



# **GUIDELINES ON REGISTRATION FRAMEWORK FOR SUPERVISED ENTITIES**

**DOCUMENT INFORMATION**

<b>VERSION</b>	<b>DATE</b>	<b>AUTHOR</b>	<b>DESCRIPTION</b>	<b>APPROVED BY</b>	<b>STATUS</b>
0.1	22/12/2020	Director FIUTT	Creation	Director FIUTT	Final
0.2	21/11/2023	Director FIUTT, C&O and Legal	Minor edits to NRFIs requirements.	Director FIUTT	Revised
1.0	12/12/2025	Director FIUTT, C&O, Legal	Moderate changes to update SEs Checklist, Fit and Proper/ Declaration forms	Director FIUTT	Revised Draft
1.1	02/02/2026	Director FIUTT, C&O, Legal	Approved Final Version	Director FIUTT	Final

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## ACRONYMS AND MEANING

ACRONYMS	MEANING
ACO	Alternate Compliance Officer
AML	Anti-Money Laundering
ATA	Anti-Terrorism Act, Chap. 12:07
CAP	Corrective Action Plan
CDD	Customer Due Diligence
CFT	Counter Financing of Terrorism
CO	Compliance Officer
CPF	Counter Proliferation Financing
CPFA	Counter Proliferation Financing Act, 2025
CPFR	Counter Proliferation Financing Regulations, 2025
EDD	Enhanced Due Diligence
FATF	Financial Action Task Force
FIUTT	Financial Intelligence Unit of Trinidad and Tobago
FIUTTA	Financial Intelligence Unit of Trinidad and Tobago Act, Chap. 72:01
FIUTTR	Financial Intelligence Unit of Trinidad and Tobago Regulations, 2011
FORs	Financial Obligations Regulations, 2010
FO(FT)R	Financial Obligations (Financing of Terrorism) Regulations, 2011
KYE	Know Your Employee
LB	Listed Business
ML	Money Laundering
MOU	Memoranda of Understanding
NRA2	National Risk Assessment for the period 2016-2020 (NRA2)
NRA3	National Risk Assessment for the period 2021-2025 (NRA3)
NRFI	Non-Regulated Financial Institutions
PF	Proliferation Financing
POCA	Proceeds of Crime Act, Chap. 11:27
QTRs	Quarterly Terrorist Reports
RBA	Risk-Based Approach
SDD	Simplified Due Diligence
STR/SAR	Suspicious Transaction/Suspicious Activity Report
TF	Terrorist Financing
UNSCR	United Nations Security Council Resolution

# THE FINANCIAL INTELLIGENCE UNIT OF TRINIDAD AND TOBAGO

## REGISTRATION FRAMEWORK FOR SUPERVISED ENTITIES

### OVERVIEW

Section 3 of the Financial Intelligence Unit of Trinidad and Tobago Act (FIUTTA) established the FIUTT as a department in the Ministry of Finance.

### AML/CFT/CPF Supervisory Authority

Part IIIA of the FIUTTA establishes the FIUTT as the AML/CFT/CPF Supervisory Authority for Listed Business (LBs) as specified in the First Schedule of the Proceeds of Crime Act, Chapter 11:27 (POCA), and Non-Regulated Financial Institutions (NRFIs) as specified in Section 2(1) of the FIUTTA. For the purposes of the FIUTT's functions as an AML/CFT/CPF Supervisory Authority, LBs and NRFIs, are collectively referred to as "Supervised Entities".

These Supervised Entities comprise individuals and/or entities that conduct business activities recognised to be vulnerable and exposed to a higher risk of misuse by criminals and their associates for ML/FT/PF purposes. Supervised Entities are mandated to register with the FIUTT, which, utilising a risk-based approach, monitors their compliance with the domestic AML/CFT/CPF laws and regulations. This monitoring ensures the implementation of measures necessary to identify, mitigate and report any risk of ML/FT/PF misuse. The FIUTT is empowered to initiate enforcement action against Supervised Entities to ensure compliance with these legal obligations.

