

Terms of reference (ToR) for the procurement of services below the EU threshold

CONFIDENTIAL

Consultancy services to Central Bank of Iraq to Design unified E-KYC Framework

**Project number/
cost centre:
G-018140-001/
25.2071.6-001.00
Tender number**

0. General Information.....	1
1. Context.....	2
2. Tasks to be performed by the contractor	3
3. Concept.....	6
Technical-methodological concept	7
Project management of the contractor (1.6)	7
Further requirements (1.7).....	7
4. Personnel concept.....	7
5. Costing requirements	10
Assignment of personnel and travel expenses	10
Sustainability aspects for travel	10
6. Inputs of GIZ or other actors.....	12
7. Requirements on the format of the tender	12
8. Outsourced processing of personal data	12

0. General Information

Since 2003, Iraq has faced persistent political, economic, and institutional challenges that continue to constrain sustainable development. Structural weaknesses, including heavy reliance on oil revenues, limited fiscal space, low trust in public institutions, and a constrained private sector—have reduced the state's ability to respond effectively to economic shocks, climate pressures, and demographic demands. Addressing these challenges requires strengthened public institutions, improved economic governance, and a gradual shift towards a more diversified and resilient economy.

The Strengthening Public Finances and Financial Markets (FFM) II project supports the Government of Iraq in strengthening financial and fiscal governance to promote macro-fiscal stability, economic diversification, and sustainable economic development. Financed by the Federal German Government.

FFM II adopts a structural reform approach by embedding reforms within government systems, legal frameworks, and institutional processes while strengthening the capacities required to sustain them. The project supports Iraqi reform priorities, including enhancing non-oil revenues, improving public sector performance and accountability, strengthening anti-money laundering and countering the financing of terrorism (AML/CFT) systems, and fostering a more resilient and inclusive financial sector.

The Iraqi population is the ultimate target group, benefiting from improved governance, economic stability, and service delivery. Primary institutional partners include the Ministry of Finance (including tax and customs authorities), the Central Bank of Iraq (including the Financial Intelligence Unit and financial intermediaries), and the Prime Minister's Office. Project activities are implemented at the central government level in Baghdad.

The Project has the following Outputs:

- Output 1: Investment-promoting legal reforms have been carried out in selected thematic areas.
- Output 2: The technical and methodological competencies of the staff of public financial institutions, including competencies related to gender-sensitive instruments, are improved.
- Output 3: Public financial institutions have internal organizational and implementation strategies for sector reforms.

1. Context

The Central Bank of Iraq (CBI), in line with its mandate to promote a sound, stable, secure and efficient financial system, is pursuing the modernization and digital transformation of Iraq's financial sector. The development of digital financial services, electronic payments, digital banking and broader financial inclusion requires reliable and efficient mechanisms for identifying and verifying customers while maintaining compliance with applicable Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) requirements.

Customer identification and Know Your Customer (KYC) processes in Iraq are currently undertaken by individual financial institutions using their own procedures, systems, documentation requirements and verification arrangements. This can result in duplication of customer information, repeated submission of documents, different onboarding processes across institutions, operational costs, and varying levels of digitalization.

A unified electronic Know Your Customer (e-KYC) framework could provide a common approach through which regulated financial institutions can electronically identify and verify customers using trusted and authorized sources of information. Such a framework could improve customer onboarding, reduce duplication, strengthen the quality and consistency of customer identification, support financial inclusion, and facilitate the development of digital financial services.

The CBI has already established a regulatory foundation relevant to this work. This includes the Iraqi AML/CFT framework, customer due-diligence requirements, electronic payment regulations, regulations relating to electronic banking services, and rules governing digital financial services. The CBI also maintains regulatory and supervisory responsibilities over

banks and relevant financial institutions and has undertaken work related to digital identity and electronic KYC. The design of a unified e-KYC framework should therefore build on existing Iraqi legislation, regulations, institutional mandates and infrastructure rather than creating a parallel or disconnected framework.

The purpose of the assignment is to develop a comprehensive, practical and Iraq-specific design for a Unified e-KYC Framework and e-KYC Solution that can be adopted by the CBI as a common reference for regulated financial institutions.

