Identomat

COMPLIANCE GUIDE

Insurance & Insurtech Compliance in Azerbaijan

COUNTRY Azerbaijan

INDUSTRY Insurance & Insurtech

LAST UPDATED 13 November 2026

KEY REGULATORS Central Bank of the Republic of Azerbaijan · Financial Monitoring Service

Key takeaways

- Only companies licensed by the Central Bank of the Republic of Azerbaijan (CBAR) may sell insurance in Azerbaijan, and each insurance product needs its own CBAR permission. Foreign insurers cannot open branches; they must set up a local open joint stock company.
- Full anti-money laundering (AML) duties apply to life savings business (endowment and annuity cover) and to the reinsurers and intermediaries in that business. Non-life insurers sit outside the customer due diligence regime (life insurers writing only death cover should confirm their status with the regulator), but every insurer must still freeze sanctioned persons' assets within hours.
- Selling a life savings policy online is allowed but treated as high risk. For a first remote relationship, four checks are mandatory: an enhanced electronic signature, a database check, two-factor authentication and a live video call or video recording.
- Remote applicants who act through a representative, and non-resident companies, may not be onboarded remotely at all.
- The beneficiary of a life savings policy must be identified once named and verified, and screened for politically exposed person (PEP) status, before any payout. From 1 January 2027, new monthly reporting thresholds for electronic transfers apply.

The Azerbaijani insurance market is open to digital distribution, but only through locally licensed insurers and locally licensed agents and brokers. Online sales are expressly recognised: an insurer may conclude contracts as electronic documents if its website meets the conditions in the Law on Insurance Activity.

CBAR licenses and supervises insurers and intermediaries, and is the AML supervisor of those in scope of the Law on the Prevention of the Legalization of Criminally Obtained Property and the Financing of Terrorism (No 781-VIQ of 30 December 2022), the AML/CFT Law. The Financial Monitoring Service (FMS), the national financial intelligence unit, sets the detailed customer due diligence and remote verification rules and receives reports.

The biggest obstacle for a digital entrant in life savings insurance is the remote onboarding standard: the mandatory live video step and enhanced electronic signature make a pure document-and-selfie journey insufficient for a first relationship.

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1 Who regulates this sector

Authority	Remit	Level	Official site
Central Bank of the Republic of Azerbaijan (CBAR)	Licensing of insurers, reinsurers, agents and brokers; permission for each insurance type; prudential supervision; AML supervisor of financial institutions, including life savings insurers	National	cbar.az
Financial Monitoring Service (FMS)	Financial intelligence unit; rules on customer due diligence, remote verification, risk factors and reporting; receives threshold and suspicious transaction reports	National	fiu.gov.az
Ministry of Digital Development and Transport (MDDT) and its National Cybersecurity Agency	MDDT is the authority under the Law on Personal Data; since 2 June 2026 the Agency keeps the state register of personal data systems and examines complaints	National	mincom.gov.az
MONEYVAL (Council of Europe)	Evaluates Azerbaijan's AML and counter-terrorist financing (CFT) regime	Supranational	coe.int/moneyval

The principal statutes are the Law on Insurance Activity No 519-IIIQ of 25 December 2007 and the AML/CFT Law.

2 Licensing and authorisation

Insurers and reinsurers

Insurance and reinsurance require an open-ended CBAR licence (Law on Insurance Activity, art. 7.1, 43.1 and 43.2). An insurer must be an open joint stock company (art. 7.6), may write life or non-life business but not both (art. 14.1), and needs separate CBAR permission for each insurance type (art. 7.2 and 16.2).

CBAR reviews applications in two stages: a preliminary application by the founders, then a final application after state registration of the company (art. 43.4). Each stage is decided within one month of a complete file (art. 45.1 and 51.1), and the final application must follow within six months of a positive preliminary decision (art. 45.3). Share capital must be paid in cash before registration, at no less than CBAR's minimum required capital (art. 79.2 and 80.1).