The FIUTT's powers and functions are comprehensively set out in the FIUTTA and the Financial Intelligence Unit of Trinidad and Tobago Regulations, 2011 (FIUTTRs).

### 1. PURPOSE & OBJECTIVES

This updated document was created for persons<sup>1</sup> with the intention, to provide a clear and standardised process for Supervised Entities when registering with the FIUTT, in compliance with their legal obligation. This registration framework ensures transparency, accountability, and compliance with AML/CFT/CPF laws and regulations. The objective of registering with the FIUTT is to facilitate effective engagement, monitoring, reporting, and supervision of the Supervised Entities.

### 2. SCOPE OF APPLICATION

This framework ensures that Supervised Entities under the FIUTT are properly registered, monitored, and compliant with AML/CFT/CPF obligations, strengthening the integrity of Trinidad and Tobago's financial system.

#### ***Supervised Entities Required to Register with the FIUTT:***

- NRFIs as defined under section 2 of the FIUTTA (i.e. Money or Value Transfer Services (Money Remittance, E-Money Issuers and Payment Service Providers), Cooperative Societies (Credit Unions) and Building Societies.

LBs under the First Schedule of the POCA (e.g., attorneys-at-law, accountants, real estate business, jewellers, motor vehicle dealers, trust and company service providers (TCSPs), pool betting, private members' club (PMCs) and art dealers.

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<sup>1</sup> Persons include any natural or legal person, whether unincorporated or incorporated and includes partnerships and sole traders.

**Exemptions:** There are no exemptions from registration once a person is performing the business activities identified in the table above. However, if a person participates in a particular profession, but is not performing any of the business activities identified in the table above, he will not be required to register. For example, Attorneys-at-Law who are solely conducting the business activity of criminal litigation are not captured in the First Schedule of POCA and will not be required to register.

**Important Note:**

No Registration Fees: There are no fees associated with registering as a Supervised Entity with the FIUTT. This makes the process more accessible.

### 3. REGISTRATION REQUIREMENTS

**Mandatory Documentation:**

- i. A covering letter addressed to the Director of the FIUTT;
- ii. A fully completed FIUTT [Listed Business](#) and [Non Regulated Financial Institutions](#) Registration Form for Supervised Entities (RG1) (All fields are mandatory);
- iii. Police Certificate of Character (CoC) for Directors/Owners/Legal or Beneficial Owners/Partners;
- iv. Proof of incorporation or business registration certificate (where applicable);
- v. Proof of business address (*utility bill (no older than three (3) months) or letter of authorisation with ID<sup>2</sup>, where your name is not on the utility bill*);
- vi. FIUTT's [Fit and Proper Declaration Form](#) to be completed by legal or [beneficial owners](#), directors, partners and senior officers;
- vii. An Organisational structure chart (must clearly show the hierarchy, reporting lines, roles, and responsibilities of each position within the Supervised Entities' business) where applicable;
- viii. Financial statements for the most recent financial year (NRFIs), management accounts (LBs) for persons or businesses already in operation (*where applicable*) or estimates of annual income if in operation for less than a year<sup>3</sup>;
- ix. Business profile outlining services, target market and risk management framework;
- x. Copy of a valid Identification Document<sup>4</sup> for all legal owners, beneficial owners, directors, partners and senior officers of the applicant (only one form of valid ID is required, unless another is requested by the FIUTT: Drivers' Permit, Passport or National Identification Card);
- xi. BIR Advice letter;
- xii. VAT registration certificate where applicable;
- xiii. Copies of Professional and Educational Qualifications (*for Compliance and Alternate Compliance Officers*);
- xiv. An updated Curriculum Vitae (*for Compliance and Alternate Compliance Officers*);
- xv. Professional Reference<sup>5</sup> (*for Compliance and Alternate Compliance Officers*), if requested by the FIUTT; and

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<sup>2</sup> Acceptable forms of identification include: National Identification Card, Drivers Permit or Passport

<sup>3</sup> Audited Financial Accounts for NRFIs. Listed Businesses should provide the type of financial statements or accounts, which are normally produced in the conduct of their business.

