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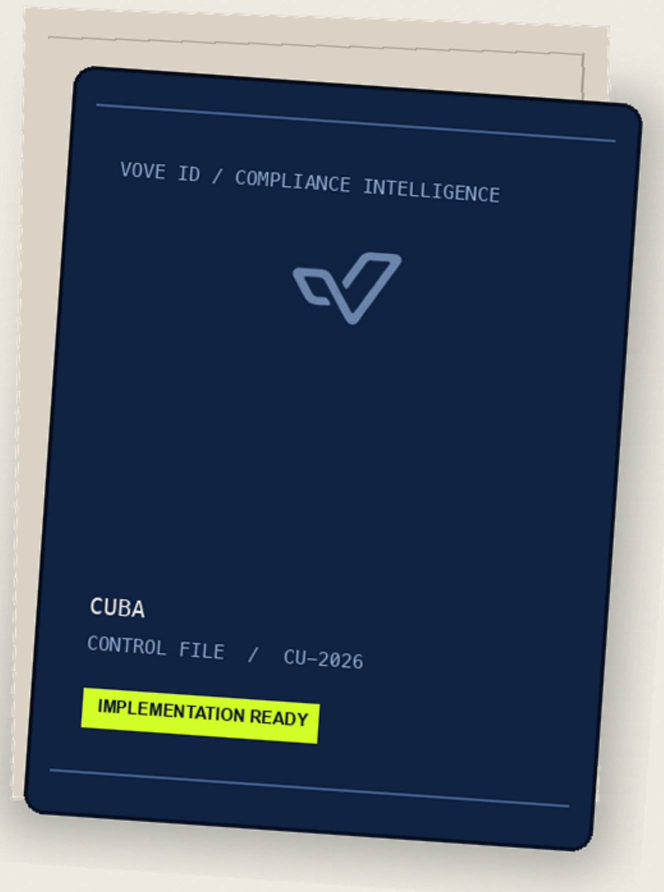

KYC / KYB / AML

COMPLIANCE CHECKLIST

2026 EDITION

IMPLEMENTATION CHECKLIST / NOT LEGAL ADVICE

READ THIS FIRST

Cuba KYC, KYB & AML Compliance Checklist

An implementation-focused checklist for Cuba's AML/CFT/CPF framework, including the DGIOF reporting route, sector perimeter, customer and beneficial-owner diligence, targeted financial sanctions, company records, personal-data protection, payments and virtual assets.

National FIU	**Dirección General de Investigación de Operaciones Financieras (DGIOF), within the Banco Central de Cuba**
Core preventive law	**Decree-Law 317 of 2013 and BCC Resolution 51 of 2013, supplemented by sector rules**
Suspicious reporting	**Report promptly to DGIOF when suspicion or reasonable grounds arise, regardless of amount**
CDD	**Identify every customer and verify identity data and documents; identify the beneficial owner**
Records	**Maintain identification and transaction records under the applicable BCC or sector rule; confirm the live sector retention period**
Company records	**The Central Commercial Registry and other competent registries evidence legal existence; access and beneficial-ownership availability require live confirmation**
Privacy	**Law 149 of 2022 on Personal Data Protection, effective 180 days after its 25 August 2022 publication**
Virtual assets	**BCC licensing and DGIOF AML supervision apply under Resolution 215/2021 and subsequent AML rules**
FATF status	**GAFILAT member; not identified on FATF's June 2026 high-risk or increased-monitoring statements; status reviewed 5 August 2026**

Scope and legal framework

Decree-Law 317 of 2013 establishes the preventive and reporting framework for money laundering, terrorist financing, proliferation financing and illicit capital movements; BCC Resolution 51 of 2013 regulates DGIOF functions and the handling of suspicious and threshold reports; Sector rules issued by BCC and other competent authorities determine detailed customer, monitoring, reporting and recordkeeping procedures; Law 149 of 2022 governs personal-data processing and data-subject rights; Resolution 215/2021 establishes a BCC licensing perimeter for specified virtual-asset services

FATF context

Cuba is a GAFILAT member. GAFILAT concluded Cuba's Fourth-Round follow-up and is preparing its Fifth-Round mutual evaluation. As reviewed on 5 August 2026, Cuba was not named in FATF's June 2026 statements on high-risk jurisdictions subject to a call for action or jurisdictions under increased monitoring. This status is time-sensitive and does not replace country, customer or transaction risk assessment.

