



ASIA AND THE PACIFIC

# Mapping the Regulatory Landscape for Financial Inclusion of Refugees and Asylum-seekers

**A GLOBAL COMPARATIVE ANALYSIS**

June 2026

# Acknowledgements

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# Introduction

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This regional report forms part of a global comparative analysis of regulatory environments shaping access to financial and digital services for refugees and asylum-seekers. Building on a common analytical framework applied across five regions, it examines how national laws, regulations, and regulatory practices affect the ability of forcibly displaced populations to open bank accounts, register SIM cards, and access mobile money and digital payment services.

To support a consistent and legally grounded assessment across regions, UNHCR partnered with DLA Piper International to examine legal and regulatory frameworks affecting access to financial services for refugees and asylum-seekers across 79 countries in Sub-Saharan Africa, the Americas, Europe, the Middle East and North Africa (MENA), and Asia.

The findings aim to support policymakers, regulators, financial institutions, mobile network operators, and humanitarian and development actors by highlighting where legal foundations for financial inclusion already exist, where implementation gaps persist, and how existing good practices can be strengthened and replicated.

To support accessibility and use of the data, UNHCR has developed an online interactive map showcasing the report's findings, available [here](#).



# Methodological Note

This study assesses regulatory frameworks relevant to the financial inclusion of refugees and asylum-seekers, focusing on four key areas: access to bank accounts, SIM card registration, mobile money accounts, and digital wallets or electronic payment accounts, as defined in the figure below.

Category	Description
<b>Bank Accounts</b>	Accounts provided by licensed financial institutions, including basic, savings, and current accounts.
<b>SIM Card Registration</b>	Ability to obtain and register a SIM card with a mobile network operator.
<b>Mobile Money Accounts</b>	Mobile-based electronic value accounts that enable users to store, send, and receive money and make payments using a mobile phone. Mobile money services may be delivered under telecom-led, bank-led, or other branchless financial service models, depending on the regulatory framework.
<b>Digital Wallets / Electronic Payment Accounts</b>	Bank- or fintech-issued digital accounts enabling electronic payments, transfers, and storage of funds via apps or online platforms.

The analysis categorises national regulatory environments as enabling, mixed, or to be developed, based on the extent to which refugees and asylum-seekers are able—under applicable laws, regulations, and regulatory practice—to open bank accounts, register SIM cards, and access mobile money or digital wallets and electronic payment accounts.

An *enabling* environment refers to contexts in which access to financial and digital services is legally permitted and generally functional in practice for refugees and/or asylum-seekers, with no major legal, regulatory, or documentation barriers. A *mixed* environment refers to contexts in which access to these services is legally permitted but constrained by important practical barriers, including documentation requirements, regulatory discretion, inconsistent implementation, or provider-level practices that limit effective access. An environment *to be developed* refers to contexts in which access is not legally permitted or is effectively excluded in practice, such that most refugees and asylum-seekers are unable to access basic financial or digital services.

The findings draw on country-specific legal questionnaires completed by DLA Piper’s corporate clients, including Amazon, BNP Paribas, Santander, Airbus, and Fundación Telefónica. The questionnaires were based on applicable legislation, regulations, supervisory guidance, and other publicly available sources.

These questionnaires were reviewed and validated by UNHCR country-level focal points, who provided contextual insights on regulatory implementation and practical access constraints.

Data collection began in January 2025 and was conducted in phases, with questionnaires administered across countries at different points throughout the year. Given the time elapsed between the initial data collection and the subsequent validation and finalisation of the report, some countries experienced changes in legislation or practice; updates flagged by UNHCR country operations were therefore incorporated to ensure the report reflects the most up-to-date situation.

Refugee figures referenced in this report are drawn from UNHCR's *2025 Mid-Year Trends Report*. The most recent statistics can be accessed through [UNHCR's Refugee Data Finder](#), while additional country-level information on displacement situations is available on [UNHCR's website](#).

While the methodology applies a common analytical framework across all countries, the classification necessarily reflects professional legal interpretation and assesses both formal legal provisions and their likely effects in practice. As a result, classifications should be understood as indicative of overall regulatory environments, rather than as definitive assessments of individual service providers' practices or of access for all individuals in all locations.