<sup>4</sup> See Footnote 2

<sup>5</sup> This should be from a person who can speak to the experience and ability of the prospective Compliance Officer or Alternate Compliance Officer.

- xvi. Any other supporting documents deemed relevant for the purposes of this application. Please list the additional documents provided (if any).

**Declarations:**

- Knowingly or recklessly making a misrepresentation in any application, notification, or other document (s. 18K of the FIUTTA) commits an offence and is liable on summary conviction to a fine of two hundred and fifty thousand dollars and to imprisonment for two years.

**4. REGISTRATION PROCESS STEPS**

*i. Confirmation of Business Eligibility/Activity*

- Before starting the registration process, the person or entity proposing to register with the FIUTT must first ensure that the business activity that they propose or are performing qualifies either as a (i) Listed Business in the First Schedule of POCA or (ii) is a NRFI. Therefore, consult the FIUTT's list of Supervised Entities. See the [List of Supervised Entities](#) with the qualifying business activities at **Appendix I**.

*ii. FIUTT Registration*

- Complete the Application form by accessing the FIUTT website at [Listed Business](#) and [Non Regulated Financial Institution](#). Provide detailed information about your business model, including services offered and ownership structure. See item #3, Registration Requirement above.

*iii. Application Submission (Registration Form and All Supporting Documents)*

- Submit the FIUTT Registration Form after filling out all the fields (*this is mandatory*) on the form and then submit to the FIUTT. Please keep a copy for your records, as it will not be available after submission. See the FIUTT's registration process map at **Appendix II**;
- Designate a Compliance Officer and an Alternate Compliance Officer. Apply to the FIUTT for the approval of your designated Compliance Officer by completing the [Compliance Officer and an Alternate Compliance Officer Fit and Proper Questionnaire](#) form (filling all fields) and uploading with the completed registration form as a supporting document;
- All Supervised Entities registering with the FIUTT must complete an initial Registration Risk AML/CFT/CPF Assessment Questionnaire (RRAQ);
- All Directors, Legal or [Beneficial Owners](#) or Senior Employees are required to complete a [Fit and Proper Declaration](#) attached to the FIUTT Registration Form at Appendix III;
- What are the documentary requirements needed to register?
  - Corporations/Partnerships: most recent Articles of Incorporation/Partnership Agreement, etc.
  - Sole Proprietorship: Registrar Generals' Department business registration certificate

- Professionals (Real Estate Business (where applicable), Lawyers (Legal Practicing Certificate), and Accountants (ACCA, CPA, etc.); and
- The Registration Application Form, the Compliance Officer and or an Alternate Compliance Officer Fit & Proper Questionnaires and the [Fit and Proper Declaration](#) must be submitted together, along with all supporting documents via email at [fiutt.compliance@gov.tt](mailto:fiutt.compliance@gov.tt) or the signed hard copy to:

**Director**  
**Financial Intelligence Unit of Trinidad and Tobago**  
**Level 25, Tower D,**  
**International Waterfront Complex,**  
**1A Wrightson Road, Port of Spain.**

iv. Preliminary Review

- Upon receipt of a fully completed application with all required supporting documents from a applicant Supervised Entity. The FIUTT shall confirm receipt within 2 working days of having received the FIUTT Application Form and its supporting documents via email.
- The initial review of your application with supporting documents typically takes 21 days, but due to high volumes, it may take longer.
- The FIUTT will check the application for completeness and eligibility.
- If the FIUTT discover any errors or omissions the proposed entity would be informed (*via email telephone or in writing*) to have any errors or omissions rectified in the shortest possible time to ensure minimal delays in approval.

v. Due Diligence Checks

- The FIUTT will conduct due diligence checks on owners, directors, [beneficial owners](#), compliance officers, and alternate compliance officers utilising government databases, designated entity lists, police certificate of character (submitted by the application), voluntary information received from the public, completed questionnaires/declarations for legal and beneficial owners where applicable and open-source information.
- The FIUTT due diligence checks will be conducted utilising the [FIUTT Targeted Sanctions Search Tool](#) for all applications received by Supervised Entities.
- The primary objective of assessing fitness and propriety is to ensure that at the registration stage and throughout the life of the supervised entity, that only fit and proper persons are allowed to control and direct the operations of Supervised Entities. The assessment of a person's fitness and propriety is to: (i) ensure that criminals and their associates are prevented from holding (or being beneficial owners of), a significant or controlling interest in, or managing Supervised Entities; and (ii) protects the reputation of Trinidad and Tobago.