Activity	Minimum required capital
Non-life insurance	AZN 5,000,000
Life insurance	AZN 10,000,000
Reinsurance only	AZN 20,000,000
Reinsurance by an insurer	AZN 5,000,000

Set by CBAR Board Decision No 08/2 of 4 March 2020.

Market access limits

- Foreign insurers may not open branches in Azerbaijan (art. 20.2).
- Property interests in insured subjects located in Azerbaijan may be insured only by local insurers, with exceptions for international marine, air and space risks (art. 10.3 and 10.3-1).
- Only local brokers may intermediate placement of such risks with local insurers (art. 10.5).
- A single foreign individual may hold no more than 10% of an insurer's shares, and foreign individuals together no more than 30% (art. 20.1-1).

Agents and brokers

Agents and brokers need a CBAR licence (art. 83.1). Individuals must be at least 19, pass CBAR attestation and re-attest every five years (art. 83.2 and 88.3); a legal-entity agent needs at least two attested employees (art. 83.3). Unlicensed activity attracts administrative or criminal liability (art. 7.4 and 83.1).

3 AML, KYC and customer due diligence

Who is in scope

The AML/CFT Law defines financial institutions to include domestic and foreign insurers, reinsurers and insurance intermediaries engaged in life savings insurance (art. 1.1.8). The Law on Insurance Activity uses the same scope (art. 13.1 and 13.2). Life savings insurance means endowment-type life cover and annuity insurance (Law on Insurance Activity, art. 1.1.24 and 15.1). The FMS confirms that insurers, reinsurers and intermediaries are obliged entities when they carry on life savings insurance. Non-life insurers are outside the AML/CFT Law. A life insurer writing only death cover should confirm its status with CBAR: the FMS's English version of the Law says "life insurance", and MONEYVAL found coverage of other investment-related policies unclear (2023). Targeted financial sanctions apply to everyone (section 7).

When due diligence applies

Customer due diligence (CDD) is required before establishing a business relationship, before an occasional transaction of AZN 20,000 or more (including linked transactions that together exceed it), whenever money laundering or terrorist financing is suspected, and when there are doubts about the accuracy of data already obtained (AML/CFT Law, art. 4.2). If CDD cannot be completed, no transaction may be carried out, the relationship must be refused or ended and the FMS informed (art. 4.14).

For individuals, the minimum data set includes full name, personal identification number (FİN) or document number, citizenship, residency, date of birth, contact details, employment and income sources (FMS Rules, para. 2.1.1).

Beneficiaries and beneficial owners

Policy beneficiary

Identify the beneficiary as soon as named or designated; for beneficiaries designated by class, collect enough information to identify them at payout; verify identity at payout (AML/CFT Law, art. 4.9).

Beneficiary risk

Treat the beneficiary as a risk factor; where a legal-person beneficiary is high risk, apply enhanced due diligence (EDD) to it and its beneficial owner (art. 4.13.2).

PEP check before payout

Before paying out, establish whether the beneficiary or its beneficial owner is a PEP; if high risk, obtain senior management approval, scrutinise the relationship and report to the FMS (art. 7.2).

Beneficial ownership

Identify natural persons holding a significant participation, defined as 10% or more of capital or voting rights, then those with other control (art. 1.1.20 and 4.7).

Reporting thresholds and holds

- **Cash transactions** of AZN 20,000 or more: report within 3 working days (AML/CFT Law, art. 11.1.1 and 11.4; FMS Decision No 3-21-28/3-6-8/2023).
- **Electronic transfers** of AZN 20,000 or more: report within 3 working days (art. 11.1.2). From 1 January 2027, transfers by individuals (other than sole proprietors) are also reportable once their monthly total exceeds AZN 50,000 `Adopted, effective 1 Jan 2027`.
- **Foreign PEP transactions** of any amount: report within 3 working days (art. 11.3.1).
- **Suspicious transactions** linked to high-risk profiles, of AZN 200,000 or more, or withdrawing funds from an account: do not execute for 2 working days and report immediately before execution (art. 11.5).

