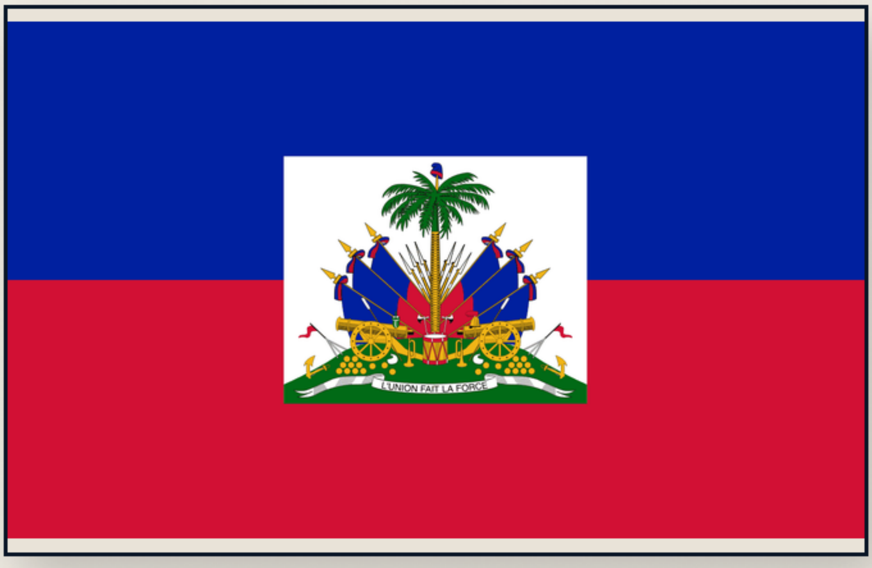
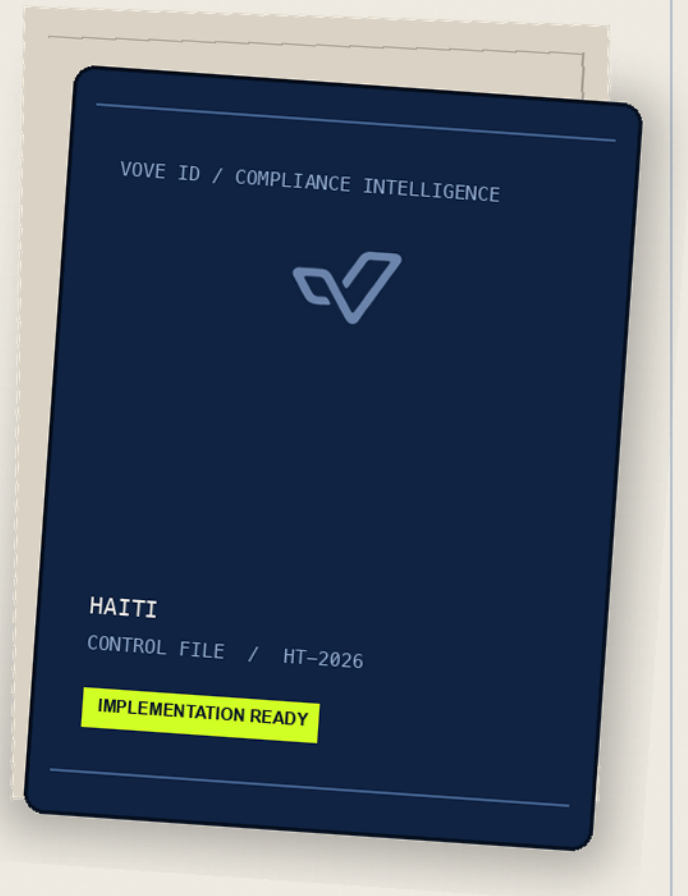
VOVE ID

HAITI



HAITI / HT



KYC / KYB / AML

COMPLIANCE CHECKLIST

2026 EDITION

IMPLEMENTATION CHECKLIST / NOT LEGAL ADVICE

READ THIS FIRST

Haiti KYC, KYB & AML Compliance Checklist

An implementation-focused checklist for Haiti's 2023 AML/CFT/CPF decree and the BRH financial-sector rules applicable from 2 March 2026, covering UCREF reporting, risk-based CDD, beneficial ownership, sanctions, records, payments and registry evidence.

