



TRINIDAD AND TOBAGO NATIONAL ANTI-MONEY LAUNDERING COMBATTING TERRORISM FINANCING COUNTERING PROLIFERATION FINANCING POLICY AND STRATEGY

UPDATED TO DECEMBER 2025

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TABLE OF ACRONYMS

AML	Anti-Money Laundering
CA	Competent Authorities
CBTT	Central Bank of Trinidad and Tobago
CED	Customs and Excise Division
CFATF	Caribbean Financial Action Task Force
CFT	Combating the Financing of Terrorism
CPF	Combating the Financing of Proliferation of Weapons of Mass Destruction
EXBS	Export Control and Related Border Security
FATF	Financial Action Task Force
FI	Financial Institution
FIUTT	Financial Intelligence Unit of Trinidad and Tobago
GoRTT	Government of the Republic of Trinidad and Tobago
LB	Listed Business
LEA	Law Enforcement Authority
KCL	King's College of London
ML	Money Laundering
NAMLC	The National Anti-Money Laundering Counter Financing of Terrorism Committee
NPO	Non-Profit Organisation
NP&S	Trinidad and Tobago National Anti-Money Laundering Combating Terrorism Financing, Countering Proliferation Financing Policy and Strategy

NRA	National Risk Assessment
PF	Financing the Proliferation of Weapons of Mass Destruction or Proliferation Financing
PF Risk Assessment	Financing the Proliferation of Weapons of Mass Destruction Risk Assessment
RE	Reporting Entity
SA	Supervisory Authority
STR	Suspicious Transaction Report
TF	Terrorist Financing
TFS	Targeted Financial Sanctions
TTSEC	Trinidad and Tobago Securities & Exchange Commission
UNSCR	United Nations Security Council Resolution
VA	Virtual Asset
VASP	Virtual Assets and Service Provider
WB	World Bank

Foreword

Trinidad and Tobago remains firmly committed to safeguarding the integrity of its financial and other systems and protecting the country from the threats posed by money laundering, terrorist financing and proliferation financing. These threats have the potential to evolve in scale, complexity and sophistication, necessitating a dynamic, coordinated and risk-based national response.

The updated Trinidad and Tobago National Anti-Money Laundering Combating Terrorism Financing, Countering Proliferation Financing Policy and Strategy (NP&S) represents a critical step in strengthening Trinidad and Tobago's framework to detect, prevent and disrupt illicit financial activity. This updated NP&S sets out the government's comprehensive plan for the period 2026-2029, stemming from the results of the third national risk assessment (3rd NRA) which assessed data and information for the period 2021-2024. The NP&S also builds on the findings of the Proliferation Financing Risk Assessment and the Virtual Assets and Virtual Assets Service Providers Risk Assessment. It builds upon the last approved NP&S dated July 2025, developed in response to the country's second NRA (2nd NRA) for the period 2016-2020, with ongoing efforts to respond to a dynamic threat environment, including the opportunities and challenges presented by new technologies and digital platforms.

Through these assessments, Trinidad and Tobago has enhanced its understanding of the nature and extent of its money laundering, terrorist financing and proliferation financing risks. This NP&S translates those insights into coordinated National Policies and Actions designed to ensure that risks are effectively mitigated and resources are allocated on a risk-based approach. Furthermore, the NP&S provides a coherent and responsive framework for competent authorities, financial institutions and designated non-financial businesses and professions and non-profit organisations to operate.

The successful implementation of this NP&S will require the collective commitment of all stakeholders, including policy-makers, law enforcement authorities, supervisory authorities, the judiciary, reporting and supervised entities. Through shared responsibility and coordinated action, Trinidad and Tobago will continue to strengthen its resilience against financial crime and uphold its international obligations.

This NP&S reaffirms the Government's unwavering commitment to protecting the financial system,

preserving national security, and promoting transparency, integrity and confidence in Trinidad and Tobago's economy.

Mr. John S. Jeremie SC
Attorney General
December 2025

1. Background and Introduction

1. Money laundering (ML), terrorist financing (TF) and proliferation financing (PF) are global threats that not only compromise the integrity and stability of the international financial and other systems, but also threatens individual national economies. Trinidad and Tobago's anti-money laundering (AML), combatting the financing of terrorism (CFT), and combatting the financing of proliferation of weapons of mass destruction (CPF) (AML/CFT/CPF) regime is a fundamental pillar in safeguarding its financial system, promoting national security and protecting the economy from the destabilising effects of illicit financial flows and activities.
2. The NP&S is guided by Financial Action Task Force (FATF's) globally recognised standards and is designed to enhance the effectiveness of the country's policy and domestic coordination, measures to prevent and detect ML/TF/PF and actions to disrupt, investigate, prosecute and convict persons responsible for abusing of systems and facilitating the flow of illicit funds.
3. Trinidad and Tobago's success depends on a coordinated, risk-based approach where measures are proportionate to the risks identified. It includes all government agencies such as; the Financial Intelligence Unit of Trinidad and Tobago (FIUTT), law enforcement authorities (LEAs), supervisory authorities (SAs), the judiciary and other competent authorities (CAs) as well as, our private partners like the financial institutions (FIs), designated non-financial businesses or professions (known as 'listed businesses') (LBs) and FATF defined non-profit organisations (NPOs) together with the donor community.
4. This document provides a clear roadmap for a collaborative whole-country approach.
5. The NP&S includes Trinidad and Tobago's direct response to the risks identified in the 3rd NRA. All measures within the NP&S will be applied proportionately to close existing gaps.
6. In March 2025, Trinidad and Tobago commenced the Caribbean Financial Action Task Force (CFATF) 5th Round of Mutual Evaluations Assessment to assess the country's compliance with the FATF Recommendations. The evaluation will assess the technical compliance of our legislative and institutional framework and most importantly the effectiveness of the country's AML/CFT/CPF systems in practice.

2. Purpose

7. This document has been developed by the Government of the Republic of Trinidad and Tobago (GoRTT) to enable the mitigation of ML/TF/PF risks. It sets out the overall AML/CFT/CPF policy, as well as the key elements of the strategic direction to be followed by key and responsible stakeholders, to ensure that the policy focus is effectively maintained, and that risks are managed and reduced. It describes the institutional arrangements to effectively implement the national AML/CFT/CPF framework, and key actions and activities to maintain and strengthen the safety and security of the broader economy.
8. This is a component of an overall integrated approach to national security, including anti-crime and anti-terrorism policies and strategies, together with a robust legal, regulatory and operational framework consistent with best practices and international standards. It seeks to prevent, and promptly apply proportionate and dissuasive sanctions for ML/TF/PF activities and related predicate offences, depriving criminals of the proceeds and instrumentalities of financial crime, terrorism and proliferation and otherwise dissuade and disrupt criminal, terrorist and proliferation activities. It is responsive to and anticipates changes in the operating environment and to changes in patterns of criminal and sanctioned conduct.
9. Further, the document provides guidance to CA as well as the FIs, LBs and the FATF NPO sectors to ensure that their business practices and internal control mechanisms are aligned with national, sectoral and institutional understanding of ML/TF/PF risks and promoting these policy objectives.

3. National Vision and Mission

The following statements summarise Trinidad and Tobago's overall policy objectives in relation to ML/FT/PF activities:

Vision: As a component of an overall integrated approach to national security, including anti-crime and anti-terrorism policies and strategies, a robust legal, regulatory and operational framework and effective capacity, consistent with best practices and international standards, that identifies, seeks to prevent, and promptly applies proportionate and dissuasive sanctions

for ML/TF/PF activities and related predicate offences, and deprives criminals of the proceeds and instrumentalities of financial crime, terrorism and proliferation and otherwise dissuades and disrupts criminal, terrorist and proliferation activities and that evolves, is responsive to and anticipates changes in the operating environment and to changes in patterns of criminal and sanctioned conduct.

Mission: To ensure AML/CFT/CFP understanding among stakeholders, as well as, develop and maintain their full participation to counter, disrupt and discourage all forms of ML/TF/PF activities, and prevent criminals from benefiting from the proceeds of crime.¹

4. Policy Statement

10. National, regional and global attempts to use the international financial system to launder money and finance terrorism and proliferation of weapons of mass destruction, are of great concern to the GoRTT, impacting on the safety and security of our citizens. It is therefore the GoRTT's policy to implement legal, regulatory, and operational measures using a risk-based approach, to prevent, detect, prosecute, disrupt and otherwise dissuade ML/TF/PF and protect the national and international financial system from abuse. This is achieved through continuous and proportionate measures to identify, understand, assess and mitigate ML/TF/PF risks at the national, sectoral and institutional levels, including (but not limited to) through national, sectoral and thematic risk assessments, ongoing supervisory actions, strategic analytical products produced by the FIUTT, intelligence products developed by other key CAs and maintaining a diligent watch over emerging and evolving international ML/TF/PF trends and typologies.

¹ This mission will be achieved by involving the public sector, private business sector, NPOs and the general population, as appropriate, together with ongoing information sharing with competent authorities in partner jurisdictions.