The assignment shall establish:

1. The policy and regulatory requirements for a unified e-KYC ecosystem in Iraq;
2. The functional design of a unified e-KYC solution;
3. The high-level technical and interoperability architecture;
4. The institutional and governance model;
5. The data, authentication, privacy, security and access-control principles;
6. The business processes and use cases applicable to Iraqi financial institutions; and
7. The technical and functional specifications that could subsequently be used by the CBI in a separate implementation or procurement phase.

The assignment shall be limited to the assessment, conceptualization, design and specification of a country-specific unified e-KYC framework and solution for Iraq. The assignment shall include the development of the policy, regulatory, functional, business-process, data, governance, security, privacy, interoperability, and high-level technical architecture requirements necessary to support a future implementation.

The assignment shall not include **software development, procurement, database development, system integration, deployment, operationalization, or implementation** of the final e-KYC solution. The outputs of the assignment shall constitute a comprehensive design and specification package that the CBI may subsequently use as a basis for a separately procured implementation, development, or procurement phase.

GIZ shall hire the contractor for the anticipated contract term, from 01.11.2026 to 01.11.2027. Place of assignment, Baghdad, Iraq.

2. Tasks to be performed by the contractor

2.1 – Assess the Iraqi context

Assess the current KYC and E-KYC and customer onboarding environment in Iraq, including relevant legislation, CBI regulations, institutional arrangements, existing identification infrastructure, digital financial services, and current practices among

regulated financial institutions. The assignment will also include a one-day workshop at the CBI with representatives of banks to collect relevant data and information.

2.2 – Design the national e-KYC framework

Develop a unified framework defining how electronic identification and verification should operate across regulated financial institutions while remaining consistent with Iraq's AML/CFT requirements and other applicable laws and regulations.

2.3 – Design a unified e-KYC solution

Develop the functional and high-level technical design and specifications of a common e-KYC solution capable of providing authorized financial institutions with standardized customer identification and verification services. The design shall be sufficiently detailed to support a subsequent, separately procured implementation or development phase, but shall not include actual software development, system integration or deployment.

2.4 – Define interoperability

Define how the proposed e-KYC solution should securely exchange information with relevant authoritative data sources and participating financial institutions.

2.5 – Define governance and responsibilities

Establish a proposed governance model identifying the roles and responsibilities of the CBI, participating financial institutions, identity/data providers and other relevant stakeholders.

2.6 – Produce implementation-ready design specifications

Produce sufficiently detailed functional, technical and architectural documentation that the CBI can subsequently use as a basis for a separate procurement, implementation or development phase.

Milestones	Timeline /Location /Responsibility	Criteria for acceptance
Inception and Stakeholder Consultation Up to 5 working days	Within 2 weeks after contract commencement/On-site at CBI and remotely, Service provider in coordination with CBI	Objectives, scope, stakeholders, methodology, work plan, assumptions, risks, information gaps and stakeholder engagement approach are agreed. Measures to avoid unnecessary collection of personal information are confirmed.
Current-State Assessment and Gap Analysis Up to 9 working days	Within 6 weeks after contract commencement/ On-site and remotely/ Service Provider with CBI, financial institutions and relevant authorities	Relevant legal and regulatory requirements, AML/CFT requirements, customer onboarding practices, identity and data infrastructure, and applicable international good practices are assessed. Key legal, regulatory, institutional, process, technology, data, interoperability and operational gaps are identified, documented and prioritized.

Draft Iraqi Unified e-KYC Framework Up to 7 working days	Within 10 weeks after contract commencement/on-site and/or remotely/ Service Provider with CBI and relevant authorities	A draft unified e-KYC framework is developed based on risk-based, proportionate, secure, privacy-preserving and interoperable principles. The framework addresses individuals, legal persons, beneficial owners and applicable non-residents; minimum information requirements; verification and authentication methods; confidence/status levels; alternative verification mechanisms; and the distinction between identity verification, AML/CFT screening and customer risk assessment.
Functional Requirements and Business Process Design Up to 6 working days	Within 12 weeks after contract commencement/On-site and/or remotely/Service provider with CBI and selected financial institutions	End-to-end e-KYC processes and functional requirements are documented, including identification, identity matching, document/demographic verification, identity-status verification, duplicate detection, consent, and authentication. Screening interfaces, standardized response categories, exception/referral procedures, and manual-review mechanisms are defined sufficiently to support future implementation or procurement.
High-Level Technical Architecture and Interoperability Design Up to 7 working days	Within 14 weeks after contract commencement/On-site and remotely/Service provider with CBI IT, Payments and relevant stakeholders	Alternative architectural models are assessed; the recommended architecture is justified and documented; unnecessary centralization of sensitive personal information is avoided; integration with identity/data providers and participating financial institutions is defined; API, authentication, authorization, encryption, logging, audit, error handling, transaction identification and version management requirements are documented; and availability, resilience, scalability and monitoring requirements are addressed.