As the country analyses were prepared by different national legal experts, the level of detail in individual sections may vary to reflect differences in legal complexity, data availability, and expert emphasis; these variations do not affect the overall comparability of the findings.



# Regional Overview

As of 2025, UNHCR estimates that Asia and the Pacific hosts approximately **17.6 million forcibly displaced people**, including around **7.5 million Internally Displaced Persons (IDPs)**, **over 5.2 million refugees, other people in need of international protection and asylum-seekers**, and the world's largest stateless population. The scale and diversity of displacement contexts contribute to a highly complex financial inclusion landscape.

Across the region, access to financial and digital services for refugees and asylum-seekers remains predominantly constrained. While a small number of countries provide relatively enabling environments—particularly for individuals with formally recognised status—most contexts are characterised by partial, inconsistent, or highly restricted access in law and in practice.

A defining regional characteristic is limited formal adherence to international refugee protection frameworks. Many countries in South and Southeast Asia are not parties to the 1951 Refugee Convention or its 1967 Protocol and do not provide a dedicated legal status for refugees or asylum-seekers under domestic law. As a result, displaced individuals are frequently treated as foreign nationals with irregular, temporary, or tolerated status rather than as rights-bearing individuals. This legal positioning has direct implications for financial inclusion, as access to financial and digital services is closely linked to lawful residence, civil registration, and the possession of nationally recognised identity documents.

The eight countries analysed illustrate a wide spectrum of legal, regulatory, and operational approaches. In some jurisdictions, refugees with recognised legal status and government-issued documentation are generally able to access banking, mobile connectivity, and digital financial services, albeit with certain practical limitations. In others, refugees and asylum-seekers face systemic exclusion driven by restrictive legal frameworks, lack of formal recognition, or the non-acceptance of available documentation. In several countries, access also varies significantly within the same jurisdiction depending on the group concerned—for example, refugees holding government-issued identification compared to those relying solely on UNHCR documentation—resulting in fragmented and unequal outcomes.

Documentation requirements emerge as the primary structural barrier across the region. Know Your Customer (KYC) and customer due diligence frameworks—often aligned with stringent Anti-Money Laundering and Counter-Terrorism Financing (AML/CFT) standards—typically require government-issued identity documents, proof of address, and, increasingly, biometric verification.

Barriers to mobile connectivity further compound these challenges. Mandatory SIM card registration regimes are in place across all countries analysed and generally require nationally recognised identity documents and biometric verification.



Where refugees and asylum-seekers are unable to register SIM cards in their own names, exclusion from mobile connectivity creates an additional obstacle to accessing digital financial services, which increasingly rely on mobile numbers for authentication, transaction authorisation, and account management.

Mobile money and digital payment ecosystems are unevenly developed across the region. In many contexts, access to these services is contingent on prior access to a bank account or a registered SIM card, reinforcing existing barriers. As a result, even where digital financial infrastructure is relatively advanced, displaced populations often remain excluded in practice.

At the same time, emerging policy discussions and pilot initiatives in several countries point to potential avenues for improving access. These include regulatory sandbox proposals, efforts to expand acceptance of alternative forms of identification, and broader national strategies aimed at increasing financial inclusion and digitalisation. To date, however, such initiatives remain limited in scope and have not resulted in systemic or large-scale improvements for refugees and asylum-seekers.

Overall, while only a limited subset of the countries analysed demonstrate relatively enabling regulatory environments, most contexts in the region continue to be characterised by significant legal, regulatory, and practical barriers. Persistent documentation constraints, limited recognition of alternative forms of identification, and inconsistent implementation remain key factors shaping refugees' and asylum-seekers' ability to access financial and digital services in an increasingly digitalised financial ecosystem.



**TABLE 1:** Financial Inclusion Regulatory Environment for Refugees and Asylum-seekers in Asia, by Status

Country	Status	Number* (June 2025)	Bank Accounts	SIM Card Registration	Mobile Money Accounts	Digital Wallets/ Electronic Pay- ments
Bangladesh	Refugees	1,143,178	●	●	●	●
	Asylum-seekers	35	●	●	●	●
India	Refugees	236,878	●	●	●	●
	Asylum-seekers	14,315	●	●	●	●
Indonesia	Refugees	7,557	●	●	●	●
	Asylum-seekers	4,473	●	●	●	●
Japan	Refugees	29,068	●	●	●	●
	Asylum-seekers	31,293	●	●	●	●
Kazakhstan	Refugees	65,028	●	●	●	●
	Asylum-seekers	229	●	●	●	●
Malaysia	Refugees	144,448	●	●	●	●
	Asylum-seekers	57,205	●	●	●	●
Pakistan	Refugees	1,547,260	●	●	●	●
	Asylum-seekers	220,540	●	●	●	●
Thailand	Refugees	84,489	●	●	●	●
	Asylum-seekers	2,738	●	●	●	●