- Provided ensure that all the required information on the requested forms, questionnaires and the supporting documents are fully and accurately completed without omissions, the FIUTT can furnish the Supervised Entity with an FIUTT Certificate of Registration within 30 days of initial submission.

vi. Approval, Certification and Publication

- The FIUTT, after approval of the Supervised Entity's registration will inform the Supervised Entity via email or in writing.
- When registration is confirmed, the FIUTT will provide the Supervised Entity with a Certificate of Registration, which will indicate:
  - the FIUTT registration number;
  - the official business or company name;
  - the registered business address;
  - the date of registration with the FIUTT (*valid for 5yrs only*); and
  - the expiration date of registration.
- The FIUTT will also post the Supervised Entity's identification information on its public website in accordance with Section 18C of the FIUTTA. This includes information about the Supervised Entity name, the date of registration with the FIUTT and the expiration date of registration.
- Pursuant to Section 18B(2) of the FIUTTA, the Supervised Entity's registration is valid for a period of five (5) years. Unless the Supervised Entity is de-registered prior to the end of the period.
- The Supervised Entity shall apply to renew their registration with the FIUTT no later than three (3) months prior to its expiration date (s. 18B(3) of the FIUTTA), in accordance with the procedure approved by the FIUTT, if you intend to continue carrying on the business or profession.
- Once the steps under No. 4 i.e. (i), (ii), (iii), (iv) and (v) above are completed with no adverse findings, the FIUTT will inform the Supervised Entity of the approval via email.
- The Supervised Entity can use the FIUTT's e-appointment service at [FIUTT's e-appointment application – Financial Intelligence Unit](#).
- The Supervised Entity will be added to the official list of Supervised Entities and published on the FIUTT's website.
- Additionally, the FIUTT will be informing Supervised Entities via emails, website and social media, of Circular Letters, Guidelines, Typologies, changes in Legislation, Outreach and Awareness sessions, selection for AML/CFT/CPF Examinations (via email/letter), Risk assessments and other AML/CFT/CPF information and obligations.

An application for registration may not be approved for any of the following reasons:

- The Applicant is not an NRFI or LB.
- The Applicant failed to provide a complete set of registration documents as required.
- Double registration. Another application for registration was already approved under the same name.
- The Applicant was assessed as not being fit and proper after assessment of (i) the Fit and Proper Questionnaire and (ii) the Declaration (by Directors/Owners/Legal Persons/Beneficial Owners).
- Any other reason as may be advised by the FIUTT in writing.

If an application for registration is not approved, the Applicant will be given an opportunity to make representations, in writing, to the FIUTT.

## **5. ONGOING OBLIGATIONS BY SUPERVISED ENTITIES**

- i. Annual Updates:
  - Submit annual AML/CFT/CPF risk Self-Assessment Questionnaire (SAQ)
- ii. Compliance Reporting:
  - File AML/CFT/CPF reports as required under the FIUTT published guidance and the AML/CFT/CPF laws (Suspicious Transaction/Activity Reports (STRs/SARs), QTRs for NRFIs, Economic Sanction Orders (ESOs), Terrorist Funds Reports (TFRs)
- iii. Notification Changes:
  - Report immediately material changes (ownership, Directorship, Compliance Officers/Alternate Compliance Officers, Address change, Change in the nature of business, etc.)
- iv. Compliance Examinations:
  - Cooperate with the FIUTT's AML/CFT/CPF compliance examinations (On-site, Desk-based or Hybrid).
  - Cooperate with the FIUTT's Outreach and Awareness sessions.