5. Importance of a National AML/CFT/CPF Framework

11. Apart from Trinidad and Tobago's long-standing commitment to meet its global obligations as a responsible member of the international community, the critical importance to the country of its full engagement in the global AML/CFT/CPF effort lies in both:
 - (a) the direct nexus between financial crime and predicate offences, which presents risks to the safety and security of the citizens of Trinidad and Tobago; and
 - (b) Trinidad and Tobago's heavy dependence on international trade and the associated payment arrangements to maintain and develop its economic and social system and framework.
12. Since ML involves the set of activities designed to conceal the criminal origins of the proceeds of illegal activity, AML operations are thus intended to deprive criminal elements of their illicit profits, while safeguarding the country's borders, the economy and financial and non-financial systems and sectors from such bad actors.
13. On the other hand, resources used to finance terrorist activity may have been obtained by either unlawful or lawful means. It is the use of those resources to fund terrorists, individuals or organisations at which CFT is aimed, particularly in circumstances whereby funding can be tied to a specific terrorist act. Individual FATF NPOs that have weak governance structures and that receive funding could be potentially exposed to being abused as unwitting conduits for TF and as platforms for terrorist support activities such as recruitment.
14. Similar to TF, resources used in PF may be obtained through licit and illicit sources. Whereas, the FATF Standards focuses on state actors, the policy of the country for the conduct of the 3rd NRA, was to adopt a broader approach to PF, which goes beyond what is required by the FATF Standards and extends to non-state actors², such as international organisations and corporations. This is in keeping with United Nations Security Council Resolution (UNSCR) 1540(2004).
15. In keeping with the Government's commitments, the national AML/CFT/CPF framework is key to protecting the country's national security, economic integrity and global reputation. It

² UNSCR 1540 defines non-state actors as "individual or entity, not acting under the lawful authority of any State in conducting activities which come within the scope of this resolution". Non-state actors could include terrorist groups, criminal organisations, or individuals acting independently to acquire or use WMD.

is the overarching structure which provides the strategic, legal, and operational foundation that establishes a clear and coordinated system of measures, through which CAs, including regulatory bodies, LEAs, as well as FIs, and LBs in Trinidad and Tobago, coordinate their efforts to prevent, detect, and deter financial crime. Equally, its focus is evidence based on the findings from the NRA serving as the basis for informed policy making and a risk-based approach to mitigating financing crimes.

16. In addition to:

- i. ensuring national security and public safety by;
 - i. disrupting criminal networks with the aim to "take the profit out of crime" by depriving criminals and terrorists of the funds and instrumentalities needed to operate.
 - ii. combatting global threats including Targeted Financial Sanctions (TFS) measures to freeze the assets of designated terrorists and those involved in PF.
 - iii. targeting high-risk crimes by focusing on specific high-threat predicate offenses such as fraud, corruption, drug trafficking, illicit arms trafficking and human trafficking and related offences.
- ii. the protection of economic stability and integrity to:
 - i. safeguard the financial system and the wider economy from destabilising threats.
 - ii. foster investor confidence by upholding high standards of transparency and integrity, so Trinidad and Tobago can maintain its reputation as a safe and trusted international business hub, which is essential for attracting investment.
 - iii. strengthen international cooperation and information sharing between the FIUTT, LEAs and SAs, which is critical in an increasingly complex and interconnected global environment where crimes and criminality often cross borders.
 - iv. prevent financial loss by having effective controls to deter illicit activities that could otherwise lead to significant institutional or systemic losses.
- iii. compliance with the FATF international standards to:
 - i. achieve legal and regulatory alignment with the FATF requirements.
 - ii. avoid being placed on the FATF's List of Jurisdictions Under Increased Monitoring by ensuring deficiencies from previous assessments as well as any weaknesses

identified by NRAs are adequately addressed in a timely manner by relevant stakeholders. Staying off this and other international "high-risk" lists, allows the country to continue to access international financial markets.

iv. strategically manage its resources to:

- i. mitigate its specific ML/TF/PF risks based on identified risk, making sure to allocate limited national resources efficiently to higher-risk sectors, products, and activities, for maximum impact and at the same time, promoting proportionality and reducing unnecessary burdens on low-risk entities.
- ii. facilitate Inter-Agency Coordination by fostering a "whole-of-government" approach and coordinate efforts between LEAs, intelligence agencies, the SAs and the private sector.

v. strengthen governance and transparency to:

- i. close gaps such as requiring transparency on who ultimately owns or controls a legal entity.
- ii. ensure accountability by having a strong legal framework that establishes clear obligations for reporting entities (REs) to perform due diligence and report suspicious activity.

vi. through public-private partnership, promote a clear understanding of ML/TF/PF risks and AML/CFT/CPF obligations among all stakeholders to develop and maintain their full participation to counter, disrupt and discourage all forms of ML/TF/PF activities, and prevent criminals from benefiting from the proceeds of crime.

17. To this end, Trinidad and Tobago has sought to maintain a fair, balanced and proportionate approach to addressing this issue by ensuring that there is continuous dialogue with the FATF NPOs sector and their stakeholders to keep them abreast of the obligations they are required to fulfil and remain aware of evolving TF risks within the sector.

18. Trinidad and Tobago has implemented UNSCR 1718(2006) regarding the imposition of an arms embargo, assets freeze and travel ban on persons involved in the Democratic People's Republic of Korea (DPRK) nuclear programme, and a ban on a range of imports and exports, to prohibit the DPRK from conducting nuclear tests or launching ballistic missiles. The country has also

previously implemented UNSCR 2231(2015) that endorsed the Joint Comprehensive Plan of Action on the nuclear program of the Islamic Republic of Iran (Iran).

19. Additionally, the SAs provide training and awareness to the FI and LBs on the CPF policies and procedures that are implemented on a national level and conduct examinations of REs to ensure that they are complying with the said policies and procedures.
20. A balance has to be struck between the full implementation of TFS relating to PF and a risk-based approach to mitigating the potential breach, non-implementation or evasion of such CPF obligations, as this is critical, particularly against the background of resource constraints and competing risk areas at the national, sectoral and institutional levels. Like TFS relating to FT, PF-related TFS applies to all Trinidad and Tobago natural and legal persons, as well as all persons and entities within the territory of Trinidad and Tobago. As such, CAs must take a broader approach to ensure that appropriate steps are taken by FIs and LBs to both compliance and outreach activities than which applies to AML/CFT. This is as a result of international typologies and best practices highlighting that a broader range of non-reporting sectors may be at increased risk of PF abuse, including the shipping and manufacturing sectors, particularly regarding dual-use goods and technologies. CAs, as well as FIs and LBs must also remain acutely aware of the risk of abuse of legal persons for PF.
21. All persons in Trinidad and Tobago are responsible for adhering to PF TFS, proportionate to the risks to which they are exposed based on their individual circumstances. Such risks can arise based on the potential for intersection with weapons of mass destruction supply chains and proportionate measures to mitigate those risks should be adopted. REs owe a special duty of care granted their integral role in the financial system and the functioning of the economy. In line with the FATF requirements, Trinidad and Tobago requires REs to identify, assess and take effective action to mitigate their PF risks³, alongside ML and TF risks. Assessing and mitigating CPF risks is a new area that has been included in the revised FATF Methodology that will be utilised for Fifth Round Mutual Evaluations. Trinidad and Tobago, through the National Anti-Money Laundering and Counter Financing of Terrorism Committee (NAMLC),

³ In the present context, “proliferation financing risk” refers only to the potential breach, non-implementation or evasion of applicable proliferation financing targeted financial sanctions.

will remain vigilant with a view to ensuring that the country maintains compliance with its international obligations, and understands that this area requires close collaboration amongst all public and private sector stakeholders.

22. Effective implementation of the FATF Recommendations, and similar measures to combat ML, the financing of terrorism, and proliferation, must remain a priority for all stakeholders in the country. As noted, the economy of Trinidad and Tobago is heavily dependent on international trade, with cross-border financial flows mirroring the movement of goods and services in both directions⁴. The GoRTT, via the Ministerial coordination of (i) the Office of the Attorney General (OAG), (ii) the Ministry of Finance, (iii) the Ministry of Homeland Security, (iv) the Ministry of Justice, (v) the Ministry of Land and Legal Affairs and (vi) the Office of the Prime Minister, has made the fight against ML/TF/PF a priority. Among the goals of this effort are: (i) protecting the integrity and stability of its domestic and consequently the international financial system; (ii) cutting off the resources available to terrorists; and (iii) making it more difficult for those engaged in crime to profit from their criminal activities.
23. Compliance with global AML/CFT/CPF standards can provide the levels of reassurance to international public and private sector partners necessary to preserve and strengthen banking, business and trading relationships.
24. Trinidad and Tobago must, however, not simply be responsive to changes in the global landscape but must also be proactive in anticipating ML/TF/PF threats to the financial system, both domestically and internationally as well as domestic, regional and international security. These actions should occur within the context of the rapidly evolving international security climate. The country understands that it has to update its policies based on existing threats, such as geopolitical conflicts and wars as these situations can impact trends, typologies, risk and the focus of the international standard setters. Continuing attention thus needs to be paid to business operations and technological developments, policy developments in the major economies, and to sanctioning action by international and other regulatory institutions, in addition to well-recognised regimes, which may ultimately precede multi-lateral TF/PF/PF obligations to which Trinidad and Tobago is bound.
25. The process of identifying, understanding and assessing ML/TF/PF risk allows the country to have a contemporary understanding at the level of the CA and as such, identify policies and strategies

⁴ Trinidad and Tobago's economy is primarily driven by natural gas and petrochemical exports and well-developed industrial and financial sectors.

and specified targeted outreach activities and information flow to the wider population and these form integral parts of the AML/CFT/CPF programme.

26. The country will also ensure that priority will continue to be given to inter-agency cooperation and capacity building for CA, with particular emphasis on financial investigations, as well as the use of financial intelligence and information (both generated by the FIUTT and otherwise such as by the full range of LEAs, including the Customs and Excise Division (CED) and Inland Revenue Division. Continued emphasis must be placed at the strategic, operational and tactical levels, on utilising the most effective criminal justice, regulatory and other measures to disrupt and dissuade criminal and terrorist activity. The importance of the LEAs providing feedback to the FIUTT regarding the quality of the financial intelligence produced is fundamental, as it needs to be ensured that this intelligence continues to meet the needs of the LEAs in line with the country's risk and context. Appropriate use will also be made of informal and formal international cooperation, including extradition.

6. The National Anti-Money Laundering and Counter Financing of Terrorism Committee

27. Pursuant to Section 57A (1) of the POCA, the NAMLC is responsible for:

- (a) making recommendations to the Minister (to whom responsibility for NAMLC has been assigned) in relation to the development of policy; and coordinating the implementation, of national AML/CFT/CPF policies;
- (b) collecting and compiling statistics with respect to AML/CFT/CPF;
- (c) coordinating the conduct of NRAs and mutual evaluations;
- (d) for co-ordinating action to understand the risk of ML, TF and PF;
- (e) keeping assessments for the risk of ML/TF/PF up-to-date and may include assessments conducted on a thematic or sectoral basis; and due to any trigger event; and
- (f) for disseminating the findings of any risk assessment to all relevant CAs, FIs and LBs.