\* Source: UNHCR 2025 Mid-Year Trends Report

**Classification key (used throughout this report):**

● Enabling	● Mixed	● To be developed
Legally permitted and generally functional in practice	Legally permitted, but important practical or documentation constraints	Not legally permitted or effectively excluded

# BANGLADESH



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

**1,143,178 / 35** (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:

**29,089** of which 27,912 refugees and asylum-seekers (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **TO BE DEVELOPED**

For asylum-seekers: **TO BE DEVELOPED**

Bangladesh is not a State party to the 1951 Refugee Convention or its 1967 Protocol and lacks a formal legal or policy framework for the protection of refugees and asylum-seekers. The majority of refugees and asylum-seekers in the country are of Rohingya origin. Under the current legal framework, they are not permitted to access formal financial services or mobile connectivity services.

Stringent documentation requirements, combined with the non-recognition of UNHCR-issued documentation for KYC purposes, create significant barriers to accessing banking services, registering SIM cards, and opening mobile money accounts or digital wallets. Consequently, refugees and asylum-seekers remain largely excluded from Bangladesh's formal financial system.

However, under a pilot initiative, Rohingya refugees residing in camps in Cox's Bazar are currently provided with corporate SIM cards registered under a government authority's identification number and issued in the names of the refugees. UNHCR supports SIM card distribution through PRIMES' Global Distribution Tool. In parallel, discussions are ongoing regarding refugee access to SIM cards and mobile money services, with the Government of Bangladesh generally expressing a positive stance. While no regulatory amendments have been enacted to date, proposals are under consideration to pilot a regulatory sandbox initiative that would link SIM access to mobile money services.



## Financial and Digital Access for Refugees and Asylum-seekers in Bangladesh

Category	Refugees	Asylum-seekers
<b>Opening bank accounts</b>	<ul style="list-style-type: none"> <li>Refugees face stringent documentation requirements, including the need for a valid passport and visa. UNHCR-issued documentation is not accepted by banks for KYC purposes.</li> </ul>	<ul style="list-style-type: none"> <li>Asylum-seekers face similar documentation barriers. UNHCR-issued documentation is not accepted by banks for KYC purposes.</li> </ul>
<b>Registering SIM cards</b>	<ul style="list-style-type: none"> <li>Refugees are not permitted to register local SIM cards in their own names. Under a pilot initiative, refugees in Cox's Bazar camps are provided with corporate SIM cards registered under a government authority's ID number and issued in the name of the refugee, with UNHCR facilitating SIM card distribution. The regulatory framework has not yet changed.</li> </ul>	<ul style="list-style-type: none"> <li>Asylum-seekers are not permitted to register local SIM cards in their own names.</li> </ul>
<b>Opening mobile money accounts</b>	<ul style="list-style-type: none"> <li>Refugees are not permitted to open mobile money accounts. Required documentation—such as a valid passport and visa—is generally unattainable, and UNHCR-issued documentation is not recognised for KYC compliance.</li> </ul>	<ul style="list-style-type: none"> <li>Asylum-seekers face similar barriers and are not permitted to open mobile money accounts.</li> </ul>
<b>Opening digital wallets / electronic payment accounts</b>	<ul style="list-style-type: none"> <li>Refugees are not permitted to open digital wallets or electronic payment accounts. Required documentation, including a valid passport and visa, is often unattainable for refugees.</li> </ul>	<ul style="list-style-type: none"> <li>Asylum-seekers face similar barriers to refugees and are not permitted to open digital wallets or electronic payment accounts.</li> </ul>



## Opening Bank Accounts

Bangladesh's current legal framework does not permit refugees and asylum-seekers to open bank accounts, as they are unable to meet stringent documentation requirements. To open a bank account, non-nationals are required to present either a photo ID and birth certificate, or a passport with a valid visa—documentation that refugees and asylum-seekers generally do not possess.