## **6. ENFORCEMENT AND SANCTIONS**

- i. Failure to register or comply after registration with the AML/CFT/CPF obligations may result in:
  - Revocation of registration.
  - Warning letters and or Notices.
  - Enforcement Hearing.
  - Administrative penalties and fines.
  - Criminal penalties.
  - Public disclosure of enforcement actions.

## **7. TRANSITIONAL PROVISION**

Guidance notes and awareness sessions will be provided by FIUTT to assist Supervised Entities as it relates to the updated FIUTT Registration Framework. This framework ensures that entities supervised by the FIUTT for AML/CFT/CPF are properly registered, monitored, and compliant with AML/CFT/CPF obligations, strengthening Trinidad and Tobago's financial integrity system.

**Director  
Financial Intelligence Unit of Trinidad and Tobago.**

## LIST OF FIUTT SUPERVISED SECTORS

Supervised Entities are Non-Regulated Financial Institutions and Listed Businesses who perform only the nature of business as stated in the “**Interpretation**” column of the table below. Only those Supervised Entities are required to register with the FIUTT under the **Financial Intelligence Unit of Trinidad and Tobago Act, Chap 72:01 (as amended)**, namely:

Non-Regulated Financial Institutions	Listed Businesses
Building Society	Accountant
	Art Dealer
Co-operative Societies	Attorney-at-law
	Jewellery
	Motor Vehicle Sales
Money or Value Transfer Services <ul style="list-style-type: none"> <li>• Money Remittance</li> <li>• E-Money Issuers</li> <li>• Payment Service Providers</li> </ul>	Pool Betting/Gaming House
	Private Members’ Club
	Real Estate Business
	Trust and Company Service Provider

## NON-REGULATED FINANCIAL INSTITUTIONS

TYPE OF FINANCIAL INSTITUTION	INTERPRETATION	LAWS OF TRINIDAD AND TOBAGO
1. Building Society	A society registered under the Building Societies Act.	Building Societies Act, Chapter 33:04
2. Co-operative Societies	A society registered under the Co-operative Societies Act.	Cooperative Societies Act, Chapter 81:03

## NON-REGULATED FINANCIAL INSTITUTIONS

TYPE OF FINANCIAL INSTITUTION	INTERPRETATION	LAWS OF TRINIDAD AND TOBAGO
3. Money or Value Transfer Service Provider	A person who carries on money or value transfer services is one who provides a financial service that accepts cash, cheques, other monetary instruments or other stores of value in one location and pays a corresponding sum in cash or other form to a beneficiary in another location by means of a communication, message, transfer or through a clearing network to which the money value service belongs. This includes the following sectors:	Regulation 2 - Financial Obligations Regulations 2010
a) Money Remitter	Money Remitters means a provider of electronic transfer who accepts funds from a payer for the purpose of making them available to a payee, through a data communication network or by an electronic platform that processes the data, without necessarily maintaining an account relationship with the payer or payee.	The E-Money Issuer Order, 2020
b) Payment Service Provider	A provider of payment services which enables cash deposits and withdrawals, execution of a payment, the issue or acquisition of a payment instrument, the provision of a remittance service, and any other service functional to the transfer of money	The E-Money Issuer Order, 2020
c) Electronic-Money (E-Money) Issuer	<p>EMI means a category of persons (other than a licensee) who has been registered by the Central Bank to issue E-money pursuant to the E-Money ministerial Order.</p> <p>E-Money means monetary value represented by a claim on the issuer, which is:</p> <ul style="list-style-type: none"> <li>a) stored on an electronic device;</li> <li>b) issued on receipt of funds of an amount not less in value than the monetary value issued; and</li> <li>c) accepted as a means of payment by persons other than the issuer, so however that the funds referred to in (b) above shall not be treated as a deposit under the Financial Institutions Act, 2008.</li> </ul>	<p>The E-Money Issuer Order, 2020</p> <p>The Financial Institutions Act, Chapter 79:09</p>

