-currency accounts (Articles 10 and 11), lets residents hold accounts abroad (Article 12) and requires all payments to non-residents to pass through licensed intermediaries or the National Bank of Rwanda (BNR) (Article 20).
- Regulations N° 89/2025 of 23/05/2025, published in the Official Gazette of 30 May 2025, define pricing in foreign currency to include displaying, quoting, advertising, requesting, invoicing and fixing contract prices in foreign currency, permit payment in foreign currency for goods or services exported or imported (Article 20 bis), and fine unauthorised pricing RWF 5,000,000 (RWF 10,000,000 on a repeat) and unauthorised transacting 50% of the amount (100% on a repeat) (Article 34).
- An unpaid sanction is reported to the Credit Bureau after 15 days from notification and accrues 1% of the sanction per day of delay (Article 34(5)), the fines also apply to licensed intermediaries and authorised dealers pricing or transacting in foreign currency with a resident (Article 34(4)), and every person must report unauthorised foreign exchange operations to the BNR (Article 37 bis).
- Directive N° 4230/2025-00042 [613] of 17/09/2025 deems listed businesses authorised to transact in foreign currency, including RDB-licensed tourism entities and travel agencies, real estate companies whose RDB investment certificate approves foreign-currency transactions, KIFC entities recommended by Rwanda Finance Limited, mining operators trading in minerals, international schools and duty-free shops (Article 4); others apply through e-correspondence.bnr.rw for a decision within 20 working days, extendable once by 10, after which silence counts as approval.

Open at the border, Rwandan francs at home

Rwanda's foreign exchange regime has two halves that point in opposite directions. For money crossing the border the regime is liberal: there is no approval for inward or outward direct investment, residents may borrow abroad, and banks pay imports, dividends, interest and fees abroad against documents. For money changing hands inside Rwanda the regime is strict: prices must be set, and payments made, in Rwandan francs unless the business falls within an exception or holds a permission from the **National Bank of Rwanda (BNR)**. Since May 2025 the second half has been enforced with fines calculated on the value of the deal, and since September 2025 the exceptions have been set out in a directive. A foreign investor who understands the first half but not the second is the investor most likely to be fined.

The legal sources are Article 39(6) of **Law N° 033/2026 of 24/07/2026 governing the National Bank of Rwanda** (the Central Bank Law), **Regulation N° 42/2022 of 13/04/2022 governing foreign exchange operations**, published in the Official Gazette n° 16 bis of 18/04/2022 (the FX Regulation), **Regulations N° 89/2025 of 23/05/2025** amending it, published in the Official Gazette n° Special of 30/05/2025 and in force on publication (the 2025 Amendments), and **Directive N° 4230/2025-00042 [613] of 17/09/2025 governing persons authorized to transact in foreign currencies and the requirements for obtaining authorization** (the Directive), which replaced Directive N° 0520/2023-00041 of 22/02/2023 and took effect on signature. The BNR makes these instruments under its power to organise and manage the foreign exchange market (Article 45 of the Central Bank Law). The FX Regulation and the Directive cite the repealed 2017 central bank law; the BNR continues to publish and apply them.

The Rwandan-franc rule

Article 39(6) of the Central Bank Law provides that any monetary obligation or transaction entered into in the Republic of Rwanda is presumed to be expressed and settled in the Rwandan franc, unless otherwise provided for by other laws. The 2017 law, as quoted in the BNR's public notice of 29 December 2023, also allowed obligations in another currency where lawfully agreed between the parties; that allowance is not in the 2026 text, and the Directive describes the Rwandan franc as the only legal tender. The FX Regulation builds on the presumption: Article 4 requires a person who is not a licensed intermediary to apply to the BNR for authorisation to transact in foreign currency according to the needs and type of its business, and requires foreign currency it receives to be credited to a foreign-currency account, sold to a licensed intermediary or used to settle external obligations through an authorised financial institution. Article 32 prohibits pricing goods and services in foreign currency except as the Regulation provides.

The consequence is that the currency clause of a contract between two Rwandan residents is no longer a matter of free choice. A lease, supply contract, service agreement or employment contract performed in Rwanda between residents should state its price in Rwandan francs unless one of the parties is permitted to transact in foreign currency. An indexation clause that fixes a franc price by reference to a dollar amount at the date of each invoice deserves care: the 2025 definition of pricing covers "any other activities intended to inform the client of the price in foreign currency", so a clause whose effect is to quote a dollar price may be treated as pricing in foreign currency.

A liberalised capital account

The FX Regulation states in Article 1 that it aims at the liberalisation of the capital account. Capital account operations are defined in Article 2(2°) to include direct investment, equity and portfolio investment, bank and credit transactions, payment of interest and amortisation, dividends and other income on investments, repatriation of the proceeds of sale of assets and other investment flows. Under **Article 25**, inward and outward transactions on direct investment are **fully liberalised** and portfolio investment between residents and non-residents is liberalised, but before repatriating a return on investment a licensed intermediary must request relevant supporting documents. Residents may freely contract foreign-currency loans from non-residents (Article 26), described in [Offshore loans and external borrowing](#).

Current payments are equally open but documented. Importers may pay without limit for goods imported under a documentary credit, for goods already imported, and in advance against an import contract or other evidence that prepayment is required (Article 14), producing the customs bill of entry, final invoice and delivery note (Articles 15 to 17). Banks may transfer net salaries of expatriates after tax and social security contributions (Article 23), and dividends, directors' and managers' fees, foreign consultants' fees, royalties, interest, repair costs, card payments, reinsurance, airline reimbursements, advertising, hire and leasing costs, transport, memberships, communications and training costs and VAT refunds, on presentation of supporting documents indicating the source of the funds (Article 24). Personal transfers such as gifts, inheritances, emigrants' assets and refunds are allowed on documentary evidence (Article 28). **Article 20** requires all payments to non-residents and all transfers to or from abroad by residents to be made through licensed intermediaries or the BNR, and under Article 33 the BNR may prohibit transfers abroad to meet Rwanda's international obligations. How these rules apply to dividends and exit proceeds is in [Repatriating profits and capital](#).

Accounts, dealing and residence

Residents and non-residents may open and operate **foreign-currency accounts** with banks and deposit-taking microfinance institutions, which apply the anti-money-laundering know-your-customer rules (Article 10); the accounts may be freely debited and credited, with the reason for each withdrawal recorded for statistical purposes (Article 11). A non-resident account is an account held with a licensed bank or deposit-taking microfinance institution by a non-resident individual or legal entity (Article 2(15°)). Banks and other BNR-regulated institutions may open accounts abroad within the BNR's prudential limits on foreign currency held in overseas accounts, other residents may also open and operate overseas accounts, and licensed intermediaries report transfers to such accounts to the BNR for statistical purposes (Article 12). Holding a foreign-currency account does not by itself permit a business to price or collect domestic sales in foreign currency.

Only **licensed intermediaries**, meaning licensed banks, deposit-taking microfinance institutions, forex bureaus and other institutions the BNR authorises, may carry on foreign exchange business (Articles 2(1°) and 3). They set their buying and selling rates freely but must display them on a rate board and their website (Article 5) and issue slips for every purchase and sale (Article 8). Buying or selling foreign currency where at least one party is not a licensed intermediary is prohibited (Article 29), as are currency auctions and other practices that distort the market (Article 30), and intermediaries may not carry cash abroad without BNR approval (Article 35). Forex bureaus are licensed under Regulation N°

2310/2018-00015 of 27/12/2018. Travellers crossing the border with cash or bearer negotiable instruments worth RWF 10,000,000 or more must declare them under Article 5 of Regulation N° 001/FIC/2023 of 26/06/2023 ([Anti-money-laundering and sanctions compliance](#)).

Every person is presumed resident for foreign exchange purposes unless the Regulation provides otherwise (Article 9). Since the 2025 Amendments, an individual is resident if he or she has a residence or domicile in Rwanda or is a Rwandan representing Rwanda abroad, and a legal entity or legal arrangement is resident if it is incorporated or registered according to Rwandan laws, has effective management functions in Rwanda or is a Rwandan Government entity. The 2022 text also treated individuals resident or domiciled in another East African Community state as residents; that limb has gone. A non-resident is an individual, legal entity or legal arrangement operating in Rwanda that is not a resident. A Rwandan subsidiary of a foreign group is therefore a resident, and a branch registered with the Rwanda Development Board (RDB) would appear to be one too, as an entity registered according to Rwandan law.

Pricing and transacting in foreign currency since May 2025

The 2025 Amendments define **pricing in foreign currency** as fixing the monetary value a seller receives for goods or services in foreign currency, including displaying prices, informing the client of the price verbally or in writing, marketing or advertising the price, requesting a client to pay, invoicing, fixing the price in a contract, and any other activity intended to inform the client of the price in foreign currency. **Transactions in foreign currency** means receiving payment in foreign currency derived from pricing in foreign currency. New **Article 20 bis** provides that payment in foreign currency for goods or services exported or imported is permitted, so an exporter may invoice its foreign buyer in dollars and an importer may pay its foreign supplier in dollars through its bank.

New **Article 34** makes it an administrative fault, without prejudice to criminal provisions or other laws, for a person not permitted by the BNR to price or transact in foreign currency, and sets fixed sanctions imposed by the BNR. The sanctions for transacting are expressed in Rwandan francs at the exchange rate of the day of the sanction (Article 34(2)). The same sanctions apply to licensed intermediaries and authorised dealers that price or transact in foreign currency with a resident (Article 34(4)), so a bank or a deemed dealer is not free to sell domestic goods or services to a Rwandan resident in dollars beyond what its own permission covers. A person who does not pay the sanction into the BNR's account within **15 days** of notification is reported to the **Credit Bureau** and owes a further 1% of the sanction for each day of delay until payment (Article 34(5)), and the BNR works with other institutions to enforce the rules (Article 34(6)). New **Article 37 bis** obliges every person to report to the BNR information in his or her possession on unauthorised foreign exchange operations and protects whistle-blowers. Under Article 11 of the Directive, the Rwanda Inspectorate, Competition and Consumer Protection Authority (RICA), the Rwanda National Police and local authorities support the BNR in enforcement.

The BNR announced the sanctions in a public notice of 16 June 2025. That notice described hotels, casinos, travel and tourism agencies, duty-free shops and international schools dealing with non-residents as exempt; the Directive of 17 September 2025, which is the later and more formal instrument, uses a different list that does not mention hotels as such and is not limited to dealings with non-residents. This guide follows the Directive.

Sanctions for unauthorised foreign-currency operations (Article 34, as amended by Regulations N° 89/2025)

Breach	First instance	Second instance and above
Pricing in foreign currency without BNR permission (displaying, quoting, advertising, requesting, invoicing or fixing a contract price)	RWF 5,000,000	RWF 10,000,000
Transacting in foreign currency without permission (receiving payment derived from foreign-currency pricing)	50% of the amount transacted, in Rwandan francs at the rate of the day of the sanction	100% of the amount transacted
Calling or taking part in a foreign-currency auction	50% of the total amount auctioned	50% of the total amount auctioned
Licensed intermediary or authorised dealer pricing or transacting in foreign currency with a resident outside its permission	Same as for pricing or transacting	Same as for pricing or transacting
Sanction unpaid 15 days after notification	Report to the Credit Bureau and 1% of the sanction per day of delay	Same

Businesses deemed authorised to transact in foreign currency

Article 4 of the Directive deems the following persons authorised to transact in foreign currency without applying: real estate companies holding an investment certificate approved by RDB to transact in foreign currency; tourism entities and travel agencies licensed by RDB; entities under the Kigali International Financial Centre (KIFC) regime recommended by Rwanda Finance Limited; the Kigali International Arbitration Centre (KIAC); mining operators trading in minerals; aviation and logistics service providers, air ticketing agencies and cross-border land and water transport operators; duty-free shops and casinos; international schools and universities; suppliers of goods and services to diplomatic missions and international organisations; expatriates authorised to work in Rwanda and persons serving entities that use foreign currency from abroad; suppliers to expatriates and to persons with foreign-sourced income; and any other person the BNR authorises. The KIFC regime is described in [Kigali International Financial Centre](#).

A deemed or authorised dealer remains subject to conditions. It may not refuse payment in Rwandan francs or compel a customer to pay in foreign currency unless the parties have agreed, and a price shown in foreign currency must also be shown in Rwandan francs at the BNR's daily average exchange

rate, without any surcharge for paying in francs (Articles 3(3) and 4(2) and (3) of the Directive). A hotel or lodge licensed by RDB as a tourism entity can therefore show room rates in dollars with the franc equivalent beside them, but must accept francs at the BNR rate from any guest who prefers them.

The Directive allowed persons with existing foreign-currency contracts outside the list six months from its publication to comply (Article 12). The Directive's publication in the Official Gazette has not been located, so the exact closing date is uncertain, but on any reading the period ended in the first half of 2026; contracts still priced in foreign currency between residents should now be converted to francs or covered by an authorisation.

Applying to the BNR for authorisation to transact in foreign currency

1 Check the deemed list first

If the business falls within Article 4 of the Directive, no application is needed, but keep the RDB licence or certificate, the Rwanda Finance Limited recommendation or other evidence of the category on file.

2 Prepare the application letter

Explain the business need for foreign currency, the expected foreign-currency inflows and outflows and the accounts held. An association may apply on behalf of its sector.

3 Attach the supporting documents

Where applicable: registration documents, a current tax clearance certificate from the Rwanda Revenue Authority (RRA), the agreements that involve foreign currency, financial statements for the last two years and a recommendation from RDB.

4 File through e-correspondence.bnr.rw

Applications go to the BNR's Non-Bank Financial Institutions Department through its electronic correspondence portal.

5 Acknowledgement and decision

The BNR acknowledges within 5 working days and decides within 20 working days; it may extend once by up to 10 working days, after which the absence of a reply means approval.

6 Comply with the conditions

Show franc equivalents at the BNR daily average rate, accept francs, keep records for 10 years and stay within the scope of the authorisation.

7 If revocation is proposed

The dealer has 10 working days to respond to the BNR and may appeal to the Governor within 10 working days of a revocation decision.

DECISION GUIDE

Can this business price or take payment in foreign currency?

A decision guide for a business operating in Rwanda. Answer in order; any 'no' at the last step means price and settle in Rwandan francs.

Q1 Is the payment for goods or services exported from Rwanda or imported into Rwanda?

Yes Permitted by Article 20 bis: invoice and settle in foreign currency through a licensed bank, keeping the export or import documents.

No Continue to Q2.

Q2 Is the business a licensed intermediary (bank, deposit-taking microfinance institution or forex bureau) acting within its licence?

Yes It may deal in foreign exchange, but Article 34(4) fines still apply if it prices or sells other goods or services to residents in foreign currency outside its permission.

No Continue to Q3.

Q3 Does it fall within a category in Article 4 of the Directive, such as an RDB-licensed tourism entity, a KIFC entity recommended by Rwanda Finance Limited, a mining operator trading in minerals or an international school?

Yes Deemed authorised: it may price and accept foreign currency, but must also show the franc price at the BNR daily average rate and accept francs.

No Continue to Q4.

Q4 Does it hold an individual BNR authorisation covering this activity?

Yes Transact within the authorisation and its conditions, and keep records for 10 years.

No Price, invoice and collect in Rwandan francs, or apply through e-correspondence.bnr.rw before quoting in foreign currency.

WORKED EXAMPLE

An office landlord quoting rent in dollars

A Rwandan property company without an investment certificate approving foreign-currency transactions leases office space in Kigali to a Rwandan-registered tenant at USD 10,000 a month and collects a year's rent of USD 120,000 into its dollar account. The exchange rate of RWF 1,450 to the dollar is illustrative, as are all figures.

Pricing breach	The lease fixes the price in dollars and the invoices are in dollars: pricing in foreign currency without permission, first instance RWF 5,000,000.
Transacting breach	USD 120,000 x RWF 1,450 = RWF 174,000,000 received; 50% for a first instance = RWF 87,000,000.
Late payment	If the RWF 87,000,000 is not paid within 15 days of notification, the company is reported to the Credit Bureau and owes 1% a day, RWF 870,000 for each day of delay.
Repeat	A second instance would cost RWF 10,000,000 for pricing and 100% of the amount transacted.
Compliant alternative	Price the lease at RWF 14,500,000 a month and collect in francs, or apply to the BNR, or, for a real estate investor, seek an RDB investment certificate approving foreign-currency transactions, which brings it within the deemed list.
The tenant	The fines target the person who prices and receives payment, so a tenant paying in dollars is not itself pricing; but it is bound by the franc presumption in Article 39(6), and Article 37 bis obliges any person aware of an unauthorised operation to report it to the BNR. A tenant should insist on a franc price.

Article 34(1) applies "without prejudice to penal provisions", so administrative fines do not exclude other liability.

The BNR applies the exchange rate of the day of the sanction to convert the amount transacted.

Questions investors ask

Does Rwanda have exchange controls?

Not on cross-border investment: Regulation N° 42/2022 fully liberalises direct investment and liberalises portfolio investment, and payments abroad go through banks against documents.

Inside Rwanda, however, obligations are presumed to be in Rwandan francs, and since Regulations N° 89/2025 pricing or transacting in foreign currency without BNR permission is fined.

Can a Rwandan company invoice its customers in US dollars?

Only for exports or imports, which Article 20 bis permits, or if it is a deemed dealer under Directive N° 4230/2025-00042 or holds a BNR authorisation. Otherwise invoicing in dollars is pricing in foreign currency, fined RWF 5,000,000, and collecting dollars is transacting, fined 50% of the amount for a first instance.

Who is automatically authorised to transact in foreign currency in Rwanda?

Article 4 of the Directive lists, among others, RDB-licensed tourism entities and travel agencies, real estate companies whose RDB investment certificate approves foreign-currency transactions, KIFC entities recommended by Rwanda Finance Limited, KIAC, mining operators trading in minerals, aviation and logistics providers, duty-free shops, casinos, international schools and suppliers to diplomatic missions.

How long does the BNR take to authorise foreign-currency transactions?

Under the Directive the BNR acknowledges an application within 5 working days and decides within 20 working days, with one extension of up to 10 working days. If it has not decided by then, the application is treated as approved. Some commercial summaries cite 25 working days; the Directive's text says 20.

Can my company hold a US dollar bank account in Rwanda?

Yes. Article 10 of Regulation N° 42/2022 lets residents and non-residents open foreign-currency accounts, freely debited and credited under Article 11, subject to know-your-customer checks. The account can receive export proceeds, capital and loans, but it does not authorise pricing or collecting domestic sales in foreign currency.

What happens if we do not pay a foreign-currency fine?

Under Article 34(5) of Regulation N° 42/2022, as amended, a person who does not pay within 15 days of notification is reported to the Credit Bureau and owes a further 1% of the sanction for each day of delay until full payment, which affects its access to credit.

Are EAC residents treated as Rwandan residents for foreign exchange?

No longer. The 2022 definition treated individuals resident or domiciled in another East African Community state as residents, but Regulations N° 89/2025 removed that limb. Residence now depends on residence or domicile in Rwanda, or, for entities, incorporation, registration or effective management in Rwanda.

THE 2027 HORIZON

- The FX Regulation and the Directive were made under the 2017 central bank law, repealed on 24 July 2026; watch for a restated foreign exchange regulation under Article 45 of Law N° 033/2026, which may consolidate the 2025 Amendments and the Directive.
- The BNR may add categories to the deemed list or issue sector authorisations on applications by associations; check the BNR's public notices before assuming a sector remains outside the list.
- The East African Community approved a Cross-Border Payment System Masterplan in May 2025; regional payment arrangements may change how cross-border trade settles, but the domestic franc rule is a matter of Rwandan law.
- Commercial reports of foreign-currency shortages suggest banks will continue to scrutinise the documents behind transfers abroad; no change to the documentary requirements in Articles 24 and 25 had been announced by 10 October 2026.

Terms you will meet in the documents

English	Kinyarwanda	French	Meaning
Pricing in foreign currency	<i>Gushyiraho igiciro mu madevise</i>	<i>Fixation du prix en devise</i>	Displaying, quoting, advertising, requesting, invoicing or fixing in a contract a price in foreign currency (Regulations N° 89/2025).
Transactions in foreign currency	<i>Ibikorwa by'ubucuruzi mu madevise</i>	<i>Transactions en devise</i>	Receiving payment in foreign currency derived from pricing in foreign currency.
Licensed intermediaries	<i>Abahuza bemewe</i>	<i>Intermédiaires agréés</i>	Licensed banks, deposit-taking microfinance institutions, forex bureaus and others the BNR authorises to deal in foreign exchange (Article 2(1°)).
Foreign currency account	<i>Konti y'amadevise</i>	<i>Compte en devises</i>	An account in foreign currency held with a bank or deposit-taking microfinance institution in Rwanda (Article 2(9°)).
Capital account operations	<i>Ibikorwa bya konti y'imari</i>	<i>Opérations du compte capital</i>	Investment, loans, interest, dividends, sale proceeds and other investment flows (Article 2(2°)).
Resident	<i>Utuye mu gihugu</i>	<i>Résident</i>	For foreign exchange, a person residing or domiciled in Rwanda, or an entity incorporated, registered or effectively managed in Rwanda.
Spot exchange rate	<i>Igipimo cy'ivunjisha rikozwe uwo mwanya</i>	<i>Taux de change au comptant</i>	The market rate for exchange with delivery within 48 hours (Article 2(8°)).

English	Kinyarwanda	French	Meaning
Foreign currency auction	—	<i>Vente aux enchères de devises</i>	Offering foreign currency by tender to obtain the best rate, prohibited and fined at 50% of the amount auctioned.
Legal tender	—	<i>Monnaie ayant cours légal</i>	The Rwandan franc, the monetary unit of Rwanda under Article 39 of Law N° 033/2026.

FOREIGN V RWANDAN INVESTOR

The foreign exchange rules turn on residence, not nationality. A company incorporated in Rwanda is a resident whether its shareholders are Rwandan or foreign, and it is bound by the franc rule and the fines in exactly the same way; a foreign investor's subsidiary has no greater freedom to price in dollars than a local competitor. Since the 2025 Amendments, individuals living in other East African Community states are non-residents, as are other foreigners without residence or domicile in Rwanda. Expatriates authorised to work in Rwanda are deemed dealers under Article 4 of the Directive, so they may be paid and may transact in foreign currency, and businesses supplying expatriates and persons with foreign-sourced income are also on the deemed list. For cross-border flows, foreign and Rwandan investors alike benefit from the liberalised capital account, and both must route payments abroad through licensed intermediaries.

WATCH OUT FOR

- Dollar prices on websites, price lists, quotations and emails to Rwandan customers: each is pricing in foreign currency, fined RWF 5,000,000 for a first instance.
- Contracts between residents still denominated in dollars after the Directive's six-month transition: collecting under them is transacting, fined at 50% to 100% of the amount.
- Assuming a dollar bank account permits dollar sales: it does not.
- Deemed dealers that refuse francs, charge a surcharge for paying in francs or omit the franc equivalent at the BNR daily average rate.
- Buying or selling currency with an unlicensed person, including informal street dealers: prohibited by Article 29, whatever the amount.
- Unpaid sanctions: after 15 days the BNR reports the business to the Credit Bureau and adds 1% a day.