28. Section 57B of the POCA allows the NAMLC to regulate its own procedures and as such, the NAMLC has its Charter and Terms of Reference that outlines its functions and governs its operations⁵. Each member of the NAMLC is bound to ensure that there is adherence to these procedures as part of its own operations.

29. The NAMLC conducts monthly meetings (and meets more frequently as necessary) and is responsible for coordinating the implementation of national AML/CFT/CPF policies, including the conduct of NRAs and mutual evaluations.

30. The NAMLC has three (3) sub-committees. (*Refer to Appendix I*)

⁵ <https://agla.gov.tt/anti-terrorism-unit/national-anti-money-laundering-and-counter-financing-of-terrorism-committee-namlc/>

7. Institutional Responsibilities of Competent Authorities

31. All CAs are required to implement institutional frameworks to effectively carry out their responsibilities and to align respective policies and activities with this NP&S. Refer to Appendix II for a description of each SA's and CA's institutional responsibilities. (*Refer to Appendix II*)

8. Policy Objectives

32. The strength of Trinidad and Tobago's commitment to counter ML/TF/PF is evident in actions taken by successive administrations to build on past efforts, and to continue to mobilise the resources required to ensure that the country fully meets its obligations to maintain global financial stability and discourage criminal activity.

8.1. Policy Objective 1: Further strengthen the AML/CFT/CPF legal and regulatory framework

33. Through these efforts, Trinidad and Tobago reaffirms its commitment to meeting the technical compliance and effectiveness standards of the FATF Recommendations and the corresponding Immediate Outcomes. This commitment remains steadfast even as these standards evolve in response to emerging risks to the global financial system.
34. This is supported by high-level commitment at the political, administrative and technical levels. To this end, Trinidad and Tobago has engaged in the amending of existing pieces of legislation, enacting new legislation, restructuring processes and procedures, and developing new arrangements for internal cooperation and coordination within the public sector, as well as with international partners. These efforts are complemented by increased involvement of the private sector, NPOs, and enhanced outreach and information dissemination to the general population.
35. Satisfying the FATF Recommendations on an ongoing basis is only one aspect of the continuing effort, albeit a critically important one. As indicated above, the FATF Recommendations themselves are subject to ongoing review and revision to take account of, among other developments, new products and delivery mechanisms, especially in the financial sector; the need for enhanced cooperation and coordination both domestically and across international

borders; and a stronger emphasis on the development of risk-based approaches on the part of both SAs and CAs and FIs and LBs themselves, in order to make more efficient and effective use of resources in mitigating financial crime and TFS risks. Consequently, the NAMLC will ensure that the policies and sector guidance are revised and updated.

36. Priority will also be given to strengthening the supervisory regime for those businesses which are at the greatest risk of abuse for ML, TF and PF.

8.2.Policy Objective 2: Maintain and enhance effectiveness of AML/CFT/CPF systems

37. The country will continue to monitor and evaluate developments in the domestic and international environments, as this is a critical element in maintaining and enhancing the effectiveness of the entire AML/CFT/CPF framework. Maintaining effectiveness will be achieved by ensuring that the legislative and regulatory framework is kept up to date, and provides sufficient authority and capacity to SAs, regulators, and LEAs to identify predicate offences and potential criminal and terrorist activity, and to take appropriate action to prevent, prosecute, and penalise such activity in ways that minimise or eliminate the possibility of benefiting from criminally derived proceeds or financing of terrorism, and that dissuades others from participating in such activity.
38. In light of the foregoing, the NAMLC will closely follow; changes to the FATF Recommendations, Interpretive Notes and Immediate Outcomes, as well as international best practices, together with developments in the global and domestic risk landscapes. Guided by the NAMLC, Trinidad and Tobago will continue to strengthen its policy, legislative, regulatory and operational frameworks in response to emerging and evolving risks and as global standards evolve. Trinidad and Tobago will maintain the flexibility to quickly adjust components of the national framework, as well as regulatory and operational mechanisms in response to both ongoing evolution and rapid changes in the domestic and international landscapes.

8.3. Policy Objective 3: Maintain an understanding of the ML/TF/PF risk environment

39. The sub-committees of the NAMLC will be used to coordinate the undertaking of the cross-sectoral thematic assessments. This ongoing understanding of risk will be channelled upwards to the NAMLC, through the SWG and LEAWG, which shall act as a coordinating and cooperative body for this purpose, particularly in areas of dual supervision. Industry meetings will also be used as a mechanism for identifying emerging risk, as well as ensuring that there is shared understanding of risk between SAs and FIs and LBs. This is in line with the understanding that protecting the financial system from ML/TF/PF abuse is a shared responsibility between CA, REs and other public and private sector stakeholders. It shall therefore remain the policy of GoRTT that CAs shall engage in public-private partnership initiatives to ensure that the national AML/CFT/CPF framework remains robust and effective.
40. CAs will also continue to assess emerging and evolving risk through typology reports.
41. The NAMLC will continue to maintain its contemporary understanding of TF risks through feedback channelled upwards regarding CFT investigations conducted by the LEAs. The NAMLC shall also conduct NPO risk assessments on a periodic basis, maintaining an ongoing understanding of NPO risk through regulatory mechanisms and feeding the understanding of NPO risk into the process of the NAMLC maintaining an ongoing understanding of TF risk. The regulator for NPOs, the FIUTT, is directly incorporated into policy matters, as a member of the NAMLC and operational coordinating bodies, by being a member of Task Force Charlie. This eases the information sharing on NPO/TF risk among key stakeholders, including investigative and intelligence agencies.
42. The NAMLC shall implement measures to maintain an ongoing understanding of ML/TF/PF risks, not limited to the conduct of NRAs.

8.4. Policy Objective 4: Enhance risk-based supervision and monitoring

43. All SAs will continue to police the perimeter on a risk sensitive basis to detect and deter unlicensed and unauthorised activity in the sectors under their respective supervision. All SAs will continue to keep their written supervisory frameworks, including supervisory manuals,

risk rating matrices and on-site calendars updated, as well as continue to prioritise off-site and on-site schedules for examinations of FIs and LBs, guidance and outreach, enforcement and penalty matrices. All of these measures shall be in line with risk.

8.5. Policy Objective 5: Strengthening of intelligence, detection, enforcement and asset recovery

44. The LEAs will continue to prioritise investigations in line with risk. Decision making on utilising the most effective criminal justice, regulatory and other measures to disrupt and dissuade criminal and terrorist activity where it is not practicable to pursue a conviction shall be integrated into the investigative process.
45. The GoRTT continues to recognise that the Judiciary is an important stakeholder in the AML/CFT/CPF framework and will continue to foster cooperation and collaboration with the Judiciary, while respecting the boundaries of judicial independence. The GoRTT shall ensure that strategic support is provided to the Judiciary, in terms of staffing (ensuring there are sufficient judicial officers and support staff) and other resources.
46. The GoRTT recognizes the need to operationalize the Civil Asset Agency to effectively assist with asset recovery.

8.6. Policy Objective 6: Strategic Focus on financial crime and safeguarding the economy

47. As approved by Cabinet in 2025, the Inter-Ministerial Committee (IMC) demonstrates a high level of political commitment in addressing AML/CFT/CPF issues, fast-tracking the approval and implementation of compliance measures and aiding in accelerating the rate of decision-making. The IMC comprises six (6) essential Ministers dealing primarily with AML/CFT matters, namely-
1. The Attorney General (Chair)
 2. The Minister of Justice
 3. The Minister of Land and Legal Affairs
 4. The Minister of Homeland Security
 5. The Minister of Finance

6. The Minister in the Office of the Prime Minister

48. The IMC shall ensure that the GoRTT allocates time for AML/CFT/CPF legislation on the basis of risk, as well as ensure that other pieces of legislation are harmonised with AML/CFT/CPF policies.

8.7. Policy Objective 7: Strengthen enforcement and sanctions

49. SAs, as part of their mandates, shall maintain oversight to ensure that sanctions to be imposed on FIs and LBs found to be in breach of their obligations are effective, proportionate and dissuasive with SAs reporting upwards to NAMLC in this regard. Penalties will also be reviewed on a periodic or triggered basis to ensure that they remain effective, proportionate and dissuasive.

8.8 Policy Objective 8: Maintain up-to-date ML, TF and PF risk assessments at the national and sectoral levels

50. This will allow for adequate appreciation of risks by relevant public and private sector stakeholders, and to inform the efficient allocation of resources and appropriate design of ML/TF/PF risk mitigation measures. It is recognized that as both global AML/CFT/CPF standards and risks continue to evolve, it may be practical for Trinidad and Tobago to undertake stand-alone/thematic/sectoral risk assessments of other risk areas. The findings of these risk assessments will provide a valuable tool for understanding and addressing specialized risks that may not be fully addressed in a broader, general risk assessment. Trinidad and Tobago will continue to ensure that resources are allocated to assess and mitigate risks. The country shall also promote financial inclusion through increased focus on proportionality and simplified measures under the risk-based approach.

9. National Risk Assessments

51. In addition to the ongoing monitoring of risk and identification of emerging risks through the NAMLC, Trinidad and Tobago shall conduct updates at least once every five (5) years to the NRA, or due to any trigger event.