IMPORTANT	General regulatory information, not legal advice, a licensing decision or a substitute for the operative Spanish texts and current sector instructions. Reviewed 5 August 2026. Cuba's framework is sector-specific and official online access can be inconsistent. Confirm the reporting channel, sector thresholds, retention periods, registry access, sanctions procedure, licence perimeter and any post-review amendments directly with DGIOF, BCC, the competent registry and qualified Cuban 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

Resolve the entity, activity and competent authority before applying a sector rule.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Entities and activities designated by Decree-Law 317 must apply preventive controls and report to DGIOF.	Map each product and legal entity to Article 4 and the current sector instruction; obtain written perimeter confirmation for ambiguity.	Perimeter memo, legal texts, regulator correspondence, licence inventory and launch approval.	Decree-Law 317/2013 arts. 4-5
Reserved banking, financial, payment or exchange activity requires the applicable BCC authorisation.	Separate regulated functions and block launch until the responsible authority confirms every licence or registration.	Product map, applications, authorisations, conditions and public-register checks.	Decree-Law 362/2018; current BCC licensing rules
Virtual-asset services within Resolution 215/2021 require a BCC licence and AML controls.	Classify custody, exchange, transfer, financial and issuer-related services; verify the current licence and DGIOF registration route.	Service taxonomy, BCC decision, DGIOF registration and control assessment.	BCC Resolution 215/2021; GAFILAT final Fourth-Round follow-up

Governance and risk assessment

A documented risk-based programme must reflect the operator's actual sector and exposure.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Reporting entities must identify and evaluate vulnerabilities to ML/TF/PF and illicit capital movements.	Assess customers, products, geography, channels and delivery methods; approve risk appetite and remediation.	Risk methodology, assessment, data, approvals and remediation log.	Decree-Law 317/2013 arts. 5 and 19-20
Internal controls must support prevention, detection, reporting and competent-authority access.	Assign accountable leadership and compliance roles, maintain procedures, training, testing and escalation.	Governance charter, appointments, manual, training and assurance reports.	Decree-Law 317/2013 arts. 5 and 8; applicable sector rule
Material legal and risk changes require controlled updates.	Monitor Gaceta Oficial, BCC, DGIOF, FATF and GAFILAT releases and test each parameter change before deployment.	Source register, change log, approvals, testing and release record.	Implementation control supporting Decree-Law 317/2013

Natural-person identification

CDD is based on reliable identity evidence, purpose, risk and ongoing consistency.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Reporting entities must always identify customers and verify the authenticity of submitted data and documents.	Capture identity and contact data, authenticate reliable documents and bind them to the applicant before activation.	Application, document images, validation results, timestamps and reviewer decision.	Decree-Law 317/2013 art. 12
CDD includes purpose, intended character and ongoing monitoring consistent with identified risk.	Record expected activity, assign risk, refresh on change or doubt and investigate deviations.	Purpose statement, profile, rating, refresh history and monitoring cases.	Decree-Law 317/2013 art. 9
A person acting for a customer must be identified and their authority verified.	KYC the representative, validate the mandate, scope and expiry and link it to the customer.	Representative KYC, power, verification and permission record.	Decree-Law 317/2013 arts. 9 and 12; applicable sector rule

KYB and beneficial ownership

Legal existence, authority, ownership and control must be reconstructed from reliable evidence.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Legal-person customers require reliable formation, registration, address, activity and authority evidence.	Obtain current registry evidence, constitutional documents, tax details, directors and powers and reconcile discrepancies.	Registry extract, formation documents, tax record, governance list and reconciliation.	Decree-Law 317/2013 arts. 9 and 12; Commercial Registry rules
CDD must identify the beneficial owner and take reasonable steps to verify that person's identity.	Trace natural-person ownership and control through every tier and document the sector-specific test used.	Ownership chart, source records, declarations, control analysis and verification.	Decree-Law 317/2013 arts. 9 and 12
Registry evidence does not replace independent AML verification.	Reconcile customer declarations with the Central Commercial Registry and other competent registers; escalate missing or conflicting data.	Registry results, access log, discrepancy case and resolution.	Commercial Registry rules; Decree-Law 317/2013 arts. 9 and 12