OFFICIAL SOURCES

- National Bank of Rwanda: Regulation N° 42/2022 of 13/04/2022 governing foreign exchange operations — https://www.bnr.rw/documents/Regulations_governing_Foreign_Exchange_Operations_2022.pdf
- Official Gazette n° Special of 30/05/2025 (MINIJUST): Regulations N° 89/2025 of 23/05/2025 amending Regulation N° 42/2022 — <https://www.minijust.gov.rw/index.php?elD=dumpFile&t=f&f=130794&token=6f00e9b15aafacbcf8c4cdddad1bfcd2abf0b670>
- National Bank of Rwanda: Directive N° 4230/2025-00042 [613] of 17/09/2025 governing persons authorized to transact in foreign currencies — https://www.bnr.rw/documents/Directive_on_Foreign_Exchange_Operations.pdf
- National Bank of Rwanda: public notice of 16/06/2025 on pecuniary sanctions for unauthorized foreign exchange operations — https://www.bnr.rw/documents/Public_Notice-_Pecuniary_Sanctions_for_Unauthorized_Foreign_Exchange_Operations.pdf
- National Bank of Rwanda: Law N° 033/2026 of 24/07/2026 governing the National Bank of Rwanda, Articles 39 and 45 — https://www.bnr.rw/documents/Law_governing_NBR_2026.pdf

Opening corporate bank accounts: what a Rwandan bank must establish about your company under Law N° 001/2025 on money laundering, beneficial owners at 25%, Rwandan-franc, foreign-currency and non-resident accounts under Regulation N° 42/2022, enhanced checks for politically exposed persons and higher-risk countries, timing, refusal, and bringing in share capital with a clean paper trail

Reviewed 10 October 2026 · Prepared by a commercial lawyer with over 30 years' international experience · Legal and tax information, not legal advice · [How we check](#) · [Open in the app](#)

WHAT YOU NEED TO KNOW

- Under Article 10 of Regulation N° 42/2022 of 13/04/2022 governing foreign exchange operations, residents and non-residents may open foreign-currency accounts with banks and deposit-taking microfinance institutions, which must apply the anti-money-laundering know-your-customer requirements; the accounts may be freely debited and credited (Article 11), and a non-resident may also hold a non-resident account (Article 2(15°)).
- Articles 13 and 14 of Law N° 001/2025 of 22/01/2025 on the prevention and punishment of money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction require a bank to verify a company's name, legal form, proof of existence, binding powers, senior managers and registered office, to understand its business and ownership and control structure, to verify the authority and identity of those acting for it, and to identify its beneficial owners and the purpose of the relationship.
- A beneficial owner is a natural person holding 25% or more of the shares or voting rights, directly or indirectly, under Instructions of the Registrar General N° 001/2023/RG of 31/03/2023; failing such a person, the bank looks to whoever controls the company by other means and then to its senior managing official (Article 14(2) of Law N° 001/2025).
- A bank may complete verification after opening the account only if it does so as soon as reasonably practicable, it is essential not to interrupt business and the risks are managed (Article 16); if due diligence cannot be completed it must not open the account and must consider a suspicious transaction report (Article 19); records are kept for 10 years (Article 21).
- For a foreign politically exposed person, the bank must obtain senior management approval, establish the source of wealth and funds and monitor the relationship more closely (Article 22), and it must apply enhanced due diligence to persons from countries for which the Financial Action Task Force calls for it (Article 31).

Why the account comes first

A company registered in Rwanda cannot function without a local bank account. It needs one to receive its share capital and shareholder loans, to pay the Rwanda Revenue Authority (RRA), the Rwanda Social Security Board (RSSB) and its staff, and to make any payment abroad, because Article 20 of **Regulation N° 42/2022 of 13/04/2022 governing foreign exchange operations** (the FX Regulation) requires all payments to non-residents and all transfers to or from abroad by residents to pass through licensed intermediaries or the National Bank of Rwanda (BNR). The account is also where the evidence of the original investment is created: the bank's credit advice for the incoming capital is the first document a bank will ask for, years later, when the investor wants to repatriate that capital under Article 12 of Law N° 006/2021 of 05/02/2021 on Investment Promotion and Facilitation ([FAQ 70](#)).

No Rwandan law prescribes which bank a company must use or how long account opening may take. The account is opened after the company has been registered with the Rwanda Development Board (RDB), since the bank needs the registration certificate and the company code that serves as its tax identification number; the registration steps are in [Registering a company with RDB step by step](#). A branch of a foreign company follows the same route once registered ([Branches of foreign companies](#)). The licensed banks and the market are described in [The financial system and regulators](#).

The legal framework

Account opening is governed by **Law N° 001/2025 of 22/01/2025 on the prevention and punishment of money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction** (the AML Law), published in the Official Gazette n° Special Bis of 22/01/2025, which repealed Law N° 028/2023 of 19/05/2023 (Article 75). Banks and other financial institutions are reporting persons under Article 8, supervised for these purposes by the BNR. The detailed rules are in Regulations N° 002/FIC/2026 of 22/06/2026 of the Financial Intelligence Centre (FIC), published in the Official Gazette n° 25 Bis of 22/06/2026, which replaced the 2023 regulations, and the threshold for identifying beneficial owners is set by Instructions of the Registrar General N° 001/2023/RG of 31/03/2023. The wider anti-money-laundering regime, including suspicious transaction reporting and sanctions screening, is covered in [Anti-money-laundering and sanctions compliance](#).

Under Article 12 of the AML Law, a bank must carry out customer due diligence when it establishes a business relationship, when it suspects money laundering or terrorist financing regardless of any threshold, when it doubts the accuracy of identification data it already holds, and when an occasional customer carries out a transaction at or above the FIC's thresholds, which Article 15 of Regulations N° 002/FIC/2026 sets at RWF 10,000,000, or RWF 1,000,000 for wire transfers, with linked transactions added together. The FX Regulation adds that banks opening foreign-currency accounts must comply with the anti-money-laundering requirements (Article 10) and that licensed intermediaries may request from customers any information they consider necessary for their duties, while keeping transactions confidential (Article 36).

What the bank must establish about your company

Article 13 sets the measures for every customer. The bank must identify the customer and verify its identity using reliable, independent documents, data or information; verify that any person acting on the customer's behalf is authorised and identify and verify that person; identify the **beneficial owner** and take reasonable measures to verify his or her identity, so that the bank is satisfied it knows who the beneficial owner is; understand the purpose and intended nature of the relationship; and conduct ongoing due diligence, scrutinising transactions for consistency with what it knows of the customer, its business, its risk profile and, where necessary, its source of funds, and keeping its records up to date.

For a company, Article 14 requires the bank to understand the nature of the customer's business and its ownership and control structure, and to verify its identity through its name, legal form and proof of existence; the powers that regulate and bind it and the names of the persons in senior management; and the address of its registered office and, if different, its principal place of business. For each individual involved, whether director, signatory or beneficial owner, Article 13(1)(f) requires full legal and other names, telephone number and email address, date and place of birth, nationality, occupation, any public position held or the name of the employer, and residence and domicile address. The name and identifying number are verified against an **unexpired official document bearing a photograph** of the person, with signature and other documentary evidence specified by the supervisor (Article 13(2)). A company must also authorise the bank to provide its basic and beneficial ownership information to the competent authorities (Article 14(4)).

The bank applies a risk-based approach. It must perform enhanced due diligence where higher risks are identified and may apply simplified measures where risks are lower (Article 18), and it must review existing customers at appropriate times, in particular when the identity of the customer or its beneficial owner changes or transactions no longer fit its profile (Article 17). A change of shareholder, director or signatory is therefore something to tell the bank promptly, not only RDB.

Beneficial owners

The AML Law defines a beneficial owner as a natural person who ultimately owns or controls a customer, or on whose behalf a transaction is conducted, including a person who exercises ultimate effective control over a legal person or arrangement (Article 2(x)). Instructions N° 001/2023/RG fix the ownership threshold at **25% of the shares or voting rights**, held directly or indirectly. Article 14(2) of the AML Law sets the cascade a bank follows: first, the natural persons with a controlling ownership interest; second, where there is doubt or no one controls through ownership, the natural persons controlling the company by other means; and third, where no one is identified, the natural person who holds the position of senior managing official. For a trust the bank identifies the settlor, trustee, protector, beneficiaries or class of beneficiaries and anyone with ultimate effective control (Article 14(3)).

The same information is held by the Registrar General. Article 35 of the AML Law requires the registration authority to keep adequate, accurate and updated beneficial ownership information that is publicly available in a timely manner, and companies must file and update their beneficial owners with RDB, as explained in [Beneficial ownership and transparency](#). Banks compare what they are told with the

register, and a mismatch is one of the most common reasons for delay. A group structure chart showing every intermediate holding company, its jurisdiction and the percentages held, down to the individuals at 25% or more, saves time at both RDB and the bank.

Accounts a Rwandan company and its foreign investors may hold

Account	Who may hold it	Legal basis	Practical points
Rwandan-franc current account	Any resident company or branch	Banking practice; AML Law due diligence	Used for tax, RSSB, payroll and domestic suppliers, all of which are settled in francs.
Foreign-currency account in Rwanda	Residents and non-residents	Articles 10 and 11 of the FX Regulation	Freely debited and credited; suits capital inflows, loans, export proceeds and import payments, but does not authorise pricing domestic sales in foreign currency.
Non-resident account	Non-resident individuals and legal entities	Article 2(15°) of the FX Regulation	A foreign parent or investor may hold an account in Rwanda, subject to the same due diligence.
Account abroad held by a Rwandan resident	Any resident; banks and other BNR-regulated institutions only within the BNR's prudential limits	Article 12 of the FX Regulation	Transfers to it go through a licensed intermediary, which reports them to the BNR for statistics.
Mobile-money wallet or merchant account	Persons onboarded by a licensed payment service provider	Law N° 061/2021 and Regulation N° 74/2023	Useful for collections from consumers; covered in the payments section.

Foreign-owned companies, politically exposed persons and higher-risk countries

Nothing in the AML Law imposes extra requirements merely because a company's owners are foreign, but foreign ownership changes the bank's risk assessment and the documents it needs. Corporate shareholders abroad must be identified and their own ownership traced to the individuals at the top, and their constitutional documents usually need to be certified or notarised, which is also required for registration with RDB. Banks often ask for evidence of the source of the funds to be invested, such as the shareholder's audited accounts, a bank statement showing the funds or a board resolution approving the investment, because they must be able to explain the money arriving in the account ([FAQ 69](#)).

Article 22 requires a bank to have systems to determine whether a customer or beneficial owner is a **politically exposed person**. For a foreign politically exposed person, including family members and close associates, the bank must obtain senior management approval before establishing or continuing the relationship, take reasonable measures to establish the source of wealth and the source of funds, and conduct enhanced ongoing monitoring; for a domestic or international organisation politically

exposed person, those measures apply where the relationship is higher risk. An Order of the Minister determines who is considered a politically exposed person (Article 22(6)). Under Article 31, banks apply enhanced due diligence, proportionate to the risk, to persons and financial institutions from countries for which the Financial Action Task Force (FATF) calls for it, and the FIC may set countermeasures. An investor with a minister, senior official or state-owned enterprise in its ownership chain, or with funds coming from a jurisdiction on the FATF lists, should expect more questions and a longer timetable.

Bank checklists, such as board resolutions authorising the account, specimen signatures, business plans and proof of address, are a matter of each bank's policy rather than law, and differ from bank to bank. Whether a director or signatory must attend in person, or whether parts of the process can be completed remotely, depends on the bank and its risk assessment.

Timing, refusal and records

A bank must normally verify the identity of the customer and the beneficial owners before or while establishing the relationship. Under **Article 16** it may complete verification after opening the account only if this happens as soon as reasonably practicable, is essential so as not to interrupt the normal conduct of business, and the risks are effectively managed; the bank must have procedures limiting what the customer can do before verification is complete. In practice a bank may open an account and accept the incoming share capital while restricting outgoing payments until its file is complete. No official timeline for account opening has been published, so investors should allow for the bank's internal approvals, particularly where a foreign parent, a trust or a politically exposed person is involved.

If the bank cannot complete due diligence, **Article 19** requires it not to open the account, not to start the relationship, not to carry out the transaction, or to end an existing relationship, and to consider filing a suspicious transaction report with the FIC. Where it suspects money laundering and reasonably believes that pursuing due diligence would tip off the customer, it may stop and file a report instead (Article 20). A refusal therefore usually comes without detailed reasons. Under **Article 21** the bank keeps records of the due diligence, account files, correspondence, reports, sanctions screening and refused business for at least **10 years** after the transaction or the end of the relationship, and the company should keep its own copies of what it supplied for the same period, which also matches its tax record-keeping duty.

Bringing in share capital and keeping the trail

Capital is best paid by bank transfer from the shareholder's own account abroad into the company's account in Rwanda, in the shareholder's name and with a payment reference identifying the subscription. A foreign-currency account can receive the funds without immediate conversion, and the company can sell foreign currency to its bank as it needs francs, at the rate the bank sets freely under Article 5 of the FX Regulation. Under Article 4 of the FX Regulation, foreign currency received by a person who is not a licensed intermediary is credited to a foreign-currency account, sold to a licensed intermediary or used to settle external obligations through an authorised financial institution, so cash brought in by hand and kept outside the banking system creates problems at once.

The documents created at entry should be filed together and kept for the life of the investment: the shareholder's transfer instruction, the bank's credit advice, the subscription and allotment resolutions, the updated share register and RDB filing, and, where the investor holds an investment certificate, the RDB record of the investment. Article 25 of the FX Regulation allows a bank to request relevant supporting documents before it repatriates a return on investment, and these are the documents that answer that request; the repatriation process is described in [Repatriating profits and capital](#). Contributions in kind, such as equipment, should be valued and documented in the same way, since they too can later be repatriated as capital.

Opening the account, step by step

- 1 Register the company with RDB**

Obtain the certificate of registration and company code (the tax identification number) and file the beneficial owners with the Registrar General.

- 2 Choose the bank and the accounts**

Usually a franc current account and a foreign-currency account for capital and cross-border payments; compare the banks' onboarding requirements and fees.

- 3 Pass the board resolution**

Authorise the opening of the accounts, name the signatories and set the signing rules; banks commonly ask for this even though no statute requires it.

- 4 Assemble the corporate and identity documents**

Registration certificate, articles, register of shareholders, beneficial ownership details, structure chart, foreign shareholders' certified constitutional documents and unexpired photographic identification for directors, signatories and beneficial owners.

- 5 Explain the business and the money**

Describe the planned activity, expected turnover, countries of counterparties and the source of the capital, with supporting evidence.

- 6 Answer screening and enhanced due diligence questions**

The bank screens names against sanctions lists and identifies politically exposed persons; expect senior management approval and source-of-wealth questions where one is involved.

- 7 Fund the account and keep the evidence**

Transfer the capital from the shareholder's own account and file the bank's credit advice with the share allotment records.

- 8 Keep the bank informed**

Notify changes of shareholders, beneficial owners, directors and signatories, which trigger fresh due diligence under Article 17 of the AML Law.

Documents a Rwandan bank typically asks for

Requirements vary by bank and by risk; this list reflects the legal requirements in Articles 13 and 14 of the AML Law and common bank practice.

- ☐ **Proof of existence**
RDB certificate of registration and extract showing the company code, legal form, registered office, directors and shareholders.
- ☐ **Constitution and powers**
Articles of association and the resolution authorising the account and the signatories.
- ☐ **Ownership and control**
Register of shareholders, beneficial ownership filing and a structure chart down to individuals holding 25% or more.
- ☐ **Foreign shareholders**
Certified certificate of incorporation, constitution, register of members and directors of each corporate shareholder.
- ☐ **Individuals**
Unexpired passport or national ID, contact details, address, occupation and any public position for each director, signatory and beneficial owner.
- ☐ **Business and funds**
Business description or plan, expected account activity and evidence of the source of the capital.
- ☐ **Tax and licences**
Tax identification number and any sector licence or RDB investment certificate held.

WORKED EXAMPLE

Identifying beneficial owners and funding the account

Kigali Solar Ltd, a new Rwandan company, is owned 70% by SunCo Holdings, a Mauritius company, and 30% by Ms U, a Rwandan citizen. SunCo is owned 50% by Mr K, a Kenyan resident, 30% by an infrastructure fund in which no investor holds 25% or more, and 20% by four individuals with 5% each. Figures are illustrative.

Ms U	30% directly: a beneficial owner.
Mr K	$70\% \times 50\% = 35\%$ indirectly on a look-through calculation: a beneficial owner.
The fund	$70\% \times 30\% = 21\%$ indirectly, below 25%; the bank will still ask whether the fund's manager controls SunCo by other means, such as board appointment rights.
The four individuals	$70\% \times 5\% = 3.5\%$ each: not beneficial owners, but identified in the structure chart.

Capital	SunCo transfers USD 300,000 from its own Mauritius account into Kigali Solar's dollar account, referenced as a share subscription.
Conversion	Kigali Solar sells USD 100,000 to its bank at an illustrative RWF 1,450, receiving RWF 145,000,000 for fit-out and payroll, and keeps USD 200,000 to pay its foreign panel supplier, an import payment allowed under Article 14 of the FX Regulation.
Records	The transfer instruction, credit advice, allotment resolution, share register and RDB filing are kept together for at least 10 years.

Whether an indirect holding is calculated by multiplying through the chain, as here, or by another method can depend on the facts; the bank and RDB may ask for explanations of any interest close to 25%.

If Mr K were a foreign politically exposed person, the bank would need senior management approval and evidence of his source of wealth before opening the account.

Questions investors ask

What documents does a Rwandan bank need to open a company account?

Under Articles 13 and 14 of Law N° 001/2025 the bank verifies the company's name, legal form, proof of existence, binding powers, senior managers and registered office, its ownership and control, its beneficial owners and the identity and authority of signatories, using unexpired photographic identification. Banks add their own requirements, such as board resolutions and source-of-funds evidence.

Who counts as a beneficial owner for a Rwandan bank account?

A natural person holding 25% or more of the shares or voting rights, directly or indirectly, under Instructions N° 001/2023/RG. If no one meets that test, the bank looks to whoever controls the company by other means and, failing that, to its senior managing official, under Article 14(2) of Law N° 001/2025.

Can a foreign-owned company hold a US dollar account in Rwanda?

Yes. Article 10 of Regulation N° 42/2022 allows residents and non-residents to open foreign-currency accounts with banks and deposit-taking microfinance institutions, and Article 11 lets them be freely debited and credited. The account does not authorise pricing or collecting domestic sales in foreign currency, which needs BNR permission.

How long does it take to open a corporate bank account in Rwanda?

No official timeline exists. The bank must verify the company and its beneficial owners before or while opening the account, or as soon as reasonably practicable afterwards under Article 16 of Law N° 001/2025. Foreign corporate shareholders, trusts and politically exposed persons lengthen the process, so start as soon as the company is registered.

Can a bank refuse to open an account without giving reasons?

Yes. If due diligence cannot be completed, Article 19 of Law N° 001/2025 requires the bank not to open the account and to consider a suspicious transaction report to the Financial Intelligence Centre. Because tipping off is prohibited, the bank may not explain its reasons in detail.

Can a foreign parent company open an account in Rwanda?

Yes. A non-resident legal entity may hold a non-resident account and a foreign-currency account with a licensed Rwandan bank under Articles 2(15°) and 10 of Regulation N° 42/2022, subject to the same customer due diligence as any other customer.

THE 2027 HORIZON

- Regulations N° 002/FIC/2026 of 22/06/2026 replaced the 2023 anti-money-laundering regulations; banks are updating their onboarding procedures and periodic reviews, so existing customers may receive requests to refresh their files during 2026 and 2027.
- Rwanda's 2024 mutual evaluation by the Eastern and Southern Africa Anti-Money Laundering Group rated 10 of the 11 effectiveness outcomes low; follow-up reporting is likely to keep pressure on banks to verify beneficial ownership and source of funds rigorously.
- Article 22(6) of the AML Law leaves the definition of politically exposed persons to an Order of the Minister; investors should check whether an Order has been issued or revised before onboarding a structure that includes officials.
- RRA's list of Ministerial Orders includes a Common Reporting Standard Order of September 2024, so banks will increasingly collect tax residence information for account holders and exchange it with treaty partners.

Terms you will meet in the documents

English	Kinyarwanda	French	Meaning
Beneficial owner	<i>Nyir'umutungo nyawe</i>	<i>Bénéficiaire effectif</i>	The natural person who ultimately owns or controls a customer (Article 2(x) of Law N° 001/2025); 25% under Instructions N° 001/2023/RG.
Customer due diligence	<i>Ubushishozi ku mukiriya</i>	<i>Devoir de vigilance à l'égard de la clientèle</i>	The identification, verification and monitoring a reporting person must carry out (Articles 12 to 18).
Business relationship	<i>Imikoranire y'ubucuruzi</i>	<i>Relation d'affaires</i>	The continuing relationship, such as an account, that triggers due diligence.

English	Kinyarwanda	French	Meaning
Politically exposed person	<i>Umntu ugaragara mu rwego rwa politiki</i>	<i>Personne politiquement exposée</i>	A person entrusted with prominent public functions, with family members and close associates (Article 22).
Reporting person	<i>Ushinzwe gutanga amakuru</i>	<i>Personne déclarante</i>	A financial institution or designated business bound by the AML Law (Article 8).
Customer	<i>Umukiriya</i>	<i>Client</i>	A person or arrangement for whom a reporting person carries out a transaction or opens an account.
Foreign currency account	<i>Konti y'amadevize</i>	<i>Compte en devises</i>	An account in foreign currency with a bank or deposit-taking microfinance institution in Rwanda (Article 10 of the FX Regulation).
Non-resident account	—	<i>Compte du non-résident</i>	An account held with a licensed bank by a non-resident individual or legal entity (Article 2(15°)).
Shell bank	<i>Banki ya baringa</i>	<i>Banque fictive</i>	A bank with no real presence where it is licensed; Article 23(4) bars correspondent relationships with shell banks.

FOREIGN V RWANDAN INVESTOR

The account-opening rules are the same for every company, whoever owns it: Articles 13 and 14 of the AML Law apply equally to a Rwandan-owned and a foreign-owned company, and the 25% beneficial ownership test does not depend on nationality. Foreign ownership matters because of what the bank must trace and verify: foreign corporate shareholders, trusts and nominees add layers, foreign documents need certification, and the source of funds is abroad. Two rules bite harder on foreign structures. Enhanced measures, with senior management approval and source-of-wealth checks, are mandatory for foreign politically exposed persons but apply to domestic ones only in higher-risk cases (Article 22), and enhanced due diligence applies to persons from countries the FATF identifies (Article 31). Nationals and companies of other East African Community and COMESA states receive no special treatment, and since May 2025 EAC residents are non-residents for foreign exchange purposes, although they may still hold foreign-currency and non-resident accounts.

WATCH OUT FOR

- Beneficial ownership details given to the bank that differ from the RDB register: banks check, and a mismatch stops the process.
- Paying capital from a third party's account or in cash: the source of funds cannot be traced, and repatriation later becomes harder.
- Collecting company receipts in a director's personal account while the corporate account is pending, which mixes funds and raises due diligence concerns.
- Changes of shareholders, beneficial owners or signatories not notified to the bank, which can lead to frozen mandates under Article 17.
- Assuming a dollar account allows dollar invoicing to Rwandan customers: the pricing rules and fines in Regulations N° 89/2025 still apply.
- Politically exposed persons in the ownership chain not disclosed at the outset: late discovery can end the relationship under Article 19.