Ongoing CDD must be refreshed at least yearly for high-risk customers, every two years for medium risk, every three years for low risk, and continuously for PEPs (FMS Rules, para. 8.1). CDD records and transaction records are kept for at least five years after the relationship or transaction ends (AML/CFT Law, art. 6.1 and 6.2; Law on Insurance Activity, art. 123.2).

Internal control programme

FMS minimum requirements (Decision No 3-21-28/3-6-6/2023) require a responsible AML officer at management level (para. 1.4.2) with independent authority over suspicious transaction decisions; for firms under corporate governance standards, appointment and

dismissal need supervisory board consent (para. 3.1.3). Firms must run an institutional risk assessment at least annually (para. 2.9.1), train staff regularly and report on training to the FMS at least once a year (para. 4.2.1).

4 Identity verification and onboarding

The FMS Rules on verification measures in customer due diligence and the application of new technologies (Decision No 3-21-28/3-6-4/2023 of 21 February 2023) list the accepted identity documents: the identity card for Azerbaijani citizens; a foreign passport, residence permit or other recognised border-crossing document for foreigners; and specified documents for stateless persons, refugees, military personnel and seafarers (Annex). Verification may use reliable independent sources (para. 6.3).

Remote verification toolkit

For relationships formed through new technologies without direct contact, the FMS Rules list eight verification measures, including security codes sent to a verified address and documents obtained from state bodies with consent (para. 7.1).

For a **first** relationship, four of these are mandatory: enhanced electronic signature, database or independent-source check, strong customer authentication and live video or video recording (para. 7.2). Strong customer authentication means at least two independent elements from knowledge, possession and inherence, with face recognition named as an inherence example (para. 7.1.3). An enhanced electronic signature is created with signature tools under the signer's control, belongs only to the signer, identifies them and shows whether the signed data was altered; made with certified tools and an advanced ("təkmil") certificate, it has the same legal force as a handwritten signature (Law on Electronic Signature and Electronic Document No 602-IIQ, art. 1.1.5 and 3.2). ASAN İmza, the mobile signature issued by the ASAN Certification Services Center of the State Tax Service, is an enhanced electronic signature (Presidential Decree No 1598, Rules, para. 1.2.4).

