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VOVE COUNTRY CONTROL FILE

KYC / KYB / AML

2026 EDITION

HONDURAS

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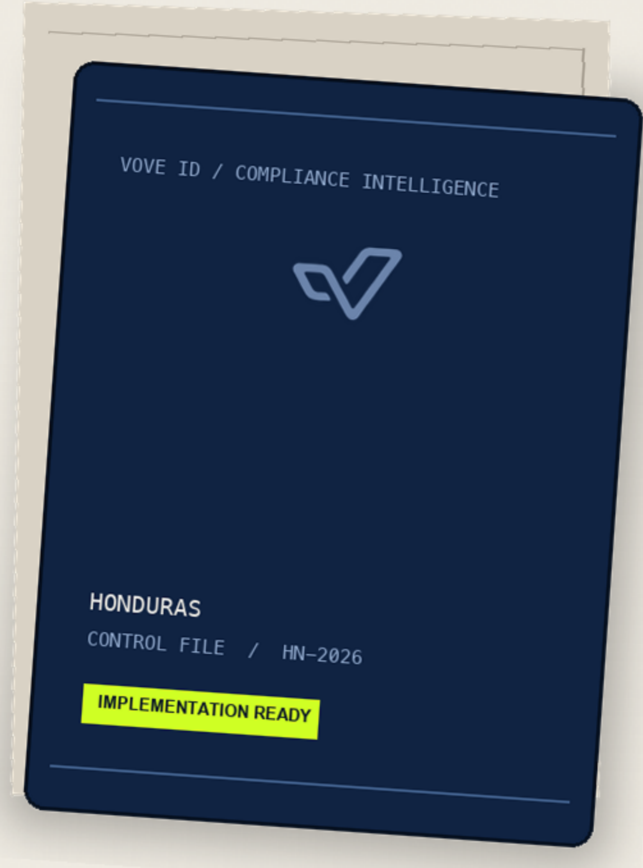

KYC / KYB / AML

COMPLIANCE CHECKLIST

2026 EDITION

IMPLEMENTATION CHECKLIST / NOT LEGAL ADVICE

READ THIS FIRST

Honduras KYC, KYB & AML Compliance Checklist

An implementation-focused checklist for Honduras under Decree 144-2014 and CNBS Resolution SB 348/2016, covering UIF reporting, risk-based CDD, beneficial ownership, sanctions, records, payments, APNFD scope and registry evidence.

FIU	**Unidad de Inteligencia Financiera (UIF), attached to the CNBS Presidency**
Primary framework	**Decree 144-2014; CNBS Resolution SB 348/27-04-2016**
Suspicion reporting	**To UIF regardless of amount; reconcile immediate statutory duty with 60/30-day regulatory case limits**
Periodic reports	**BCH-set thresholds; generally due within first 10 business days of the following month**
Retention	**At least 5 years after the relationship or transaction, as applicable**
FATF status	**Not on FATF public lists dated 13 February 2026; recheck live lists**

Scope and legal framework

Decree 144-2014, published 30 April 2015, is the principal special AML law. CNBS Resolution SB 348/27-04-2016, published 28 May 2016, regulates supervised institutions. Decree 131-2014 and its implementing framework separately govern designated non-financial activities and professions. Product, sector and current circular overlays must be confirmed before launch.

FATF context

Honduras is a GAFILAT member and was not named on FATF's 13 February 2026 lists of jurisdictions under increased monitoring or subject to a call for action, as reviewed on 9 August 2026. GAFILAT follow-up is distinct from FATF public listing; recheck both live sources before reliance.

IMPORTANT	General regulatory information, not legal advice or a licence determination. Reviewed 9 August 2026 and legally scoped as applicable on that date. Confirm live UIF reporting channels, BCH thresholds, APNFD rules, registry and beneficial-ownership access, sanctions release procedures, privacy requirements and product-specific licensing with the competent authority and qualified Honduran 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.