OFFICIAL SOURCES

- National Bank of Rwanda: Law N° 001/2025 of 22/01/2025 on the prevention and punishment of money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction — https://www.bnr.rw/documents/2025_AMLCFT_LAW.pdf
- National Bank of Rwanda: Regulation N° 42/2022 of 13/04/2022 governing foreign exchange operations, Articles 2, 10 to 12 and 36 — https://www.bnr.rw/documents/Regulations_governing_Foreign_Exchange_Operations_2022.pdf
- Amategeko, the official legal portal: Regulations N° 002/FIC/2026 of 22/06/2026 and Instructions of the Registrar General N° 001/2023/RG of 31/03/2023 — <https://amategeko.gov.rw>
- Financial Action Task Force: Mutual Evaluation Report of Rwanda, 2024 — <https://www.fatf-gafi.org/en/publications/Mutualevaluations/MER-Rwanda-2024.html>

Offshore loans and external borrowing: no BNR approval to borrow abroad under Article 26 of Regulation N° 42/2022, the 15% withholding tax on interest and its exemptions for development finance institutions and bank lenders, the four-to-one related-party debt limit and foreign exchange losses, repaying and repatriating debt service under Article 12 of the Investment Code, and the 120% tests for foreign-currency loans from Rwandan banks under Directive N° 46/2026

Reviewed 10 October 2026 · Prepared by a commercial lawyer with over 30 years' international experience · Legal and tax information, not legal advice · [How we check](#) · [Open in the app](#)

WHAT YOU NEED TO KNOW

- Under Article 26 of Regulation N° 42/2022 of 13/04/2022 governing foreign exchange operations, residents may freely contract loans in foreign currency from non-resident banks, international financial institutions or other non-residents to finance their activities, and banks record information on repayments for reporting; no approval or registration by the National Bank of Rwanda (BNR) is required of the borrower.
- Article 12 of Law N° 006/2021 of 05/02/2021 on Investment Promotion and Facilitation entitles an investor, upon fulfilling tax obligations in Rwanda, to repatriate debt and interest on foreign loans, and Article 24 of Regulation N° 42/2022 lets banks transfer interest abroad against supporting documents indicating the source of funds.
- Article 60 of Law N° 027/2022 of 20/10/2022 establishing taxes on income imposes 15% withholding tax on interest paid by residents, except interest on deposits of at least one year, interest on loans from a foreign development finance institution exempt from income tax in its home country, and interest paid by Rwandan banks and deposit-taking microfinance institutions to foreign banks and financial institutions; interest booked as owed and unpaid six months after the tax period is treated as paid.
- Under Article 25 of Law N° 027/2022, interest on loans between related persons is not deductible on total loans above four times paid-up equity, excluding provisions, reserves and retained earnings, and realised foreign exchange losses on that excess are also non-deductible, as are all unrealised foreign exchange losses; the interest rule does not apply to commercial banks, insurers and other financial institutions.
- Directive N° 46/2026 of 08/04/2026 on lending in foreign currency, signed and in force on 4 May 2026, lets Rwandan banks and deposit-taking microfinance institutions lend in foreign currency only to borrowers earning foreign currency or authorised to transact in it, with net foreign-currency cash flow of at least 120% of annual debt service, repayment in the loan currency and collateral from non-residents of at least 120% of the loan (100% for same-currency cash or guarantees); BNR non-objection, given within 10 working days, is needed for every microfinance loan and for bank lending above 20% of core capital.

Borrowing from abroad needs no approval

Rwanda has no approval regime for external borrowing. **Article 26 of Regulation N° 42/2022 of 13/04/2022 governing foreign exchange operations** (the FX Regulation) provides that residents may freely contract loans in foreign currency from non-resident banks, international financial institutions or other non-residents to finance their activities. The same article tells borrowers to pay attention to the interest rate and to ensure that foreign exchange risk is mitigated, and requires banks to record information on the repayment of offshore borrowing for reporting purposes. Bank and credit transactions and the payment of interest and amortisation are capital account operations under Article 2(2°), and the regulation states in Article 1 that its aim is the liberalisation of the capital account. No provision requiring the borrower to obtain BNR approval, register the loan or report it to the National Bank of Rwanda (BNR) has been found in the FX Regulation, the 2025 amendments or the BNR directives in force at 10 October 2026.

The loan must nevertheless move through the banking system. Article 20 requires all payments to non-residents and all transfers to or from abroad by residents to pass through licensed intermediaries or the BNR, so the drawdown is received into the borrower's account with a Rwandan bank, and interest and principal are paid out through that bank. The bank records the repayments and reports them, and it will ask for the loan agreement when the first payment is made. Keeping the loan agreement, the drawdown notice and the bank's credit advice together from the start is what makes later repayments routine.

The 2025 rules on **pricing and transacting in foreign currency**, described in [Foreign exchange rules](#), concern prices for goods and services. A foreign-currency loan from a non-resident is a capital account operation that Article 26 expressly permits, so the borrower may receive and repay it in dollars or euros even if it is not itself authorised to transact in foreign currency. What the borrower may not do is pass the currency on to its Rwandan customers by pricing its own sales in dollars without permission.

Loans between residents, guarantees and currency risk

Article 26 covers loans from non-residents. Lending in foreign currency by financial institutions resident in Rwanda is governed by Article 27 and Directive N° 46/2026, described below. The position of a resident company that is not a financial institution lending in foreign currency to another resident, for example a Rwandan holding company lending dollars to its Rwandan subsidiary, is less clear: the FX Regulation defines **foreign exchange business** to include any account facility, credit extension, lending, issue of guarantee or counter-guarantee involving a foreign currency (Article 2(7°)), and only licensed intermediaries may carry on foreign exchange business (Article 3). Such a loan, and a guarantee in foreign currency given by a Rwandan company, for instance in support of its foreign parent's borrowing, should therefore be discussed with the company's bank, and if necessary the BNR, before it is signed. A loan between residents in Rwandan francs raises no foreign exchange question.

Currency risk falls on the borrower. A company whose income is in francs and whose debt is in dollars must buy dollars from its bank for each payment, at the rate the bank sets freely under Article 5, and a United States government guide of March 2026 reports investors' accounts of foreign-currency shortages in the Rwandan market. The tax rules add to the risk: unrealised foreign exchange losses are never deductible under Article 25 of the income tax law, so a fall in the franc can increase the company's liabilities in its accounts without any tax relief until the loss is realised, and realised losses on related-party loans above the four-to-one limit are not deductible either. Lenders and borrowers commonly address this by lending in francs where a franc source of funding exists, by hedging with a Rwandan bank, or by matching dollar debt to dollar revenue, such as export proceeds.

Withholding tax on interest paid abroad

Interest paid by a Rwandan resident to a non-resident lender is subject to withholding tax at **15%** under Article 60 of **Law N° 027/2022 of 20/10/2022 establishing taxes on income** (the Income Tax Law), computed on the gross interest and declared and paid within 15 days after the month of payment (Article 64). The payer is personally liable for tax it fails to withhold, with penalties and interest (Article 66). Article 60 itself excludes three kinds of interest: interest on deposits held with financial institutions for at least one year; interest on loans granted by a **foreign development finance institution** exempt from income tax under the law of its country of origin; and interest that banks and deposit-taking microfinance institutions operating in Rwanda pay to banks or other foreign financial institutions. The

second exclusion makes loans from development finance institutions particularly attractive for project and infrastructure finance; the lender should be asked to evidence its tax-exempt status at home. The third means that a Rwandan bank can fund itself abroad without withholding tax, which matters when a foreign bank lends to a Rwandan bank that on-lends to the borrower.

Article 60 also provides that an amount recorded in the books as a liability to a creditor, which reduced taxable income, is treated as paid if it is still outstanding **six months after the end of the tax period**. Accrued but unpaid interest on a shareholder loan therefore triggers withholding tax within that time even if the parent agrees to defer payment. Lower rates are available in three ways. Treaties reduce the rate on interest, typically to 10% (8% under the treaty with China), where the lender is the beneficial owner and its tax residence certificate is submitted with the withholding tax declaration under Articles 22 and 101 of Law N° 020/2023 of 31/03/2023 on tax procedures. The Investment Code sets 0% on interest paid by investors on its 3% regimes and by licensed financial-services investors on its 15% regime, and 10% on interest on foreign loans paid by a specialised park developer. And interest on securities listed on a capital market paid to residents of Rwanda or the East African Community, and interest on Treasury bonds of at least three years, bear 5%. The full rules are in [Withholding taxes and tax treaties](#) (FAQ 23).

Withholding tax on interest at 10 October 2026

Interest paid	Rate	Source
To a non-resident lender, general rule	15% of the gross interest	Article 60, Law N° 027/2022
On a loan from a foreign development finance institution exempt from income tax in its home country	Excluded from the 15% charge	Article 60(2°)(b)
By a Rwandan bank or deposit-taking microfinance institution to a foreign bank or financial institution	Excluded from the 15% charge	Article 60(2°)(c)
On deposits held with financial institutions for at least one year	Excluded from the 15% charge	Article 60(2°)(a)
On listed securities paid to a resident of Rwanda or the EAC; on Treasury bonds of three years or more	5%	Article 60
By an investor on the Investment Code's 3% regimes or a licensed financial-services investor on the 15% regime	0%	Annex to Law N° 006/2021

Interest paid	Rate	Source
By a specialised park developer on foreign loans	10%	Annex to Law N° 006/2021
To a beneficial owner resident in a treaty state, with a tax residence certificate	Treaty rate, for example 10% (Mauritius, Singapore, South Africa, UAE) or 8% (China)	Treaty; Articles 22 and 101, Law N° 020/2023

Deductibility: the four-to-one rule and exchange losses

Interest is deductible for corporate income tax if incurred for the business, but Article 25 of the Income Tax Law sets three limits that matter for foreign financing. Item 10° disallows interest arising from loans between **related persons**, paid or due, on total loans in excess of **four times the paid-up equity**, which excludes provisions, reserves and retained earnings as shown in the balance sheet prepared under generally accepted accounting principles. Item 11° disallows realised foreign exchange losses arising from related-party loans in excess of the same four-to-one ratio, and item 12° disallows all unrealised foreign exchange losses. The interest limitation in item 10° does not apply to commercial banks, insurance companies and other financial institutions. There is no separate cap based on earnings before interest, tax, depreciation and amortisation (EBITDA).

Because the ratio counts only paid-up equity, a profitable company with large retained earnings gains no extra borrowing capacity from them. Converting retained earnings into share capital would raise the ceiling, but profit after tax or retained earnings converted into shares is itself a payment subject to 15% withholding tax under Article 60(7°), except in a financial institution whose capital is below the BNR minimum, so the cost of a capitalisation should be weighed against the value of the extra deductions. Related persons are defined broadly in the Income Tax Law, as anyone who acts or is likely to act in accordance with the directions or wishes of another, and include group companies. Related-party loans must also carry an arm's length interest rate under the transfer pricing rules in Ministerial Order N° 003/26/10/TC of 29/04/2026, which require documentation of intra-group financing; see [Transfer pricing and international tax \(FAQ 28\)](#).

Repaying the loan and paying interest abroad

Article 12 of **Law N° 006/2021 of 05/02/2021 on Investment Promotion and Facilitation** (the Investment Code) entitles an investor, upon fulfilling tax obligations in Rwanda, to repatriate capital, profits, **debt and interest on foreign loans**, liquidation proceeds and other assets ([FAQ 61](#)). The FX Regulation implements the right through the banks: interest is one of the payments a licensed intermediary may transfer abroad on presentation of relevant supporting documents indicating the source of the funds (Article 24), and before repatriating a return on investment the intermediary must request supporting documents (Article 25). The documents that answer those requests are the loan agreement, evidence that the principal was actually received in Rwanda, the interest calculation or amortisation schedule, and the withholding tax declaration and receipt. Article 33 allows the BNR to prohibit transfers abroad in the framework of Rwanda's obligations under international agreements.

Principal repayments bear no Rwandan tax, but the bank will want to see that the loan was received, so a loan advanced in kind, or paid by the parent directly to the borrower's suppliers abroad, should be documented with equal care. No rule in the FX Regulation restricts early repayment or refinancing of a foreign loan. Where interest is capitalised or rolled up, the six-month rule in Article 60 may bring the withholding tax forward even though no cash moves. The wider repatriation process, including the bank's checks and timing, is in [Repatriating profits and capital](#).

Foreign-currency loans from Rwandan banks: Directive N° 46/2026

A company that wants to borrow dollars locally meets a stricter regime. Article 27 of the FX Regulation allows resident financial institutions to lend in foreign currency to residents and non-residents under conditions set by a BNR directive, now **Directive N° 46/2026 of 08/04/2026 on lending in foreign currency**, which repealed Directive N° 2500/2018-09 of 27/12/2018 and entered into force on its signature on 4 May 2026. It applies to lending institutions, meaning banks and deposit-taking microfinance institutions, and covers any loan denominated or repayable in foreign currency, including facilities where principal or interest is payable in foreign currency (Article 2).

Under Article 4 a lending institution may grant a foreign-currency loan only if: the borrower is an individual earning in foreign currency or a legal entity authorised to transact in foreign currency; its foreign-currency income derives from lawful business permitted to generate foreign currency; its net foreign-currency cash flow is sufficient to service the loan and is at least **120% of the total annual repayment** of principal and interest, or of total instalments for loans under one year; repayment will be in the loan currency until maturity; foreign exchange risk is mitigated; collateral pledged by non-residents is easily accessible and realisable and worth at least **120% of the loan**, or 100% where it is cash or a guarantee in the loan currency; and prudential rules on related parties, concentration and large exposures are respected. The lender must assess and periodically reassess the borrower's capacity to service the loan in foreign currency.

Under Article 5 the lender needs the BNR's prior **non-objection** for every foreign-currency loan by a deposit-taking microfinance institution, and for any on-balance-sheet foreign-currency lending by a bank exceeding **20% of its core capital**. The application describes the borrower, amount, currency, purpose, tenor, risk assessment, terms, risk mitigation and security, and the BNR responds within **10 working days** of a complete application. The BNR may restrict an institution's foreign-currency lending if it fails to mitigate the risks (Article 6), lenders report regularly on these loans (Article 7), and breaches attract regulatory penalties (Article 8). The link to the foreign exchange rules is direct: a borrower is eligible if it earns foreign currency, such as an exporter, or is a deemed or authorised dealer under Directive N° 4230/2025-00042, such as an RDB-licensed hotel or a KIFC entity. Foreign-currency loans were 27.6% of bank loans in March 2026, with a non-performing ratio of 0.2%, according to the BNR's Financial Stability Report of June 2026.

Security for lenders

Foreign lenders commonly take security over the borrower's Rwandan assets. Mortgages over land and buildings are governed by Law N° 10/2009 of 14/05/2009 on mortgages and registered with the Registrar General through RDB's electronic mortgage registration system, a filing made by the lender, so an offshore lender needs a local agent or security agent able to file and later enforce; security over

movable assets such as equipment and receivables is governed by Law N° 34/2013, which repealed Law N° 11/2009 on security interests in movable property, and registered with the same office. The rules on mortgages, leasehold land as security and enforcement are in [Mortgages, security and real estate business](#), and the ranking of secured creditors in insolvency in [Insolvency and restructuring](#). For a Rwandan bank lending in foreign currency, Directive N° 46/2026 adds that collateral pledged by non-residents, such as a guarantee or pledge from a foreign parent, must be easily accessible and realisable and cover at least 120% of the loan, or 100% for cash or a guarantee in the loan currency.

DECISION GUIDE

Which rules apply to this loan?

A decision guide for a Rwandan company planning to borrow. Answer in order.

Q1 Is the lender a non-resident (a foreign parent, bank, fund or development finance institution)?

Yes No BNR approval: Article 26 lets residents borrow freely. Receive the funds through a Rwandan bank and keep the agreement and credit advice. Continue to Q3.

No Continue to Q2.

Q2 Is the lender a Rwandan bank or deposit-taking microfinance institution lending in foreign currency?

Yes Directive N° 46/2026 applies: foreign-currency earnings or authorisation, 120% cash-flow cover, repayment in the loan currency, 120% non-resident collateral and possibly BNR non-objection.

No A franc loan from a resident raises no foreign exchange issue; a foreign-currency loan or guarantee from a non-financial resident should be cleared with the bank or BNR first, since it may be foreign exchange business.

Q3 Is the lender an exempt foreign development finance institution, or is the borrower a Rwandan bank paying a foreign bank?

Yes Interest is excluded from the 15% withholding tax under Article 60; keep evidence of the lender's status.

No Withhold 15%, or the treaty rate with a tax residence certificate, or the Investment Code rate if the borrower qualifies, within 15 days after the month of payment.

Q4 Is the lender a related person of the borrower?

Yes Check the four-to-one limit on paid-up equity under Article 25, set an arm's length rate and document it under Ministerial Order N° 003/26/10/TC.

No Interest is deductible under the general rules; unrealised exchange losses remain non-deductible.

The loan file to keep from day one

What the paying bank, the Rwanda Revenue Authority (RRA) and a future buyer are likely to ask for.

- ☐ **Loan agreement**
Signed agreement with currency, rate, repayment schedule and any security, plus board approvals of both parties.
- ☐ **Proof of drawdown**
The lender's transfer instruction and the Rwandan bank's credit advice showing the funds received in Rwanda.
- ☐ **Interest computations**
Interest and amortisation schedules matching each payment abroad.
- ☐ **Withholding tax evidence**
Declarations and receipts for each payment, or evidence of the exemption, treaty residence certificate or Investment Code status.
- ☐ **Thin capitalisation workings**
Annual calculation of related-party loans against four times paid-up equity, and the resulting disallowance.
- ☐ **Transfer pricing support**
Benchmarking of the interest rate and guarantee fees for related-party loans.
- ☐ **Security documents**
Mortgage and movable security registrations and any parent guarantee.

WORKED EXAMPLE

A shareholder loan above the four-to-one limit

A Rwandan manufacturing subsidiary has paid-up share capital of RWF 1,000,000,000 and retained earnings of RWF 400,000,000. Its Mauritius parent, the beneficial owner with a tax residence certificate, has lent it RWF 6,000,000,000 at 8% a year. The company has no other borrowings. All figures are illustrative.

Interest for the year	$\text{RWF } 6,000,000,000 \times 8\% = \text{RWF } 480,000,000.$
Four-to-one ceiling	$4 \times \text{RWF } 1,000,000,000 = \text{RWF } 4,000,000,000$; retained earnings are excluded.
Excess borrowing	$\text{RWF } 6,000,000,000 - \text{RWF } 4,000,000,000 = \text{RWF } 2,000,000,000$, one third of the loan.
Non-deductible interest	Apportioning proportionately, which the law does not spell out, one third of RWF 480,000,000 = RWF 160,000,000; RWF 320,000,000 remains deductible.

Extra corporate income tax	RWF 160,000,000 x 28% = RWF 44,800,000.
Withholding tax on the full interest	Treaty rate 10% x RWF 480,000,000 = RWF 48,000,000, against RWF 72,000,000 at 15% without the certificate.
Alternative: capitalise retained earnings	Converting RWF 400,000,000 of retained earnings into shares would raise the ceiling by RWF 1,600,000,000, but the conversion bears 15% withholding tax, RWF 60,000,000, under Article 60(7°), before any treaty relief.
Alternative: DFI lender	Had RWF 2,000,000,000 come instead from an exempt foreign development finance institution, interest on that part would bear no withholding tax and, not being interest on a loan between related persons, would not itself be disallowed under item 10°; see the first note on how total loans are measured.

Whether third-party loans count towards "total loans" in Article 25(10°) is not spelt out; this example avoids the point by assuming no other debt.

Any unrealised exchange loss on a dollar loan would be non-deductible whatever the ratio.

Questions investors ask

Do I need BNR approval for a loan from my foreign parent?

No. Article 26 of Regulation N° 42/2022 lets residents freely contract foreign-currency loans from non-resident banks, international financial institutions and other non-residents. The funds must pass through a licensed bank under Article 20, and banks record repayments for reporting, but no approval or registration duty for the borrower has been found.

What withholding tax applies to interest paid on a foreign loan?

15% under Article 60 of Law N° 027/2022, unless the lender is a foreign development finance institution exempt from tax at home, the payer is a Rwandan bank paying a foreign bank, a treaty reduces the rate with a tax residence certificate, or the borrower qualifies for the Investment Code's 0% or 10% rates.

How much shareholder debt can a Rwandan company deduct interest on?

Interest on related-party loans is not deductible on total loans above four times paid-up equity, excluding provisions, reserves and retained earnings, under Article 25 of Law N° 027/2022. Realised exchange losses on the excess are also disallowed. Banks, insurers and other financial institutions are outside the interest rule.

Can a Rwandan bank lend to my company in US dollars?

Only if your company earns foreign currency or is authorised to transact in it, its net foreign-currency cash flow is at least 120% of annual debt service and it repays in dollars, under Directive N° 46/2026. Collateral from non-residents must cover 120% of the loan, and large loans need BNR non-objection within 10 working days.

Can interest on a shareholder loan be accrued and paid later?

It can be accrued, but under Article 60 of Law N° 027/2022 an amount booked as owed to a creditor, which reduced taxable income, is treated as paid if still outstanding six months after the end of the tax period, so withholding tax becomes due then even without payment.

Can loan repayments be sent abroad freely?

Yes. Article 12 of Law N° 006/2021 guarantees repatriation of debt and interest on foreign loans once tax obligations are met, and banks transfer interest against supporting documents under Article 24 of Regulation N° 42/2022. Keep the loan agreement, drawdown evidence and withholding tax receipts ready.

THE 2027 HORIZON

- Directive N° 46/2026 and the FX Regulation cite the repealed 2017 central bank law; a restatement under Law N° 033/2026 of 24/07/2026 may adjust the foreign-currency lending tests, so check the BNR's website before structuring a local dollar facility.
- The 15% excise duty on amounts or commissions charged on financial transactions in Law N° 011/2025 of 27/05/2025 is reported by commercial sources to start on 1 July 2027 under ministerial guidance; arrangement and other fees charged by Rwandan lenders may then cost more.
- CMA Directive N° 01/2025 of 30/10/2025 allows securities denominated in foreign currency to be issued to foreign-currency earners and foreign investors, opening a route to raise dollar debt locally; a draft Capital Market Business Bill published in August 2025 would replace the 2011 capital market law.
- No registration or approval regime for external borrowing had been announced by 10 October 2026; investors should watch for any change when the BNR restates its foreign exchange regulation.

Terms you will meet in the documents

English	Kinyarwanda	French	Meaning
Offshore borrowing by residents	<i>Inguzanyo zisabwa hanze n'abatuye mu gihugu</i>	<i>Emprunts à l'étranger par les résidents</i>	Foreign-currency loans residents may freely contract from non-residents (Article 26 of the FX Regulation).

English	Kinyarwanda	French	Meaning
Lending in foreign currency	<i>Inguzanyo mu madevize</i>	<i>Prêts en devises</i>	Loans in foreign currency by resident financial institutions, governed by Article 27 and Directive N° 46/2026.
Foreign exchange business	—	<i>Affaires de change</i>	Any facility, lending, guarantee or other transaction involving foreign currency, reserved to licensed intermediaries (Articles 2(7°) and 3).
Withholding tax	<i>Umusoro ufatirwa</i>	<i>Impôt retenu à la source</i>	Tax deducted by the payer of interest and paid to RRA within 15 days after the month (Articles 60 and 64).
Related persons	<i>Abantu bafitanye isano</i>	<i>Personnes liées</i>	Persons who act or are likely to act on another's directions or wishes, including group companies (Income Tax Law).
Paid-up equity	—	<i>Capitaux propres libérés</i>	Paid-up capital excluding provisions, reserves and retained earnings, the base for the four-to-one ratio (Article 25(10°)).
Realised foreign exchange loss	—	<i>Perte de change réalisée</i>	An exchange loss crystallised on payment; non-deductible on related-party loans above the four-to-one ratio (Article 25(11°)).
Unrealised foreign exchange losses	—	<i>Pertes de change non réalisées</i>	Book losses from revaluing foreign-currency balances, never deductible (Article 25(12°)).
Foreign development finance institution	—	<i>Institution financière étrangère de développement</i>	A lender whose interest is excluded from withholding tax if it is exempt from income tax at home (Article 60(2°)(b)).
Mortgage	<i>Ubugwate</i>	<i>Hypothèque</i>	Security over immovable property, valid when recorded with the Registrar General (Law N° 10/2009).

FOREIGN V RWANDAN INVESTOR

Every resident borrower, whoever owns it, may borrow abroad freely under Article 26, and the four-to-one rule applies to related-party loans whether the lender is a foreign parent or a Rwandan shareholder. The differences are in tax and in currency. Interest paid to a non-resident lender bears 15% withholding tax unless an exemption, treaty or incentive applies, while a Rwandan lender holding a tax clearance certificate is paid gross under Article 65 of the Income Tax Law. Treaty relief depends on the lender's tax residence, not its nationality, and the 5% rate on interest from listed securities is available to residents of Rwanda and of other East African Community states. Directive N° 46/2026 turns on the borrower's foreign-currency earnings rather than its ownership, but its 120% collateral test applies specifically to security pledged by non-residents, such as a foreign parent's guarantee.