Data Governance, Institutional Model, Security, Privacy, Customer Protection and Use Cases Up to 7 working days	Within 16 weeks after contract commencement/On-site and/or remotely/Service provider in coordination with CBI and relevant stakeholders	A logical e-KYC data model and complete data dictionary are developed. Data ownership, stewardship, access, retention, correction, sharing and customer-rights principles are defined. Governance roles and institutional responsibilities are allocated. Security, privacy, business continuity and incident-management requirements are established. Procedures for mismatches, incomplete or unavailable information, identity issues, technical failures, suspected fraud, duplicate identities, disputes and authentication failures are defined, including escalation, manual review and alternative verification. Relevant Iraq-specific use cases are documented.
Regulatory Recommendations and Draft Design Package Up to 5 working days	Within 18 weeks after contract commencement/On-site and/or remotely/Service provider with CBI and relevant authorities	Required regulatory, policy, institutional, data-sharing, and technical actions are identified and categorized. The complete draft e-KYC design package is compiled and presented to relevant stakeholders. Comments, decisions, outstanding issues and required amendments are documented, and an agreed process for incorporating changes is established.
Validation and Final e-KYC Framework and Design Package Up to 5 working days	Within 20 weeks after contract commencement/On-site and/or remotely/Service provide with CBI	Stakeholder validation is completed, and agreed comments are incorporated. The final package is complete and internally consistent, covering the framework, functional requirements, business processes, architecture, interoperability, data, governance, security, privacy, customer protection, use cases and regulatory recommendations. The package is sufficiently detailed to support a future separately procured implementation/development phase and is formally accepted by CBI.
Total working days: up to 50 days		

3. Concept

In the tender, the tenderer is required to show *how* the objectives defined in Chapter 2 (Tasks to be performed) are to be achieved, if applicable under consideration of further method-related requirements (technical-methodological concept). In addition, the tenderer must describe the project management system for service provision.

Note: The numbers in parentheses correspond to the lines of the technical assessment grid.

Technical-methodological concept

Strategy (1.1): The tenderer is required to consider the tasks to be performed with reference to the objectives of the services put out to tender (see Chapter 1 Context) (1.1.1). Following this, the tenderer presents and justifies the explicit strategy with which it intends to provide the services for which it is responsible (see Chapter 2 Tasks to be performed) (1.1.2).

The tenderer is required to present the actors relevant for the services for which it is responsible and describe the **cooperation (1.2)** with them.

The tenderer is required to present and explain its approach to **steering** the measures with the project partners (1.3.1) and its contribution to the **results-based monitoring system** (1.3.2).

The tenderer is required to describe the key **processes** for the services for which it is responsible and create an **operational plan** or schedule (1.4.1) that describes how the services according to Chapter 2 (Tasks to be performed by the contractor) are to be provided. In particular, the tenderer is required to describe the necessary work steps and, if applicable, take account of the milestones and **contributions** of other actors (partner contributions) in accordance with Chapter 2 (Tasks to be performed) (1.4.2).

The tenderer is required to describe its contribution to knowledge management for the partner (1.5.1) and GIZ and to promote scaling-up effects (1.5.2) under **learning and innovation**.

Project management of the contractor (1.6)

Not applicable

Further requirements (1.7)

Not applicable

4. Personnel concept

The tenderer is required to provide personnel who are suited to filling the positions described, on the basis of their CVs (see Chapter 7), the range of tasks involved and the required qualifications.

The below specified qualifications represent the requirements to reach the maximum number of points in the technical assessment.

