Gobanimo Microfinance

DIGNITY. FREEDOM. PROSPERITY.

FOR REGULATORS & SUPERVISORS

Regulator Evidence Pack — Overview

Hargeisa · Bosaso · Mogadishu · Version 1.0 · July 2026 · gumfi.com

Our regulatory posture

Gobanimo Microfinance does not treat licensing as a post-build detail. The platform touches credit, mobile money, customer identity, collections, AML/CFT, and Sharia-sensitive contracts — so regulatory engagement begins **before first live disbursement**, and the pilot operates only within approved capital, city, and customer limits.

- **Phase 0 (pre-pilot):** concept note and sandbox / no-objection / supervised-pilot dialogue with the applicable authority in each operating city; documented analysis of the regulated capacity in which Gobanimo Microfinance acts (lender, arranger, fund manager, technology provider, or agent of a licensed partner).
- **Phase 1 (controlled one-year pilot):** audit-ready records for onboarding, consent, credit decisions, contracts, ledger, and complaints; pilot metrics reported monthly.
- **Phase 2 (scale preparation):** pilot findings converted into a licensing pack, independent AML/CFT review, Sharia Board certificate, and outsourcing / model-risk controls.

What the evidence pack contains

1. **Legal entity decision memo** — entity, registration, and ownership.
2. **Regulated activity analysis** — which activities we perform and under what authority in each jurisdiction.
3. **Pilot boundary memo** — approved capital, city, product, and customer limits, and how they are technically enforced.
4. **Customer disclosure pack** — contract templates, pricing disclosures, and plain-language summaries in Somali and English.
5. **AML/CFT policy and procedures** — full policy, due-diligence tiers, screening approach, suspicious-transaction reporting route, and the named responsible officer.
6. **Complaints handling procedure** — channels, timelines, escalation, and the complaints register format.
7. **Sharia Board approval memos** — board charter, product approvals, and the current certification.
8. **Technology and data controls** — role-based access, append-only audit trail, PII firewall, human-decision gates over automated systems, and model-risk controls.
9. **Pilot metrics reporting template** — portfolio, repayment, complaints, and incident metrics supplied monthly.
10. **Regulator meeting notes** — record of engagement to date.

Standing commitments

- Every financing decision is made by a human officer; automated systems cannot override sanctions, PEP, or high-risk gates.
- Records are retained per applicable law and regulator expectation.
- Material incidents are reported to the supervising authority within the timeframe agreed with that authority.
- Independent review (AML/CFT and Sharia) precedes any scale-up beyond pilot limits.

Request the pack: gumfi.info@gmail.com · attention: the Founder & Managing Director. Requests are answered within 5 business days.