WATCH OUT FOR

- Accruing interest to a foreign lender without paying it: six months after the year end it is treated as paid and the 15% withholding tax falls due.
- Counting retained earnings towards the four-to-one ratio: only paid-up equity counts, and capitalising profits bears 15% withholding tax.
- Dollar loans to a franc earner: unrealised exchange losses are never deductible, and a Rwandan bank cannot lend dollars to a borrower without foreign-currency income or authorisation.
- Foreign-currency loans or guarantees between Rwandan residents outside the banking system, which may be foreign exchange business reserved to licensed intermediaries.
- Applying a treaty or development finance exemption without the tax residence certificate or proof of the lender's exempt status on file.
- Loans advanced in kind or paid to suppliers abroad without documents showing that the money reached Rwanda, which complicates repayment through the banks.

OFFICIAL SOURCES

- National Bank of Rwanda: Regulation N° 42/2022 of 13/04/2022 governing foreign exchange operations, Articles 2, 20, 24 to 27 — https://www.bnr.rw/documents/Regulations_governing_Foreign_Exchange_Operations_2022.pdf
- National Bank of Rwanda: Directive N° 46/2026 of 08/04/2026 on lending in foreign currency — https://www.bnr.rw/documents/Directive_on_Lending_in_Foreign_Currency_May_2026.pdf
- Rwanda Revenue Authority: Law N° 027/2022 of 20/10/2022 establishing taxes on income, Articles 25, 60, 64 to 66 — https://www.rra.gov.rw/fileadmin/user_upload/Income_Tax_law_of_2022.pdf
- UNCTAD Investment Policy Hub: Law N° 006/2021 of 05/02/2021 on Investment Promotion and Facilitation, Article 12 — <https://investmentpolicy.unctad.org/investment-laws/laws/369/print/3>
- National Bank of Rwanda: Annual Financial Stability Report, June 2026 — https://www.bnr.rw/documents/Annual_Financial_Stability_Report__June_2026.pdf

Repatriating profits and capital: the Article 12 guarantee in the Investment Code, the liberalised capital account under Regulation N° 42/2022, what the bank checks before a transfer, withholding tax on dividends, branch profits, interest and fees, capital gains tax and liquidation on exit, and the paper trail from the first inflow to the last outflow

Reviewed 10 October 2026 · Prepared by a commercial lawyer with over 30 years' international experience · Legal and tax information, not legal advice · [How we check](#) · [Open in the app](#)

WHAT YOU NEED TO KNOW

- Article 12 of Law N° 006/2021 of 05/02/2021 on Investment Promotion and Facilitation allows an investor, upon fulfilling tax obligations in Rwanda, to repatriate its capital, profits derived from business activities, debt and interest on foreign loans, proceeds from the liquidation of the investment and its other assets; no approval from the National Bank of Rwanda (BNR) is required.
- Under Regulation N° 42/2022 of 13/04/2022 governing foreign exchange operations, inward and outward direct investment is fully liberalised (Article 25), all transfers abroad by residents go through authorised intermediaries (Article 20), dividends, fees, royalties and interest are transferred against documents showing the source of funds (Article 24), and the BNR may prohibit transfers abroad to meet international obligations (Article 33).
- Under Article 60 of Law N° 027/2022 of 20/10/2022 establishing taxes on income, a Rwandan company withholds 15% on dividends, interest, royalties and service fees paid abroad, and on profits repatriated by a branch and retained earnings converted into shares, declared and paid within 15 days after the month of payment, subject to lower treaty rates (7.5% on dividends under the treaties with China, Singapore and the United Arab Emirates) and 0% for payers on the Investment Code's 3% and financial-services regimes.
- Since 29 May 2025 a gain on the direct or indirect transfer of shares in a Rwandan company bears 10% capital gains tax, withheld by the Rwandan company whose shareholders change and paid within 15 days after the month of the transfer, while gains on listed securities and collective investment scheme units are exempt (Article 38) and, on a liquidation, what remains after payment of liabilities and distribution of shares is treated as a dividend (Article 55).
- Related-party interest is not deductible on loans above four times paid-up equity, related non-resident management, technical and royalty fees are deductible only up to 2% of turnover (Article 25), and an amount owed to a creditor that remains unpaid six months after the end of the tax period is treated as paid for withholding tax purposes.

What the law guarantees

Rwanda has no approval regime for taking investment returns out of the country. The guarantee is in **Article 12 of Law N° 006/2021 of 05/02/2021 on Investment Promotion and Facilitation** (the Investment Code): 'Upon fulfilling tax obligations in Rwanda, an investor is allowed to repatriate' five things, namely the capital, profits derived from business activities, debt and interest on foreign loans, proceeds from the liquidation of the investment, and other assets of an investor. The French text heads the article 'Rapatriement du capital et du patrimoine'. The guarantee is not limited to holders of an investment certificate from the Rwanda Development Board (RDB): it is given to 'an investor', and Article 9 gives foreign investors equal treatment with Rwandan investors on incentives and facilitation ([FAQ 61](#)).

The one condition is in the opening words. Repatriation follows the fulfilment of tax obligations, so a dividend leaves after withholding tax has been deducted, a sale price leaves after capital gains tax has been accounted for and liquidation proceeds leave after the company's final returns. The Investment Code does not say how fulfilment is to be proved, and no regulation sets an official checklist; in practice the paying bank asks for the withholding tax declaration and receipt, and often a current tax clearance certificate, before it executes the transfer. The guarantee also protects 'capital', which Article 2 defines as wealth 'in the form of tangible or intangible assets used for investment purposes', so equipment or intellectual property contributed in kind is protected as much as cash, provided its value was documented on entry ([FAQ 70](#)).

Behind Article 12 sit the elimination of restrictions on the free movement of capital under Article 24 of the East African Community (EAC) Common Market Protocol, subject to the general exceptions and safeguard measures in its Articles 25 and 26, and, for investors from a state with a bilateral investment treaty in force, the treaty itself ([Investment guarantees, treaties and reporting](#)). In practice the binding constraints are tax, the bank's documents and, at times, the availability of foreign currency, not legal permission.

How the exchange-control rules apply to outward transfers

The exchange-control rules are in **Regulation N° 42/2022 of 13/04/2022 governing foreign exchange operations**, issued by the National Bank of Rwanda (BNR) and amended by Regulations N° 89/2025 of 23/05/2025. Article 1 states the aim as the 'liberalization of capital account'. Article 25 provides that 'inward and outward transactions on direct investment are fully liberalized', and portfolio investment between residents and non-residents is liberalised too. The capital account items listed in Article 2 include direct investment and the 'repatriation of proceeds from the sale of assets', so sale and liquidation proceeds are capital-account transfers that the regulation permits.

The control is exercised through the banks. Under **Article 20**, all transfers of funds by residents to or from abroad must be made through authorised intermediaries, that is licensed banks and other licensed dealers, or the BNR. Under **Article 24**, transfers of dividends, fees, royalties, interest and similar items are made on presentation of 'relevant supporting documents indicating the source of funds to be transferred'. Under Article 25, before repatriating returns on investment the intermediary 'must request relevant supporting documents'. The same documentary approach runs through the rest of the regulation: under Article 21 an intermediary delivering or transferring currency for travel, medical, educational and other services abroad must be satisfied that the funds are required for those purposes,

and under Article 22 it must be satisfied that the documents support the amount of salaries transferred to residents employed temporarily abroad. Banks also report outward flows to the BNR for statistics (Articles 11 and 37). Expatriate employees' net salaries may be transferred after income tax and social security under Article 23, a point covered in [Wages, minimum wage and payroll](#).

Two powers limit the liberal regime. **Article 33** allows the BNR to prohibit any transfer of foreign currency abroad in order to meet international obligations, which is the hook for United Nations sanctions and freezing orders ([Anti-money-laundering and sanctions compliance](#)). And the rules on pricing and settling in foreign currency inside Rwanda, tightened by Regulations N° 89/2025, govern how a Rwandan company earns and holds the currency it later sends abroad. A transfer to a non-resident parent is a cross-border payment and is not itself restricted by those rules, but a subsidiary that has invoiced Rwandan customers in US dollars without authorisation faces fines of 50% of the amount transacted before any question of repatriation arises ([Foreign exchange rules](#)).

Regulation N° 42/2022 was made under the central bank law of 2017, which **Law N° 033/2026 of 24/07/2026 governing the National Bank of Rwanda** has replaced without an express saving clause; the BNR still publishes the regulation as current and banks apply it, so this guide treats it as in force at 10 October 2026.

Repatriation routes, the tax due first and what the bank asks for

Route	Rwandan tax at source	Who withholds and when	Typical documents for the bank
Dividend from a Rwandan subsidiary to a foreign shareholder	15% withholding tax (Article 60); lower treaty rate with a tax residence certificate; 0% if the payer is on a 3% or financial-services regime; 5% from a listed company to a Rwanda or EAC resident	The paying company, within 15 days after the month of payment (Article 64)	Resolution, accounts, withholding tax receipt
Profits of a branch sent to the head office	28% corporate income tax on the branch's profits, then 15% on 'profits repatriated from Rwanda' (Article 60), unless a treaty limits it	The branch, within 15 days after the month of transfer	Branch accounts and return, withholding tax receipt
Interest and principal on a foreign loan	15% on interest, except loans from tax-exempt foreign development finance institutions and interest paid by Rwandan banks to foreign financial institutions; no tax on principal	The borrower, within 15 days after the month of payment or of the deemed payment six months after year-end	Loan agreement, drawdown evidence, withholding tax receipt
Royalties, management and technical fees	15% (treaty rates often 10% to 12%); deductible only up to 2% of turnover when paid to related non-residents	The payer, within 15 days after the month of payment	Agreement, invoice, evidence of services
Retained earnings converted into shares	15% on the amount capitalised (Article 60)	The company, within 15 days after the month of the capitalisation	Resolution, Registrar General filing, tax receipt

Route	Rwandan tax at source	Who withholds and when	Typical documents for the bank
Sale of shares in a Rwandan company, directly or indirectly	10% capital gains tax on the gain since 29 May 2025; exempt for listed securities and collective investment scheme units (Article 38)	The Rwandan company whose shareholders change, within 15 days after the month of the transfer	Sale agreement, updated share register, tax receipt
Surplus on a solvent liquidation	Treated as a dividend in the final tax period (Article 55), so 15% withholding tax or the treaty rate	The company acting through its liquidator	Liquidator's final accounts, RRA clearance, tax receipt

Dividends: from board decision to bank transfer

A dividend starts as a company-law decision. The Companies Law, **Law N° 007/2021 of 05/02/2021 governing companies**, as amended by Law N° 019/2023 of 30/03/2023, ties distributions to the **solvency test** and to a directors' certificate, which a private company may dispense with by unanimous resolution under Article 209 (Share capital, shareholders and shares). The directors should approve the dividend on the basis of accounts that show distributable profit, and the resolution should state the amount, the record date and the payment date. Because the bank will ask for the accounts, a dividend is usually paid after the annual financial statements have been finalised and, where required, audited or certified.

The tax step comes next. Under **Article 60 of Law N° 027/2022 of 20/10/2022 establishing taxes on income** (the Income Tax Law), the company withholds **15%** of the gross dividend paid to a non-resident shareholder and, under Article 64, declares and pays it to the Rwanda Revenue Authority (RRA) within 15 days after the month of payment. Dividends between Rwandan resident companies are outside the tax, and so are distributions to holders of units in a collective investment scheme. The 15% falls to **5%** for dividends from a company listed on a capital market paid to residents of Rwanda or the EAC, and to **0%** where the paying company holds an investment certificate on one of the 3% regimes or on the 15% regime for licensed financial-services firms (Annex to the Investment Code, point X; Kigali International Financial Centre). A foreign parent resident in a treaty state can claim a lower rate, for example 7.5% under the treaties with China, Singapore and the United Arab Emirates and 10% under the treaty with Mauritius, but only if the paying company holds the parent's tax residence certificate and files it with the withholding tax declaration under Articles 22 and 101 of Law N° 020/2023 of 31/03/2023 on tax procedures (Withholding taxes and tax treaties).

The payer carries the risk. Under Article 66 of the Income Tax Law a person who fails to withhold is personally liable for the tax, penalties and interest, and the exemption in Article 65 for holders of an RRA tax clearance certificate is designed for Rwandan payees; it should not be read as allowing a dividend to a foreign parent to be paid gross. Once the tax has been paid, the company converts Rwandan francs at the bank's rate (rates are set freely under Article 5 of Regulation N° 42/2022), or debits a foreign-currency account, and sends the funds against the resolution, the accounts and the withholding tax receipt.

Branch profits, interest, royalties and fees

A **branch** of a foreign company has no shareholders and pays no dividends, but Article 60 treats 'profits repatriated from Rwanda' as a payment subject to 15% withholding tax, on top of the 28% corporate income tax on the branch's profits. The combined burden matches a subsidiary paying a dividend at the domestic rate; whether a treaty reduces the branch tax depends on its text ([FAQ 67](#); [Branches of foreign companies](#)).

Interest and principal on a foreign loan are repatriable under Article 12, and borrowing abroad needs no BNR approval (Article 26 of Regulation N° 42/2022); the bank records repayments for reporting. Interest bears 15% withholding tax unless one of the exclusions in Article 60 applies, notably loans from a foreign development finance institution that is exempt from income tax in its home country. For related-party loans, Article 25 of the Income Tax Law denies the deduction of interest on total loans above four times paid-up equity, excluding reserves and retained earnings, and denies foreign exchange losses on the excess; the interest can still be paid and repatriated, with withholding tax. An amount recorded as owed and still unpaid six months after the end of the tax period is treated as paid. The lending side is covered in [Offshore loans and external borrowing](#).

Royalties and management or technical fees are the other common channel. They bear 15% withholding tax, reduced under most treaties, and Article 25 limits the deduction of such fees paid to related non-residents to 2% of turnover, so a group that charges more than that pays Rwandan corporate income tax on the excess as well as withholding tax on the whole fee. RRA may ask for evidence that the services were rendered and priced at arm's length under Ministerial Order N° 003/26/10/TC of 29/04/2026 ([Transfer pricing and international tax](#); [FAQ 66](#)).

Exit: sale proceeds and capital gains tax

When an investor sells its Rwandan company, the price is the capital and the gain that Article 12 allows it to repatriate. Since **29 May 2025**, Law N° 014/2025 of 27/05/2025 amending the Income Tax Law has taxed gains on the direct or indirect transfer of shares, in Rwanda or abroad, at **10%** (previously 5%). The tax on a share transfer is withheld by the **resident company** whose shareholders change, which declares and pays it within 15 days after the month of the transfer. That is so even where the buyer and seller are both foreign and the price is paid outside Rwanda, so the share purchase agreement should require the seller to fund the tax and give the company the information it needs ([FAQ 25](#); [Capital gains, property and other taxes](#)).

Gains on listed securities on a securities exchange operating in Rwanda and on units of collective investment schemes are exempt under Article 38. The Annex to the Investment Code (point XVIII) exempts registered investors from capital gains tax except on commercial immovable property, but how that exemption interacts with the 2025 amendments has not been settled in any published ruling, and a seller relying on it should obtain RRA's confirmation before signing.

Where a Rwandan resident buys from a non-resident, the buyer pays through its bank against the sale agreement and evidence that the capital gains tax has been dealt with, as a capital-account transfer permitted by Article 25 of Regulation N° 42/2022. Where both parties are non-resident, no Rwandan transfer takes place, but the target still files the share transfer and beneficial ownership change with the Registrar General and accounts for the tax. Regulatory approvals that condition the sale itself, such

as merger control under Law N° 011/2026 of 26/02/2026 relating to competition and consumer protection or BNR approval of significant holdings in a bank, are explained in [Deal documents and closing mechanics](#).

Liquidation and returning share capital

A solvent company that is closing distributes what remains to its shareholders through a **voluntary liquidation**, which is governed by Law N° 075/2021 of 06/12/2021 relating to insolvency (Article 2(4)) and conducted by a licensed insolvency practitioner appointed by special resolution. Under **Article 55 of the Income Tax Law**, what remains 'after payment of liabilities and distribution of shares' is treated as dividends in the company's final tax period, so a foreign shareholder receives that surplus after 15% withholding tax or the treaty rate, not after capital gains tax. The article does not say expressly whether the 'distribution of shares' means that the paid-up share capital is returned first, free of the tax, with only the excess treated as a dividend; that is the more natural reading, but RRA's position should be confirmed before the final distribution is calculated. Article 12 of the Investment Code expressly protects the repatriation of liquidation proceeds once that tax and the final returns have been dealt with.

Before the final transfer, a registered investor notifies RDB in writing within 30 days before terminating its operations (Article 27 of the Investment Code), the company settles employees' terminal benefits and Rwanda Social Security Board (RSSB) contributions and deregisters with RRA on the e-tax system at a nil balance, and banks commonly ask for RRA's online tax clearance certificate, which RRA states is valid for three months and costs RWF 5,000 ([Liquidation, striking off and deregistration](#)).

A return of share capital while the company continues, by a share buy-back or a reduction of capital, is possible under the Companies Law (buy-backs are governed by Articles 176 to 185) subject to the solvency test. The Income Tax Law has no specific provision on the tax treatment of a buy-back or capital reduction outside liquidation that could be confirmed for this guide, and RRA may treat any payment above the capital originally subscribed as a distribution of profit. An investor planning to take capital out of a continuing company should therefore document the paid-up capital precisely and seek an advance ruling from the Commissioner General before the transaction.

Foreign currency availability and timing

No law or BNR regulation sets a time limit within which a bank must execute an outward transfer. A company holding only Rwandan francs must buy the currency from its bank at the market rate, and the United States Government's commercial guide of March 2026 records investors' reports of periodic foreign-currency shortages, so a large dividend or sale price should be timed and priced with the bank in advance, and may be staged.

Foreign-currency accounts, which residents and non-residents may hold and freely debit and credit (Articles 10 and 11 of Regulation N° 42/2022), remove the conversion step. A resident company may not, however, build up dollar balances by pricing or collecting in foreign currency from Rwandan customers without authorisation under Directive N° 4230/2025-00042 of 17/09/2025; the deemed authorised

dealers in that Directive, such as tourism entities licensed by RDB and KIFC entities recommended by Rwanda Finance Limited, can, and are best placed to repatriate without conversion ([Opening corporate bank accounts](#)).

Building the paper trail from entry to exit

Repatriation is easiest for investors who planned it on the way in. The bank's question on the way out is the source of the funds, and the best answer is a continuous record: the original wire of share capital or loan funds into a Rwandan bank account, the bank's credit advice, the share allotment or loan agreement, the Registrar General filings showing the paid-up capital and the beneficial owners, and the annual accounts showing the investment on the balance sheet. Contributions in kind should be valued and documented at the time, because Article 2 of the Investment Code protects intangible and tangible capital, but a bank cannot verify a value that was never recorded ([FAQ 70](#)).

For each later outflow, keep the corporate decision, the accounts, the tax declaration and receipt, any treaty residence certificate and the bank's confirmation for ten years, the period for which both RRA and, under Law N° 001/2025 of 22/01/2025 on the prevention and punishment of money laundering, banks keep records. Gaps in that trail are a common reason for a bank to delay a transfer, because the bank bears the anti-money-laundering risk if the source of funds cannot be shown ([FAQ 69](#)).

Paying a dividend to a foreign parent, step by step

1 Close the accounts

Finalise the annual financial statements, audited or certified where the company's turnover requires it, and confirm distributable profit and the company's ability to pass the solvency test.

2 Decide the dividend

Board resolution (and shareholders' resolution where the articles require it) stating the amount, record date and payment date, with the directors' solvency certificate unless dispensed with under Article 209 of the Companies Law.

3 Fix the withholding tax rate

Apply 15%, or 5% or 0% where the payer qualifies, or the treaty rate if the parent's current tax residence certificate is on file; record the basis for the rate.

4 Pay the dividend and withhold

Credit the parent's entitlement, deduct the tax, and declare and pay it on RRA's e-tax system within 15 days after the month of payment, attaching the residence certificate for a treaty rate (Article 64; Article 22 of Law N° 020/2023).

5 Arrange the currency

Debit a foreign-currency account or buy the currency from the bank at its rate; for large amounts, agree timing with the bank in advance.

6 Instruct the transfer

Give the bank the resolution, the accounts, the withholding tax receipt and, if asked, a current tax clearance certificate; the bank checks the source of funds under Articles 24 and 25 of Regulation N° 42/2022 and executes the transfer.

7 File and keep the records

Keep the decision, the tax documents and the transfer confirmation for ten years, and reflect the dividend in the annual return and, for a registered investor, the annual report to RDB.

WORKED EXAMPLE

Taking RWF 2 billion of profit out of Rwanda: four routes compared

A Rwandan subsidiary of a Singapore company makes a profit before tax of RWF 2,000,000,000 in 2026 and wants to send the after-tax profit to its parent in 2027. Its paid-up equity is RWF 1,000,000,000. All figures are illustrative; foreign tax credits in Singapore are ignored.

Corporate income tax	$28\% \times \text{RWF } 2,000,000,000 = \text{RWF } 560,000,000$, leaving RWF 1,440,000,000 available for distribution.
Dividend at the domestic rate	$15\% \times \text{RWF } 1,440,000,000 = \text{RWF } 216,000,000$ withheld, so RWF 1,224,000,000 reaches the parent.
Dividend at the treaty rate	With the parent's Singapore tax residence certificate filed, $7.5\% \times \text{RWF } 1,440,000,000 = \text{RWF } 108,000,000$ withheld, so RWF 1,332,000,000 reaches the parent, RWF 108,000,000 more.
Same business run as a branch	Corporate income tax of RWF 560,000,000, then 15% on profits repatriated: $15\% \times \text{RWF } 1,440,000,000 = \text{RWF } 216,000,000$, unless the treaty limits the branch tax; RWF 1,224,000,000 reaches the head office.
Part of the return as interest	If the parent had lent RWF 3,000,000,000 at 10%, the interest of RWF 300,000,000 is within the 4:1 limit (RWF 4,000,000,000) and deductible, cutting corporate income tax by $28\% \times \text{RWF } 300,000,000 = \text{RWF } 84,000,000$; withholding tax on the interest at the 10% treaty rate is RWF 30,000,000 (RWF 45,000,000 at 15%).
Exit after three years	If the parent sells the shares for a gain of RWF 4,000,000,000, the subsidiary withholds 10% = RWF 400,000,000 within 15 days after the month of the transfer, unless an exemption or the treaty allocates the gain to Singapore.
Closing instead of selling	If the subsidiary is liquidated with RWF 3,000,000,000 left after liabilities, Article 55 treats the remainder after the distribution of shares as a dividend. If the RWF 1,000,000,000 of paid-up capital is returned first, the dividend is RWF 2,000,000,000 and the 7.5% treaty rate gives RWF 150,000,000 withheld; if RRA treated the whole RWF 3,000,000,000 as a dividend, RWF 225,000,000.

Treaty rates are those in the treaty texts published by RRA and summarised in the tax chapter; confirm the treaty is in force and the parent is the beneficial owner before relying on them.

Interest is deductible only if it is arm's length and documented under the transfer pricing rules.

Questions investors ask

Do I need permission from the National Bank of Rwanda to send dividends abroad?

No. Direct investment is fully liberalised under Article 25 of BNR Regulation N° 42/2022, and Article 12 of the Investment Code guarantees repatriation of profits once tax obligations are fulfilled. The transfer must go through a licensed bank, which will ask for documents showing the source of funds and, in practice, proof that the 15% or treaty-rate withholding tax has been paid.

What tax is due on a dividend paid by a Rwandan company to a foreign parent?

Withholding tax of 15% under Article 60 of Law N° 027/2022, declared and paid within 15 days after the month of payment. Treaty rates can be lower, such as 7.5% under the treaties with China, Singapore and the United Arab Emirates, if the payer holds the parent's tax residence certificate. Payers on the Investment Code's 3% and financial-services regimes withhold 0%.

How are a branch's profits taxed when they are sent to head office?

The branch pays 28% corporate income tax on the profits attributable to it, and Article 60 of the Income Tax Law then charges 15% withholding tax on profits repatriated from Rwanda, unless a treaty limits it. The combined burden on fully remitted profits is the same as a subsidiary paying a dividend at the domestic rate.