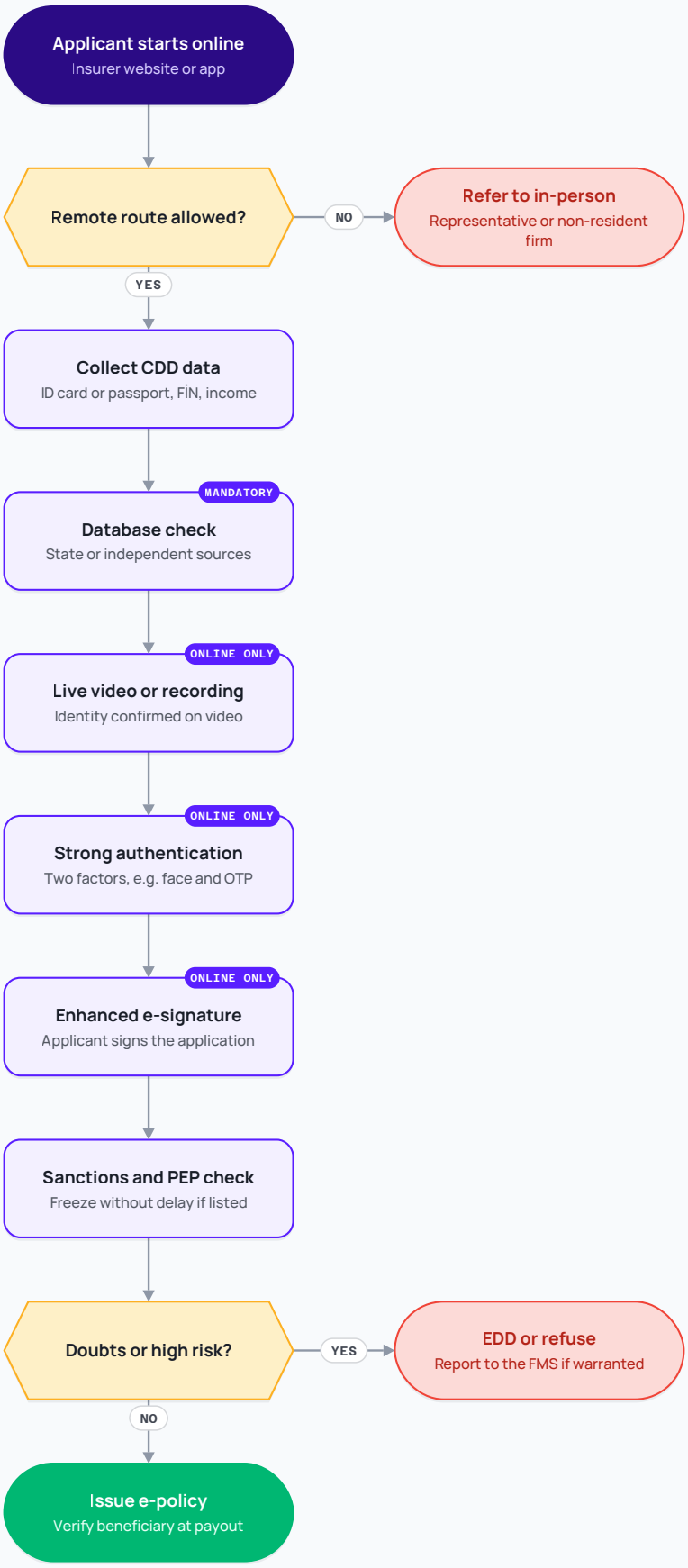


Figure 1. Remote onboarding for a life savings insurance policy in Azerbaijan.

Who cannot be onboarded remotely

Remote relationships may not be established with customers acting through an authorised representative (other than a legal entity's legal representative) or with non-resident legal entities (para. 7.4). If remote measures do not establish identity, or doubts about documents cannot be resolved, the remote transaction must be refused (para. 7.3; AML/CFT Law, art. 8.6).

5 Digital channels: what's different

> **Bottom line:** online life savings sales are lawful, but the AML/CFT Law treats relationships formed through new technologies as high risk, and the FMS requires four specific verification steps, including live video, for a first remote relationship.

Requirement	In person / branch or agent	Online / remote	Difference
Risk classification	Risk-based	High risk by law (new technologies)	`Differs`
Verification methods	Identity document verified from reliable independent sources	E-signature, database check, two-factor authentication and live video all required for a first relationship	`Differs`
Verification timing	Before the relationship	May be completed within 5 working days, with usage limits meanwhile	`Differs`
Representatives and non-resident companies	Permitted	Not permitted	`Differs`
Contract form	Paper policy	Electronic contract only if the website meets statutory conditions	`Differs`
Beneficiary verification and PEP check at payout	Required	Required	`Same`

Sanctions freeze	Without delay	Without delay	Same
Record retention	At least 5 years	At least 5 years; documents provided electronically	Same

Remote means high risk

Relationships established through new technologies are high-risk, and new products and delivery channels must be risk-assessed before launch (AML/CFT Law, art. 8.1 and 8.3; FMS Rules, para. 3.11.5).

Deferred verification with limits

For relationships formed through new technologies, verification may be completed after the relationship starts, but within five working days (FMS Rules, para. 6.4.1). Until then the insurer needs procedures restricting the number, type, amount and purpose of transactions (para. 6.5).

Electronic policies and website duties

Every insurer must maintain an official website for information and complaints and an electronic information system for its contracts (Law on Insurance Activity, art. 10.11). Contracts may be concluded as electronic documents only if the customer can review the insurance rules and terms and print them before signing, and access, print and email the contract for its term and the retention period afterwards (art. 17-1.1). If these features are missing, CBAR issues a reasoned instruction suspending electronic contracting (art. 17-1.2). Minimum website requirements include all insurance rules in searchable PDF form, an online claim notification form with automatic acknowledgement, and an electronic complaints section (Ministry of Finance Collegium Decision No Q-08 of 27 March 2014, Annex 1, para. 2.1, still in force).