Although UNHCR issues documentation to registered refugees and asylum-seekers based on protection needs, this documentation is not recognised by financial institutions as compliant with KYC requirements for opening a bank account.

In addition, banks typically require proof of residence, a tax identification number, and a letter of introduction. Proof of residence is rarely available to refugees and asylum-seekers, particularly those without formal residence status or those living in temporary or informal settlements, further limiting their ability to access banking services.



## SIM Card Registration

SIM card registration is mandatory under the *Cellular Mobile Phone Operator Regulatory and Licensing Guidelines* (2011) and is overseen by the Bangladesh Telecommunication Regulatory Commission (BTRC). Subscribers are required to present a national identity card or passport and provide fingerprint biometrics for verification against a national database.

Refugees and asylum-seekers are legally barred from accessing and owning local SIM cards due to stringent documentation requirements. UNHCR-issued documentation is not recognised for KYC purposes, and there is a specific prohibition on the sale of SIM cards to Rohingya refugees.

However, the Government of Bangladesh has recently approved the distribution of 10,000 SIM cards to Rohingya refugees under a pilot initiative. Refugees are currently provided with corporate SIM cards registered under a government authority's identification number and issued in the names of the refugees. UNHCR is facilitating SIM card distribution through PRIMES' Global Distribution Tool, including updating contact information and conducting biometric authentication at the distribution point.

In addition, on 31 August 2025, the World Bank convened a workshop on refugees' access to mobile money, bringing together key government, humanitarian, and development stakeholders. During the workshop, participants discussed a proposal for a regulatory sandbox pilot that would link mobile money services to the distributed SIM cards, with recommendations for further technical-level consultations on the design and rollout of the pilot.



## **Mobile Money and Digital Payments**

Similarly to access to traditional bank accounts, refugees and asylum-seekers in Bangladesh face legal and regulatory barriers to accessing mobile money and digital payment services.

Bangladesh operates a bank-led Mobile Financial Services model, under which mobile money services are provided by licensed banks and regulated by the Bangladesh Bank in accordance with the *Regulatory Guidelines for Mobile Financial Services*. Key providers include bKash, Nagad, Rocket, Upay, and SureCash.

These services are subject to strict KYC and customer due diligence requirements, typically requiring nationally recognised identity documents for account opening.

As a result, refugees and asylum-seekers are generally unable to meet the required documentation standards—such as presenting a valid passport and visa—and UNHCR-issued documentation is not recognised for KYC compliance. Consequently, refugees and asylum-seekers are effectively excluded from opening mobile money accounts and digital wallets in Bangladesh.



## **Challenges and Practical Realities**

Refugees and asylum-seekers in Bangladesh face significant legal and practical barriers that restrict their access to financial and mobile services. A key practical challenge is limited mobile and digital connectivity, driven by weak mobile network coverage and inadequate internet infrastructure in refugee settlements.



## **Other Government and Regulatory Efforts to Enhance Financial Inclusion**

In 2021, Bangladesh Bank launched the country's first National Financial Inclusion Strategy (NFIS) 2021–2026. One of the strategy's key objectives is to *broaden and deepen financial inclusion for women, populations affected by climate change, other underserved segments of the population, and senior citizens*.

However, despite identifying several priority groups, the NFIS does not explicitly include refugees or asylum-seekers among its target populations.

# INDIA



NUMBER OF REFUGEES/ASYLUM-SEEKERS:  
**236,878 / 14,315** (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:  
**3,320** (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **MIXED**

For asylum-seekers: **TO BE DEVELOPED**

India is not a State party to the 1951 Refugee Convention or its 1967 Protocol. The entry, stay, and movement of foreign nationals are governed by the *Immigration and Foreigners Act (2025)*, which consolidates and replaces earlier legislation. While this framework provides for the formal registration of all foreign nationals, including refugees and asylum-seekers, registration with UNHCR does not result in the automatic regularization of stay.

In the absence of a valid visa or other form of legal authorisation issued by the authorities, refugees are generally unable to access services and entitlements comparable to those available to Indian nationals or other legally recognised residents.