Scope, authorities, and licensing

Classify each entity, activity and delivery model before applying sector rules.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Determine whether each activity is a supervised financial activity, APNFD or other obliged activity.	Map services and entities against Decrees 144-2014 and 131-2014 and the current CNBS, UIF/URMOPRELAFT and sector rules; obtain advice for uncertain scope.	Applicability memo, service map and authority or counsel confirmation.	Decree 144-2014 arts. 2, 18-19; Decree 131-2014
Treat UIF as the national financial intelligence unit and reporting recipient.	Register the compliance officer and approved reporting channels, test access and maintain current UIF contact and submission procedures.	Registration, access test, appointments and channel procedure.	Decree 144-2014 arts. 27-30
Obtain required authorisation before regulated financial, remittance, payment or electronic-money activity.	Classify the product under CNBS and BCH rules and secure the necessary licence, registration or approval before launch.	Licence analysis, approval and permitted-activity register.	Financial System Law; BCH electronic-money and payment rules; CNBS supervisory inventory

Governance and risk assessment

The prevention system must be proportionate, documented and overseen by accountable management.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain a board-approved, risk-based compliance programme.	Cover policies, sanctions, ethics, training, monitoring and independent internal and external review; refresh for products and risk changes.	Board approvals, programme, training and audit reports.	Decree 144-2014 arts. 6, 10; CNBS Resolution SB 348/2016 arts. 5, 17-24
Appoint an independent senior compliance officer and appropriate committee or unit.	Document authority, resources, access, reporting line, substitution and UIF notification; justify any permitted proportional structure.	Appointments, UIF notice, job descriptions and minutes.	Decree 144-2014 art. 9; CNBS Resolution SB 348/2016 arts. 4-12
Assess customer, product, channel and geographic risks continuously.	Maintain enterprise and customer risk models, validate controls and record enhanced or simplified measures only where supported.	Risk assessment, model governance, scores and control mapping.	Decree 144-2014 art. 6; CNBS Resolution SB 348/2016 chs. V-VI

Natural-person identification

Identify and verify customers, users and representatives from reliable independent evidence.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Identify and verify each customer before or during establishment of the relationship under the approved risk procedure.	Collect official identity, address, occupation, economic activity, purpose and expected activity; authenticate documents and resolve inconsistencies.	Identity file, verification result, profile and approval.	Decree 144-2014 art. 7; CNBS Resolution SB 348/2016 arts. 27-30
Apply CDD to customers and occasional users without treating a reporting threshold as a safe harbour.	Configure relationship, transaction, suspicion and unreliable-data triggers; apply enhanced checks where risk requires.	CDD trigger matrix, linked-transaction logic and case files.	Decree 144-2014 arts. 6-7; CNBS Resolution SB 348/2016 arts. 27-35
Do not maintain anonymous, fictitious or concealed-identity accounts.	Reject false, anonymous or coded identities and verify every person acting for the customer and their authority.	Account controls, identity results and authority documents.	Decree 144-2014 art. 7(9); CNBS Resolution SB 348/2016 art. 29
Stop or end service when required identity evidence remains inconsistent or inadequate.	Document the failure, refuse or terminate as appropriate and assess a confidential ROS to UIF.	Decline or exit record, escalation and ROS decision.	Decree 144-2014 art. 7(5); CNBS Resolution SB 348/2016 art. 30

KYB, registries, and beneficial ownership

Registry evidence supports but does not replace ownership and control verification.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Verify legal existence, purpose, address, tax identity and authority to act.	Obtain current Mercantile Registry evidence, constitutive documents, RTN, directors, signatories and powers; verify through the competent registry.	Registry extract, constitutive documents, RTN and powers.	Commercial Code; Decree 144-2014 art. 7; CNBS Resolution SB 348/2016 arts. 29, 37
Identify the natural person who ultimately owns or controls the customer.	Trace ownership and effective control to natural persons and apply the regulation's control sequence; do not invent a universal percentage threshold.	Ownership chart, source records, control analysis and verified identities.	Decree 144-2014 arts. 2(5), 7(2); CNBS Resolution SB 348/2016 art. 38
Keep company and beneficial-owner information current and plausible.	Refresh on ownership, management, activity or risk change; escalate discrepancies and consider a ROS where explanations are inadequate.	Refresh log, change monitoring and discrepancy decisions.	Decree 144-2014 arts. 6-8; CNBS Resolution SB 348/2016 arts. 27-38
Do not assume one complete public national beneficial-ownership database.	Use the competent territorial Mercantile Registry and tax or sector evidence where lawfully accessible, then independently verify natural-person ownership and control.	Registry searches, access logs, customer evidence and discrepancy memo.	Commercial Code; Institute of Property / CCIT registry framework; GAFILAT Honduras follow-up

