



OG/311/2025

23<sup>rd</sup> November 2025

**Chief Executive Officer**

All Banks

All Financing companies

Manama - Kingdom of Bahrain

Dear Sir/ Madam,

**Consultation: Proposed Buy Now Pay Later Module**

As part of the Central Bank of Bahrain's ("CBB") commitment to develop the financial sector, the CBB is hereby issuing a consultation on a new proposed Module, "Buy Now Pay Later" which will be applicable to short term credit offerings.

Also attached to this circular is a questionnaire (See Annex) that licensees should complete for the CBB to get a better understanding of the implementation implications of the proposed requirements.

The proposed requirements shall be available on the CBB website ([www.cbb.gov.bh](http://www.cbb.gov.bh)) under the "Open Consultations" Section.

The CBB requests you to provide your comments, including "nil comments", on the proposed requirements as well as your responses to the consultation questions, in an editable format to [consultation@cbb.gov.bh](mailto:consultation@cbb.gov.bh) by 8<sup>th</sup> December 2025.

Yours faithfully,

**Khalid Humaidan**

Governor

cc: All Law Firms  
All External Audit Firms  
Bahrain Association of Banks

**Annexure: Consultation questionnaire**

1. Do you agree that proposed requirements will ensure customers' interests are adequately safeguarded?
2. Do you agree that the requirements relating to marketing, promotions, disclosures and client agreements are adequate to protect the interests of the ordinary consumers of BNPL services? Are there other measures that the CBB should consider?
3. Do you believe that the new requirements will ensure there is level playing field between Buy Now Pay Later companies and other licensees offering similar services?
4. Do you believe that the operational and cost implications in adopting such measures match the benefits provided to the market and to consumers at large?
5. Do you agree with the regulatory measures included in the Module addressing customers having difficulties paying back the installments? Are there other measures that the CBB should consider?
6. Do you agree with the CBB's approach regarding ensuring the debt burden assessments prior to entering a BNPL arrangement? What alternative measures can you suggest to ensure that the debt burden does not rise beyond acceptable levels among the vulnerable customer segments?
7. What is the average debt burden ratio of customers entering into BNPL arrangements?
8. What has your experience been thus far on default risk on these types of offerings? Provide data to substantiate?