Who pays capital gains tax when a foreign investor sells shares in a Rwandan company?

The tax is 10% of the gain since 29 May 2025 and is borne on the seller's gain, but the Rwandan company whose shareholders change must withhold and pay it within 15 days after the month of the transfer, even where the sale takes place abroad between non-residents. Listed securities and collective investment scheme units are exempt.

Is there a time limit within which a Rwandan bank must execute my transfer?

No statutory time limit was found in the Investment Code or in Regulation N° 42/2022. Transfers with complete documents are usually executed in the ordinary course, but converting large Rwandan franc amounts can take longer when foreign currency is scarce. Agree timing and rate with the bank in advance and keep a complete source-of-funds file.

How are liquidation proceeds taxed and repatriated?

Under Article 55 of the Income Tax Law, what remains after a liquidation's liabilities are paid and the shares are distributed is treated as a dividend in the company's final tax period, so 15% withholding tax or the treaty rate applies; confirm with RRA whether paid-up capital is returned first, free of that tax. Once the final returns are filed and the tax is paid, Article 12 of the Investment Code allows the liquidation proceeds to be repatriated.

THE 2027 HORIZON

- New BNR regulations under Law N° 033/2026 of 24/07/2026 governing the National Bank of Rwanda may replace Regulation N° 42/2022, which was made under the repealed 2017 law; any new text should be checked for changes to the documentary rules in Articles 20 to 25.
- RRA's position on the Investment Code's capital gains tax exemption for registered investors after Law N° 014/2025 remains to be clarified by ruling or amendment; it determines whether many exits are taxed at 10% or 0%.
- Hong Kong and Botswana treaties were reported ratified in 2026 but did not appear on RRA's published list at 10 October 2026; their publication would add new dividend and gains rates for holding structures.
- The 2026/27 budget referred to 'rationalized tax exemptions' without detail; any change to the 0% withholding tax in point X of the Investment Code's Annex would change the value of KIFC holding structures.
- The 15% excise on amounts or commissions charged on financial transactions under Law N° 011/2025 is reported to apply from 1 July 2027 and may add to the bank charges on outward transfers.

Terms you will meet in the documents

English	Kinyarwanda	French	Meaning
Repatriation of capital and assets	<i>Gusohora mu gihugu ishyingu n'umutungo</i>	<i>Rapatriement du capital et du patrimoine</i>	The investor's right under Article 12 of the Investment Code to transfer capital, profits, loan payments, liquidation proceeds and other assets out of Rwanda after tax.
Regulation governing foreign exchange operations	<i>Amabwiriza rusange agenga imikoreshereze y'amadovize</i>	—	BNR Regulation N° 42/2022 of 13/04/2022, as amended by Regulations N° 89/2025, which sets the rules for transfers, accounts and dealing in foreign currency.
National Bank of Rwanda	<i>Banki Nkuru y'u Rwanda</i>	—	Rwanda's central bank (BNR), which supervises banks and the foreign exchange market under Law N° 033/2026 of 24/07/2026.
Withholding tax	<i>Umusoro ufatirwa</i>	—	Tax the payer deducts and pays to RRA, at 15% on dividends, interest, royalties, fees and branch profits paid abroad unless a lower rate applies.
Dividend income	<i>Inyungu ku migabane</i>	<i>Dividendes</i>	A distribution of profit to shareholders; a liquidation surplus is treated as a dividend under Article 55 of the Income Tax Law.

English	Kinyarwanda	French	Meaning
Capital gains tax	<i>Umusoro ku gaciro kiyongereye</i>	<i>Impôt sur la plus-value</i>	The 10% tax on gains from direct or indirect transfers of shares and certain other assets, withheld by the Rwandan company on share transfers.
Tax clearance certificate	<i>Icyemezo cy'ubudakemwa</i>	<i>Quitus fiscal</i>	RRA's certificate that a taxpayer has no arrears, issued online and stated by RRA to be valid for three months; banks often ask for it before large transfers.
Agreement for the avoidance of double taxation	<i>Amasezerano yo kuvanaho gusoresha kabiri no gukumira inyerezwa ry'umusoro</i>	<i>Accords pour éviter la double imposition et prévenir la fraude fiscale</i>	A tax treaty that may reduce Rwanda's withholding tax on dividends, interest and royalties for a resident of the other state that is the beneficial owner.
Investment certificate	<i>Icyemezo cy'ishoramari</i>	<i>Certificat d'investissement</i>	RDB's certificate making the holder a registered investor, needed for the 0% withholding tax and other Investment Code incentives.

FOREIGN V RWANDAN INVESTOR

The right to repatriate in Article 12 belongs to every investor, and the exchange-control rules in Regulation N° 42/2022 apply to every resident payer whatever the nationality of its owners, so there is no separate repatriation regime for foreigners. The difference lies in tax. A Rwandan company receiving a dividend from another Rwandan company suffers no withholding tax, while a foreign parent suffers 15% or the treaty rate, and Article 60 of the Income Tax Law reserves the 5% rate on dividends and interest from listed companies for payees resident in Rwanda or another EAC Partner State (point XI of the Investment Code Annex states 5% for investors in RSE-listed companies without that condition, a point to confirm with RRA).

Investors from EAC and COMESA states are not 'foreign investors' in the Investment Code's definition, and EAC investors also have the capital-movement provisions of the EAC Common Market Protocol, but they still pay withholding tax on dividends received outside Rwanda unless a treaty or the listed-company rate applies. A foreign investor's real protection against a refusal to transfer is Article 12 and, where one applies, a bilateral investment treaty.

WATCH OUT FOR

- Paying a dividend to a foreign parent without withholding: the Rwandan company is personally liable for the tax, penalties and interest under Article 66, and the bank may refuse the transfer.
- Claiming a treaty rate without the parent's tax residence certificate on file and submitted with the withholding tax declaration.
- Leaving interest or fees owed to a parent unpaid to defer the tax: amounts outstanding six months after the end of the tax period are treated as paid.
- A foreign sale of the parent or holding company: the Rwandan subsidiary must still account for 10% capital gains tax on the indirect transfer, although it receives none of the price.
- Building up US dollar balances by invoicing Rwandan customers in foreign currency without authorisation, which exposes the company to fines of 50% of the amount transacted.
- Contributing equipment or intellectual property without a documented valuation, which makes the capital hard to prove when it is taken out.

OFFICIAL SOURCES

- Official Gazette n° 04 bis of 08/02/2021: Law N° 006/2021 of 05/02/2021 on Investment Promotion and Facilitation, Articles 2, 9 and 12 (copy hosted by the Capital Market Authority) — https://cma.rw/fileadmin/user_upload/Investment-code-2021.pdf
- National Bank of Rwanda: Regulation N° 42/2022 of 13/04/2022 governing foreign exchange operations — https://www.bnr.rw/documents/Regulations_governing_Foreign_Exchange_Operations_2022.pdf
- Rwanda Revenue Authority: Law N° 027/2022 of 20/10/2022 establishing taxes on income — https://www.rra.gov.rw/fileadmin/user_upload/Income_Tax_law_of_2022.pdf
- Ministry of Justice: Official Gazette n° Special of 29/05/2025 (Law N° 014/2025 of 27/05/2025 amending the income tax law) — <https://www.minijust.gov.rw/index.php?eID=dumpFile&t=f&f=130496&token=4b9d4de9658212b7aaeeb5c8a42c823a7b879d7b>
- National Bank of Rwanda: Law N° 033/2026 of 24/07/2026 governing the National Bank of Rwanda — https://www.bnr.rw/documents/Law_governing_NBR_2026.pdf
- Rwanda Revenue Authority: About the Tax Clearance Certificate (TCC) — <https://www.rra.gov.rw/en/domestic-tax-services/other-services/about-tax-clearance-certificate-tcc>

Payments, currency and mobile money: settling in Rwandan francs and when foreign currency may be used, collecting through banks, cards and mobile money, paying abroad, licensing payment service providers and e-money issuers under Law N° 061/2021 and Regulation N° 74/2023, safeguarding customer funds, cash declarations, virtual assets and the cost of financial transactions

Reviewed 10 October 2026 · Prepared by a commercial lawyer with over 30 years' international experience · Legal and tax information, not legal advice · [How we check](#) · [Open in the app](#)

WHAT YOU NEED TO KNOW

- Under Article 39(6) of Law N° 033/2026 of 24/07/2026 governing the National Bank of Rwanda, a monetary obligation or transaction in Rwanda is presumed to be expressed and settled in Rwandan francs unless other laws provide otherwise, and since Regulations N° 89/2025 of 23/05/2025 pricing in foreign currency without permission is fined RWF 5,000,000 (RWF 10,000,000 on repeat) and transacting in it 50% of the amount (100% on repeat), while payment in foreign currency for exported or imported goods and services is permitted (new Article 20 bis).
- Article 16 of Law N° 061/2021 of 14/10/2021 governing the payment system requires a licence from the National Bank of Rwanda (BNR) to provide payment services, and Regulation N° 74/2023 of 18/09/2023 governing payment services providers sets four licence categories with minimum initial capital of RWF 300,000,000 (category I), RWF 100,000,000 (II), RWF 30,000,000 (III, money remittance) and RWF 50,000,000 (IV, payment initiation and account information).
- An applicant must be a company incorporated in Rwanda with a permanent place of business there and a chief executive who is a Rwandan citizen or resident; the BNR flags missing information within seven working days, decides within 90 days of a complete application, and charges licence fees of RWF 5,000,000, RWF 3,000,000, RWF 1,000,000 and RWF 2,000,000 by category plus an annual oversight fee of 0.5% of gross income.
- Under Regulation N° 54/2022 of 01/09/2022 governing the electronic money issuers, e-money issuers keep at least 100% of the e-money float in liquid assets in trust accounts, a non-deposit-taking issuer may hold no more than 20% of its trust funds with any one institution (Article 25), and may not pay interest on trust or e-money accounts unless the account is a savings account.
- Mobile-money transfers in Rwanda reached RWF 24,931 billion in the 2024/25 financial year, up 56% in value, in 1,034 million transactions (up 40%), the BNR counted 39 licensed payment service providers, and a traveller carrying RWF 10,000,000 or more in cash or bearer instruments must declare it, failing which a 5% administrative fine is imposed (Regulation N° 001/FIC/2023, Articles 5 and 7).

The Rwandan franc as the currency of payment

Every payment decision in Rwanda starts with currency. **Article 39(6) of Law N° 033/2026 of 24/07/2026 governing the National Bank of Rwanda** provides that a monetary obligation or transaction in Rwanda 'is presumed to be expressed and settled in the Rwandan franc, unless otherwise provided for by other laws'. The previous central bank law also allowed settlement in another currency where 'lawfully agreed upon between the parties'; that wording has gone. The National Bank of Rwanda (BNR) Directive N° 4230/2025-00042 of 17/09/2025 describes the franc as 'the only legal tender', and Article 32 of Regulation N° 42/2022 of 13/04/2022 governing foreign exchange operations already prohibited pricing goods and services in foreign currencies.

Regulations N° 89/2025 of 23/05/2025, published in the Official Gazette on 30 May 2025, gave the rule teeth. 'Pricing in foreign currency' now covers displaying, quoting, advertising, requesting, invoicing and fixing contract prices in a foreign currency. Pricing without permission is fined RWF 5,000,000 for a first breach and RWF 10,000,000 for a repeat; transacting without permission is fined 50% of the amount for a first breach and 100% for a repeat; an unpaid fine is reported to the Credit Bureau after 15 days and accrues 1% a day. The sanctions also apply to banks, other licensed intermediaries and

authorised dealers that price or transact in foreign currency with residents in breach of the rules, and Article 37 bis makes it mandatory to report unauthorised foreign exchange operations to the BNR. Enforcement is shared with the Rwanda Inspectorate, Competition and Consumer Protection Authority (RICA), the Rwanda National Police and local authorities.

Two routes make foreign currency lawful inside the country. First, new **Article 20 bis** permits payment in foreign currency for goods or services exported or imported, so an exporter may invoice its foreign buyer in dollars and an importer may pay its foreign supplier in euros. Second, the persons listed in Article 4 of Directive N° 4230/2025-00042 are deemed authorised to transact in foreign currency, among them tourism entities and travel agencies licensed by the Rwanda Development Board (RDB), Kigali International Financial Centre (KIFC) entities recommended by Rwanda Finance Limited, mining operators trading in minerals, aviation and cross-border transport providers, international schools, suppliers to diplomatic missions and expatriates authorised to work; anyone else may apply to the BNR. Even an authorised dealer may not refuse Rwandan francs or compel payment in foreign currency unless the parties agree, and a price shown in foreign currency must also show the franc equivalent at the BNR's daily average rate with no surcharge. The full rules, the application procedure and the fines table are in [Foreign exchange rules](#).

Collecting money in Rwanda: banks, cards and mobile money

Rwanda's payment infrastructure is supervised by the BNR, which under Article 7 of Law N° 033/2026 oversees payment systems and sets clearing and settlement policy. The core systems are the automated transfer system (ATS) for large-value and interbank payments, the central securities depository (CSD), the retail clearing system known as RIPPS and the national retail switch, eKash; RSwitch Ltd, formerly SIMTEL, is a company in which the BNR holds an investment. Under Article 8 of **Law N° 061/2021 of 14/10/2021 governing the payment system** (the Payment System Law) the BNR may designate any clearing or settlement system that poses systemic risk, after which the operator needs prior approval to change its rules (Article 12), and Articles 39, 40 and 43 protect netting and the finality of settlement in designated systems.

Mobile money is the rail most customers use. The BNR's annual report for the 2024/25 financial year records mobile-money transfers of RWF 24,931 billion, up 56%, in 1,034 million transactions, and a rise of 219% in the volume of transactions through eKash. For a business selling to consumers, accepting mobile-money and card payments through a licensed acquirer or aggregator is therefore usually as important as having a bank account. Each sale must still be recorded with an electronic billing machine or other certified invoicing system for VAT purposes ([VAT and electronic invoicing](#)).

Businesses should choose collection partners with the licensing rules in mind. Under Article 27 of **Regulation N° 74/2023 of 18/09/2023 governing payment services providers**, a merchant acquirer or payment aggregator (category II) and a money remitter (category III) may not hold users' funds except funds in transit, and a category II provider must keep merchants' funds in a separate escrow account with a bank, restricted to transfers to the end beneficiary and covered by insurance or a bank guarantee from an institution outside its own group (Article 28). A merchant's money in the hands of a licensed aggregator is therefore ring-fenced from the aggregator's creditors, which is not the case if the merchant uses an unlicensed intermediary. Payments by cheque remain available, and Regulations N° 87/2024 of 19/12/2024 deal with bouncing cheques.

Paying abroad and receiving from abroad

Cross-border payments by residents must pass through authorised intermediaries, that is licensed banks and other licensed dealers, or the BNR (Article 20 of Regulation N° 42/2022). Import payments are not limited in amount but must be supported by documents, such as the final commercial invoice and the goods delivery note, and for payment after import also the customs bill of entry (Articles 14 to 17). Service fees, royalties, interest and dividends are paid against documents showing the source of funds (Article 24), and the payer must deduct withholding tax first, as explained in [Repatriating profits and capital](#) and [Withholding taxes and tax treaties](#). Expatriate employees may send their net salaries abroad (Article 23).

Two tax rules now bite at the payment stage. Since Ministerial Order N° 004/26/10/TC of 29/04/2026, non-resident suppliers of digital services to Rwandan customers must register for VAT or appoint a representative, and where they have not, the financial institution processing the payment withholds the VAT and pays it by the 15th of the following month. And the excise law, Law N° 011/2025 of 27/05/2025, lists a 15% excise on the amount or commission charged on financial transactions; the law states no deferred start, but commentators cite guidance of the Ministry of Finance and Economic Planning applying it from 1 July 2027, so businesses should confirm with their bank how fees will be charged.

Inbound money is free of exchange control: foreign-currency accounts may be freely credited (Article 11 of Regulation N° 42/2022) and the capital account is liberalised for direct and portfolio investment (Article 25). Every transfer carries customer due diligence obligations for the banks involved. Under Regulations N° 002/FIC/2026 of 22/06/2026, wire transfers, payments and value transfers of RWF 1,000,000 or more carry full originator and beneficiary information requirements and trigger customer due diligence for occasional customers, and transfers at or above the reporting thresholds are reported to the Financial Intelligence Centre (FIC) within two working days ([Anti-money-laundering and sanctions compliance](#)). Cross-border money remittance is a licensed activity (category III), governed also by Regulation N° 64/2023 on money remittance services, and regional integration is moving: the East African Community approved a Cross-Border Payment System Masterplan in May 2025.

Licensing a payments or e-money business

Under **Article 16 of the Payment System Law**, any person offering payment services must hold a BNR licence for the type of service, and the BNR licenses both payment system operators and payment service providers (Article 6(2)). Licensed banks and authorised microfinance institutions are exempt (Article 17). A provider must have a permanent place of business or registered office in Rwanda with at least one person available to handle customer queries and complaints (Article 23), and it is an offence to pretend to be licensed or to solicit the public to use unlicensed payment services (Article 22). Interoperability arrangements are set by BNR regulation (Article 25), agents may be used under Article 29, and customer funds must be safeguarded (Article 46).

Regulation N° 74/2023 sets four categories (Article 7) and the minimum initial capital for each. The applicant must be a company incorporated under Rwandan company law with a permanent place of business or registered office in Rwanda, a chief executive or managing director who is a Rwandan citizen or resident, a three-year strategy and business plan with realistic projections, fit and proper shareholders, directors and managers, and procedures that keep client funds identifiable and separate

from the provider's creditors (Article 15). Governance scales with the category: a category I provider needs a board of at least seven, at least four of them independent, four key senior managers (chief executive, chief financial officer, head of risk and compliance and head of information technology) and audit and risk committees; category II needs at least five directors, three of them independent; categories III and IV at least three directors, one independent (Articles 16 to 18). The chair and the chief executive may not be the same or related persons, and in category I a significant shareholder, meaning a holder of 5% or more, may not be chair, deputy chair or chief executive (Article 19). Directors and senior managers may not start work until the BNR has approved them (Article 29).

The procedure is fixed by the regulation. The application letter is addressed to the Governor with the information in Annex I; the BNR tells the applicant within **seven working days** if information is missing (Article 30) and, within **90 days** of a complete application, investigates and responds, stating any conditions, with written reasons for a refusal (Article 31). Before the licence issues, the applicant deposits its initial capital, proves it with a bank statement and pays a non-refundable licence fee of RWF 5,000,000 (category I), RWF 3,000,000 (II), RWF 1,000,000 (III) or RWF 2,000,000 (IV) (Article 32). Each year a licensed provider pays an oversight fee of 0.5% of its previous year's gross income, falling to 0.05% on income above RWF 20,000,000,000, by the end of April (Article 33). Acquisitions of shareholdings in payment service providers and payment system operators are governed by Regulations N° 94/2026 of 11/05/2026, and digital lenders and other non-deposit-taking providers by Regulations N° 96/2026 of 07/07/2026.

E-money issuers are also governed by **Regulation N° 54/2022 of 01/09/2022 governing the electronic money issuers**. A category I provider and a small e-money issuer in category II must establish a trusteeship arrangement (Article 26 of Regulation N° 74/2023). The e-money regulation requires at least 100% of the e-money float to be held in liquid assets in trust accounts, topped up whenever the float exceeds them and reconciled daily; a non-deposit-taking issuer's trust funds held with any one institution may not exceed 20% of the total, any excess being placed with another deposit-taking institution (Article 25); the issuer's articles must state that e-money owed to customers is held in trust and will not be encumbered on insolvency; and interest on trust accounts and individual e-money accounts is prohibited unless the account is explicitly a savings account (Article 38). The Investment Code's 15% corporate income tax rate is available to licensed fintechs that obtain an RDB investment certificate ([Investment incentives](#); [FAQ 92](#)).

Payment service provider licences under Regulation N° 74/2023

Category	Services	Minimum initial capital	Licence fee	Board
I	Large e-money issuer (wallet balances above RWF 50,000 and e-money outstanding of RWF 1,000,000,000 or more for six consecutive months) plus one or more other payment services	RWF 300,000,000	RWF 5,000,000	At least 7 directors, 4 independent; audit and risk committees

Category	Services	Minimum initial capital	Licence fee	Board
II	Small e-money issuer (wallet limit up to RWF 50,000 and less than RWF 1,000,000,000 outstanding), merchant acquiring or payment aggregation	RWF 100,000,000	RWF 3,000,000	At least 5 directors, 3 independent; risk committee
III	Money remittance	RWF 30,000,000, plus insurance of at least RWF 100,000,000 for funds held in vaults	RWF 1,000,000	At least 3 directors, 1 independent
IV	Payment initiation and account information services	RWF 50,000,000, plus professional indemnity insurance	RWF 2,000,000	At least 3 directors, 1 independent
All categories	Annual oversight fee	0.5% of prior-year gross income (0.05% above RWF 20,000,000,000), paid by April	Non-refundable; payable once the BNR confirms the application meets the requirements	Chair and chief executive must be different, unrelated persons

Cash, and the anti-money-laundering rules on payments

Cash remains lawful and widely used, but it attracts reporting. A person entering, leaving or transiting Rwanda with cash or bearer negotiable instruments worth **RWF 10,000,000** or more, or the equivalent in other currencies, must make a truthful declaration to the competent authority (Article 5 of Regulation N° 001/FIC/2023 of 26/06/2023 relating to the declaration of cross-border cash or bearer negotiable instruments). A false declaration or failure to declare allows officers to stop the courier and the cash, question the courier on the origin and intended use of the funds, and immediately impose an administrative fine of **5%** of the cash or instruments, without prejudice to criminal sanctions (Article 7).

Inside Rwanda, reporting persons such as banks, payment service providers, real estate agents and dealers in precious metals report cash transactions of RWF 10,000,000 or more by occasional customers (RWF 3,000,000 in casinos and RWF 15,000,000 for dealers in precious metals and stones) and wire transfers of RWF 1,000,000 or more, adding together linked transactions (Article 41 of Regulations N° 002/FIC/2026). A business that routinely pays suppliers or receives customer payments in cash should expect questions from its bank, and should never split payments to stay below a threshold, which is itself a reportable red flag.

Virtual assets, digital currency and trading platforms

Crypto-assets are not money in Rwanda. **Law N° 023/2026 of 25/05/2026 regulating virtual asset business**, published on 28 May 2026, makes the Capital Market Authority (CMA) the regulator of virtual asset service providers (Article 2(bb)). A legal entity providing virtual asset services must be licensed; a foreign-incorporated provider must be registered and keep a local presence in Rwanda (Article 10). Article 13 provides a regulatory sandbox, with conditions to be set by the CMA and the BNR, for business models the law does not yet cover. The penalties are severe: a natural person who engages in a virtual asset business faces a fine of RWF 30,000,000 to RWF 50,000,000 and three to five years' imprisonment, or one of them (Article 33); a legal entity providing virtual asset services without a licence faces a fine of RWF 70,000,000 to RWF 100,000,000 (Article 34); and issuing virtual assets without approval carries RWF 120,000,000 to RWF 150,000,000 (Article 35).

The BNR published a proof-of-concept report on a central bank digital currency in February 2026, but no digital franc had been issued at 10 October 2026. Retail leveraged foreign-exchange trading platforms are governed separately by CMA regulations on leveraged foreign exchange trading published in February 2024. Neither changes the rule that domestic prices and settlements are in Rwandan francs, and an investor considering a stablecoin or crypto payment product should start with the CMA's licensing route and the BNR's payment licence, which may both be needed (E-commerce, fintech and AI).

DECISION GUIDE

Can this business price or take payment in US dollars inside Rwanda?

A decision guide for a resident business dealing with customers in Rwanda. Answer in order.

Q1 Is the transaction a payment for goods or services exported from or imported into Rwanda?

Yes Payment in foreign currency is permitted by Article 20 bis of Regulation N° 42/2022 as amended; keep the export or import documents.

No Continue to Q2.