PEPs, EDD, and remote onboarding

Higher-risk relationships require senior oversight, provenance evidence and enhanced monitoring.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Detect domestic, foreign and internatio nal-organisation PEPs and relevant connected persons.	Screen customers and beneficial owners at onboarding and periodically and document match disposition.	Screening output, disposition and refresh schedule.	Decree 144-2014 art. 7(8); CNBS Resolution SB 348/2016 arts. 39-40
Apply enhanced PEP controls.	Obtain authorised senior approval, establish source of wealth and funds and conduct enhanced ongoing monitoring.	Approval, provenance file and monitoring plan.	CNBS Resolution SB 348/2016 arts. 39-40
Treat non-face-to-face onboarding as higher risk under the statutory rule.	Use enhanced document, liveness, device and first-payment controls and update relevant information at least annually where Decree 144-2014 art. 7(7) applies.	Remote-onboarding test, annual refresh and approval.	Decree 144-2014 art. 7(7); CNBS Resolution SB 348/2016 art. 35

Monitoring and suspicious reporting

Suspicion is independent of amount and reporting information is confidential.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Monitor activity against customer profile and risk.	Detect unusual, complex, linked and unjustified activity; investigate and preserve a confidential documented conclusion.	Alerts, investigation, disposition and rule governance.	Decree 144-2014 arts. 6-7, 27; CNBS Resolution SB 348/2016 arts. 55-58
Report suspicious operations to UIF regardless of amount or completion.	File attempted, rejected and completed activity using the live UIF channel; do not wait for a threshold or proof of crime.	ROS decision, supporting file, submission receipt and UIF reference.	Decree 144-2014 art. 27; CNBS Resolution SB 348/2016 arts. 58-59
Reconcile immediate statutory escalation with the regulation's outer case-processing periods.	Escalate suspicion immediately internally and to UIF where the statute requires; never use the 60-calendar-day first-ROS or 30-day supplemental limits to delay an urgent report, and document the applicable timeline.	Detection, escalation, decision and filing timestamps.	Decree 144-2014 art. 27; CNBS Resolution SB 348/2016 art. 59
Prevent tipping off and protect ROS confidentiality.	Restrict access, exclude ROS material from customer disclosures and train staff and agents on prohibited communications.	Access logs, confidentiality procedure and training.	Decree 144-2014 arts. 28, 31; CNBS Resolution SB 348/2016 art. 60

Payments, wires, thresholds, and agents

BCH-set thresholds and UIF channels must be confirmed live and applied by report type.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Apply the current BCH threshold to required cash, multiple, non-cash, transfer and remittance reports.	Obtain the current operative BCH/UIF threshold and reporting specification before configuring controls; do not rely on an undated historical amount.	Current resolution, configuration approval and test results.	Decree 144-2014 arts. 23-25; CNBS Resolution SB 348/2016 arts. 62-64
Send periodic threshold reports within the applicable deadline.	Report through the authorised UIF method within the first ten business days of the following month unless a current sector rule specifies otherwise.	Submission log, receipt and exception record.	CNBS Resolution SB 348/2016 art. 62
Carry required originator and beneficiary information in transfers at or above the BCH-set amount.	Validate names, accounts, originator address or identification and amount; manage missing information under the approved risk procedure.	Payment message, validation and exception decision.	Decree 144-2014 art. 12; CNBS Resolution SB 348/2016 art. 36
Control agents, third parties and outsourced providers while retaining accountability.	Perform diligence, contract for record access and security, monitor performance and retrieve identity evidence without delay.	Due diligence, contracts, monitoring and retrieval tests.	Decree 144-2014 art. 13; CNBS Resolution SB 348/2016 arts. 48-50