## LISTED BUSINESSES

TYPE OF BUSINESS	INTERPRETATION	LAWS OF TRINIDAD AND TOBAGO
1. Art Dealer	An individual or company that buys and sell works of any category or art.	
2. Pool Betting/Gaming House	Any such business registered under the Gambling and Betting Act.	Gambling and Betting Act, Chapter 11:19
3. Jewellery	A Business licensed under the Licensing of Dealers (Precious Metals and Stones) Act. Chap.	Licensing of Dealers (Precious Metals and Stones) Act, Chapter 84:06
4. An Attorney at-law, 5. Accountant or other person performing the functions of an Accountant or Other other Independent Legal Professional.	Such a person is accountable when they prepare for, or carry out, transactions for their clients concerning the following activities: <ul style="list-style-type: none"> <li>a) buying and selling of real estate;</li> <li>b) managing of client money, securities and other assets;</li> <li>c) management of banking, savings or securities accounts;</li> <li>d) organisation of contributions for the creation, operation or management of companies;</li> <li>e) creation, operation or management of legal persons or arrangements, and buying and selling of business entities.</li> </ul>	
6. Motor Vehicle Sales	Any natural or legal person, firm or partnership, carrying on the business of selling or leasing new or used motor vehicles as defined under the Motor Vehicles and Road Traffic Act.	Motor Vehicles and Road Traffic Act, Chapter 48:50
7. Private Members' Club	A Private Members' Club A member's club which is granted a certificate under section 5(4) of the Registration of Clubs Act.	Registration of Clubs Act, Chapter 21:01
8. Real Estate Business	Any natural or legal person, partnership or firm carrying on the business of -	

	<ul style="list-style-type: none"> <li>a) the auctioning or negotiating the sale, exchange, purchase, lease or licensing of real property;</li> <li>b) advertising or holding himself out as being engaged in the business of auctioning or negotiating the sale, exchange, purchase, lease or licensing of real property;</li> <li>c) engaging in property management either as a consultant or an agent;</li> <li>d) taking part in the procuring of vendors, purchasers, lessors, lessees, landlords or tenants of real property; or</li> <li>e) directing or assisting in the procuring of prospects, or the negotiation or closing of transactions which result in the sale, exchange, lease or licensing of real property.</li> </ul> <p>Notwithstanding the foregoing, a person shall not be regarded as engaging in real estate business by reason only of the fact that—</p> <ul style="list-style-type: none"> <li>a) he acts for and on behalf of a client under a power of attorney for the purpose of negotiating or executing a contract, transfer or conveyance in respect of real property, provided always that he does not engage in these transactions in breach of his fiduciary duties or for personal profit;</li> <li>b) he furnishes legal advice and services ancillary thereto in his capacity as an Attorney-at law;</li> <li>c) he is— (i) an administrator, executor, receiver or trustee acting under or by virtue of an appointment by will or written instrument or by order of a court; or (ii) an assignee, custodian, liquidator, receiver, or trustee acting under any written law;</li> <li>d) he deals with real property of which he is an owner or a part owner;</li> <li>e) he is a developer; or</li> <li>f) he is employed as a salaried employee of a financial institution dealing with real estate transactions.</li> </ul>	
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<p>9. Trust and Company Service Provider</p>	<p>Any such person when he prepares for and when he carries out transactions for a client in relation to the following activities:</p> <ul style="list-style-type: none"> <li>a) acting as a formation agent of legal persons;</li> <li>b) acting as (or arranging for another person to act as) a director or secretary of a company, a partner of a partnership or a similar position in relation to other legal persons;</li> <li>c) providing a registered office, business address or accommodation, correspondence or administrative address for a company, a partnership or any other legal person or arrangement;</li> <li>d) acting as (or arranging for another person to act as) a nominee shareholder for another person; and</li> <li>e) acting as, or arranging for another person to act as a trustee of an express trust.</li> </ul>	
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Source: [Proceeds of Crime Act, Chap 11:27 as amended on 15 August 2025.](#)

**9 January 2026**

**Director, FIUTT**

**FIUTT'S REGISTRATION PROCESS MAP**