PEPs, enhanced diligence and remote onboarding

Higher-risk relationships require stronger approval, source and monitoring controls under the applicable sector rule.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Customers and beneficial owners must be assessed for PEP status under the current sector rule.	Screen at onboarding and periodically, cover family and close associates where required, and preserve the basis.	Declaration, screening, public-source evidence and review history.	Applicable BCC or sector AML rule; FATF Recommendation 12 implementation assessed by GAFILAT
Higher-risk and PEP cases require enhanced measures proportionate to risk.	Obtain senior approval, establish source of wealth and funds where required and intensify monitoring.	Approval, source pack, risk rationale, monitoring plan and reviews.	Applicable sector rule; Decree-Law 317/2013 risk-based framework
Remote onboarding must meet the same identification standard and protect personal data.	Authenticate document and person, manage impersonation risk, secure the flow and provide manual review.	Flow design, vendor diligence, security tests, legal basis and review record.	Decree-Law 317/2013 art. 12; Law 149/2022

Monitoring and suspicious reporting

Suspicion is reported promptly and without an amount floor; live submission mechanics must be confirmed.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Reporting entities must monitor activity against customer knowledge, purpose and risk.	Implement risk-based scenarios, reconcile complete data, investigate alerts and tune controls.	Scenario inventory, data lineage, cases, tuning and validation.	Decree-Law 317/2013 arts. 9-10
A suspicious transaction or attempted activity must be reported promptly to DGIOF when suspicion or reasonable grounds arise.	Document the grounds, preserve supporting material and submit through the current confidential DGIOF route.	Case analysis, decision, report, attachments, timestamp and acknowledgement.	Decree-Law 317/2013 arts. 13-14
Suspicious reporting applies independently of transaction amount.	Do not suppress or delay escalation because an amount is below a threshold; aggregate linked activity.	Rule configuration, linked-case analysis, report decision and testing.	Decree-Law 317/2013 art. 14
Reporting and DGIOF information must remain confidential.	Restrict access, avoid tipping off and separate customer communications from the reporting decision.	Access list, confidentiality controls, training and incident log.	Decree-Law 317/2013; BCC Resolution 51/2013

Payments, wires and threshold reports

Detailed payment fields and threshold reporting are sector-specific and must be confirmed from the live rule.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Specified cash or other operations above a BCC-set threshold may require registration and reporting.	Obtain the current sector threshold, currency conversion, aggregation period, report type and filing calendar directly from BCC or DGIOF.	Authoritative parameter sheet, configuration, tests, report and receipt.	Decree-Law 317/2013 art. 15; BCC Resolution 51/2013 art. 7
Wire transfers must carry and preserve required originator and beneficiary information.	Validate required fields before release, reject or escalate incomplete messages and screen all parties.	Message sample, validation, screening, exception and decision.	Applicable BCC transfer rule; GAFILAT technical-compliance assessment
Agents and outsourced providers do not remove the reporting entity's responsibility.	Contract, train, monitor and test delegated onboarding, payment and reporting controls.	Contract, agent register, training, testing and remediation.	Applicable BCC or sector rule

Targeted financial sanctions

Screening and freezing must follow current UN and Cuban designation procedures without delay.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Reporting entities must identify designated persons and entities under applicable UN and national measures.	Synchronise authoritative lists and screen customers, beneficial owners, transactions and counterparties.	List source, version, screening logs, match analysis and disposition.	Decree-Law 317/2013 arts. 16-18; BCC Resolution 51/2013 arts. 9-12
Funds or assets connected to a confirmed designation must be frozen without delay under the competent procedure.	Block access without warning, notify DGIOF and preserve the complete authority and action chronology.	Match record, freeze timestamp, notification, acknowledgement and account controls.	Decree-Law 317/2013 arts. 16-18; BCC Resolution 51/2013 arts. 9-12
False-positive, release and exception handling must use the live authority route.	Maintain escalation and unfreezing procedures and confirm any humanitarian or other exception before acting.	Procedure, authority correspondence, approvals and audit trail.	Current DGIOF/BCC sanctions procedure; controlled uncertainty