FIU	**Unité Centrale de Renseignements Financiers (UCREF)**
Primary current framework	**Decree of 30 April 2023; BRH Circular 129-1 effective 2 March 2026**
Suspicion reporting	**Promptly to UCREF; do not wait for a threshold**
Transaction reports	**Sector-specific thresholds and deadlines under BRH Circular 95-5**
Retention	**At least 5 years for BRH-regulated financial institutions**
FATF status	**Increased monitoring as at 13 February 2026; recheck live lists**

Scope and legal framework

The decree of 30 April 2023 is the central AML/CFT/CPF instrument. For BRH-regulated financial institutions, Circular 129-1 (effective 2 March 2026) sets preventive controls and Circular 95-5 (16 April 2025) sets sector-specific transaction-reporting thresholds and channels. The 11 November 2013 law and UCREF guidance remain useful historical and reporting context; confirm how each legacy provision interacts with the 2023 decree before relying on it outside the express BRH rules.

FATF context

Haiti is a CFATF member and remained under FATF increased monitoring in the 13 February 2026 statement reviewed on 8 August 2026. Increased monitoring does not itself require blanket enhanced due diligence; apply proportionate risk controls and recheck the live FATF statements before reliance.

IMPORTANT	General regulatory information, not legal advice or a licence determination. Reviewed 8 August 2026 and legally scoped as applicable on that date. Confirm UCREF forms and access, BRH interpretations, non-financial-sector supervision, registry access, sanctions release procedures, privacy rules and product-specific licensing with the competent authority and qualified Haitian counsel before launch.

HOW TO USE THIS GUIDE

Turn each requirement into owned evidence

For every row, assign an owner, confirm whether the control applies, link the evidence, record gaps, and set a remediation date. A checked box is not evidence by itself.

01 / SCOPE	02 / DESIGN	03 / EVIDENCE	04 / REVIEW

Confirm institution, supervisor, product, customer and risk scope.	Map each obligation to a policy, system control or human review.	Retain the document, decision, timestamp, owner and rationale.	Test the control and update it when rules or risks change.

Checklist legend

CONTROL tells you what outcome to cover. IMPLEMENTATION ACTION translates that outcome into operational work. EVIDENCE suggests what an auditor or reviewer should be able to inspect. SOURCE points back to the primary rule or regulator guidance.

Minimum review record

Keep a compact decision record for each checklist row so a later reviewer can reconstruct what applied, who decided, and what evidence was inspected.

APPLICABILITY	OWNERSHIP	TRACEABILITY
Applicable, not applicable, or pending legal confirmation, with a short rationale.	Named control owner, reviewer, approval date and next review date.	Evidence link, source version, test result, gap status and remediation ticket.

1. SCOPE, AUTHORITIES, AND LICENSING

Scope, authorities, and licensing

Map the legal entity, activity and delivery model before applying sector rules.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Determine whether the business is a reporting entity under the 2023 decree.	Map each service and entity to the financial or designated non-financial categories; document any excluded or uncertain activity and obtain local advice.	Applicability memo, service map and counsel or authority confirmation.	Decree of 30 April 2023; UCREF legal framework
Treat UCREF as Haiti's financial intelligence unit.	Register for the applicable UCREF reporting channel, nominate authorised reporters and test access before onboarding customers.	UCREF registration, access test and reporter appointment.	UCREF Organic Law of 4 May 2017; UCREF reporting guidance
Obtain BRH authorisation before providing a regulated financial or payment service.	Classify banking, transfer, exchange, microfinance and electronic-payment functions and secure the relevant BRH approval before launch.	Licence analysis, BRH approval and permitted-activity register.	Banking Law of 14 May 2012; BRH Circular 121; Circular 129-1 scope