9.1. Trinidad and Tobago's 3rd NRA

52. The 3rd NRA of Trinidad and Tobago was conducted for the period 2021–2024, where the following ten (10) areas were covered:

- i. Money Laundering Threat Assessment;
- ii. National Vulnerability;
- iii. Banking Sector;
- iv. Securities Sector;
- v. Insurance Sector;
- vi. Other Financial Institutions;
- vii. Designated Non-Financial Business and Professions;
- viii. Terrorist Financing Risk Assessment;
- ix. Non-Profit Organisations;
- x. Legal Persons/ Legal Arrangements

53. The 3rd NRA can be accessed publicly via the following websites:

- a. Office of the Attorney General Website > National Risk Assessment > Trinidad and Tobago 3rd National Risk Assessment- [Trinidad and Tobago's 3rd National Risk Assessment.pdf](#)
- b. The Financial Intelligence Unit of Trinidad and Tobago's website: <https://fiu.gov.tt/wp-content/uploads/2025/12/Public-3rd-NRA.pdf>
- c. The Trinidad and Tobago Securities and Exchange Commission website: <https://www.ttsec.org.tt/trinidad-and-tobagos-3rd-national-ml-tf-risk-assessment/>

54. Key personnel from all supervisors participated in both NRA exercises as working group members. While the 2nd NRA provided a solid foundation for supervisors' understanding of national risk, their participation in the 3rd NRA ensured that this understanding remained current and enabled them to contribute sector-specific insights to the assessment process. Supervisors also stay updated on international typologies relevant to their sectors. Their ongoing off-site and on-site monitoring, along with direct engagement with supervised entities whether through individual feedback or collective meetings with compliance officers and other

RE representatives gives them visibility into evolving and emerging sectoral risks. Off-site monitoring incorporates institutional risk assessment tools, as well as internal and external AML/CTF audit reports. Supervisors assess both inherent and management risks within REs, taking into account factors such as customer type, products and services offered, delivery channels, and geographic exposure.

55. Assessment of the ML Threats in the 3rd NRA indicates that Fraud, Corruption, Drug Trafficking, Illicit Arms Trafficking, and Human Trafficking are the primary High threat predicate offences which continue to generate substantial illicit proceeds and feature prominently in domestic and cross-border investigations. Tax Evasion, Gang and Gang-Related Activities, and Gambling, Gaming and Betting remain classified as Medium threats, reflecting their persistent but comparatively lower exposure to ML. Notably, Larceny Related Offences have been upgraded from a low to a medium threat predicate offence, due to the considerable number of reported cases and the established correlation with ML prosecutions.
56. Enhancing our law enforcement environment to more effectively dismantle illicit financial activities through evidence-based investigations and rigorous prosecutions, supported by high-quality financial intelligence has been identified as a key strategic objective for Trinidad and Tobago.
57. The assessment of Trinidad and Tobago's national TF risk in the 3rd NRA concludes that the overall TF risk is rated Medium-Low, reflecting the country's continued progress in strengthening its counter terrorism and CFT framework.
58. Continuous monitoring of new financing trends and techniques that may be used to finance terrorist and terrorist organisations, similar to the risk assessed and acted upon regarding the use of virtual assets and virtual asset service providers has been identified as a key strategic objective for Trinidad and Tobago.

Legal Persons and Legal Arrangements Risk Assessment

59. Trinidad and Tobago conducted a first assessment of the level of ML/TF risks associated with legal persons and arrangements, to enable the development of national policies informed by the risks identified. The assessment was carried out on each type of domestic legal structure

formed in Trinidad and Tobago and foreign legal structure with sufficient links to Trinidad and Tobago. The period under review was 1st January 2020 to 31st December 2024. The assessment was co-led by the Office of the Registrar General, Companies Registry and the FIUTT.

60. The consolidated threat rating for all legal structures was concluded to be Medium for both ML and TF with the figures indicating that the threat for ML was more significant than that for TF.
61. In the assessment of vulnerability, domestic legal structures were assessed as having a Medium vulnerability for both ML and TF and foreign legal structures were also assessed as having a Medium vulnerability for both ML and TF. The overall rating for vulnerability of legal structures for ML and TF however, was concluded to be Medium.
62. This risk assessment concluded that the jurisdiction has a strong risk management supported by effective frameworks and international cooperation. It was noted however that continued vigilance is essential and that strengthening supervisory capacity, enhancing enforcement rigor, and addressing structural vulnerabilities in high-risk sectors will be critical to further reduce ML exposure and maintain low TF risk.
63. Based on the findings of the risk assessment there are some strategic objectives to achieve and these include a need to enhance regulatory oversight, enhance enforcement and to enhance accessibility.

9.2. Stand Alone Risk Assessments

9.2.1. Proliferation Financing Risk Assessment (PF Risk Assessment)

64. Parallel to the conduct of the 3rd ML/ TF NRA, Trinidad and Tobago conducted its first PF Risk Assessment. The U.S Department of State's Export Control and Related Border Security (EXBS) Program partnered with Kings College of London and provided assistance to Trinidad and Tobago with the drafting of the PF Risk Assessment. As part of the assistance, experts from King's College of London (KCL) worked with the Government of Trinidad and Tobago to exchange best practices for countering the financing of the proliferation of weapons of mass

destruction.

65. The PF Risk Assessment assessed Trinidad and Tobago's PF risk exposure by examining particular aspects of the CPF legislative regime to ascertain vulnerabilities in certain sectors and activities. This Working Group led by the CED and the CBTT were tasked with collecting both qualitative and quantitative data to analyse the size and scope of the PF activities or threats, as well as possible vulnerabilities in various sectors. The PF risk has been rated as Low.
66. The PF risk assessment concluded that existing controls, regulatory oversight, and risk mitigation measures are generally effective, however continued monitoring and targeted improvements remain essential to sustain the overall low risk profile.
67. A strategic objective identified by Trinidad and Tobago is to include PF within the mandate of Task Force Charlie and institute the Maritime Services Division and the CED as members. The Maritime Services Division and the CED as members of Task Force Charlie will play a key role in monitoring and controlling cross-border movement of goods and in enforcing TFS, which are central to the country's effectiveness in addressing PF obligations. Their expertise will strengthen inter-agency cooperation and provide the necessary capacity to investigate and address PF matters in a timely and effective manner.

9.2.2. VAs and VASPs Risk Assessment

68. The stand-alone risk assessment of VAs and VASPs was conducted by a working group comprising of both public and private sector stakeholders and co-led by the regulators namely; (i) the CBTT, (ii) the FIUTT and (iii) the TTSEC. The risk assessment utilised the WB Tool with technical assistance from the European Union Global Facility (EUGF) on Money Laundering and Terrorism Financing⁶. The VAs and VASPs Risk Assessment examined VAs activities and VASPs that fall within the scope of FATF Recommendations, as these VASPs have the same full set of full obligations as FIs or LBs. Further, it also considered other actors within the technology providers sector that may fall within the definition of FATF VASPs, if

⁶ The EUGF is a facility which supports countries in their efforts to strengthen their Anti-Money Laundering/Countering the Financing of Terrorism (AML/CFT) regimes.

they provide any of the functions defined in the FATF Recommendation 15.

69. The threat assessment focused on the risk exposures of VA products offered by VASPs and the vulnerabilities assessment focused on the inherent vulnerabilities of the VASPs from the entity perspective. The overall ML/TF threat exposure was rated as High.
70. The NAMLC recognised the need for the provision of a more in-depth exploration of this area to ensure its adaptability and flexibility to Trinidad and Tobago's specific needs in order to ensure the VAs and VASPs ecosystem is well understood.
71. Further, implementation of the VA and VASP Act is a priority matter. Further, capacity and technical building for CAs was identified as a key strategic objective for Trinidad and Tobago arising out of this risk assessment.

10. Post NRA Objectives-

72. The results of national and sectoral risk assessments will be fully utilised in implementing National risk mitigation measures outlined in this NP&S, the National Action Plan or any other identified policies and procedures.
73. All CAs, including regulatory, supervisory, law enforcement and prosecutorial authorities, will be guided by the NRA, sectoral risk assessments and measures implemented through NAMLC to maintain an ongoing understanding of risk in ensuring that a risk-based approach is applied to developing and revising institutional strategies, policies and work programmes. This includes collaborative efforts and cross-cutting measures including revision and strengthening of the legislative framework as necessary.
74. The NAMLC in respect of NRAs, and CAs in respect of sectoral risk assessments shall provide appropriate targeted information on the results of such risk assessments to all relevant CAs, FIs and LBs and the wider public, as well as continue to ensure that there is a shared understanding of risk between CAs, FIs, LBs and other stakeholders.
75. **Responsible Stakeholders:** The NAMLC at the national level and all CAs at the operational level.

11. Effective Implementation of Legal and Regulatory Framework

11.1 Supervision of FIs and LBs

76. The SAs will continue to intensify their work programmes using various methods, providing guidance to and risk-based supervision of FI and LBs (including through desk-based reviews, on-site examinations and other supervisory interventions), as appropriate to ensure that FIs and LBs are fulfilling their compliance obligations.

77. Responsible Stakeholders: SAs – CBTT, FIUTT and TTSEC

11.2 Compliance by FIs and LBs

78. FIs and LBs play a critical role in detecting financial crime (including TF and PF) and attempts at sanctions evasion through the filing of high-quality STRs and other relevant reporting forms in line with risk.

79. The adoption of robust risk-based compliance programmes by FIs and LBs is key to protecting Trinidad and Tobago's financial system from ML, TF and PF abuse. This includes FIs and LBs:

- (a) Undertaking at an appropriate level, an assessment of the risk of ML, TF and PF abuse.
- (b) Adopting risk-based policies, procedures and controls;
- (c) Appointing a Compliance Officer at the management level;
- (d) Conducting ongoing AML/CFT/CPF employee training tailored to the level of responsibility of the employee;
- (e) Applying robust screening procedures when hiring and retaining employees; and
- (f) Establishing an adequately resourced and independent audit function to test compliance.

80. Special emphasis shall also be placed on implementing TFS compliance programmes which, while being risk-based, ensure full implementation of sanctions compliance obligations.