Q2 Is the business on the list of deemed authorised dealers in Article 4 of Directive N° 4230/2025-00042 (for example an RDB-licensed tourism entity, a KIFC entity recommended by Rwanda Finance Limited, a mining operator trading in minerals or an international school)?

Yes It may transact in foreign currency, but must accept Rwandan francs if offered and show the franc equivalent at the BNR daily average rate without surcharge.

No Continue to Q3.

Q3 Has the business obtained individual authorisation from the BNR through e-correspondence.bnr.rw?

Yes Transact within the terms of the authorisation and keep records for ten years.

No Price, invoice and settle in Rwandan francs; pricing in foreign currency risks a fine of RWF 5,000,000 and transacting 50% of the amount.

Applying for a payment service provider licence, step by step

1 Choose the category

Map the business model to category I to IV under Article 7 of Regulation N° 74/2023, bearing in mind that an e-money wallet above RWF 50,000 or float of RWF 1,000,000,000 for six months moves the issuer into category I.

2 Incorporate and staff the company

Register a Rwandan company with RDB, appoint a chief executive who is a Rwandan citizen or resident, a resident director and the board and senior managers the category requires.

3 Prepare the application

Letter to the Governor with the Annex I information, a three-year strategy and business plan, fit and proper files for shareholders, directors and managers, policies on safeguarding, outsourcing, AML and IT security.

4 Answer the completeness check

The BNR flags missing information within seven working days; processing starts only when it confirms the file is complete.

5 Receive the decision

The BNR responds within 90 days of a complete application, possibly with conditions; a refusal states its reasons and the applicant may resubmit.

6 Capitalise and pay

Deposit the initial capital (RWF 30,000,000 to RWF 300,000,000), present the bank statement and pay the licence fee (RWF 1,000,000 to RWF 5,000,000).

7 Go live and comply

Set up trust or escrow accounts, register with the FIC within 30 days of incorporation as a reporting person, appoint a compliance officer and pay the annual oversight fee by April.

WORKED EXAMPLE

A Kigali hotel's payments: what is lawful and what it costs

A Rwandan company licensed by RDB as a tourism entity runs a hotel. In one month it receives USD 80,000 from foreign tour operators, RWF 60,000,000 from local guests by card and mobile money, and it buys furniture from a Rwandan supplier for RWF 30,000,000. The exchange rate used is an illustrative RWF 1,450 to USD 1.

Tour operator receipts	USD 80,000 from abroad for services exported to non-residents: lawful in foreign currency under Article 20 bis, credited to the hotel's dollar account.
Local guests	As a deemed authorised dealer, the hotel may quote room rates in dollars to local guests, but must show the franc price: a USD 150 room is shown as RWF 217,500 ($150 \times 1,450$), and it must accept francs.
Card and mobile-money takings	RWF 60,000,000 collected through a licensed category II aggregator sits in the aggregator's escrow account until paid out, protected from the aggregator's creditors.
Local supplier	The furniture supplier is not an authorised dealer, so it must price and invoice in francs and the hotel pays RWF 30,000,000. Had the supplier invoiced in dollars and been paid in dollars without authorisation, it would face RWF 5,000,000 for pricing plus $50\% \times \text{RWF } 30,000,000 = \text{RWF } 15,000,000$ for transacting, RWF 20,000,000 in all.
Cash	A hotel is not a reporting person, so it files nothing with the FIC when a guest pays RWF 12,000,000 in cash; its bank applies its own monitoring to the deposit, and a guest who carried that cash into Rwanda had to declare it at the border because it exceeds RWF 10,000,000.

The 15% excise on commissions on financial transactions, reportedly applied from 1 July 2027, would increase the cost of the aggregator's fees.

Rates and amounts are illustrative; the BNR's daily average rate applies to price displays.

Questions investors ask

Can a Rwandan company invoice its local customers in US dollars?

Generally no. Law N° 033/2026 presumes obligations in Rwanda are expressed and settled in Rwandan francs, and Regulations N° 89/2025 fine pricing in foreign currency without permission RWF 5,000,000 and transacting 50% of the amount. Exceptions cover import and export payments and the deemed or individually authorised dealers under BNR Directive N° 4230/2025-00042.

Who licenses mobile money and payment businesses in Rwanda?

The National Bank of Rwanda, under Article 16 of Law N° 061/2021 governing the payment system and Regulation N° 74/2023. There are four licence categories with minimum capital of RWF 300 million, RWF 100 million, RWF 30 million and RWF 50 million; banks and authorised microfinance institutions are exempt from a separate licence.

Can a foreign fintech serve Rwandan customers without a local company?

Not as a payment service provider. Regulation N° 74/2023 requires a company incorporated in Rwanda with a permanent place of business there and a chief executive who is a Rwandan citizen or resident, and Article 22 of the Payment System Law prohibits soliciting the public to use unlicensed payment services. A foreign fintech can partner with a licensed provider or bank instead.

How long does the BNR take to decide a payment licence?

Under Regulation N° 74/2023, the BNR notifies missing information within seven working days and decides within 90 days of a complete application. The applicant then deposits the initial capital, shows a bank statement and pays a licence fee of RWF 1 million to RWF 5 million depending on the category.

Do I need to declare cash when entering Rwanda?

Yes, if you carry cash or bearer negotiable instruments worth RWF 10,000,000 or more, or the equivalent in other currencies, under Article 5 of Regulation N° 001/FIC/2023. Failing to declare, or declaring falsely, leads to an immediate administrative fine of 5% of the amount and possible criminal proceedings.

Is cryptocurrency legal for payments in Rwanda?

Virtual assets are regulated, not legal tender. Law N° 023/2026 makes the Capital Market Authority the licensing authority for virtual asset service providers, provides a regulatory sandbox, and fines a company providing virtual asset services without a licence RWF 70 million to RWF 100 million. Domestic payments remain subject to the Rwandan-franc rule.

THE 2027 HORIZON

- The 15% excise on amounts or commissions charged on financial transactions under Law N° 011/2025 is reported to apply from 1 July 2027; its start date and base should be confirmed against RRA's published position.
- Implementing regulations of the CMA and the BNR under Law N° 023/2026 on virtual assets, including the sandbox criteria in Article 13, are expected after the May 2026 law.
- New BNR instruments under Law N° 033/2026, which replaced the 2017 central bank law without an express saving clause, may restate or replace Regulation N° 42/2022 and the payment regulations.
- Work under the EAC Cross-Border Payment System Masterplan approved in May 2025 and the BNR's National Financial Inclusion Roadmap 2026 to 2030 may change cross-border and interoperability rules.
- The BNR's February 2026 proof-of-concept report on a central bank digital currency did not commit to issuance; any decision would be announced by the BNR.

Terms you will meet in the documents

English	Kinyarwanda	French	Meaning
Payment services providers	<i>Abatanga serivisi zo kwishyurana</i>	<i>Prestataires de services de paiement</i>	Persons licensed by the BNR under Regulation N° 74/2023 to issue e-money, acquire or aggregate payments, remit money or provide payment initiation and account information services.
Electronic money issuer	—	<i>Émetteur de monnaie électronique</i>	A provider that issues stored value against funds received, governed by Regulation N° 54/2022 and required to hold the float in trust accounts.
Trust account	—	<i>Compte en fiducie</i>	A separate bank account holding customers' e-money funds, segregated from the issuer's own funds and not available to its creditors.
Regulation governing foreign exchange operations	<i>Amabwiriza rusange agenga imikoreshereze y'amadovize</i>	—	BNR Regulation N° 42/2022 as amended by Regulations N° 89/2025, the source of the rules on pricing and settling in foreign currency.
Directive	<i>Amabwiriza yihariye</i>	—	A BNR instrument such as Directive N° 4230/2025-00042 on persons authorised to transact in foreign currencies.

English	Kinyarwanda	French	Meaning
National Bank of Rwanda	<i>Banki Nkuru y'u Rwanda</i>	—	The central bank, which licenses payment service providers and oversees payment systems.
Financial Intelligence Centre	<i>Urwego rushinzwe Ubutasi ku Mari</i>	<i>Centre de Renseignement Financier</i>	The FIC, which receives cash, wire transfer and suspicious transaction reports and sets the cash declaration threshold.
Regulatory sandbox	—	<i>Sandbox réglementaire</i>	A controlled testing framework under Article 13 of Law N° 023/2026 for virtual asset business models not covered by the law.

FOREIGN V RWANDAN INVESTOR

The currency rules turn on residence, not nationality. Every legal entity incorporated or registered in Rwanda, or effectively managed there, is resident for exchange-control purposes, and everyone is presumed resident unless shown otherwise (Article 9 of Regulation N° 42/2022); the limbs that treated some East African Community entities differently were removed in 2025. A foreign-owned Rwandan subsidiary is therefore bound by the Rwandan-franc rule exactly as a Rwandan-owned company is, and foreign shareholders gain nothing by invoicing through the local company in dollars.

The payment licensing rules also apply equally, but they favour local establishment: a payment service provider must be a Rwandan company with a chief executive who is a Rwandan citizen or resident, whereas a foreign virtual asset service provider may be licensed if registered with a local presence. Expatriates authorised to work in Rwanda, and businesses that supply them, appear among the deemed authorised dealers in foreign currency, which is one of the few places where foreign status matters.

WATCH OUT FOR

- Quoting, advertising or invoicing in dollars to Rwandan customers without being a deemed or authorised dealer: RWF 5,000,000 per pricing breach and 50% of the amount for each transaction.
- Offering wallets, collections or remittance to the public through an unlicensed entity: Article 22 of the Payment System Law makes soliciting for unlicensed payment services an offence.
- Assuming a foreign parent can hold the PSP licence: the regulation requires a Rwandan company, a Rwandan citizen or resident chief executive and BNR approval of directors and managers before they start.
- Paying interest or rewards on e-money balances, which Article 38 of Regulation N° 54/2022 prohibits unless the account is explicitly a savings account.
- Carrying RWF 10,000,000 or more in cash across the border without declaring it, which costs 5% of the amount on the spot.
- Splitting cash or transfer payments to stay below RWF 10,000,000 or RWF 1,000,000: linked transactions are added together and the pattern is itself suspicious.

OFFICIAL SOURCES

- National Bank of Rwanda: Law N° 033/2026 of 24/07/2026 governing the National Bank of Rwanda — https://www.bnr.rw/documents/Law_governing_NBR_2026.pdf
- Ministry of Justice: Official Gazette n° Special of 30/05/2025 (Regulations N° 89/2025 of 23/05/2025 amending Regulation N° 42/2022 governing foreign exchange operations) — <https://www.minijust.gov.rw/index.php?elD=dumpFile&t=f&f=130794&token=6f00e9b15aafacbcf8c4cdddad1bfcd2abf0b670>
- National Bank of Rwanda: Law N° 061/2021 of 14/10/2021 governing the payment system — https://www.bnr.rw/documents/Law_governing_the_Payment_system_2021.pdf
- National Bank of Rwanda: Regulation N° 74/2023 of 18/09/2023 governing payment services providers (Official Gazette n° 38 Bis of 25/09/2023) — https://www.bnr.rw/documents/Regulation_governing_payment_services_providers_2023_1.pdf
- National Bank of Rwanda: Annual Report 2024/25 — https://www.bnr.rw/documents/Annual_Report_2024_25_English_Full_Version_H3MVurT.pdf
- National Bank of Rwanda: Law N° 023/2026 of 25/05/2026 regulating virtual asset business — https://www.bnr.rw/documents/Law_regulating_virtual_asset_business.pdf

Anti-money-laundering and sanctions compliance: Law N° 001/2025 and the Financial Intelligence Centre, who is a reporting person, registration and the compliance officer, customer due diligence thresholds, suspicious and cash transaction reports, beneficial ownership, targeted financial sanctions and freezing within 24 hours, cross-border cash, penalties and Rwanda's standing with the FATF

Reviewed 10 October 2026 · Prepared by a commercial lawyer with over 30 years' international experience · Legal and tax information, not legal advice · [How we check](#) · [Open in the app](#)

WHAT YOU NEED TO KNOW

- Law N° 001/2025 of 22/01/2025 on the prevention and punishment of money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction, which replaced Law N° 028/2023, lists as reporting persons financial institutions, advocates, notaries and bailiffs doing transactional work, auditors, accountants and tax advisers, real estate agents, dealers in precious metals and stones, money distributors, casinos, trust and company service providers and virtual asset service providers (Article 8).
- Under Regulations N° 002/FIC/2026 of 22/06/2026 a reporting person registers with the Financial Intelligence Centre (FIC) within 30 days after incorporation (Article 4), notifies its compliance officer within three working days of appointment (Article 6), and applies customer due diligence to occasional transactions of RWF 10,000,000 or more, wire transfers of RWF 1,000,000 or more, casino transactions of RWF 3,000,000, cash dealings in precious metals and stones of RWF 15,000,000 and every real estate transaction, for buyer and seller alike (Article 15).
- Suspicious transactions are reported to the FIC whatever the amount within 24 hours (Article 39 of Regulations N° 002/FIC/2026), cash transactions and transfers at the same thresholds are reported within two working days of the transaction (Articles 41 and 42), records are kept for at least ten years (Article 43), and tipping off is prohibited while good-faith reporters are protected (Article 34 of Law N° 001/2025).
- Under Regulations N° 001/FIC/2025 of 15/01/2025 relating to targeted financial sanctions, every reporting person screens customers against the domestic and United Nations lists before establishing a relationship and freezes a designated person's funds without prior notice, 'without delay but no later than 24 hours', reporting to the FIC; breaches are fined RWF 3,000,000 to RWF 5,000,000 for individuals and RWF 5,000,000 to RWF 20,000,000 for legal persons (Article 27).
- Money laundering is punished by 10 to 15 years' imprisonment and a fine of three to five times the proceeds (Article 56), a legal person faces a fine of 10 to 20 times the value and possible dissolution (Article 62), and breaches of preventive duties are offences punished by one to three years' imprisonment or a fine of RWF 1,000,000 to RWF 5,000,000 for individuals and RWF 5,000,000 to RWF 20,000,000 for legal persons (Article 66).
- Rwanda's 2024 mutual evaluation by the Eastern and Southern Africa Anti-Money Laundering Group rated it Compliant or Largely Compliant on 19 of the 40 FATF Recommendations; an August 2025 follow-up report re-rated four Recommendations upwards (R.2 and R.12 to Compliant, R.5 and R.14 to Largely Compliant), bringing the total to 23, and Rwanda was not on the FATF list of jurisdictions under increased monitoring published on 19 June 2026.

The framework and the authorities

Rwanda's anti-money-laundering (AML) regime was rebuilt in 2025 and 2026. The statute is **Law N° 001/2025 of 22/01/2025 on the prevention and punishment of money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction** (the AML Law), which repealed Law N° 028/2023 of 19/05/2023 (Article 75). The Financial Intelligence Centre (FIC) operates under Law N° 045/2021 of 18/08/2021 governing the Financial Intelligence Centre, as amended by Law N° 002/2024 published on 22 January 2025. Three FIC instruments carry the detail: **Regulations N° 002/FIC/2026 of 22/06/2026** relating to anti-money laundering, combating the financing of terrorism and proliferation (the FIC Regulations), which repealed Regulation N° 002/FIC/2023; Regulations N° 001/FIC/2026 of

22/06/2026 determining faults and sanctions; and Regulations N° 001/FIC/2025 of 15/01/2025 relating to targeted financial sanctions. Cross-border cash is governed by Regulation N° 001/FIC/2023 of 26/06/2023.

The FIC receives and analyses reports, publishes guidance and red-flag indicators (Article 40 of the FIC Regulations) and keeps the national statistics. Sector supervisors check compliance: under Article 43 of the AML Law a supervisory authority regulates and monitors its reporting persons, licenses them, keeps criminals and their associates out of significant holdings and management, and conducts risk-based supervision. In practice the National Bank of Rwanda (BNR) supervises banks, microfinance institutions, insurers, payment service providers, foreign exchange bureaus and trust and company service providers; the Capital Market Authority (CMA) supervises capital market licensees and, since Law N° 023/2026 of 25/05/2026, virtual asset service providers, and has its own regulations on administrative sanctions for AML failures by capital market players. Suspected offences are investigated by the Rwanda Investigation Bureau (RIB) and prosecuted before the courts.

The AML Law defines its key terms broadly. A **beneficial owner** is the natural person who ultimately owns or controls a customer or on whose behalf a transaction is conducted, including anyone with ultimate effective control of a legal person or arrangement. A **politically exposed person** is someone entrusted with a prominent public function by Rwanda, a foreign State or an international organisation, with family members and close associates. Money laundering covers proceeds of crimes committed in Rwanda or abroad. And 'immediately' means within 24 hours at the latest (Article 2), a definition echoed in the targeted financial sanctions regulations, where it means without delay but no later than 24 hours after the decision is made, and that drives the freezing and reporting deadlines.

Is your business a reporting person?

Article 8 of the AML Law lists the **reporting persons**: (a) financial institutions, defined by activity so as to include deposit-taking, lending, leasing, money or value transfer, issuing payment instruments, investment management and money changing; (b) advocates, notaries, professional bailiffs and other independent legal professionals when they act for a client outside legal proceedings, in particular in buying and selling real estate, managing client money, securities or accounts, organising contributions to companies, and creating, operating or managing legal persons or arrangements or buying and selling businesses; (c) auditors, accountants and tax advisers; (d) real estate agents; (e) dealers in precious metals and precious stones; (f) persons in the business of distributing money; (g) casinos and national lottery gaming halls; (h) trust and company service providers; and (i) virtual asset service providers. An Order of the Minister may add others.

The list matters to investors in two ways. First, a business in one of these sectors, such as a fintech, a property brokerage, a dealer in precious metals or stones, a corporate services firm or a casino, carries its own AML obligations, registration and reporting duties, and its licence depends on them (FAQ 86). Second, every other business deals with reporting persons, above all its bank, its lawyers and its auditors, and will be asked for the information they need to perform customer due diligence on it. Mining and mineral-trading businesses have additional traceability and due diligence obligations under the mining framework, explained in [Sanctions, due diligence and reforms in the mining sector](#).

Registration, risk assessment and the compliance officer

Under Article 9 of the AML Law and Articles 3 and 4 of the FIC Regulations, a new reporting person must **register with the FIC** through the Centre's system within **30 days** after obtaining its certificate of incorporation, and must notify any change to its registration particulars in writing within seven working days. Failing to register on time is fined RWF 8,000,000 to RWF 10,000,000, and late notification of changes RWF 500,000 per day of delay for up to 30 days (Articles 3 and 4 of Regulations N° 001/FIC/2026).

Article 5 of the FIC Regulations requires a **risk-based approach**: the reporting person conducts and documents an institutional risk assessment at least once a year, and whenever its business, customer profile or services change significantly, informed by the national and sector risk assessments. It must have policies, procedures and internal controls (Article 29 of the AML Law and Article 32 of the FIC Regulations), an independent audit function (Article 33), training (Article 34) and group-wide controls over foreign branches and subsidiaries (Article 35). Failing to conduct the risk assessment is fined RWF 1,000,000 to RWF 3,000,000 (Article 7 of Regulations N° 001/FIC/2026).

Article 6 of the FIC Regulations requires a **compliance officer** at managerial level with sufficient authority, seniority and resources to act independently, with direct and unfettered access to the board, to which he or she reports compliance status. The FIC must be told of the appointment within three working days and of any change within 24 hours. Each year the reporting person files an annual compliance report with its supervisory authority, copied to the FIC (Article 44). For a foreign group setting up a regulated business in Kigali, the compliance officer should be one of the first hires.

Customer due diligence

Customer due diligence (CDD) is required before establishing a business relationship and for occasional transactions above the thresholds. The basic measures are to identify and verify the customer and its beneficial owners and to understand the purpose and intended nature of the relationship (Article 7 of the FIC Regulations; Articles 12 to 14 of the AML Law). For a company, the basic account-opening file contains the identification and identity numbers of the customer and its beneficial owners, the identity of signatories, the full professional address, the legal form, status and structure, the country of establishment, proof of incorporation and registered office, the nature and purpose of the activity and the expected use of the account (Article 11 of the FIC Regulations). The reporting person must verify that anyone acting for the customer is authorised (Article 12), and treat non-face-to-face customers by the same procedures as those met in person (Article 13); the practical steps are in [Opening corporate bank accounts](#).

Verification may be completed after the relationship begins only if this happens as soon as reasonably practicable, is essential not to interrupt normal business and the risks are effectively managed (Article 16 of the AML Law). Simplified measures are allowed for lower risks, and enhanced measures are mandatory for higher risks (Articles 8 and 9 of the FIC Regulations). A **foreign politically exposed person** is always treated as high-risk; a domestic or international organisation's politically exposed person is assessed case by case (Article 10). Customers connected with higher-risk countries attract enhanced measures and any countermeasures the FIC prescribes (Article 31 of the AML Law; Articles 18

and 19 of the FIC Regulations), and correspondent banking relationships have their own rules (Article 20). Existing customers are reviewed on the basis of materiality and risk, for example when ownership changes or transactions stop matching the customer's profile (Article 17 of the AML Law).

Article 15 of the FIC Regulations sets the triggers for **occasional transactions**: RWF 10,000,000 or more; a domestic or cross-border wire transfer, payment or value transfer of RWF 1,000,000 or more; a casino transaction of RWF 3,000,000 or more; a cash transaction of RWF 15,000,000 or more with a dealer in precious metals or stones; every real estate purchase or sale, with due diligence on both buyer and seller; and specified trust and company services such as forming companies, acting as or providing nominee directors, providing a registered office and acting as trustee. Linked transactions are added together. Wire transfers must carry originator and beneficiary information, fuller above the RWF 1,000,000 de minimis threshold (Articles 21 to 31).

Thresholds and deadlines at 10 October 2026

Obligation	Threshold or trigger	Deadline	Source
Register with the FIC as a new reporting person	Every reporting person	Within 30 days after the certificate of incorporation; changes within 7 working days	FIC Regulations, Article 4
Notify the compliance officer	Appointment or change	3 working days; changes within 24 hours	FIC Regulations, Article 6
Customer due diligence on occasional transactions	RWF 10,000,000; wire transfers RWF 1,000,000; casinos RWF 3,000,000; precious metals and stones cash RWF 15,000,000; all real estate deals	Before the transaction (verification may follow only under Article 16 of the AML Law)	FIC Regulations, Article 15
Suspicious transaction or activity report	Any amount, including attempted transactions	Within 24 hours from its occurrence	AML Law, Article 32; FIC Regulations, Article 39
Cash transaction or transfer report	RWF 10,000,000 for occasional customers (not bank-to-bank); RWF 3,000,000 casinos; RWF 15,000,000 precious metals and stones; RWF 1,000,000 wire transfers; linked transactions aggregated	Within two working days from the transaction	FIC Regulations, Articles 41 and 42
Freeze a designated person's funds	Any match with the domestic or UN list	Without delay, no later than 24 hours; report to the FIC	Regulations N° 001/FIC/2025, Articles 2 and 7
Cross-border cash declaration	RWF 10,000,000 or equivalent	On entry, transit or departure	Regulation N° 001/FIC/2023, Article 5

Obligation	Threshold or trigger	Deadline	Source
Record keeping	Transactions, CDD files, correspondence and analyses	At least 10 years; records handed to the supervisor within 30 days if the business ceases	FIC Regulations, Article 43
Annual compliance report	Every reporting person	To the supervisor, copied to the FIC, on the template and timetable set	FIC Regulations, Article 44

Reporting to the Financial Intelligence Centre

A reporting person must report to the FIC whenever it suspects, or has reasonable grounds to suspect, that funds or other assets are the proceeds of crime or are linked to money laundering, terrorist financing or proliferation financing, **regardless of the amount** and including attempted transactions (Article 32 of the AML Law). The report is made on the FIC's template, electronically or through another channel the FIC sets, **within 24 hours** from the occurrence (Article 39 of the FIC Regulations). Separately, cash transactions and value transfers at or above the thresholds in the table are reported within two working days from the transaction, whether or not anything is suspicious (Article 33 of the AML Law; Articles 41 and 42 of the FIC Regulations).