Governance and risk assessment

BRH-regulated financial institutions require a documented, proportionate prevention programme.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain an AML/CFT/CPF prevention programme proportionate to the institution.	Approve policies, internal controls, employee screening, training, independent testing and branch-level compliance responsibilities.	Board approval, programme, training records and audit reports.	BRH Circular 129-1, section 1
Appoint a compliance officer and operational compliance contacts.	Document authority, independence, direct escalation, resources and substitution arrangements.	Appointment, job description, reporting line and committee minutes.	BRH Circular 129-1, sections 1.1-1.3
Apply a documented risk-based approach.	Assess customer, product, channel, geography and transaction risks; assign a client risk level and tune controls to it.	Enterprise risk assessment, client scoring and control mapping.	BRH Circular 129-1, sections 1.7, 2 and 7

3. NATURAL-PERSON IDENTIFICATION

Natural-person identification

Identify and verify customers, representatives and persons behind transactions using reliable evidence.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Identify and verify the customer before establishing a relationship.	Collect identity, address, occupation and expected activity; verify with current reliable documents and record exceptions.	Identity file, verification result, address proof and onboarding approval.	Decree of 30 April 2023 arts. 37-39; BRH Circular 129-1, sections 3-4
Apply CDD to relationships, covered occasional transactions, transfers, suspicion and unreliable prior data.	Trigger CDD for every relationship; for financial institutions also apply Circular 129-1's HTG 1,320,000 occasional/linked-cash trigger and all national or international transfers, without treating the threshold as a safe harbour.	CDD trigger log, linked-transaction logic and completed case files.	BRH Circular 129-1, section 2
Collect specified identity evidence for remittances and transmissions at HTG 132,000 or equivalent.	For covered financial institutions, verify the parties and retain required transfer information at or above the threshold and whenever risk or complexity warrants it.	Transfer record, identity documents and threshold alert.	BRH Circular 129-1, section 3
Do not proceed when required identity or authority cannot be established.	Refuse or end the relationship or transaction and assess whether to report suspicion to UCREF.	Decline record, escalation and STR decision.	Decree of 30 April 2023 art. 46; BRH Circular 129-1, sections 3 and 5

KYB, registries, and beneficial ownership

Registry evidence is a starting point; it does not replace ownership and control verification.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Verify legal existence, purpose, registered office and authority to act.	Obtain constitutive documents, MCI commercial-registration evidence, tax identifiers, directors and representative powers; independently confirm current status.	Registry extract, statutes, tax evidence and authority documents.	Decree of 30 April 2023 art. 38; MCI company-registration procedures
Understand ownership and control and identify beneficial owners.	Trace natural persons who ultimately own or control the customer and apply the decree's control and fallback sequence without inventing a percentage threshold.	Ownership chart, source documents, control analysis and verified natural-person files.	Decree of 30 April 2023 arts. 40-42; BRH Circular 129-1, section 5
Keep beneficial-owner information current and plausible.	Refresh on ownership, management or risk changes; stop service and consider UCREF reporting when information is missing, implausible or cannot be verified.	Change monitoring, refresh log and escalation record.	BRH Circular 129-1, sections 5, 8 and 9
Do not assume a comprehensive public beneficial-ownership register.	Use MCI records and published formation documents where accessible, then obtain independent ownership/control evidence from the customer and reliable third parties.	Registry search, access log, ownership documents and discrepancy memo.	MCI commercial-register procedures; FATF Haiti action plan

PEPs, EDD, and remote onboarding

High-risk relationships require approval, provenance evidence and enhanced monitoring.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Detect domestic, foreign and internatio nal-organisation PEPs and connected persons.	Screen customers and beneficial owners at onboarding and periodically, including family members and close associates.	Screening output, match disposition and refresh schedule.	Decree of 30 April 2023 art. 6; BRH Circular 129-1, section 6
Apply PEP controls when a match is confirmed.	Obtain senior-management approval, establish source of wealth and source of funds and conduct enhanced ongoing monitoring.	Approval, provenance file and monitoring plan.	BRH Circular 129-1, section 6
Control non-face-to-face and other high-risk relationships.	Use stronger identity, liveness, device, document and first-payment controls proportionate to risk and record why residual risk is acceptable.	Remote-onboarding test results, fraud checks and approval.	Decree of 30 April 2023 art. 36; BRH Circular 129-1, section 2.3

