

February 12, 2026

**CIRCULAR LETTER TO ALL INSTITUTIONS:**

*Financial Institutions licensed under the Financial Institutions Act, Chap. 79:09 (as amended);*  
*Financial Holding Companies permitted under the Financial Institutions Act, Chap. 79:09 (as amended);*  
*Insurers Registered under the Insurance Act, Chap. 84:01 (as amended);*  
*Payment Service Providers authorized under the Central Bank Act, Chap. 79:02 (as amended);*  
*E-Money Issuers Registered under the E-Money Issuer Order, 2020 (as amended);*  
*Bureaux de Change Operators licensed under the Exchange Control Act, Chap. 79:50;*  
*TTMB; ADB; BATT; ATTIC; IBATT and EXIM*

**REF: CB-OIFI-517/2026**

**MISCELLANEOUS PROVISIONS (FATF COMPLIANCE) ACTS**

The Central Bank of Trinidad and Tobago (“Central Bank”) advises that the following Miscellaneous Provisions (FATF Compliance) Acts (“the Acts”) were fully proclaimed and are in effect:

- Miscellaneous Provisions (FATF Compliance) Act No. 25 of 2020
- Miscellaneous Provisions (FATF Compliance) Act No. 17 of 2024
- Miscellaneous Provisions (FATF Compliance) Act No. 7 of 2025

The Acts seek to strengthen Trinidad and Tobago’s Anti-Money Laundering (“AML”) Countering the Financing of Terrorism (“CFT”) and Proliferation Financing (“CPF”) legislative framework, in alignment with the Financial Action Task Force’s Recommendations. In this regard, the Acts make amendments to *inter alia* the Proceeds of Crime Act and Regulations, Chap. 11:27; the Anti-Terrorism Act and Regulations, Chap. 12:07; and the Financial Intelligence Unit of Trinidad and Tobago Act and Regulations, Chap. 72:01.

The Central Bank held several sessions with the regulated sectors over the period December 2025 to January 2026 to discuss the material amendments (*Appendix 1 refers*). Notwithstanding, financial institutions should conduct a thorough review of the Acts and where necessary, ensure that all new or amended regulatory requirements are embedded in the institution’s AML/CFT/CPF compliance programme.

*Gap Analysis*

In this regard, financial institutions are required to undertake a gap analysis against the Acts and develop remedial action plans with timelines, which must be approved by the Board of Directors (“Board”) by **June 30, 2026**. Thereafter, and within one (1) week of the Board meeting, the Corporate Secretary must submit to the Central Bank, a signed certification confirming that this was completed.

Reference is also made to the Central Bank’s Circular Letter CB-OIFI-3955/2025 regarding the gap analysis of the Counter Proliferation Financing Act 8 of 2025 (“the CPF Act”) which, if not yet completed, may also be included in this review.

*Discontinuation of External AML Audit and Commencement of Risk Based Independent Reviews*

Reference is made to Act No. 7 of 2025 which amended Regulation 10 of the Financial Obligations Regulations 2010 (as amended) (“FOR”), effectively revoking with immediate effect, the requirement for financial institutions to conduct annual external AML/CFT/CPF audits. The revised Regulation 10 now requires financial institutions to conduct independent risk based reviews annually. ‘Independent review’ means a review conducted by the Internal Audit function, the scope of which may be determined by the Internal Auditor. Additionally, at a minimum of every three (3) years, a comprehensive review of the financial institution’s AML/CFT/CPF compliance programme must be conducted, in accordance with the scope defined in Regulation 10(3) of the FOR.

*Timeline for Rectification of Identified Gaps*

The Central Bank expects financial institutions to take a holistic approach to fostering compliance with revised AML/CFT/CPF requirements by ensuring alignment of policies, procedures and processes with the relevant requirements in the Acts and the CPF Act, together with the recommended actions from the 3<sup>rd</sup> National Risk Assessment [*Circular Letter Ref CB-OIFI-250-2026*]. As such, except for the revised timelines for the reporting of suspicious activities and transactions to the Financial Intelligence Unit of Trinidad and Tobago, which are to be implemented with immediate effect, all other measures to close identified gaps are to be implemented by **December 31, 2026**.

Thereafter, financial institutions are required to conduct an independent review to assess the adequacy of the remedial actions taken to address the identified gaps. This review should be completed and tabled for the approval of the financial institution’s Board or its Audit Committee no later than **March 31, 2027**.

The legislation referenced in this Circular letter can be accessed via the following link <https://www.central-bank.org.tt/resources-database/all-categories/#legislation-aml-cft-cpf>. The Central Bank is reviewing the Acts and the CPF Act with a view to updating or issuing new guidance which will be circulated in subsequent correspondence.

For queries or clarification, please contact the AML Unit at [aml@central-bank.org.tt](mailto:aml@central-bank.org.tt).

Yours sincerely



Michelle Francis-Pantor  
INSPECTOR OF FINANCIAL INSTITUTIONS

Att.