Team Leader / Project Manager (2.1)

General Qualification

Education (2.1.1):

- Master's degree or equivalent in Social Sciences, computer science, Information Technology, Finance, Economics, Law, Public Administration, Business/Management or another closely related field.

Language skills (2.1.2):

C1 -level language proficiency (as defined in the CEFR) in English.

C1 -level language proficiency (as defined in the CEFR) in Arabic.

General professional experience (2.1.3):

Minimum 7 years of professional experience in leading, managing, coordinating and delivering development projects, including responsibility for project planning, stakeholder coordination, implementation, monitoring and reporting.

Specific professional experience (2.1.4) :

Minimum 5 years of professional experience in e-KYC, financial technology, banking or financial-sector infrastructure.

Leadership/management experience (2.1.5): not applicable

Regional experience (2.1.6): not applicable

Development cooperation (DC) experience (2.1.7): not applicable

Other (2.1.8): not applicable

Experts pool

Expert pool 1 Digital Identity / Technical Architect (2.2)

General Qualification

Education (2.2.1):

Bachelor's degree or equivalent in Computer Science, Information Technology, Information Systems, Software Engineering, Computer Engineering, Telecommunications Engineering, or another relevant technical discipline.

Language skills (2.2.2):

C1 -level language proficiency (as defined in the CEFR) in English.

C1 -level language proficiency (as defined in the CEFR) in Arabic.

General professional experience (2.2.3) :

Minimum 7 years of professional experience in information technology, digital transformation, systems architecture, or financial-sector technology.

Specific professional experience (2.2.4)

Minimum 7 years of professional experience in digital identity/e-KYC, interoperability, API architecture, data governance, cybersecurity, and development of functional and technical requirements.

Leadership/management experience (2.2.5): not applicable

Regional experience (2.2.6): not applicable

Development cooperation (DC) experience (2.2.7): not applicable

Other (2.2.8): not applicable

Expert pool 2 Data Governance / Privacy Expert (2.3)

General Qualification

Education (2.3.1):

Bachelor's degree or equivalent in Law, Finance, Economics, Banking, Business Administration, or a related discipline.

Language skills (2.3.2):

C1 -level language proficiency (as defined in the CEFR) in English.

C1 -level language proficiency (as defined in the CEFR) in Arabic.

General professional experience (2.3.3):

Minimum 7 years of professional experience in data governance, information management, data protection, privacy, or related fields.

Specific professional experience (2.3.4):

Minimum 7 years of professional experience in data governance frameworks, data protection and privacy, data management, data-sharing arrangements, access controls, data quality, retention and data rights, preferably in digital, financial or regulated environments.

Leadership/management experience (2.3.5): not applicable

Regional experience (2.3.6): not applicable

Development cooperation (DC) experience (2.3.7): not applicable

Other (2.3.8): not applicable

Expert pool 3 Financial Sector / Regulatory Expert (2.4)

General Qualification

Education (2.4.1):

Bachelor's degree or equivalent in Law, Finance, Economics, Banking, Business Administration, Public Policy, or another closely related discipline.

Language skills (2.4.2):

C1 -level language proficiency (as defined in the CEFR) in English.

C1 -level language proficiency (as defined in the CEFR) in Arabic.

General professional experience (2.4.3):

Minimum 7 years of professional experience in financial-sector regulation, banking, financial technology, digital financial services, financial-sector digital transformation, AML/CFT, or related areas.

Specific professional experience (2.4.4):

Minimum 7 years of professional experience in financial-sector regulatory design, AML/CFT and risk-based KYC, digital financial services, e-KYC, or financial-sector digital transformation, including demonstrated experience working with central banks, financial regulators, banks or other regulated financial institutions.

Leadership/management experience (2.4.5): not applicable
Regional experience (2.4.6): not applicable
Development cooperation (DC) experience (2.4.7): not applicable
Other (2.4.8): not applicable

5. Costing requirements

Assignment of personnel and travel expenses

Per diem allowances are reimbursed as a lump sum up to the maximum amounts permissible under tax law for each country as set out in the country table in the circular from the German Federal Ministry of Finance on travel expense remuneration (downloadable from the [German Federal Ministry of Finance – tax treatment of travel expenses and allowances for international business travel as of 1 January 2026 \(GERMAN ONLY\)](#)).