Monitoring and suspicious reporting

Suspicion is independent of amount and reporting must remain confidential.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Monitor consistently with the customer's expected activity and risk.	Detect unusual, complex, unjustified and linked activity; investigate origin, purpose and parties and preserve a confidential written analysis.	Alerts, investigation notes, disposition and rule governance.	BRH Circular 129-1, sections 1.8 and 2.1
Report suspicion promptly to UCREF.	File when funds or property are suspected or reasonably suspected to be criminal proceeds or connected to ML/TF; do not wait to prove the predicate offence.	STR decision, transmission receipt and supporting analysis.	2013 Law art. 31; Decree of 30 April 2023; UCREF reporting guidance
Escalate before, during or after a transaction as facts require.	Use the authorised electronic channel or another written method if unavailable; follow UCREF instructions for a pending transaction and promptly supplement post-transaction suspicion.	Timestamped escalation, UCREF communication and supplements.	UCREF reporting guidance, 2013 Law arts. 19 and 33-34
Prevent tipping off and protect reporter confidentiality.	Restrict STR knowledge, exclude it from customer disclosures and train staff on prohibited communications.	Access logs, confidentiality procedure and training attestations.	2013 Law arts. 35 and 37; BRH Circular 129-1, section 16

Payments, wires, thresholds, and agents

Transaction reports and transfer information use sector-specific rules.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Apply Circular 95-5 reporting thresholds only to the named sector.	Report: banks at HTG 1,320,000 for cash/transfers/wires; transfer houses at HTG 132,000 for transfers; exchange bureaux at HTG 1,132,000 cash or HTG 350,000 bank transfer; credit cooperatives and microfinance companies at HTG 1,132,000 cash, including linked transactions.	Threshold configuration, aggregation tests and filed reports.	BRH Circular 95-5, section 2
Transmit threshold reports within the prescribed channel and time.	Send electronically each day; where paper is used, send within three business days in the metropolitan area or five business days in provincial cities.	Submission log, UCREF receipt and exception record.	BRH Circular 95-5, section 1
Carry complete originator and beneficiary information through wire transfers.	Validate names, addresses, account identifiers and accompanying information; use risk-based rules to execute, reject or suspend incomplete transfers.	Payment message, validation result and exception decision.	Decree of 30 April 2023 arts. 47-53; BRH Circular 129-1, section 11
Control agents, sub-agents and outsourced providers.	Perform due diligence, contract for compliance and data access, monitor performance and retain final accountability.	Due-diligence file, contract, monitoring and remediation.	BRH Circular 129-1, sections 12 and 15; Circular 121

Targeted financial sanctions

Financial institutions must screen and act on applicable UN designations under Haiti's 2023 framework.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Screen customers, beneficial owners, counterparties and transactions against applicable designation lists.	Screen at onboarding, before execution and on list updates; cover aliases, ownership/control and indirect availability of assets.	List source, screening logs, match logic and dispositions.	Decree of 30 April 2023; BRH targeted-financial-sanctions guidelines (16 February 2026)
Freeze matched funds and other assets without delay and without prior notice.	Block dealing or making assets available, preserve the asset trail and notify the competent authorities through the prescribed channel.	Freeze timestamp, asset inventory, authority report and access restriction.	BRH targeted-financial-sanctions guidelines, sections 3-7
Manage false positives and release only under competent authority.	Document match analysis; do not release frozen property until the legally competent authority confirms delisting, exemption or authorisation.	Match file, authority instruction and controlled release approval.	BRH targeted-financial-sanctions guidelines