6 Data protection and biometrics

The Law on Personal Data No 998-IIIQ applies its full collection and processing conditions to biometric data, expressly including facial images, fingerprints and voice (art. 9.5). Processing requires a legal basis, such as the data subject's consent or legislation defining the purposes and methods (art. 9.6). For life savings insurers, the AML/CFT Law and FMS Rules can serve as that legislative basis for remote identity checks, including video and face recognition; non-life insurers using biometrics will usually need consent. The MDDT is the authority under the Law (Presidential Decree No 361, para. 3.1); since 2 June 2026 its

National Cybersecurity Agency, created on the basis of the Electronic Security Service, keeps the state register of personal data systems and examines complaints (Presidential Decree No 676, Charter, paras. 3.1.24 and 3.1.25).

Customer identity data is also insurance secrecy: name, address, other personal data, policy amounts and health details may be disclosed only with the person's written consent or in listed cases, including to the FMS under the AML/CFT Law (Law on Insurance Activity, art. 6.1 and 6.2).

7 Sector-specific obligations

Targeted financial sanctions apply to all insurers

All natural and legal persons in Azerbaijan, not only obliged entities, must freeze assets of designated persons without delay and without notice once lists are published on the targeted financial sanctions information resource, and report through it to the designated body and the FMS (Law on Targeted Financial Sanctions No 782-VIQ, art. 5.1). "Without delay" means immediately or within a few hours (art. 1.1.11). Non-life insurers therefore need screening at onboarding, at claims payment and on list updates.

An insurer's board of directors must ensure compliance with both laws (Law on Insurance Activity, art. 29.1.10.6).

8 Risk indicators and red flags

LIFE SAVINGS INSURANCE RISK INDICATORS

- **Remote first contact**: relationship formed through new technologies without face-to-face contact (AML/CFT Law, art. 8.1).
- **High-risk beneficiary**: a legal-person beneficiary, or a beneficiary or its owner who is a PEP (art. 4.13.2 and 7.2).
- **Unusual distance**: a relationship formed or kept in an unusual way, such as great geographic distance from the insurer (FMS Rules, para. 3.9.2).
- **Non-resident customers** and links to high-risk jurisdictions (para. 3.9.3 and 3.9.5).
- **Money mules and nominees**: accounts used for others' purposes, or companies with nominee holders or certificated shares (para. 3.9.8 and 3.9.9).
- **Complex ownership**: unusually complex control chains or shell companies as policyholders (para. 3.9.11 and 3.9.12).
- **Structuring**: linked occasional transactions that together exceed AZN 20,000 (AML/CFT Law, art. 4.2.2).
- **Unexplained size**: complex or unusually large transactions with no apparent economic purpose (art. 4.10).
- **Over-reliance on bank payment**: MONEYVAL found life insurers treat payment through banks as a mitigant, and rarely verify the beneficiary at payout (2023 MER, paras. 382 and 409).

9 Enforcement and penalties

CBAR can issue binding instructions (Law on Insurance Activity, art. 102) and apply sanctions: administrative liability for insurers, intermediaries and their managers under the Code of Administrative Offences, and restriction (insurers only), suspension or revocation of the licence (art. 103.1 and 103.2). Breach of the AML/CFT Law or the Targeted Financial Sanctions Law is an express ground for suspending a licence (art. 106.1.7). Insurers, reinsurers and intermediaries are liable under the Code of Administrative Offences and the Criminal Code for non-compliance with both laws (art. 124.2). Fines are set by article 598 of the Code of Administrative Offences:

Breach (Code of Administrative Offences)	Officials	Legal entities
CDD, record keeping, reliance, internal control, PEP or new-technology requirements; FMS instructions; obstruction (art. 598.1)	AZN 2,000 to 4,000	AZN 20,000 to 30,000
Reporting requirements, per transaction (art. 598.4)	AZN 2,000 to 4,000	AZN 20,000 to 30,000
Transaction non-execution (hold) requirements, per transaction (art. 598.5)	AZN 3,000 to 5,000	AZN 30,000 to 40,000
Ignoring an FMS suspension decision, per transaction (art. 598.6)	AZN 4,000 to 6,000	AZN 40,000 to 50,000
Failure to freeze under the Targeted Financial Sanctions Law, per person; applies to any legal entity, including non-life insurers (art. 598.10)	AZN 3,000 to 5,000	AZN 30,000 to 50,000

CDD and PEP breaches are counted per customer and per transaction (art. 598.1.1 and 598.1.5), so fines scale with the number of affected policies.

In October 2025 CBAR issued binding instructions to the life insurers Qala-Həyat and Atəşgah Həyat for breaching its Corporate Governance Standards for Insurers, and in September 2025 to several legal-entity agents.

10 Recent changes and what to watch

- **1 January 2027**: `Adopted, effective 1 Jan 2027` FMS Decision No 3-21-28/3-6-7/2026 adds a monthly AZN 50,000 aggregate reporting tier for electronic transfers by individuals other than sole proprietors and replaces the reporting procedure. FMS Decision No 3-21-28/3-6-17/2026 of 25 September 2026 moved the start from 1 October 2026. Update monitoring rules before the start date.
- **14 August 2026**: `In force` Law No 440-VIIQD amended the Law on Insurance Activity to allow disclosure of insurance secrecy to the Chamber of Accounts (art. 6.2.11).
- **1 January 2026**: `In force` Law No 297-VIIQD of 9 December 2025 amended the scope provisions of the Law on Insurance Activity for state compulsory personal insurance (art. 2.6). Relevant mainly to insurers in compulsory lines.
- **10 November 2025**: `Adopted` MONEYVAL's 1st Enhanced Follow-up Report, MONEYVAL(2025)16, was adopted by written procedure and published in January 2026.

It re-rated R.8, R.14, R.16, R.24, R.26, R.33 and R.34; R.15 (new technologies) remains partially compliant.

- **To 2026**: `Planned, no draft published` CBAR's Financial Markets Cybersecurity Strategy for 2023 to 2026 plans minimum information security requirements for financial institutions beyond banks. Insurers should expect binding information security requirements.

11 What this means for identity verification

- **Product split**: full CDD and the mandatory remote steps for life savings products; contract data plus sanctions screening for non-life.
- **Mandatory stack**: database check, live video or recording, two-factor authentication (for example face match plus one-time code) and an enhanced e-signature. A selfie and document scan alone fall short.
- **Documents**: Azerbaijani identity card and FİN for citizens; passport or residence permit for foreigners.
- **Gating**: no remote route for representatives or non-resident companies.
- **Deferred checks**: finish within five working days and cap premiums and surrenders meanwhile.
- **Payout**: re-verify the beneficiary and run a PEP check before every life savings payout.
- **Retention**: keep video, signature and verification evidence for at least five years.

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How Identomat helps

Identomat runs identity verification, screening and monitoring for regulated businesses on one platform, with workflows you configure for each market. For the requirements in this guide, that means:

- Video KYC and recorded video verification for the first remote relationship, alongside ID document capture and face match.
- Biometric liveness and face match as an inherence factor for strong customer authentication.
- E-signatures and phone verification to complete the signed electronic application and one-time-code factor.
- AML screening against sanctions and PEP lists at onboarding, on list updates and before each payout.
- No-code workflow builder to route life savings and non-life products to different onboarding journeys, with an audit trail.

Request a meeting

DISCLAIMER

This article is intended for informational purposes only and does not constitute legal advice. It is a compilation of information from various sources and reflects the information available as of the last updated date indicated above. Laws, regulations, and regulatory guidance may change, so readers should consult qualified legal professionals for advice specific to their circumstances.

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