Accommodation allowances are reimbursed as detailed in the specification of inputs below.

With special justification, additional Accommodation costs up to a reasonable amount can be reimbursed against evidence.

All business travel must be agreed in advance by the officer responsible for the project

Sustainability aspects for travel

GIZ has undertaken an obligation to reduce greenhouse gas emissions (CO₂ emissions) caused by travel. When preparing your tender, please incorporate options for reducing emissions, such as selecting the lowest-emission booking class (economy) and using means of transport, airlines and flight routes with a higher CO₂ efficiency. For short distances, travel by train (second class) or e-mobility should be the preferred option.

CO₂ emissions caused by air travel must be offset. GIZ specifies a budget for this, through which the carbon offsets can be settled against evidence.

There are many different providers in the market for emissions certificates, and they have different climate impact ambitions. The [Development and Climate Alliance \(German only\)](#) has published a [list of standards \(German only\)](#). GIZ recommends using the standards specified there.

Specification of inputs

Fee days	Number of experts	Number of days per expert	Total	Comments
Designation of Team leader	1	17	17	Inclusive of both on site and remote work
Designation of key expert/ expert pool	3	11	33	Inclusive of both on site and remote work

Travel expenses	Number	Price	Total	Comments
CO₂ compensation for air travel	1	280.00	280.00	A fixed budget of EUR 280.00 is earmarked for settling carbon offsets against evidence.
Fixed travel budget	1	13,848.00	13,848.00	A budget is earmarked for travel to the following countries: Baghdad, Iraq. A fixed budget of EUR 13,848.00 is earmarked for settling travel expenses against evidence. You can find further information on the travel expense budget in the 'Price schedule' document. Please use the 'Explanations' column in the price schedule to break down the individual items. Settlement is possible only until the budget is depleted.
Other costs	Number	Price	Total	Comments
Flexible remuneration	1	3,044.00	3,044.00	A budget of EUR 3,044.00 is foreseen for flexible remuneration. Please incorporate this budget into the price schedule. Use of the flexible remuneration item requires prior written approval from GIZ.
Other costs	1	3,000.00	3,000.00	A budget is earmarked for translation expenses against evidence.

6. Inputs of GIZ or other actors

GIZ and/or other actors are expected to make the following available

- Transportation on site with own project vehicle

7. Requirements on the format of the tender

The structure of the tender must correspond to the structure of the ToR. In particular, the detailed structure of the concept (Chapter 3) should be organised in accordance with the positively weighted criteria in the assessment grid (not with zero). The tender must be legible (font size 11 or larger) and clearly formulated. It must be drawn up in English (language).

The complete tender must not exceed 10 pages (excluding CVs). If one of the maximum page lengths is exceeded, the content appearing after the cut-off point will not be included in the assessment. External content (e.g. links to websites) will also not be considered.

The CVs of the personnel proposed in accordance with Chapter 4 of the ToRs must be submitted using the format specified in the terms and conditions for application. The CVs shall not exceed 4 pages each. They must clearly show the position and job the proposed person held in the reference project and for how long. The CVs can also be submitted in English (language).

Please calculate your financial tender based exactly on the parameters specified in Chapter 5 Quantitative requirements. The contractor is not contractually entitled to use up the days, trips, workshops or budgets in full. The number of days, trips and workshops and the budgets will be contractually agreed as maximum limits. The specifications for pricing are defined in the price schedule.

8. Outsourced processing of personal data

The provisions on data protection and information security of the General Terms and Conditions of Contract apply.

The performance of the Contract may involve the processing of personal data by the Contractor, such as (but not limited to) the processing of names and contact information. In such cases, the Contractor acts as an independent DATA CONTROLLER and must comply with ALL applicable data protection obligations, including those arising from regional and local laws. The Contractor may only process personal data if the objective to be achieved cannot be achieved without this data. Data protection principles such as lawfulness, data minimization, accuracy, purpose limitation, storage limitation, transparency, integrity and confidentiality and accountability as well as the numerous rights of the data subject must be observed. GIZ is in no way responsible for such processing.