Records and regulator access

Records must reconstruct decisions and transactions and be promptly retrievable.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Retain CDD records for at least five years after closure or the end of the relationship.	Preserve identity, beneficial-owner, authority and risk records with immutable dates and retrieval controls.	Retention schedule, archive sample and deletion controls.	BRH Circular 129-1, section 14
Retain transaction, analysis, correspondence and transfer records for at least five years.	Calculate from transaction execution or relationship end as applicable and preserve copies of UCREF reports.	Transaction archive, analysis file and filing copy.	BRH Circular 129-1, section 14
Respond promptly to lawful information requests.	Authenticate the requester, preserve confidentiality, produce complete records and log every disclosure.	Request, legal review, production log and receipt.	2013 Law art. 36; BRH Circular 129-1, section 14

Privacy, biometrics, and transfers

A comprehensive general private-sector data-protection statute and authority were not confirmed in the reviewed primary materials; confidentiality and sector rules still apply.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Use KYC data for defined lawful purposes and restrict access.	Document purpose, necessity, access roles, security and retention; obtain Haitian advice for biometrics, monitoring and cross-border hosting.	Data inventory, access matrix, security review and legal assessment.	Constitution of Haiti art. 28-1; Banking Law confidentiality provisions; BRH Circular 126
Do not claim a general privacy-law transfer mechanism that has not been verified.	Contract for security, confidentiality, incident response, return/deletion and regulator access; record the legal basis and uncertainty for each cross-border flow.	Transfer assessment, vendor contract and data-flow map.	BRH Circular 126; sector confidentiality duties

Practical evidence packs

Keep concise packs that allow an auditor to reproduce each decision.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain one reconstructable onboarding pack per customer.	Bundle identity, KYB, beneficial ownership, screening, risk, approvals and exceptions under stable identifiers.	Complete sampled onboarding pack.	Operational control supporting BRH Circular 129-1
Maintain one reconstructable monitoring and reporting pack per case.	Link source transactions, alerts, analysis, approvals, UCREF submissions and post-filing controls without exposing the filing to unauthorised staff.	Complete sampled case pack and access log.	Operational control supporting Decree of 30 April 2023 and BRH Circulars 95-5 and 129-1

SOURCES AND FURTHER READING

Verify against current official material

Primary law and regulator guidance control. Contextual VOVE ID reading is included to help teams operationalize the requirements and is not legal authority.

Decree of 30 April 2023 sanctioning ML, TF and proliferation financing
UCREF / Le Moniteur · Primary legislation
Open official source

BRH Circular 129-1 - preventive AML/CFT/CPF measures
Banque de la République d'Haïti · Binding financial-sector regulation
Open official source

BRH Circular 95-5 - transaction reports and thresholds
Banque de la République d'Haïti · Binding financial-sector regulation
Open official source

Targeted financial sanctions guidelines
Banque de la République d'Haïti · Authoritative supervisory guidance
Open official source

UCREF AML/CFT reporting guidance
UCREF · Official FIU guidance
Open official source

UCREF legal and regulatory framework
UCREF · Official legal inventory
Open official source

BRH prudential standards and current circulars
Banque de la République d'Haïti · Official supervisory inventory
Open official source

BRH Circular 121 - electronic payment service providers
Banque de la République d'Haïti · Binding payment regulation
Open official source

MCI professional identity and commercial-register procedure
Ministry of Commerce and Industry · Official registry guidance
Open official source

Haiti 4th enhanced follow-up report (2024)
CFATF · Authoritative regional assessment
Open official source

FATF black and grey lists - 13 February 2026
FATF · Authoritative current status
Open official source

Document control

Version 1.0 / Published 8 August 2026 / Last reviewed 8 August 2026 / Owner: VOVE ID Compliance Research

General regulatory information, not legal advice or a licence determination. Reviewed 8 August 2026 and legally scoped as applicable on that date. Confirm UCREF forms and access, BRH interpretations, non-financial-sector supervision, registry access, sanctions release procedures, privacy rules and product-specific licensing with the competent authority and qualified Haitian counsel before launch.