81. Responsible Stakeholders: FI and LBs under the POCA and ATA

11.3 Taking the Profit out of Crime

82. The country aims to disrupt and disincentivise criminality, and hold both professional money launderers and self-launderers to account by way of successful prosecutions of financial crimes and asset forfeiture. Taking the profit out of crime is a key pillar of the anti-financial crime strategy of Trinidad and Tobago. This is clearly reflected in the UW Act, 2019 which has expanded measures for civil forfeiture and confiscation, to take the profit out of crime by utilising unexplained wealth orders, criminal forfeiture orders and property restraint orders. The country shall ensure that the UW Act, 2019 is fully implemented in order to provide the country with a comprehensive civil asset recovery and management of unexplained wealth framework.
83. These mechanisms will work alongside pre-existing mechanisms outlined in the Asset Recovery and Management Policy Framework (Framework), such as the use of financial intelligence that is disseminated by the FIUTT, on its own motion or upon request, for conviction and non-conviction-based asset forfeiture, confiscation and other tools for depriving criminals of their proceeds and the instrumentalities of crime, the use of which will continue to be a priority. The application of both the Framework and mechanisms under the UW Act, 2019 shall be comprehensively harmonised for ensuring the most effective tools are available in combatting ML/TF/PF. Trinidad and Tobago also intends to establish and maintain comprehensive measures addressing all aspects of asset forfeiture/confiscation measures including the following:
- (a) Properly caring for and preserving as far as practicable such property;
 - (b) Achieving the maximum realisable value for any property which must be liquidated;
 - (c) Respecting the rights of the accused, owner of the property and any relevant third-parties;
 - (d) Keeping appropriate accurate records;
 - (e) Maintaining appropriate human resource standards to support the asset management function;
 - (f) Allocating sufficient resources to the asset management function;
 - (g) Supporting stakeholders in the asset forfeiture, management and confiscation process through appropriate guidance and outreach; and
 - (h) Being transparent and accountable in the exercise of the seizure, management, confiscation and disposal of such property.

84. Trinidad and Tobago will continue to use its legislative measures, inter alia, to enable the confiscation of criminal property and property of corresponding value after a person is convicted.
85. The country will also ensure, that where required, confiscated property will be returned to its prior legitimate owners and use confiscated property to compensate victims of crime.

86. Responsible Stakeholders: All LEAs.

11.4 Domestic and International Collaboration and Cooperation

87. The effectiveness of implementing the technical compliance arrangements involves the establishment or enhancement of processes and procedures in several areas. These include:
 - (a) Robust and holistic domestic and international cooperation and collaboration;
 - (b) Full implementation of a risk-based analytical and mitigation approach;
 - (c) Robust intelligence-gathering, investigations, enforcement and a comprehensive and dissuasive sanctions regime; and
 - (d) targeted outreach to key sectors and members of the wider public in order to reduce their vulnerability to profit-generating predicate offences and to enlist their participation in the overall anti-crime effort.
88. While the core membership of the NAMLC forms the hub of Trinidad and Tobago's national AML/CFT/CPF defences, other public sector agencies also play a critical role in this fight, including as sources of intelligence and evidence, platforms for collaboration with sectors, and preventing market access by money launderers, criminals, terrorists, proliferators and their associates. Effective coordination and collaboration between the NAMLC and other agencies that have prudential licensing or other licensing and regulatory responsibilities for key sectors, shall therefore be prioritized. The NAMLC shall institutionalize strategic partnerships with such other agencies through entering into memoranda of understanding or other formalized frameworks, providing sufficient detail of cooperative and collaborative arrangements.
89. Cooperation, collaboration, and information-sharing cannot be limited to domestic institutions given the cross-border nature of financial criminal activity, particularly in small, trade-dependent economies like Trinidad and Tobago. The country views international cooperation

as a lifeline and key mechanism to support investigations and disrupt criminal and sanctions evasion activities. CA will ensure that they make appropriate and effective use of outgoing formal (mutual legal assistance and extradition) and informal international cooperation in line with a risk-based approach. Trinidad and Tobago will also continue to provide constructive and timely formal and informal international cooperation to our foreign partners.

90. **Responsible Stakeholders:** The NAMLC at the national level and all CA at the institutional level.

11.5 Targeted Financial Sanctions

91. Trinidad and Tobago is committed to fulfilling its international obligations in accordance with Chapter VII of the Charter of the United Nations and as called for by the FATF, including through the implementation of TFS for both PF and TF. Special care will be taken to balance these obligations with adherence to the rule of law.

92. Trinidad and Tobago while strictly adhering to these international obligations will implement measures in alignment with assessed risk. Trinidad and Tobago recognizes that CPF is a relatively new area that globally lags behind AML and CFT in terms of emphasis. Focus will therefore be placed on building knowledge within CA, FI and LBs and other higher-risk sectors on CPF as a foundation for understanding PF TFS risks and identifying effective mitigation strategies. CA shall take a collaborative approach with other private-sector stakeholders to ensure the full implementation of international standards in the shortest possible time.

93. **Responsible Stakeholders:** The NAMLC at the national level, the ATU, SAs, the FIUTT and LEAs at the institutional level and FI and LBs and the general public.

11.6 Policy on FATF NPOs

94. Trinidad and Tobago recognises that NPOs play a critical role in our society, bringing relief and opportunities to the most vulnerable. Due to their types, activities and characteristics, NPOs are at varying degrees of risk of TF abuse. NPOs need to be protected from this type of abuse, as it is key to preserving public trust and confidence in the NPO sector.

95. In protecting NPOs from such TF abuse, the GoRTT shall ensure a careful balance is struck to prevent unduly disrupting or discouraging legitimate NPO activities. In line with a risk-based

approach (guided by the measures outlined in this NP&S for maintaining an ongoing understanding of risk), CA will apply focussed, proportionate and risk-based measures to only those NPOs falling within the FATF definition of NPOs, that is *“A legal person or arrangement or organisation that primarily engages in raising or disbursing funds for purposes such as charitable, religious, cultural, educational, social or fraternal purposes, or for the carrying out of other types “good works”.*

96. Trinidad and Tobago will maintain legislative, regulatory and law enforcement measures reflective of such balance. Such measures will continue to be implemented in a manner which respects Trinidad and Tobago’s obligations under the Charter of the United Nations and international law. Achieving such a balance also requires a collaborative approach between national authorities, the NPO community and other key stakeholders in the NPO sector.

97. In this regard, going forward, national authorities shall continue to actively engage with the NPO sector by institutionalising mechanisms such as the Working Group on NPOs. This will allow for, *inter alia*, direct consultation and collaboration on matters of mutual interest in order to bolster the national framework for NPOs and ensure continuous assessment and mitigation of vulnerabilities within the sector. In particular, this formalised arrangement will continue to be utilised in developing, adopting and refining best practices for NPOs to mitigate the risk of TF abuse.

98. **Responsible Stakeholders:** The NAMLC, FIs, LEAs, RGD, NPOs and Donors to NPOs.

12 Achieving Policy Objectives

99. Strengthening the AML/CFT/CPF framework of the country and allowing for the effective detection and deterrence of ML/TF/PF in accordance with the FATF Recommendations shall be achieved through a multi-stakeholder approach. These coordinated and cooperative measures will contribute to:

- (a) Understanding of national and sectoral risk by way of NRAs, sectoral reports, thematic reports, typology reports and ad hoc targeted risk assessments as required by significant trigger events;
- (b) Timely implementation of Action Plans developed and/or updated from the results of risk

assessments;

- (c) Emphasizing of a risk-based approach to AML/CFT/CPF at the policy and operational levels;
- (d) Incorporation of a strong AML/CFT/CPF focus where appropriate in all relevant legislation;
- (e) Further strengthening of cooperation, collaboration, and information-sharing among all relevant public sector agencies, with particular attention to those agencies responsible for licensing, regulating or supervising REs and regulating NPOs;
- (f) Strengthening of intelligence-gathering, investigation, prosecution, asset forfeiture and judicial capacity;
- (g) Maintenance of mutual cooperation, support and information-sharing arrangements with external law enforcement and peer institutions; and
- (h) Increased awareness and involvement of the private sector and the general population in combating financial crime and sanctions evasion.

100. Trinidad and Tobago shall also ensure that it maintains comprehensive quantitative and qualitative information to inform the understanding of evolving risk including but not limited to statistics regarding: STRs received and disseminated;

- ML/TF investigations, prosecutions and convictions;
- Property frozen, seized and confiscated; and
- Mutual legal assistance and other international requests for cooperation made and received.

13 Updated Legislative and Regulatory Framework

101. The legal and regulatory framework is the foundation on which all effective AML/CFT/CPF measures are implemented. The main elements of the legal and regulatory framework in Trinidad and Tobago, to meet global AML/CFT/CPF standards, consists of the POCA, ATU and the Financial Intelligence Unit of Trinidad and Tobago Act (FIUTT Act), Chapter 72:01, together with:

- (a) the enabling legislation establishing the individual Regulatory, SAs and other CAs charged with responsibility in the POCA for AML/CFT/CPF matters in designated classes of FIs and LBs; and
 - (b) the regulatory power provided to SAs both by their enabling legislation and by the primary and subsidiary legislation governing the various classes of FIs and LBs.
102. A critical element of the framework involves cooperation, coordination, and information-sharing arrangements among not only the SAs, but also among the broader set of public sector agencies, including those responsible for taxation, non-financial business regulation, law enforcement and the gathering and analysis of financial intelligence and other relevant information that are provided through membership in the NAMLC.
103. Trinidad and Tobago's AML/CFT/CPF legal and regulatory framework consist of the several pieces of legislation. *(Refer to Appendix III)*
104. Trinidad and Tobago continues to aim to strengthen its AML/CFT/CPF framework by closing regulatory gaps and enhancing transparency through the implementation of the following newly enacted pieces of legislation.
105. Trinidad and Tobago's **Miscellaneous Provisions (FATF Compliance) Act, 2025 (No. 7 of 2025)**, introduces mandatory registration of express trusts and other legal arrangements, updates multiple laws including the Proceeds of Crime Act and the Anti-Terrorism Act, and expands reporting obligations for FIs and NPOs. These changes also grant regulators broader powers for enforcement and improve beneficial ownership transparency to meet FATF standards. Similar global reforms emphasize risk-based approaches, stricter due diligence, and timely reporting of suspicious transactions, reflecting a unified effort to combat financial crimes and align with international best practices.
106. **The Counter-Proliferation Financing Act, 2025 (Act No. 8 of 2025)** was enacted to strengthen Trinidad and Tobago's compliance with Financial Action Task Force (FATF) Recommendations, particularly those addressing the financing of weapons of mass destruction. The Act introduces a risk-based framework requiring FIs and LBs to identify, assess, and mitigate PF risks, implement robust compliance programs, and report suspicious activities to the FIUTT. It enforces TFS, mandates record-keeping, and prohibits tipping-off, with severe penalties for breaches, up to \$5

million in fines and imprisonment. Additionally, it amends the Economic Sanctions Act to ensure timely freezing and seizure of assets linked to sanctioned entities, aligning national law with international obligations under UN Security Council resolutions.