9. RECORDS AND AUTHORITY ACCESS

Records and authority access

Records must reconstruct identity, transactions, monitoring and reporting decisions.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Reporting entities must preserve customer-identification and transaction records.	Apply the live sector retention period from the correct trigger and preserve legal holds.	Retention schedule, source rule, trigger logic, archive samples and deletion tests.	Decree-Law 317/2013 art. 9; applicable sector rule
Records must support prompt DGIOF and competent-authority requests.	Verify authority, collect complete records securely and preserve production and acknowledgement evidence.	Request, authority check, collection log, production and receipt.	Decree-Law 317/2013 arts. 6-8; BCC Resolution 51/2013
Every decision must be reconstructable from source to outcome.	Preserve versions, timestamps, reviewers, evidence, screening, alerts, approvals and linked reports.	Reconstruction test, source hashes, case export and remediation.	Implementation control supporting Decree-Law 317/2013

Privacy, biometrics and transfers

Law 149 applies to personal-data processing, including KYC information and sensitive data.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Personal data must be processed under Law 149 principles and an applicable legal basis.	Map each field to purpose, necessity and authority; provide required information and restrict incompatible reuse.	Data inventory, legal-basis matrix, notice, purpose register and approvals.	Law 149/2022 arts. 1-7
Data subjects have statutory access, correction, updating and cancellation rights subject to lawful limits.	Operate authenticated rights workflows and document any AML or legal restriction on disclosure or deletion.	Request log, identity check, decision, response and exception rationale.	Law 149/2022
Sensitive, biometric and cross-border processing require documented safeguards and current-law analysis.	Assess necessity and proportionality, secure templates and transfers, restrict vendors and obtain Cuban advice before launch.	Impact assessment, security design, contracts, transfer map and counsel opinion.	Law 149/2022; implementing rules; controlled uncertainty

Practical evidence packs

Operational evidence should show what was known, why a rule applied and when action occurred.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Onboarding decisions should be reproducible.	Bundle identity, KYB, ownership, authority, screening, purpose, risk, approvals and exceptions.	Timestamped onboarding pack with sources, hashes, reviewer and decision.	Implementation control supporting Decree-Law 317/2013 arts. 9 and 12
Monitoring and reporting decisions should preserve the complete chronology.	Capture rule version, inputs, analysis, requests, suspicion decision, submission and receipt.	Alert case, linked activity, notes, report and quality review.	Implementation control supporting Decree-Law 317/2013 arts. 13-15
Launch approval must resolve licensing, AML, sanctions, registry, privacy and reporting readiness together.	Use a cross-functional go-live gate and block unresolved perimeter, source, portal or evidence defects.	Signed checklist, legal opinions, authorisations, tests and residual-risk acceptance.	Implementation control; Decree-Law 317/2013; Law 149/2022

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-Law 317 of 2013 - AML/CFT/CPF preventive framework
Gaceta Oficial de la República de Cuba (FAOLEX official-text mirror) · Primary legislation
Open official source

BCC Resolution 51 of 2013 - DGIOF functions and reporting
Gaceta Oficial de la República de Cuba (FAOLEX official-text mirror) · Primary regulation
Open official source

Law 149 of 2022 on Personal Data Protection
WIPO Lex · Primary legislation repository
Open official source

Banco Central de Cuba
Banco Central de Cuba · Official regulator portal
Open official source

Cuba mutual evaluation
GAFILAT · Authoritative regional assessment
Open official source

Final Fourth-Round follow-up report for Cuba
GAFILAT · Authoritative regional assessment
Open official source

Cuba Fifth-Round preparation
GAFILAT · Authoritative current-status update
Open official source

FATF high-risk jurisdictions subject to a call for action
Financial Action Task Force · Authoritative current status
Open official source

FATF jurisdictions under increased monitoring
Financial Action Task Force · Authoritative current status
Open official source

Document control

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