In practice, the *Immigration and Foreigners Act (2025)* continues to classify refugees and asylum-seekers as “foreign nationals,” without providing specific exceptions for individuals who have entered India irregularly or who have overstayed their visas due to an inability to return to their country of origin safely and with dignity.

The refugee population in India also includes Tibetan and Sri Lankan refugees. Tibetan refugees are issued government-provided Registration Certificates that serve as official identification documents, while Sri Lankan refugees are registered with the Government of Tamil Nadu and are eligible to obtain Aadhaar and PAN cards. The differential treatment of Sri Lankan and Tibetan refugees reflects the fact that they fall under distinct administrative frameworks and government-notified schemes governing their legal status, documentation, and access to public services.

By contrast, refugees falling under UNHCR's mandate do not receive official documentation from the Government of India. As a result, identity and protection documents issued by UNHCR are often not formally recognised by national authorities, which limits these refugees' and asylum-seekers' access to public services, welfare schemes, and other entitlements.

UNHCR provides support to refugees and asylum-seekers in India through a range of modalities. A limited number of refugees and asylum-seekers registered with UNHCR India receive financial assistance through a partner NGO, typically delivered via bearer cheques or gift cards. However, UNHCR-issued documentation is not formally recognised as valid identification for accessing public services or formal financial services.

Myanmar nationals living in refugee-like situations in India's northeastern states are not registered with UNHCR but receive basic humanitarian assistance through local partner organisations.

Sri Lankan refugees may receive repatriation grants from UNHCR through bank accounts prior to their voluntary return to Sri Lanka. As they are eligible to obtain Aadhaar and PAN cards, they are able to open bank accounts and access mobile and digital financial services. In addition, they have access to government microfinance schemes and small loans through self-help groups.

To access financial and mobile services, individuals must meet KYC requirements, which typically include the presentation of valid identity documents—such as a PAN card, Aadhaar card, or a passport with a valid visa—as well as proof of address. While Sri Lankan and Tibetan refugees are generally able to meet these documentation requirements, most other refugees and asylum-seekers lack officially recognised identity documents.

The Reserve Bank of India (RBI) allows financial institutions to open “*small*” bank accounts under simplified KYC requirements, which could potentially benefit refugees and asylum-seekers who do not possess Aadhaar or PAN cards. However, these accounts are subject to limited validity periods and restricted functionalities and are offered by only a subset of financial institutions. Moreover, even where such accounts are available, banks do not consistently accept refugee documentation.

India has undertaken significant efforts to promote financial inclusion for its citizens through initiatives such as the Pradhan Mantri Jan Dhan Yojana (PMJDY) and the Aadhaar system. However, due to regulatory gaps and strict documentation requirements, these programs do not automatically extend to refugees and asylum-seekers.



## Financial and Digital Access for Refugees and Asylum-seekers in India

Category	Refugees	Asylum-seekers
<b>Opening Bank accounts</b>	<ul style="list-style-type: none"> <li>Many refugees lack the standard documents required for KYC compliance. UNHCR-issued documentation is often not accepted by banks. Sri Lankan and Tibetan refugees who possess Aadhaar or other officially recognised identity documents are generally able to meet KYC requirements and open bank accounts.</li> </ul>	<ul style="list-style-type: none"> <li>Asylum-seekers face similar documentation challenges. UNHCR-issued documentation is often not accepted for opening a bank account, and only those with a valid passport and visa are able to meet KYC requirements.</li> </ul>
<b>Registering SIM cards</b>	<ul style="list-style-type: none"> <li>Strict KYC requirements apply to SIM card registration. Some refugees may register prepaid SIM cards if they possess a valid passport and visa. Sri Lankan and Tibetan refugees with Aadhaar or other government-issued identity documents are generally able to meet registration requirements.</li> </ul>	<ul style="list-style-type: none"> <li>Asylum-seekers generally lack documentation recognised for KYC purposes. Only those with a valid passport and visa are able to register SIM cards.</li> </ul>
<b>Opening Mobile Money Accounts</b>	<ul style="list-style-type: none"> <li>Access is constrained by strict KYC requirements. Sri Lankan and Tibetan refugees with Aadhaar or other government-issued identity documents may be able to meet eligibility requirements.</li> </ul>	<ul style="list-style-type: none"> <li>Asylum-seekers generally lack documentation recognised for KYC purposes, and only those with a valid passport and visa may access mobile money services.</li> </ul>
<b>Opening Digital Wallets/Electronic Payment Accounts</b>	<ul style="list-style-type: none"> <li>Similar to mobile money accounts, access is restricted by stringent KYC requirements and, in some cases, linkage to bank accounts. Sri Lankan and Tibetan refugees with Aadhaar or other government-issued identity documents may meet the requirements.</li> </ul>	<ul style="list-style-type: none"> <li>Asylum-seekers generally lack documentation recognised for KYC purposes, and only those with a valid passport and visa may access digital wallet or electronic payment services.</li> </ul>