107. The Economic Sanctions (Implementation of United Nations Resolutions on the Democratic People's Republic of Korea) (Amendment) Order, 2025 - The Order seeks to address legislative deficiencies identified under Recommendation 7 of the Financial Action Task Force (FATF), which pertains to countering the financing of proliferation and implement the FATF recommendations in relation to PF. FATF Recommendation 7 which requires countries to implement TFS to combat the financing of weapons of mass destruction (WMD), based on United Nations Security Council Resolutions (UNSCRs). This involves freezing assets, prohibiting fund transfers, and preventing financial services that could support WMD proliferation.

108. The Virtual Assets and Virtual Asset Service Providers Act, 2025 represents Trinidad and Tobago's first comprehensive attempt to regulate cryptocurrency and related services in line with FATF Recommendations 15 and 16. The Act establishes a licensing and supervisory framework under the Trinidad and Tobago Securities and Exchange Commission (TTSEC) for exchanges, wallet providers, and other virtual asset businesses. Its primary goals are to regulate the conduct of business concerning Vas and VASPs and to strengthen anti-money laundering (AML) and counter-terrorism financing (CFT) compliance ahead of the FATF mutual evaluation in 2026.

14 Creative Approaches to Resource Management

109. Trinidad and Tobago, will continue to employ an integrated approach to addressing the matters of organisational planning, use of technology, human resources and other resources. This will ensure effectiveness in the AML/CFT/CPF arena through the efficient use of available resources for the purposes of intelligence gathering, analytical, investigative, supervisory and other supporting procedures.

15 Communication, Public Awareness and Outreach

110. Public awareness by the GoRTT is a critical component in the fight against ML/TF/PF, particularly for the risks and consequences of illicit activities and importance of compliance with the framework. The importance of communication between CA and their community

cannot be overstated and is evidenced by responses to and reliance on guidance and typological information by FI and LBs, NPOs and the wider community. CA will therefore continue to reinforce their targeted awareness and outreach to key audiences on the basis of risk.

111. Even though CA are integral parts of the national AML/CFT/CPF framework, the GoRTT recognises that FI and LBs are the first line of defence against financial crime. Their role is beyond being key sources of financial intelligence and critical stakeholders in the risk assessment and sectoral risk assessment procedures. AML/CFT/CPF compliance by FI and LBs and effective supervision by SAs are two sides of the same coin, with both being necessary for meeting international AML/CFT/CPF effectiveness standards. Thus, as previously noted in Section 3.1, CA shall pursue a policy of effective public-private partnership arrangements with their REs as a component of these frameworks.

112. The Government of Trinidad and Tobago will strengthen AML/CFT/CPF awareness and capacity through coordinated engagement across the public and private sectors, including the delivery of targeted presentations and training for those involved in higher-risk transactions. Supervisors and self-regulatory bodies conduct enhanced outreach to FIs, LBs, and VASPs on AML/CFT obligations, emerging risks, and TFS related to TF and PF, supported by clear and accessible guidance published by CAs on their websites. Continuous professional development across government entities has been ongoing through e-learning, webinars and specialized training.

16 Financial Inclusion and New Technologies

113. Trinidad and Tobago remains committed to implementation of a robust anti-financial crime framework but also has to ensure that a fair balance is struck between those obligations and ensuring the legitimate use of the formal financial system by the broadest cross-section of society.

114. Financial inclusion and protecting the country from ML, TF and PF abuse are national objectives that go hand-in-hand. Both objectives are vital for the sustainable development of Trinidad and Tobago in order for underserved individuals to have equitable access to a broad range of formal financial services.

115. By enabling the unserved and underserved segments of society to access and use regulated and supervised channels, this will disincentivise the use of unregulated channels, which can be easily abused for ML, TF and PF. This will further assist with improving consumer protection and deterring fraud, illicit activities, financial abuse, and other ML/TF risks.
116. The country has embraced Fintech for financial inclusion and development, while working on mitigating its potential risks. Trinidad and Tobago shall continue to leverage new technologies to improve the delivery of financial services, boost financial inclusion, and modernize the payment system, subject to the prior identification and assessment of ML/TF risks which may arise from the adoption of such technologies.
117. While Trinidad and Tobago recognises the tremendous opportunities that VAs present, the use of these assets and related services in our market is not without significant potential risks.
118. Trinidad and Tobago reaffirms its commitment to digital innovation and citizen-centred services. In respect of the moving towards a cashless society and the digitalisation of government payments and services, and to address the evolving Artificial Intelligence (AI) space, the country will continue to advance key initiatives, including the development of a National Interoperability Framework to ensure systems and agencies operate collaboratively rather than in silos; the launch of Trinidad and Tobago's first National Intelligence Assistant; and the development of a unified citizen services portal to bring all public and legal services into one accessible space. Additionally, the country, in collaboration with the International Telecommunications Union, has become one of only five countries globally to participate in a landmark AI Governance Assessment, positioning Trinidad and Tobago as a forward-thinking nation in the responsible adoption of AI.
119. Additionally, in keeping with global standards, Trinidad and Tobago will adopt a framework for the regulation of VASPs, supervised by the Trinidad and Tobago Securities and Exchange Commission (TTSEC). It will establish regulatory oversight to ensure that all VASP activity is subject to appropriate AML/CFT/CPF preventive measures, including obligations relating to customer due diligence, record-keeping, reporting and TFS compliance, consistent with applicable written laws.
120. This framework will emphasize a phased and conservative entry of VASP activity into the domestic financial system, requiring all such activity to be authorized or carried out within a

supervised Regulatory Sandbox that will operate until December 31, 2026. Existing operators may only continue under this controlled framework, and the Commission may restrict, suspend, or terminate activities where risks or non-compliance arise.

121. Further to this, TTSEC will conduct surveillance, monitor and take enforcement action against any person engaged in VA activities operating outside of this supervised Regulatory Sandbox in accordance with a temporary prohibition of unregulated VASP activity stipulated in the Act to run until the date noted above.

17. Additional Strengthening of the AML/CFT/CPF Framework

122. In executing the national legislative agenda, AML/CFT/CPF considerations will be taken into account in developing the broader suite of primary and subsidiary legislation and regulatory and supporting administrative frameworks. Particular attention will be placed on this as the country continues its drive towards maintaining and increasing its international competitiveness, including as a destination for investment. This is in keeping with the goals set under Theme IV “Building Global Competitive Business” of Vision 2030, such as making the country a more attractive destination for investment and trade, as well as making it a premier investment location. This includes:

- Synchronization of the requirements for the filing of beneficial ownership information for legal persons and legal arrangements by amending several pieces of law.
- Taking a prudent approach to regulation, supervision, monitoring and enforcement with respect to VAs and VASPs, informed by the process of assessment and understanding of risk. On the one hand, Trinidad and Tobago sees great potential in this sector, both for promoting financial inclusion and expanding the economy. On the other hand, as outlined above in section 8, it is recognised that the use of these assets and related services into our market are not without significant potential risks. The country shall therefore take a conservative approach to an introduction of VAs and VASPs, which will be informed by a robust assessment of ML/TF/PF risk. The assessment will chart the course for the legislative, regulatory, and institutional reforms required to safeguard the financial system while enabling responsible technological advancement. This report will be timely, with the introduction of the Virtual Assets and Virtual Assets Service Providers Act, 2025. The legislation represents one of several government initiatives for progressive digital and

technological transformation in the financial system, and aims to introduce regulatory clarity while balancing innovation with consumer protection.

- Reforming the criminal justice system, by continuously reviewing investigative and prosecutorial processes to identify and remove bottlenecks and inefficiencies, enhancing inter-agency collaboration and information sharing to ensure a holistic approach to investigating ML related activities, standardise ML/TF/PF data collection procedures and formats across agencies (FIUTT, TTPS, Office of DPP and Judiciary). Focus will also continue to be placed on strengthening collaborative effort between LEAs and intelligence agencies to improve the intelligence and investigative capacity in light of the dynamic nature of terrorist organisations and their supporters to adapt to alternative measures to continue their work.
- Additional actions to reform the criminal justice system includes, equipping the Immigration Division with the use of technology solutions to support counter terrorism efforts and addressing issues surrounding potential returning FTFs and their family members seeking to return to Trinidad and Tobago. Providing capacity and resources for financial crime investigations.

18. Review of NP&S

123. A sub-committee of the NAMLC is tasked with keeping this NP&S under review, and shall undertake such an analysis on a fixed basis, once every two years. In line with its responsibilities to keep abreast of changes to global AML/CFT/CPF standards and the global and domestic risk landscape, this NP&S shall also be reviewed and revised as necessary following any significant development, such as changes to the FATF Standards or the identification of new or emerging criminal typologies locally, or any such relevant typologies internationally or any other trigger event.

19. Applicability of NP&S to National Authorities

124. This NP&S as approved by the Cabinet, shall constitute the NP&S and shall bind all national authorities accordingly.