Targeted financial sanctions

Use current UN designations and UIF communications and preserve a controlled legal decision trail.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Screen customers, beneficial owners, counterparties and transactions against applicable UN designations.	Screen at onboarding, before execution and on list updates, including aliases and ownership or control; subscribe to UIF notices.	List source, update logs, match logic and dispositions.	Law Against Terrorist Financing art. 23; UIF UN sanctions portal and notices
Act without delay on a confirmed designation under the competent Honduran process.	Prevent movement or availability of assets, preserve the trail and notify UIF and other competent authorities using the live instruction; do not give advance notice.	Action timestamp, asset inventory, reports and restrictions.	Law Against Terrorist Financing; UIF sanctions communications; GAFILAT Honduras MER
Release blocked assets only on valid competent-authority instruction.	Document false-positive or delisting analysis and obtain the legally competent release, exemption or access instruction before action.	Match file, authority instruction and controlled release approval.	Law Against Terrorist Financing; GAFILAT Honduras MER, Recommendation 6 analysis

9. RECORDS AND REGULATOR ACCESS

Records and regulator access

Records must reconstruct the relationship, transactions and compliance decisions.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Retain CDD and relationship records for at least five years after the relationship ends.	Preserve identity, beneficial ownership, authority, risk and refresh evidence in retrievable form.	Retention schedule, archive sample and deletion control.	Decree 144-2014 art. 8; CNBS Resolution SB 348/2016 art. 83
Retain transaction, monitoring, ROS and periodic-report support for at least five years.	Calculate the correct trigger and preserve complete records, analyses, submissions and receipts.	Transaction archive, case file and filing copies.	Decree 144-2014 arts. 8, 24; CNBS Resolution SB 348/2016 arts. 57, 62, 83
Respond completely and promptly to lawful UIF, CNBS, prosecutor or court requests.	Authenticate requests, preserve confidentiality, produce records and log disclosure and receipt.	Request, legal review, production log and acknowledgement.	Decree 144-2014 arts. 26, 30

Privacy, biometrics, and transfers

A comprehensive enacted general private-sector data-protection law was not confirmed; constitutional, transparency, secrecy and sector duties still apply.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Protect KYC data for defined necessary purposes.	Document collection purpose, access roles, security, accuracy and retention and obtain Honduran advice for biometrics, monitoring and cross-border hosting.	Data inventory, notices, access matrix, security and legal assessment.	Constitution arts. 76, 182; Transparency and Access to Public Information Law; financial secrecy duties
Do not present the IAIP draft personal-data bill as enacted law.	Track legislative status and assess every data flow under the rules actually in force; contract for confidentiality, security, incidents, deletion and regulator access.	Legislative check, transfer assessment, data-flow map and contracts.	IAIP Draft Law on Personal Data Protection and Habeas Data; Constitution art. 182

Practical evidence packs

Keep concise packs that let a reviewer reproduce each decision.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain one reconstructable onboarding pack per customer.	Bundle identity, KYB, ownership, screening, risk, approvals and exceptions under stable identifiers.	Complete sampled onboarding pack.	Operational control supporting Decree 144-2014 and CNBS Resolution SB 348/2016
Maintain one reconstructable monitoring and reporting pack per case.	Link transactions, alerts, analysis, approvals, UIF submissions and post-filing controls while protecting ROS confidentiality.	Complete sampled case pack and access log.	Operational control supporting Decree 144-2014 arts. 27-31 and Resolution arts. 55-65

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.

Special Law Against Money Laundering - Decree 144-2014
Congress of Honduras / CNBS · Primary legislation
Open official source

Regulation of obligations and controls - Resolution SB 348/27-04-2016
CNBS · Binding financial-sector regulation
Open official source

Law regulating designated non-financial activities and professions - Decree 131-2014
Congress of Honduras / CNBS · Primary legislation
Open official source

CNBS national AML/CFT legal inventory
CNBS · Official legal inventory
Open official source

UIF guidance on suspicious-operation reports
UIF / CNBS · Official FIU guidance
Open official source

UIF data-reporting manual
UIF / CNBS · Official reporting guidance
Open official source

UN sanctions list and current UIF communications
UIF / CNBS · Official sanctions guidance
Open official source

Mercantile Registry of Francisco Morazan authority and services
CCIT / Institute of Property · Official delegated registry guidance
Open official source

Constitution of Honduras, updated 2025
Judicial Branch of Honduras · Primary constitutional text
Open official source

Draft Law on Personal Data Protection and Habeas Data
IAIP · Official draft - not enacted law
Open official source

Honduras seventh enhanced follow-up report
FATF / GAFILAT · Authoritative regional assessment
Open official source

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

Document control

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