Under **Article 34 of the AML Law**, the reporting person, its directors, senior managers and employees may not disclose that a suspicious transaction report has been filed, and they are protected from criminal and civil liability for breach of any confidentiality restriction if they report in good faith, even if they did not know precisely what the underlying crime was and whether it actually occurred. Revealing a report to a third party or warning the person concerned is an offence under Article 63. Failing to submit a required report, or submitting an incomplete or erroneous one, is an administrative fault fined RWF 2,000,000 to RWF 4,000,000 per report, rising to RWF 5,000,000 to RWF 7,000,000 where the aim was to hide a fault (Article 6 of Regulations N° 001/FIC/2026).

Beneficial ownership

Beneficial ownership is the point at which the AML regime and company law meet. A person holding **25% or more** of the shares or voting rights is a beneficial owner under Instructions of the Registrar General N° 001/2023/RG of 31/03/2023, and the Companies Law requires every company to keep a register of beneficial owners, file it with the Registrar General at the Rwanda Development Board (RDB) and report changes within 14 days ([Beneficial ownership and transparency](#)). Article 35 of the AML Law requires the registration authority to keep adequate, accurate and updated beneficial ownership information and to make it publicly available in a timely manner.

Banks do not stop at the register. They must identify every natural person who ultimately owns or controls the customer, which for a fund, trust or layered group means tracing through each holding vehicle to individuals, and they will compare what the customer tells them with the Registrar General's records. A discrepancy is itself a reason for enhanced scrutiny and, if unexplained, a possible suspicious

transaction report. Investors who hold through trusts, nominees or funds should prepare a structure chart with ownership percentages and the identity documents of each beneficial owner before approaching a Rwandan bank.

Targeted financial sanctions and screening

Rwanda implements United Nations sanctions through **Regulations N° 001/FIC/2025 of 15/01/2025 relating to targeted financial sanctions** and the National Counter-terrorism Committee, whose responsibilities for targeted financial sanctions are determined by a Prime Minister's Order under Article 67 of the AML Law. A designated person is one listed as a terrorist or financier of terrorism or proliferation under domestic law or United Nations Security Council resolutions. The domestic list is published on the website of the Ministry in charge of justice and the United Nations list is accessible through the FIC's website (Article 4), and the FIC disseminates designations and changes to reporting persons and others (Article 5).

Every reporting person, supervisor and competent authority must **screen** names and addresses against the consolidated list on receipt of each list and before establishing any business relationship (Article 6). On a match, it must **freeze** or seize all funds and assets owned or controlled by the designated person, directly or indirectly, including those held in the name of associates or relatives, without prior notice to that person, and report to the FIC (Article 7). 'Immediately' means without delay and no later than 24 hours. Frozen funds stay frozen until delisting; the FIC may appoint an administrator; a designated person may apply for access to cover basic or extraordinary expenses (Articles 8, 12 and 14); and reporting persons must report any frozen assets, attempted dealings and assets held by the designated person in the three years before designation (Article 13). Breaches are fined RWF 3,000,000 to RWF 5,000,000 for an individual and RWF 5,000,000 to RWF 20,000,000 for a legal person (Article 27). The BNR may also prohibit any transfer of foreign currency abroad to meet Rwanda's international obligations (Article 33 of Regulation N° 42/2022).

Rwandan law gives effect to United Nations and domestic designations, not to the unilateral sanctions of other states. Those regimes, such as the United States, European Union and United Kingdom programmes, still bind a foreign investor through its own nationality, its group's place of incorporation or the currency and banks used, and Rwandan banks with correspondent relationships in those currencies screen against them in practice. A group should therefore screen its Rwandan counterparties against every list that applies to it, not only the Rwandan one.

Cross-border cash

Under Article 36 of the AML Law and **Article 5 of Regulation N° 001/FIC/2023**, a person entering, transiting through or leaving Rwanda with cash or bearer negotiable instruments worth **RWF 10,000,000** or more, or the equivalent in other currencies, must make a truthful declaration or disclosure to the competent authority, in advance or at the border on the available form. Amounts carried by an accompanied person under 18 are added to the accompanying adult's. A false declaration or failure to declare allows officers to stop and hold the courier and the cash for further action, question the courier on the origin and intended use of the funds, and immediately impose an administrative fine

of **5%** of the amount, without prejudice to criminal sanctions; the FIC is informed within 30 minutes (Article 7). Investors bringing capital into Rwanda should use bank transfers, which create the paper trail the bank will later need for repatriation ([FAQ 69](#)).

Penalties

The AML Law's criminal penalties are among the heaviest in Rwandan law. **Money laundering** carries 10 to 15 years' imprisonment and a fine of three to five times the value of the proceeds laundered (Article 56); **terrorist financing** 20 to 25 years and a fine of three to five times the financing, or life imprisonment where death results (Article 57). A **legal person** convicted of either is fined 10 to 20 times the value of the proceeds or financing and may be dissolved, have its premises permanently closed and see the judgment published (Article 62). Penalties are doubled for organised crime or recidivism (Article 65), and on conviction the court orders confiscation of the laundered assets, proceeds, instrumentalities and property of equivalent value (Article 68).

Breaches of the preventive duties are offences in their own right under **Article 66**: a person who fails to meet the obligations on CDD, politically exposed persons, correspondent banking, wire transfers, internal controls, reporting or tipping off faces one to three years' imprisonment or a fine of RWF 1,000,000 to RWF 5,000,000, and a legal person a fine of RWF 5,000,000 to RWF 20,000,000. On top of these, the FIC's administrative fines under Regulations N° 001/FIC/2026 apply to specific faults, and supervisors such as the BNR and the CMA impose their own sanctions, including on licences.

Rwanda's international standing

Rwanda's anti-money-laundering system was assessed by the **Eastern and Southern Africa Anti-Money Laundering Group** (ESAAMLG), the FATF-style regional body for the region, which applies the standards of the Financial Action Task Force (FATF), in a mutual evaluation report published in July 2024. On technical compliance with the 40 FATF Recommendations, Rwanda was rated Compliant on 5, Largely Compliant on 14, Partially Compliant on 20 and Non-Compliant on 1 (Recommendation 8, on non-profit organisations); on effectiveness, 10 of the 11 Immediate Outcomes were rated low. Rwanda was placed in enhanced follow-up. Its second enhanced follow-up report, adopted by ESAAMLG in August 2025, credited the 2025 AML Law and related measures and re-rated four Recommendations: R.2 (national cooperation and coordination) and R.12 (politically exposed persons) to Compliant, and R.5 (terrorist financing offence) and R.14 (money or value transfer services) to Largely Compliant, while R.15 (new technologies), R.22 (customer due diligence for designated non-financial businesses) and R.35 (sanctions) stayed Partially Compliant. On the FATF's published ratings that takes Rwanda to 7 Compliant, 16 Largely Compliant, 16 Partially Compliant and 1 Non-Compliant; effectiveness ratings are not revisited in technical compliance follow-up. The 2026 FIC Regulations continue that work. Rwanda was not on the FATF's list of jurisdictions under increased monitoring published on 19 June 2026, which spares Rwandan banks the correspondent-banking pressure that listing brings, although each foreign bank still makes its own risk assessment of Rwandan counterparties.

Setting up an AML programme for a regulated business in Rwanda

1 Confirm the status

Check whether the business falls within Article 8 of the AML Law, and identify the supervisor (BNR, CMA or other) whose licence and AML rules apply.

2 Register with the FIC

Register through the FIC's system within 30 days after incorporation, and diarise the seven-working-day rule for later changes.

3 Appoint the compliance officer

Appoint a manager with authority, resources and board access, and notify the FIC within three working days.

4 Assess the risks

Document an institutional risk assessment of customers, countries, products, services and channels, informed by the national risk assessment, and repeat it at least yearly.

5 Write the policies and controls

CDD, enhanced due diligence for foreign politically exposed persons and higher-risk countries, wire transfer data, sanctions screening, freezing, reporting, record keeping, training and independent audit.

6 Connect the screening and reporting tools

Screen customers against the domestic and UN lists before onboarding and on each list update; set up suspicious (24 hours) and threshold (two working days) reporting to the FIC.

7 Report and review

File the annual compliance report with the supervisor and FIC, keep records for ten years, and update the programme when the business or the rules change.

WORKED EXAMPLE

A Kigali real estate agency: one sale, four obligations

A licensed real estate agency in Kigali, a reporting person under Article 8(d) of the AML Law, acts on the sale of an apartment for RWF 180,000,000. The buyer is a company owned 60% by a foreign individual who sits in his home country's parliament and 40% by a Rwandan; it proposes to pay RWF 170,000,000 by bank transfer and RWF 10,000,000 in cash. Figures are illustrative.

Due diligence on both parties	Every real estate transaction triggers CDD on buyer and seller (Article 15(d) of the FIC Regulations), whatever the price.
Beneficial owners	Both shareholders hold 25% or more, so both are beneficial owners: the agency identifies and verifies each, and checks the Registrar General's register.

Politically exposed person	The 60% owner is a foreign politically exposed person, always high-risk (Article 10): enhanced measures apply, such as establishing the source of the funds used to buy.
Cash component	RWF 10,000,000 in cash equals the RWF 10,000,000 threshold for an occasional customer (Article 41(1)(a)); the agency reports it to the FIC within two working days of the transaction.
Suspicion	If the buyer then proposes to split the cash into two payments of RWF 5,000,000 to avoid the report, the linked payments are still aggregated (Article 41(3)) and the attempt itself calls for a suspicious transaction report within 24 hours, without telling the buyer.
Cost of getting it wrong	Failing to file the cash report: RWF 2,000,000 to RWF 4,000,000 administrative fine; failing to apply the CDD measures: an Article 66 offence with a fine for the agency of RWF 5,000,000 to RWF 20,000,000.

The bank receiving the RWF 170,000,000 transfer applies its own CDD and may ask the agency for its file.

Records of the transaction and the CDD file are kept for at least ten years.

Questions investors ask

Which businesses must comply with anti-money-laundering rules in Rwanda?

Reporting persons under Article 8 of Law N° 001/2025: financial institutions, advocates and notaries doing transactional work, auditors, accountants and tax advisers, real estate agents, dealers in precious metals and stones, money distributors, casinos and lotteries, trust and company service providers and virtual asset service providers. Other businesses meet the rules through their banks' due diligence.

When must a Rwandan bank or business report to the Financial Intelligence Centre?

A suspicious transaction must be reported within 24 hours, whatever the amount, including attempts. Cash transactions and transfers are reported within two working days at RWF 10,000,000 for occasional customers, RWF 3,000,000 for casinos, RWF 15,000,000 for dealers in precious metals and stones and RWF 1,000,000 for wire transfers, adding linked transactions together.

What is the beneficial ownership threshold in Rwanda?

25% of the shares or voting rights, under Instructions of the Registrar General N° 001/2023/RG. Companies keep a beneficial ownership register and file it with the Registrar General at RDB, and banks must identify every natural person who ultimately owns or controls a customer, tracing through trusts, funds and holding companies.

How fast must assets of a sanctioned person be frozen in Rwanda?

Without delay and no later than 24 hours, without prior notice to the designated person, under Regulations N° 001/FIC/2025. Reporting persons screen against the domestic list and the United Nations list before onboarding and on every update, and report frozen assets to the FIC. Breaches are fined up to RWF 20,000,000 for a legal person.

What are the penalties for money laundering in Rwanda?

Ten to 15 years' imprisonment and a fine of three to five times the proceeds for an individual under Article 56 of Law N° 001/2025. A legal person is fined 10 to 20 times the value and may be dissolved or closed. Failing to apply preventive measures is a separate offence, fined RWF 5,000,000 to RWF 20,000,000 for a company.

Is Rwanda on the FATF grey list?

No. Rwanda was not on the FATF list of jurisdictions under increased monitoring published on 19 June 2026. Its 2024 ESAAMLG mutual evaluation rated it Compliant or Largely Compliant on 19 of 40 Recommendations and found low effectiveness on most outcomes; an August 2025 follow-up report raised four ratings, to 23 of 40 Compliant or Largely Compliant, and the 2025 and 2026 laws and regulations continue to address the gaps.

THE 2027 HORIZON

- Rwanda remains in ESAAMLG enhanced follow-up after the August 2025 re-rating of four Recommendations; further follow-up reports will test whether the 2026 FIC Regulations lift the ratings still at Partially Compliant, such as R.15, R.22 and R.35, and ESAAMLG's next report should be watched.
- The FIC Regulations call for guidance, indicators and templates (Articles 39, 40 and 44); further FIC guidance on registration, reporting and the annual compliance report timetable is expected.
- Implementing regulations under Law N° 023/2026 on virtual assets will set the AML expectations for virtual asset service providers supervised by the CMA.
- An Order of the Minister may add new categories of reporting person under Article 8 of the AML Law; none had been published at 10 October 2026.
- Any new BNR regulation under Law N° 033/2026 replacing Regulation N° 42/2022 may restate the BNR's power to block transfers abroad to meet international obligations.

Terms you will meet in the documents

English	Kinyarwanda	French	Meaning
Money laundering	<i>lyezandonke</i>	<i>Blanchiment de capitaux</i>	Converting, concealing, acquiring or using the proceeds of crime committed in Rwanda or abroad, punished under Article 56 of Law N° 001/2025.

English	Kinyarwanda	French	Meaning
Financial Intelligence Centre	<i>Urwego rushinzwe Ubutasi ku Mari</i>	<i>Centre de Renseignement Financier</i>	The FIC, which registers reporting persons, receives suspicious and threshold reports and implements targeted financial sanctions.
Reporting person	—	<i>Personne déclarante</i>	A business listed in Article 8 of the AML Law that must register with the FIC, apply due diligence and report.
Beneficial owner	<i>Ugenewe inyungu ku migabane</i>	<i>Bénéficiaire effectif</i>	The natural person who ultimately owns or controls a customer; 25% of shares or votes in a Rwandan company.
Customer due diligence	—	<i>Vigilance à l'égard de la clientèle</i>	Identifying and verifying a customer and its beneficial owners and understanding the purpose of the relationship.
Targeted financial sanctions	—	<i>Sanctions financières ciblées</i>	Freezing and prohibitions applied to persons designated under the domestic or United Nations lists, under Regulations N° 001/FIC/2025.
Designated persons	—	<i>Personnes désignées</i>	Persons or entities listed as terrorists or financiers of terrorism or proliferation whose assets must be frozen within 24 hours.
Freezing or seizing of funds	—	<i>Gel ou saisie de fonds</i>	Prohibiting the transfer or use of a designated person's assets without prior notice, until delisting (Article 7 of Regulations N° 001/FIC/2025).
Declaration of cross-border cash	<i>Imenyekanisha ry'amafaranga</i>	<i>Déclaration d'espèces</i>	The declaration required for cash or bearer instruments of RWF 10,000,000 or more crossing the border.

FOREIGN V RWANDAN INVESTOR

The AML and sanctions rules apply in the same way to Rwandan and foreign businesses and customers. What differs is the risk rating that results. A foreign politically exposed person is always treated as high-risk under Article 10 of the FIC Regulations, whereas a domestic one is assessed case by case; customers with links to higher-risk countries attract enhanced measures; and non-resident customers whose owners must be traced through foreign holding companies, trusts or funds take longer to verify. A foreign investor should therefore expect more questions, and earlier, than a Rwandan one, and should prepare certified, translated corporate documents and a beneficial ownership chart in advance.

Investors from East African Community or COMESA states are treated like other non-residents for these purposes. Foreign investors also remain bound by their home states' sanctions and anti-bribery laws, which Rwandan law does not displace and which their banks will apply.

WATCH OUT FOR

- Starting a regulated activity without registering with the FIC within 30 days of incorporation: a fine of RWF 8,000,000 to RWF 10,000,000.
- Treating the beneficial ownership register as a formality: banks verify it against the 25% test and their own tracing, and gaps trigger enhanced scrutiny.
- Splitting cash or transfers below RWF 10,000,000 or RWF 1,000,000 to avoid reports: linked transactions are aggregated and structuring is itself suspicious.
- Telling a customer or counterparty that a suspicious transaction report has been or may be filed, which is an offence under Article 63 of the AML Law.
- Screening only against Rwandan and UN lists when the group is also bound by US, EU or UK sanctions through its nationality or currency.
- Carrying cash of RWF 10,000,000 or more across the border undeclared, which costs 5% of the amount immediately.

OFFICIAL SOURCES

- National Bank of Rwanda: Law N° 001/2025 of 22/01/2025 on the prevention and punishment of money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction — https://www.bnr.rw/documents/2025_AMLCFT_LAW.pdf
- Rwanda Law Portal (amategeko.gov.rw): Regulations N° 002/FIC/2026 and N° 001/FIC/2026 of 22/06/2026, Official Gazette n° 25 Bis of 22/06/2026; Regulations N° 001/FIC/2025 of 15/01/2025; Regulation N° 001/FIC/2023 of 26/06/2023 — <https://amategeko.gov.rw>
- Financial Intelligence Centre of Rwanda — <https://fic.gov.rw>
- FATF: Rwanda mutual evaluation report 2024 — <https://www.fatf-gafi.org/en/publications/Mutualevaluations/MER-Rwanda-2024.html>
- ESAAMLG: Rwanda 2nd Enhanced Follow-up Report and 1st Technical Compliance Re-rating, August 2025 — <https://www.esaamlg.org/reports/Rwanda%20FUR-August%202025.pdf>
- FATF: Jurisdictions under increased monitoring, 19 June 2026 — <https://www.fatf-gafi.org/en/publications/High-risk-and-other-monitored-jurisdictions/increased-monitoring-june-2026.html>

Capital markets, project finance and KIFC funds: the Capital Market Authority and the Rwanda Stock Exchange, public offers and listing, foreign-currency and green bonds, governance and takeover rules for listed companies, the central securities depository and netting law, tax on securities, collective investment schemes, trusts and foundations under the Kigali International Financial Centre, public-private partnerships, and what project lenders need

Reviewed 10 October 2026 · Prepared by a commercial lawyer with over 30 years' international experience · Legal and tax information, not legal advice · [How we check](#) · [Open in the app](#)

WHAT YOU NEED TO KNOW

- Rwanda's securities market is governed by Law N° 01/2011 of 10/02/2011 regulating capital market in Rwanda, as modified by Law N° 45/2018 of 13/08/2018, and supervised by the Capital Market Authority (CMA) under Law N° 057/2021 bis of 18/09/2021; no one may offer securities to the public without first filing a prospectus for the CMA's approval (Article 54), and the Rwanda Stock Exchange listed ten equities with a market capitalisation of about RWF 6,728 billion on 9 October 2026.
- CMA Directive N° 01/2025 of 30/10/2025 allows securities denominated in currencies other than the Rwandan franc to be issued by the Government, foreign-currency earning companies, foreign entities and multilateral organisations, and bought by foreign-currency earners, foreign investors, the diaspora, international organisations and expatriates, while CMA Guidelines N° 003/CMA_G/2024 of 09/12/2024 set the framework, external review and reporting for green, social, sustainability and sustainability-linked (GSS+) bonds.
- Gains on listed securities and on collective investment scheme units are exempt from capital gains tax (Article 38 of Law N° 027/2022), dividends and interest on listed securities paid to residents of Rwanda or the East African Community bear 5% withholding tax, interest on Treasury bonds of three years or more bears 5%, and a licensed collective investment scheme meeting the Investment Code's substance tests pays 3% corporate income tax and 0% withholding tax on its distributions.
- Law N° 016/2025 of 02/06/2025 governing the central securities depository, qualified financial contracts and netting agreements requires a CMA licence to operate a central securities depository (the National Bank of Rwanda excepted) and makes close-out netting and collateral under qualified financial contracts enforceable against an insolvent party, free of stays and preference challenges (Articles 4, 40 and 45 to 47).
- Public-private partnerships are governed by Law N° 14/2016 of 02/05/2016, with projects approved by a PPP Steering Committee, procured by the contracting authority and negotiated by RDB, while a Rwandan bank's foreign-currency loan to a project is subject to National Bank of Rwanda Directive N° 46/2026, which requires foreign-currency cash flow of at least 120% of annual debt service.

The market and its regulators

Rwanda's capital market is small but its legal framework is modern and has been substantially renewed since 2021. The **Capital Market Authority (CMA)**, established by Law N° 057/2021 bis of 18/09/2021, regulates securities, collective investment schemes, trusts business, the central securities depository and, since Law N° 023/2026 of 25/05/2026, virtual asset service providers. The core statute is **Law N° 01/2011 of 10/02/2011 regulating capital market in Rwanda** (the Capital Market Law), published in the Official Gazette n° 13bis of 28/03/2011 and modified by Law N° 45/2018 of 13/08/2018, which rewrote the insider-dealing and offence provisions. The **Rwanda Stock Exchange (RSE)** operates Main, SME, Fixed Income, Green and multi-currency segments, and on 9 October 2026 listed ten equities with a total market capitalisation of RWF 6,728,252,759,081. The National Bank of Rwanda (BNR) operates the central securities depository and supervises banks and insurers, so a listed bank or insurer answers to both regulators.

Under Article 6 of the Capital Market Law no one may carry on capital market business in Rwanda, as defined by the activities in Annex II of the law, unless licensed, approved or exempted, and a **foreign person** may be authorised if the CMA is satisfied that it is regulated and licensed by a foreign agency

with equivalent powers. The CMA's published rules include regulations on takeovers, fees, licensees' financial reporting, credit rating agencies, real estate investment trusts, leveraged foreign exchange trading (February 2024), administrative sanctions for anti-money-laundering failures, the licensing of central securities depository operators and participants, and, since 2 October 2026, **Regulations N° 002/CMA/2026 of 02/10/2026 relating to the capital market corporate governance**, which replaced the 2012 corporate governance code. A draft Capital Market Business Bill circulated in August 2025 would replace the 2011 law and add a regulatory sandbox, Islamic securities and recognition of foreign rating agencies; its enactment had not been confirmed at 10 October 2026.

Raising capital: public offers, listing and governance

The gateway rule is **Article 54 of the Capital Market Law**: no person in Rwanda may offer capital market instruments for subscription or sale to the public, or to a section of the public, unless it first publishes a duly signed prospectus, a copy of which must be filed with the CMA for prior approval. The prospectus must comply with the companies law and the CMA's rules on issuing instruments to the public (Article 53), and debt issues follow the CMA's Regulation N° 15 on the issuance of capital market debt securities. Listing on the RSE then requires compliance with the exchange's rules for the relevant segment. Whether an offer to a limited group of professional investors is an offer to 'a section of the public' depends on the CMA's rules and practice and should be checked before any placement, and the intermediaries involved must in any case be licensed.

A listed company accepts continuing obligations. **Regulations N° 002/CMA/2026** apply to listed companies and other issuers and require material information to be published immediately (Articles 3 and 39); the press has reported that they also separate the roles of chair and chief executive. Insider dealing is an offence punishable by three to five years' imprisonment and a fine of RWF 80,000,000 to RWF 100,000,000 under Article 69 of the Capital Market Law as replaced in 2018, and refusing without good reason to comply with investigators' requirements by one to two years' imprisonment and a fine of RWF 3,000,000 to RWF 5,000,000, or one of them (Article 72 bis, inserted in 2018). Takeovers of listed companies follow the Capital Markets (Takeovers) Regulations N° 10 of 2012, with a mandatory offer when a holding reaches 25% and disclosure of holdings crossing 5%; the timetable is explained in [Public companies, the Rwanda Stock Exchange and takeovers](#). The company law rules on directors, including the resident director and company secretary, are in [Directors, governance and the company secretary](#).

Foreign-currency and sustainable bonds

Rwanda's Rwandan-franc rule, which presumes domestic obligations are settled in francs, would ordinarily stand in the way of dollar-denominated securities. **CMA Directive N° 01/2025 of 30/10/2025** establishing rules governing the issuance and trading of multicurrency denominated securities, signed on 20 November 2025 and in force on signature, provides the route. Under Article 2, eligible issuers may issue securities denominated in any currency other than the Rwandan franc. Article 3 lists the eligible issuers: the Government of Rwanda, corporates that generate foreign-currency revenues from their operations, foreign entities and multilateral organisations. Article 4 limits the investors to corporates with foreign-currency revenues, foreign investors, Rwandans living abroad, international organisations with foreign currency sourced from abroad and expatriates with justifiable foreign-currency income.