APPENDIX I

The Legal Working Group (LWG)

The LWG is tasked with keeping the national AML/CFT/CPF legislative framework under review and identifying legislative gaps in the said framework, monitoring changes to the FATF Standards and developing and updating policies (including this policy and strategy) suited to Trinidad and Tobago's risk and context, which will enable the country to comply with the Global Standards. In driving NAMLC's policy revisions, the LWG shall take into account on a prioritised basis, risks that have been identified as emerging internationally but which have not yet manifested in Trinidad and Tobago.

The Law Enforcement Authorities Working Group (LEAWG)

The LEAWG allows for strategic and operational cooperation and coordination between all intelligence, investigative, prosecutorial and asset-forfeiture authorities.

The Supervisory Working Group (SWG)

The SWG is a platform for the three (3) Supervisory Authorities¹ (SAs), to coordinate, provide mutual assistance to each other and for information-sharing among them for both policy and operational purposes, such as addressing matters pertaining to REs that are dual registrants. These mechanisms are further strengthened through a Multilateral Memorandum of

¹ The CBTT, the FIUTT and the Trinidad and Tobago Securities & Exchange Commission.

Understanding, which includes operating protocols, for the sharing of appropriate and confidential information and coordinating supervisory activities pertaining to guidance and outreach, as well as undertaking collaborative work in matters of common interest.

The structure and composition of the NAMLC and its sub-committees are kept under review to ensure that they remain fit-for-purpose as threats, risks and vulnerabilities evolve and emerge and the global AML/CFT/CPF standard develops.

The NAMLC and its sub-committees, in executing their mandates, ensure that the national AML/CFT/CPF framework reconciles with other high-level policies of the country, including financial inclusion, protection of personal information and the right to privacy.

The NAMLC, through its sub-committees and membership ensures the delivery of regular and ongoing training and guidance, to address the national risk understanding and evolving best practices to all CA and private sector stakeholders for compliance with the FATF international standards. CAs collaborate in this regard to ensure consistency and the most efficient use of resources.

APPENDIX II

Supervisory Authorities and Competent Authorities

Under the POCA, in particular the Financial Obligations Regulations, made pursuant to POCA, three (3) public sector statutory entities have been designated as SAs, with responsibility for risk-based AML/CFT/CPF supervision of a defined list of FIs and Listed Businesses. Two of the three SAs, the CBTT and the Trinidad and Tobago Securities Exchange Commission (TTSEC) also have prudential regulatory responsibility for the proper management and operation of core principle FIs in or operating in the country. The other SA, the FIUTT, oversees Listed Businesses and other FIs that are not regulated by the CBTT or the TTSEC.

The main responsibilities of the SAs include:

Licensing, Registration and Fitness and Propriety standards

FIs which are Core Principle Financial Institutions are required to be licensed while other FIs and Listed Businesses are obligated to be licensed or registered in accordance with the respective legal requirements. SAs are also responsible for taking necessary and proportionate legal or regulatory actions to prevent criminals and their associates from holding (or being the beneficial owner of) a significant or controlling interest, or holding a management function, in a FI or Listed Business.

Risk-Based Supervision and Monitoring

A risk-based approach relies on objective analysis of ML/TF/PF risks across financial and non-financial sectors to inform proportionate and targeted supervisory measures. Updated risk assessments support effective strategic planning, enable more efficient allocation of supervisory resources to higher risk areas, and allow for timely intervention in cases of non-compliance. Implementing a risk-based oversight framework for NPOs further strengthens the prevention and deterrence

of terrorist financing risks within the sector.

SAs, on a risk-sensitive basis, conduct on-site and off-site AML/CFT/CPF supervision of FIs and Listed Businesses to ensure they comply with their AML/CFT/CPF obligations.

The SAs continue to implement a risk-based approach to supervision while bearing in mind specific rules-based requirements, such as TF/PF targeted financial sanctions obligations.

Sanctioning

Violations/breaches of AML/CFT/CPF requirements are promptly identified, and sanctioned by SAs and remedying of breaches by REs shall be monitored and enforced.

The SAs have the broadest range of sanctions available to them, in accordance with AML/CFT/CPF policies and the said sanctions shall be imposed in a manner to ensure they are effective, proportionate and dissuasive.

Providing Feedback and Outreach

SAs are required to provide FIs and Listed Businesses with adequate risk-based feedback and guidance on levels of, and compliance with, the AML/CFT/CPF requirements and identified ML/TF/PF risks. Risk-based guidance on sanctions compliance is also provided to the general public.

Communication between SAs and REs should however not be one-way. Effective dialogue with REs will allow for a continued balanced approach to supervisory activities and feed upwards to policy setting at the NAMLC and Governmental levels, and thus forms a key element of Trinidad and Tobago's policy of strong public-private partnership arrangements as a component of

the national AML/CFT/CPF framework.

The FIUTT, Trinidad and Tobago Police Service (TTPS) and Office of The Director of Public Prosecutions

Besides its supervisory responsibilities, the FIUTT is the only agency in Trinidad and Tobago that is responsible for the receipt and analysis of Suspicious Transactions/Activity Reports (STRs/SARs), filed by FIs and Listed Businesses. Where further investigations are required into suspected cases of ML/TF/PF and other criminal conduct, the FIUTT produces intelligence reports from the analysis of STRs/SARs, which are disseminated to the relevant LEA(s). The FIUTT also conducts operational and strategic analyses. The results are disseminated to relevant CA, as well as, foreign FIUs where required, spontaneously and upon request, with priority given to those higher-risk areas identified by the NRA.

The Trinidad and Tobago Police Service (TTPS) is the lead institution responsible for investigating and prosecuting financial crime, including ML/TF/PF. The TTPS is headed by a Commissioner of Police. The umbrella body for this institution is the Ministry of Homeland Security. The Financial Investigation Branch (FIB), a unit of the White-Collar Crime Division, is the branch of the TTPS that is tasked to investigate ML/TF/PF, confiscation and asset forfeiture, and to trace the assets of criminals. The FIB is also responsible for investigating and forfeiting cash seized by police officers under the POCA¹.

The FIB is commanded by the Deputy Commissioner of Police with responsibility for crime. The operations of the FIB is managed on a daily basis by a senior Police Officer.

The FIUTT is part of the LEAWG and this group includes the FIB and other representatives from branches of the TTPS, as well as the Office of the Director

¹ The cash must be in excess of Twenty Thousand Trinidad and Tobago Currency (TT\$20,000.00) or its equivalent in other currencies

of Public Prosecutions (Office of the DPP) that is mainly responsible for the prosecution of ML/TF/PF matters. The POCA also gives the Office of the DPP the powers to institute confiscation proceedings against persons who would have benefitted from the proceeds of crime.

Key to the country's strategy in taking the profit out of crime is the Civil Asset Recovery and Management and Unexplained Wealth Act, 2019 (UW Act), which is partially proclaimed. The Civil Asset Recovery, Management and Unexplained Wealth Agency will form a core component of the national framework for the recovery of the proceeds of crime. The operationalisation of the Agency is therefore a high priority area.

The FIB and other LEAs shall remain au courant with contemporary standards on the use of financial intelligence through tailored training and sensitisation.

The Customs and Excise Division

The Customs and Excise Division (CED) is a division of the Ministry of Finance, which is responsible for effectively enforcing customs laws and regulations:

- (a) as they relate to all items/goods imported, exported and transported coastwise within Trinidad and Tobago.;
- (b) to detect and deter false or non-declaration of cash and other negotiable instruments entering or leaving the country. This includes cash and bearer negotiable instruments being transported into or out of the country by persons via different modes of transportation.

All of the aforementioned trade transactions declared to the CED involve payment/receipt of monies either via cash or negotiable instruments. Payment for these transactions is made via the financial system (Banks). Cash payments above Five Thousand Dollars Trinidad and Tobago Currency (TT\$5,000.00) are not allowed. Regarding the movement of cash and negotiable instruments into and out of the country, such transactions are governed by currency declarations that have to be made for all sums above Five Thousand Dollars United States Currency (US\$5,000.00)

or Twenty Thousand Dollars Trinidad and Tobago Currency (TT\$20,000.00). Anyone found in contravention, is charged for uttering a false declaration, among other Customs charges and such matters are reported to the FIUTT. In applicable instances, charges may also be laid under the POCA.

In light of the above, and despite existing legislation and policies, the importation of commodities and subsequent payments may be an avenue for the AML/CFT/CPF breaches. Hence, the CED's inclusion on NAMLC.

Immigration Division

7. The Immigration Division is a division of the Ministry of Homeland Security, which is the principal government agency responsible for the administration and enforcement of immigration, passport and citizenship laws. The overall function of the Division is to preserve national security by effectively monitoring and controlling the movement of persons into, within, and out of Trinidad and Tobago and to provide an efficient passport service to citizens. The Division also has a critical role to play in the strengthening and implementation of immigration laws and border control policy which can be key tools to disrupt criminals and terrorists.
8. The Division, through membership in the LEAWG, shall continue to provide information to facilitate investigations by the TTPS, FIUTT and FIB into ML/TF/PF matters and to coordinate the application of its statutory powers as disruptive tools, particularly where it is not practicable to secure a ML or TF conviction.

Inland Revenue Division

9. The Inland Revenue Division (IRD) is a division of the Ministry of Finance and serves as the principal tax collection authority in Trinidad and Tobago. The IRD is responsible for the full, fair, and consistent enforcement of the country's tax laws. Civil tax audits are a core compliance tool used to promote voluntary compliance, ensure equity within the tax system, and maintain public

confidence in the integrity of tax administration. To support these objectives, the IRD operates a graduated sanctioning regime designed to deter and penalise non-compliance with tax legislation.

In addition, the IRD is designated as a law enforcement authority under the Proceeds of Crime Act (POCA) and is responsible for the investigation of tax offences, including tax evasion, in accordance with the Income Tax Act, Chapter 75:01, and other relevant legislation. These criminal tax investigation functions, including matters with money laundering implications and potential confiscation outcomes, are critical to effective tax enforcement and form an essential component of the national AML/CFT framework.

Robust investigation and prosecution of serious tax offences support compliance with FATF standards, contribute to the fight against corruption, and complement international efforts to enhance tax transparency. The IRD also continues to cooperate with foreign states through the exchange of tax information for tax compliance and enforcement purposes, in accordance with applicable laws and international agreements.

The Office of the Attorney General

The Office of the Attorney General (OAG) has international cooperation responsibilities for coordinating mutual legal assistance to and from any foreign state whether on the basis of a treaty or not. This includes assistance in relation to ML, associated predicate offences, TF, PF, related financial crimes investigations and prosecutions, and asset forfeiture.

The OAG comprises several units that have various functions in relation to AML/CFT/CPF. The units are the Anti-Terrorism Unit, the Criminal Justice Unit, the Legislative Drafting Department in the Office of The Chief Parliamentary Counsel, the Office of the DPP, and the Central Authority. Some of these units are represented on the NAMLC.

Anti-Terrorism Unit

The core objective of the Anti-Terrorism Unit (ATU) is to effectively carry out the functions of the Attorney General pursuant to the ATA.

The ATA is the key piece of legislation to combat terrorism and terrorist financing and encompasses provisions to efficiently implement United Nations Security Council Resolutions (UNSCRs) 1267, 1989 and successor resolutions. The ATU is responsible for dealing with the designation of individuals and entities and the application of targeted financial sanctions related to terrorism and TF, from inception to delisting. The ATU works closely with key international agencies relative to CT matters, as well as international partners and non-profit organisations on preventing and countering violent extremism.

Trinidad and Tobago, via the ATU, works rigorously towards fulfilling its international obligations pursuant to UNSCR 1267(1999) and its successor resolutions.

Regarding PF, the ATU works rigorously with the FIUTT towards fulfilling the country's international obligations pursuant to UNSCRs 1540 and 1718 and successor resolutions. The GoRTT's policy is to ensure the designation of all the entities and individuals on the UNSC 1718 Sanction Lists without delay.

The country, through NAMLC, shall continuously monitor PF risks, trends and methods, share PF information and ensure that there is a common policy and understanding amongst all stakeholders. CA shall take a collaborative approach with the private sector to ensure proportionate mitigation measures are implemented at a national level while ensuring the full implementation of targeted financial sanctions obligations.

Granted that this is a relatively recent area of focus by the international community, public and private sector stakeholders would need to continue to work closely together to ensure that proportionate mitigation measures are

implemented at a national level.

Central Authority

Under the Mutual Assistance in Criminal Matters Act, Chapter 11:24 (MACMA), the Attorney General is the Central Authority for Trinidad and Tobago. The Attorney General is empowered to delegate his functions under MACMA to a public legal officer employed in the OAG, which has been operationalised through the establishment of the Central Authority.

The primary duty of the Central Authority is to ensure that incoming requests can be properly executed and that all the necessary information is provided to satisfy the requirements of the MACMA.

The Central Authority is also responsible for the execution of extradition requests which are either issued by a foreign jurisdiction or issued to a foreign jurisdiction. In this regard, the Central Authority is responsible for determining whether a request for extradition can be executed in accordance with the Extradition (Commonwealth and Foreign Territories) Act Chapter 12:04.

Equally important to the facilitation of incoming mutual legal assistance and extradition requests, the Central Authority plays a critical role in facilitating and pursuing the submission of outgoing requests for mutual legal assistance and extradition.

The Central Authority is also responsible for the sharing of confiscated, forfeited or seized assets with other countries and for the negotiation of Mutual Legal Assistance agreements, International Cooperation Agreements and Treaties with other countries.

As outlined below, both the efficient facilitation of incoming requests and the appropriate and effective use of outgoing requests, together with maximising the use of other international cooperative mechanisms outlined above, remain key components of the national AML/CFT/CPF strategy.

Criminal Justice Unit

The Criminal Justice Unit (CJU) is tasked with the continued transformation and operationalising of the criminal justice sector, through the development and refinement of policies aimed at justice reform and engagement with key stakeholders, ensuring cohesive and effective implementation. The CJU supports the national efforts to combat ML/TF/PF by providing expert legal advice, policy development, and system reform initiatives aligned with the objectives of the National AML/CFT/CPF Policy and deliverables of NAMLC.

The Unit conducts comprehensive reviews and analyses of existing laws and regulations relevant to AML/CFT/CPF activities, recommending continuous legislative revisions and amendments to address emerging risks identified through national risk assessments and international evaluations. Additionally, the Unit is involved in executing the responsibilities of treaties and conventions which pertain to criminal law or mutual legal assistance, aimed at the suppression/eradication of criminal activity, as well as facilitating the tracing, confiscation/forfeiture and restraining property derived from a serious crime locally, regionally and internationally.

The work of the CJU shall continue to focus on ensuring the harmonisation of AML/CFT/CPF policies and initiatives with broader national policies, objectives and initiatives to strengthen and maintain the efficacy of the criminal justice system.

Legislative Drafting Department

The Legislative Drafting Department, shall ensure that all AML/CFT/CPF legislation is drafted precisely and efficiently in line with legislative policy as advised by the NAMLC, in order to address new and emerging ML/TF/PF risks and revisions to international AML/CFT/CPF Standards.

The Ministry of Land and Legal Affairs, The Office of the Registrar General

The Registrar General's Department (RGD) oversees civil, land & commercial registration in Trinidad & Tobago. The RGD functions include maintaining a register of companies/businesses, NPOs and trusts, as well as the record of land titles.

The GoRTT's policy is to prevent any opportunity for misuse of legal persons and legal arrangements for ML/FT/PF. This will be effected through, *inter alia*, the RGD's regular review of the Companies Register for active and inactive companies and identifying defunct companies to be struck off the register in accordance with the Companies Act, Chapter 81:01.

The country shall also maintain a centralised registry of basic and beneficial ownership information, as a mechanism to provide timely access to adequate, accurate and up-to-date information on legal persons and legal arrangements to REs in undertaking their compliance functions and CAs for access to necessary information in the execution of their duties and to achieve the purposes of international cooperation. This includes SAs accessing such information to appropriately supervise, monitor and regulate FI and LBs. This also extends to the FIUTT accessing such information for the purposes of its analytical function. This will be underpinned by the requirement for the legal person and the trustee or persons holding an equivalent position in a similar legal arrangement to maintain and provide the required information to the Companies Registry in a timely manner.

The RGD shall implement proportionate measures to verify the accuracy and adequacy of the information it maintains in the registers.

APPENDIX III

LEGISLATIVE AND REGULATORY FRAMEWORK

Trinidad and Tobago's AML/CFT/CPF legal and regulatory framework consist of the following pieces of legislation:

1. Central Bank Act, Chapter 79:02
2. Miscellaneous Provisions (FATF Compliance) Act No. 7 of 2025
3. Miscellaneous Provisions (FATF Compliance)] Act No. 17 of 2024.
4. Miscellaneous Provisions (Mutual Assistance in Criminal Matters, Proceeds of Crime, Financial Intelligence Unit of Trinidad and Tobago, Customs and Exchange Control) Act, 2018.
5. Miscellaneous Provisions (Proceeds of Crime, Anti-Terrorism and Financial Intelligence Unit of Trinidad and Tobago) Act, 2018
6. Miscellaneous Provisions [Proceeds of Crime, Anti-Terrorism, Financial Intelligence Unit of Trinidad and Tobago, Securities, Insurance, Non-Profit Organisations, Civil Asset Recovery and Management and Unexplained Wealth Act
7. Partnership Act, Chap. 81:02
8. Registration of Business Names Act, Chap. 82:85
9. Securities Act, Chapter 83:02
10. The Anti-Terrorism Act, Chapter 12:07 and the Financial Obligations (Financing of Terrorism) Regulations, 2011;
11. The Bills of Exchange (Amendment) Act, No. 12 of 2022
12. The Civil Asset Recovery and Management and Unexplained Wealth Act, 2019;
13. The Companies Act, Chapter 81:01;
14. The Counter Proliferation Financing Act No. 8 of 2025
15. The Counter Proliferation Financing Regulations, 2025
16. The Counter-Proliferation Financing Act, 2025 (Act No. 8 of 2025);
17. The Customs Act, Chapter 78:01

18. The Economic Sanctions (Implementation of United Nations Resolutions on the Democratic People's Republic of Korea) (Amendment) Order, 2025
19. The Economic Sanctions Act, Chapter 81:05;
20. The Exchange Control Act, Chap. 79:50
21. The Financial Institutions Act, Chapter 79:09
22. The Financial Intelligence Unit of Trinidad and Tobago Act, Chapter 72:01 and the Financial Intelligence Unit of Trinidad and Tobago Regulations, 2011;
23. The Gaming and Betting Control Act No. 8 of 2021
24. The Insurance Act, Chap. 84:01
25. The Miscellaneous Provision (Global Forum) Act No. 15 of 2024;
26. The Miscellaneous Provisions (Registrar General, Companies, Registration of Business Names, and Non-Profit Organisations) Act, No. 4 of 2024 (CROS)
27. The Miscellaneous Provisions (Trustees, Exchequer and Audit Act, the Minister of Finance (Incorporation) Act, Proceeds of Crime, Income Tax, Companies, Partnerships, Securities, Tax Information Exchange Agreements, the Non-Profit Organizations and Mutual Administrative Assistance in Tax Matters) Act, No 1 of 2024
28. The Mutual Assistance in Criminal Matters Act, Chapter 11:24;
29. The Non-Profit Organisation Act, Chapter 72:02;
30. The Proceeds of Crime Act, Chapter 11:27 and the Financial Obligations Regulations, 2010;
31. The Public Procurement and Disposal of Public Property Act, No. 1 of 2015
32. The Trafficking in Persons Act, Chap 12:10
33. The Virtual Assets and Virtual Asset Service Providers Act, 2025
34. Trustee Ordinance Act Ch. 4 of 1939