Under Article 5 the BNR oversees the stability and prudential management of multicurrency activities with the CMA and the RSE. A tourism, mining or export business that earns dollars can therefore raise dollar debt on the domestic market without creating a currency mismatch, while ordinary Rwandan retail investors remain in the franc market ([Foreign exchange rules](#)).

CMA Guidelines N° 003/CMA_G/2024 of 09/12/2024 on the issuance of green, social, sustainability and other labelled (GSS+) bonds apply to listed and unlisted labelled bonds. They align with the International Capital Market Association's Green Bond Principles and related guidelines and, where applicable, Rwanda's green taxonomy. An issuer adopts a GSS+ bond framework, obtains a pre-issuance review from an independent external reviewer, manages the proceeds of a use-of-proceeds bond for eligible projects, or for a general-purpose sustainability-linked bond selects key performance indicators and sustainability performance targets, and reports on allocation and impact after issue, with post-issuance external review. The CMA may act on breaches and the exchange may suspend trading (Articles 12 and 13). The BNR's Guidelines N° 040/2024 of 25 November 2024 on sustainability disclosure for financial institutions complement the regime on the lender side.

Investing as a portfolio investor

Foreign portfolio investment is open. Article 25 of Regulation N° 42/2022 of 13/04/2022 governing foreign exchange operations liberalises portfolio investment between residents and non-residents, a non-resident may hold a Rwandan franc non-resident account and a foreign-currency account, and the proceeds of sale and income may be repatriated under Article 12 of Law N° 006/2021 of 05/02/2021 on Investment Promotion and Facilitation once tax has been paid ([Repatriating profits and capital](#)). Securities are held in book-entry form through the central securities depository, and an investor deals through a CMA-licensed broker and a custodian.

The tax position favours listed and pooled investments. Gains on listed securities on an exchange operating in Rwanda and on units of collective investment schemes are exempt from capital gains tax (Article 38 of Law N° 027/2022 of 20/10/2022 establishing taxes on income), whereas a gain on unlisted shares bears 10% since 29 May 2025. Dividends and interest on listed securities bear **5%** withholding tax when paid to residents of Rwanda or another East African Community (EAC) Partner State, and 15% or the treaty rate otherwise; interest on Treasury bonds with a maturity of at least three years bears 5%; and distributions to holders of units in a collective investment scheme are outside dividend withholding tax. Point XI of the Annex to the Investment Code separately states a 5% rate on dividends and interest paid to 'an investor investing in a company listed on the Rwanda Stock Exchange', without the residence condition in Article 60; whether a non-EAC investor can rely on it has not been settled in any published ruling, and RRA's position should be confirmed before relying on it ([Withholding taxes and tax treaties](#)).

Investors in listed banks should note the banking law's ownership rules. Under Law N° 044/2024 of 30/05/2024 governing banks, acquiring a significant holding of 5% of a bank's capital or votes needs prior BNR authorisation, no person with related parties may hold more than 25% of a bank unless the BNR authorises a reputable institution to exceed it, and shares held in breach carry no votes or dividends (Articles 20 and 21).

Tax on returns from Rwandan securities and funds at 10 October 2026

Return	Rwanda or EAC resident investor	Other foreign investor	Source
Dividend from an RSE-listed company	5% withholding tax	15%, or the treaty rate, under Article 60; point XI of the Investment Code Annex states 5% for investors in RSE-listed companies without a residence condition (confirm with RRA)	Article 60, Law N° 027/2022; Annex to Law N° 006/2021, point XI
Interest on listed securities	5%	15%, or the treaty rate, subject to the same point XI question	Article 60
Interest on Treasury bonds of three years or more	5%	5%	Article 60
Gain on listed shares or bonds	Exempt	Exempt	Article 38
Gain on unlisted shares, direct or indirect	10% (business gains of a resident company taxed in its return at 28%)	10%, withheld by the Rwandan company	Articles 35 to 37 as amended by Law N° 014/2025
Distribution by a collective investment scheme	Outside dividend withholding tax	Outside dividend withholding tax; 0% if the scheme is on the KIFC regime	Article 60; Annex to Law N° 006/2021, point X
Gain on collective investment scheme units	Exempt	Exempt	Article 38
Profit of a licensed scheme meeting the substance tests	3% corporate income tax	3% corporate income tax	Annex to Law N° 006/2021, point II

Funds, trusts and foundations under the Kigali International Financial Centre

The Kigali International Financial Centre (KIFC) is not a separate jurisdiction: a fund in Kigali is an ordinary Rwandan vehicle under the 2021 vehicle laws, supervised by the ordinary regulators, with access to the Investment Code's preferential tax regimes if it meets their substance tests. The tax regimes, the substance conditions and the role of Rwanda Finance Limited are explained in [Kigali International Financial Centre](#); this part concentrates on the fund rules ([FAQ 68](#)).

A **collective investment scheme** (CIS) must be licensed by the CMA under Law N° 062/2021 of 14/10/2021 governing collective investment schemes, or exempted where it meets the criteria of Article 20 of that law, in which case it must still comply with Article 21. The scheme's operator must be a licensed investment manager and the scheme must have a licensed custodian, which may act as corporate trustee of a unit trust or depositary of a partnership or contractual scheme; for the 3% regime in point II of the Investment Code Annex, the scheme's manager, custodian and operator must be

established in Rwanda, at least 30% of its professional staff must be Rwandan, at least 25% of its directors must reside in Rwanda and at least half the board must attend board meetings in Rwanda, and the fund must reach USD 1,000,000 within three years and spend at least USD 50,000 a year in Rwanda. KIFC states that a licensed scheme pays an annual fee of RWF 1,000,000 and a prospectus approval fee of 0.05% of the offer, and that licences are issued within 30 days of a complete application. The CMA's regulations under the 2021 law were reported as still in draft in 2026, so licensing detail rests partly on CMA practice. Fund vehicles may also take the form of a trust under Law N° 063/2021 of 14/10/2021 governing trusts, a foundation under Law N° 059/2021 of 14/10/2021, or a partnership, which KIFC describes as tax-transparent.

Three further rules make Kigali workable for international funds. KIFC-regime entities recommended by Rwanda Finance Limited are deemed authorised to transact in foreign currency under BNR Directive N° 4230/2025-00042 of 17/09/2025, so a fund can keep its books, commitments and distributions in US dollars. Units of collective investment schemes are exempt from capital gains tax, and distributions to unit holders are outside withholding tax. And a fund manager, custodian or trustee is a reporting person under the anti-money-laundering law, which must register with the Financial Intelligence Centre within 30 days of incorporation and apply due diligence to investors ([Anti-money-laundering and sanctions compliance](#)). Real estate investment trusts have their own CMA rules, described in [Mortgages, security and real estate business](#).

Project finance and public-private partnerships

Infrastructure is commonly delivered through **public-private partnerships** (PPPs) under Law N° 14/2016 of 02/05/2016 governing public private partnerships, in force since 30 May 2016 and still the only PPP statute on the law portal. It recognises management contracts, build-own-operate, build-operate-transfer and lease-develop-operate structures, with others by Prime Minister's Order (Article 3), in sectors including transport, energy, social affairs, tourism, natural resources and environment, and telecommunications and information technology (Article 5). A PPP Steering Committee, comprising the ministers in charge of finance and infrastructure, the chief executive of RDB and the head of the contracting authority, approves projects and preferred bidders (Articles 7 and 8); the contracting authority procures and signs (Article 9); and RDB leads the negotiations (Article 10). The procedure runs from feasibility study and expressions of interest through shortlisting, bids and preferred bidder to negotiation and signature (Articles 13 to 24), with complaints lodged within seven days and decided within 15 (Article 22), and direct engagement allowed in listed cases (Articles 25 to 28). The law sets no maximum term: the agreement fixes duration, dispute resolution and termination (Article 12). Prime Minister's Order N° 75/03 of 08/06/2017 governs the Steering Committee.

Project debt usually comes from abroad. Rwandan residents may freely contract foreign-currency loans from non-resident banks, international financial institutions and other non-residents, with no BNR approval, and banks record repayments for reporting (Article 26 of Regulation N° 42/2022). Interest paid abroad bears 15% withholding tax, but interest on loans from a foreign development finance institution that is exempt from income tax in its home country is excluded, and the four-to-one limit on deducting interest concerns related-party interest, not interest paid to unrelated lenders ([Offshore loans and external borrowing](#)). A local tranche from a Rwandan bank in foreign currency is governed by **BNR Directive N° 46/2026 of 08/04/2026 on lending in foreign currency**: the borrower must earn foreign currency or be authorised to transact in it, with foreign-currency cash flow of at least 120% of

annual debt service; repayment must be in the loan currency; collateral from non-residents must cover at least 120% of the loan, or 100% if cash or a guarantee in the same currency; and the bank needs BNR non-objection to lend above 20% of its core capital, answered within ten working days. The BNR's list of supervised banks shows the Development Bank of Rwanda (BRD) as a development bank, a category that carries minimum paid-up cash capital of RWF 50,000,000,000 under the 2018 regulation on licensing conditions of banks.

Lenders take security under Rwandan law. Mortgages over land rights, including leaseholds, are registered by the Registrar General at RDB under Law N° 10/2009 of 14/05/2009 on mortgages, and security over movable assets under Law N° 34/2013 on security interests in movable property, also registered with the Registrar General, with priority generally by date of registration (Mortgages, security and real estate business). On insolvency under Law N° 075/2021 of 06/12/2021 relating to insolvency, secured creditors are largely outside the stay and rescue finance ranks ahead of unsecured debts, as explained in Insolvency and restructuring. Disputes under project documents are usually referred to arbitration at the Kigali International Arbitration Centre (KIAC) or abroad; Rwanda is a party to the New York Convention and the ICSID Convention (Arbitration law and KIAC).

Netting, collateral and the central securities depository

Law N° 016/2025 of 02/06/2025 governing the central securities depository, qualified financial contracts and netting agreements, published on 3 June 2025, gives Rwanda the close-out netting certainty that derivatives counterparties, repo lenders and international banks require. A person who establishes or operates a central securities depository needs a CMA licence, although the BNR may conduct depository activities without one (Article 4). Book-entry securities may be pledged and used as collateral (Articles 22 and 36), and the realisation, appropriation or liquidation of collateral takes effect without prior notice or consent unless otherwise agreed, in a commercially reasonable manner (Article 51).

A **netting clause** in a qualified financial contract, and the collateral supporting it, is enforceable in accordance with its terms against an insolvent party and its guarantor, and may not be stayed, avoided or limited by the insolvency practitioner or the insolvency law (Article 40). Insolvency laws do not apply to netting, collateral or settlement transactions of this kind (Article 45), close-out net balances stand on insolvency (Article 46), and transfers under a netting agreement cannot be avoided as preferences or for occurring during a suspect period (Article 47). The protection extends to qualified institutions listed in Article 35, which include the BNR, the Government, licensed financial service providers, development banks and international organisations, listed issuers, insurers, special purpose vehicles and their foreign equivalents. A qualified institution files a notice of each qualified financial contract with a central securities depository operator (Article 37), although failing to file does not make the contract void (Article 38). A counterparty to a financial institution in resolution may not terminate merely because resolution has begun (Article 41).

Launching a Kigali fund on the KIFC regime

1 Choose the vehicle

Company, unit trust under Law N° 063/2021, partnership, foundation or contractual scheme; decide whether the fund will be offered to the public (licence) or qualify for exemption under Article 20 of Law N° 062/2021.

2 Appoint the manager and custodian

Use a CMA-licensed investment manager and a licensed custodian; if the 3% regime is wanted, the manager, custodian and operator must be established in Rwanda and the staffing and board-residence conditions in point II of the Investment Code Annex must be met.

3 Register and license

Register the vehicle with the Registrar General at RDB, file the fund documents and prospectus with the CMA, and pay the 0.05% prospectus fee; KIFC states licences issue within 30 days of a complete application.

4 Obtain the investment certificate

Apply to RDB for the certificate on which the 3% corporate income tax and 0% withholding tax depend, showing how the fund will reach USD 1,000,000 within three years and spend USD 50,000 a year in Rwanda.

5 Secure foreign-currency status

Obtain Rwanda Finance Limited's recommendation, which makes the fund a deemed authorised dealer in foreign currency under Directive N° 4230/2025-00042, and open franc and dollar accounts.

6 Put compliance in place

Register the manager and custodian with the Financial Intelligence Centre within 30 days of incorporation, appoint a compliance officer and apply investor due diligence.

7 Operate and report

Hold board meetings in Kigali, file CMA activity reports and pay the RWF 1,000,000 annual fee, file tax returns at 3%, and keep the substance evidence for audits.

A project lender's Rwandan checklist

Points that lenders to a Rwandan project company commonly verify before financial close.



Borrower and sponsor status

Registration, beneficial ownership, investment certificate and any sector licence; the PPP agreement and Steering Committee approval if a PPP.

☐ **Currency of revenues**

Whether the project may lawfully earn or be paid in foreign currency (deemed or authorised dealer, exporter), which determines dollar debt capacity under Directive N° 46/2026.

☐ **Withholding tax on interest**

Whether each lender is a tax-exempt development finance institution or treaty resident, and whether a gross-up is needed for 15% withholding tax.

☐ **Security**

Mortgage over the land right registered with the Registrar General, security over movables, receivables, accounts and shares, and consents of the lessor or the State for leasehold land.

☐ **Hedging and netting**

Whether swap counterparties are qualified institutions under Article 35 of Law N° 016/2025 and contracts are filed with the depository operator.

☐ **Disputes and enforcement**

KIAC or foreign arbitration clauses, waiver of immunity where a State entity is party, and any bilateral investment treaty protecting the sponsors.

WORKED EXAMPLE

A Kenyan fund in the Rwandan market: listed against unlisted

A fund resident in Kenya, an EAC Partner State, buys RWF 1,000,000,000 of shares yielding a 6% dividend and RWF 500,000,000 of five-year Rwandan Treasury bonds paying 12% a year, and after two years sells the shares at a gain of RWF 200,000,000. Each row compares shares listed on the RSE with unlisted shares in a private company. Kenya does not appear on RRA's published treaty list. All figures are illustrative.

Dividend each year	$6\% \times \text{RWF } 1,000,000,000 = \text{RWF } 60,000,000.$
Withholding tax on the dividend	Listed: $5\% \times \text{RWF } 60,000,000 = \text{RWF } 3,000,000$, as an EAC resident. Unlisted: $15\% \times \text{RWF } 60,000,000 = \text{RWF } 9,000,000.$
Treasury bond interest each year	$12\% \times \text{RWF } 500,000,000 = \text{RWF } 60,000,000$, with $5\% = \text{RWF } 3,000,000$ withheld in both cases.
Gain on sale of the shares	Listed: $\text{RWF } 200,000,000$ exempt under Article 38. Unlisted: $10\% \times \text{RWF } 200,000,000 = \text{RWF } 20,000,000$, withheld by the Rwandan company within 15 days after the month of the sale.
Total Rwandan tax over two years	Listed: $(\text{RWF } 3,000,000 + \text{RWF } 3,000,000) \times 2 = \text{RWF } 12,000,000$. Unlisted: $(\text{RWF } 9,000,000 + \text{RWF } 3,000,000) \times 2 + \text{RWF } 20,000,000 = \text{RWF } 44,000,000.$
Repatriation	In either case the fund may transfer dividends, interest and sale proceeds abroad through its custodian bank against the supporting documents, as portfolio and direct investment are liberalised under Article 25 of Regulation N° 42/2022.

A non-EAC fund would bear 15% or a treaty rate on the listed dividend under Article 60 unless RRA accepts that point XI of the Investment Code Annex applies to it.

A fund investing through a Rwandan collective investment scheme on the KIFC regime would receive distributions with 0% withholding tax.

Questions investors ask

Can a foreign company list or issue bonds on the Rwanda Stock Exchange?

Yes. Article 54 of Law N° 01/2011 requires any public offer in Rwanda to be made by a signed prospectus approved in advance by the Capital Market Authority, and CMA Directive N° 01/2025 expressly lets foreign entities issue securities in currencies other than the Rwandan franc to eligible investors such as foreign investors and foreign-currency earners.

Who can buy US dollar bonds issued in Rwanda?

Under Article 4 of CMA Directive N° 01/2025: companies earning foreign currency from their operations, foreign investors, Rwandans living abroad, international organisations with foreign currency sourced abroad, and expatriates with justifiable foreign-currency income. Issuers are limited to the Government, foreign-currency earning companies, foreign entities and multilateral organisations.

Are gains on Rwandan listed shares taxed?

No. Article 38 of Law N° 027/2022 exempts gains on listed securities traded on a securities exchange operating in Rwanda and on units of collective investment schemes. Gains on unlisted shares, including indirect transfers, bear 10% capital gains tax since 29 May 2025, withheld by the Rwandan company.

How is a fund set up in Kigali licensed?

A collective investment scheme is licensed or exempted by the Capital Market Authority under Law N° 062/2021, with a licensed investment manager and custodian. KIFC states that licences issue within 30 days of a complete application, with an annual fee of RWF 1,000,000 and a 0.05% prospectus fee; the 3% tax regime also needs an RDB investment certificate.

Is close-out netting enforceable in Rwanda?

Yes. Law N° 016/2025 makes a netting clause in a qualified financial contract, and its collateral, enforceable against an insolvent party in accordance with its terms, free of stays and of avoidance as a preference. Collateral may be realised without prior notice unless agreed otherwise, in a commercially reasonable manner.

Which law governs PPPs in Rwanda?

Law N° 14/2016 of 02/05/2016 governing public private partnerships. It covers management contracts, build-own-operate, build-operate-transfer and lease-develop-operate projects, approved by a PPP Steering Committee, procured by the contracting authority and negotiated by RDB, with complaints decided within 15 days and no statutory maximum term.

THE 2027 HORIZON

- The draft Capital Market Business Bill circulated in August 2025 would replace Law N° 01/2011 and introduce a regulatory sandbox, Islamic securities and recognition of foreign credit rating agencies; its passage should be watched.
- The CMA's regulations under Law N° 062/2021 on collective investment schemes, reported as still in draft in 2026, would settle licensing detail for managers, custodians and fund administrators.
- Listed companies are adapting to Regulations N° 002/CMA/2026 on corporate governance, in force since 2 October 2026; the first annual reports under the new rules will show how the CMA applies them.
- Implementing rules under Law N° 023/2026 on virtual assets, for which the CMA is the regulator, are expected to follow the May 2026 law.
- The 15% excise on amounts or commissions charged on financial transactions is reported to apply from 1 July 2027 and may affect brokerage and fund fees.

Terms you will meet in the documents

English	Kinyarwanda	French	Meaning
Capital market	<i>Isoko ry'imari n'imigabane</i>	<i>Marché des capitaux</i>	The market for securities such as shares and bonds, regulated by the CMA under Law N° 01/2011.
Capital Market Authority	<i>Urwego rw'u Rwanda rushinzwe Isoko ry'imari n'imigabane</i>	—	The CMA, which licenses capital market business, approves prospectuses and regulates funds, trusts business, the depository and virtual assets.
Prospectus	—	<i>Prospectus</i>	The signed offering document that must be filed with the CMA for prior approval before any public offer (Article 54 of Law N° 01/2011).
Takeover	<i>Igurwa ry'imigabane yose ya sosiyete ifite imigabane ku isoko</i>	<i>Offre publique d'achat</i>	An offer for a listed company under the 2012 Takeovers Regulations, mandatory when a holding reaches 25%.

English	Kinyarwanda	French	Meaning
Central securities depository	—	<i>Dépositaire central de titres</i>	The system holding securities in book-entry form; operated by the BNR, other operators needing a CMA licence under Law N° 016/2025.
Collective investment scheme (CIS)	<i>Ikigega cy'ishoramari cy'abishyize hamwe</i>	<i>Fonds d'investissement collectif</i>	A scheme pooling investors' money for investment in their interest, licensed or exempted by the CMA under Law N° 062/2021.
Trust	<i>Ubwizerane</i>	<i>Fiducie</i>	An arrangement under Law N° 063/2021 by which a trustee holds property for beneficiaries; one of the vehicles a fund may use.
Security interests in movable property	<i>Ubugwate ku mutungo wimukanwa</i>	<i>Sûretés mobilières</i>	Security over movable assets under Law N° 34/2013, registered with the Registrar General at RDB.
Insolvency	<i>Igihombo</i>	<i>Insolvabilité</i>	The state governed by Law N° 075/2021, against which netting and collateral under Law N° 016/2025 are protected.

FOREIGN V RWANDAN INVESTOR

Rwanda's capital market is open to foreign investors on the same terms as Rwandans: there is no foreign ownership cap on listed companies outside the banking law's 25% single-holder rule, which applies to everyone, and portfolio investment is liberalised. Two rules differ. Article 60 of the income tax law reserves the 5% withholding tax on dividends and interest from listed securities for residents of Rwanda and other EAC Partner States, so other foreign investors pay 15% or a treaty rate unless RRA accepts that point XI of the Investment Code Annex extends 5% to them; and dollar-denominated securities under CMA Directive N° 01/2025 may be bought by foreign investors, the diaspora and foreign-currency earners but not by ordinary Rwandan investors without foreign-currency income.

In project finance, the PPP law and the Investment Code apply equally, but lenders and sponsors are usually foreign, which brings in withholding tax on interest, treaty planning and the Directive N° 46/2026 limits on local dollar lending. A foreign capital market intermediary may operate in Rwanda if the CMA is satisfied that it is regulated and licensed by a foreign agency with equivalent powers (Article 6 of Law N° 01/2011).

WATCH OUT FOR

- Marketing securities or fund units to the Rwandan public without a CMA-approved prospectus or fund licence, which breaches Article 54 of Law N° 01/2011 and the collective investment schemes law.
- Assuming the 5% listed-securities withholding tax rate applies to every foreign investor: Article 60 limits it to residents of Rwanda and the EAC, and reliance on point XI of the Investment Code Annex needs RRA's confirmation.
- Selling dollar bonds to Rwandan investors who do not earn foreign currency, outside the eligible-investor list in Article 4 of CMA Directive N° 01/2025.
- Relying on a 3% fund regime without a Rwanda-domiciled licensed manager and custodian, an investment certificate and real substance in Kigali.
- Planning local dollar debt for a project that earns only Rwandan francs: Directive N° 46/2026 requires foreign-currency cash flow of at least 120% of annual debt service.
- Buying 5% or more of a listed bank without prior BNR authorisation, which strips the shares of votes and dividends.

OFFICIAL SOURCES

- Capital Market Authority: laws, including Law N° 01/2011 of 10/02/2011 regulating capital market in Rwanda, Law N° 45/2018, Law N° 062/2021 on collective investment schemes and Law N° 016/2025 on the central securities depository — <https://www.cma.rw/regulatory-framework/laws>
- Capital Market Authority: regulations, including Regulations N° 002/CMA/2026 of 02/10/2026 on capital market corporate governance — <https://www.cma.rw/regulatory-framework/regulations>
- Capital Market Authority: Directive N° 01/2025 of 30/10/2025 on multicurrency denominated securities — https://www.cma.rw/fileadmin/user_upload/Directive_Establishing_Rules_Governing_the_Issuance_and_Trading_of_Multicurrency_Denominated_Securities_in_Rwanda.pdf
- Capital Market Authority: Guidelines N° 003/CMA_G/2024 of 09/12/2024 on issuance of GSS+ bonds — https://www.cma.rw/fileadmin/user_upload/Capital_Market_Guidelines_on_Issuance_of_GSS_Bonds.pdf
- National Bank of Rwanda: Directive N° 46/2026 of 08/04/2026 on lending in foreign currency — https://www.bnr.rw/documents/Directive_on_Lending_in_Foreign_Currency_May_2026.pdf
- Rwanda Stock Exchange: market data — <https://www.rse.rw/>