## **Opening Bank Accounts**

India lacks a specific legal or policy framework for refugees and asylum-seekers, and this gap extends to banking and financial regulations. Opening a bank account is challenging due to the strict KYC requirements mandated by the Reserve Bank of India (RBI), which typically require the presentation of a PAN card, Aadhaar card, or other officially recognised documents such as a passport with a valid long-term or stay visa, or a voter ID. While Sri Lankan and Tibetan refugees may be able to meet these requirements, many other refugees and asylum-seekers are unable to obtain such documentation, and UNHCR-issued identity documents are not formally accepted for KYC purposes.

Under the *Aadhaar Act (2016)*, non-citizens who have resided in India for more than 181 days in the preceding twelve months are, in principle, eligible to apply for an Aadhaar card. In practice, however, many refugees and asylum-seekers are unable to complete the application process because they lack the supporting documentation required to establish eligibility as “residents,” particularly where their stay is irregular.

To partially address this gap, the RBI permits the opening of “small” bank accounts under simplified KYC requirements, such as the submission of a self-attested photograph and a signature or thumbprint. These accounts are subject to significant limitations, including caps on deposits and withdrawals, a prohibition on foreign remittances, and restricted validity periods. In addition, such accounts are not offered by all banks, and even where available, acceptance of refugee documentation remains inconsistent.

As a result, while there are no explicit legal prohibitions preventing refugees and asylum-seekers from opening bank accounts, substantial regulatory and practical barriers persist. Sri Lankan and Tibetan refugees with officially recognised identity documents, as well as refugees holding a valid passport and long-term visa, may generally meet KYC requirements. For most other refugees and asylum-seekers, however, access to formal banking services remains restricted.



## **SIM Card Registration**

Refugees and asylum-seekers face significant challenges in registering SIM cards due to KYC requirements set by the Department of Telecommunications (DoT) and the Telecom Regulatory Authority of India (TRAI), which require valid proof of identity and address. Sri Lankan and Tibetan refugees who possess Aadhaar cards or other government-issued identification documents are, in principle, able to meet these registration requirements. However, UNHCR-issued documentation is not officially recognised for KYC purposes, which excludes refugees and asylum-seekers who do not hold an Aadhaar card or a passport with a valid long-term visa from standard SIM registration procedures.

In limited cases, refugees and asylum-seekers may obtain prepaid SIM cards by presenting a valid foreign passport and proof of address, rely on international roaming SIM cards from their country of origin, or access restricted postpaid plans by providing additional financial documentation. These options, however, remain inaccessible for most individuals. The absence of standardised guidance on the acceptance of refugee documentation, combined with providers' reliance on biometric verification systems, further constrains access to SIM card registration.



## **Mobile Money and Digital Payments**

India does not operate a standalone mobile money system; digital payments are bank-linked.

Digital payment systems and e-wallets in India—such as Paytm, JioMoney, PhonePe, Google Pay, and Airtel Payments Bank—are regulated under the Reserve Bank of India's (RBI) Prepaid Payment Instruments (PPI) framework. While these services are widely used, refugees and asylum-seekers face significant barriers to accessing them. As foreign nationals, users are required to provide valid identity documents and proof of address to meet KYC requirements. While Sri Lankan and Tibetan refugees with government-issued identification can generally meet these requirements, most other refugees and asylum-seekers may not.

In addition, many digital payment services are linked to bank accounts or require bank account integration for full functionality, creating a further barrier for individuals who are unable to open or maintain such accounts.

## **Challenges and Practical Realities**

In practice, only Sri Lankan and Tibetan refugees with government-issued identification can reliably access financial and mobile services. Most other refugees and asylum-seekers face significant barriers due to the lack of recognised identity documentation, limiting their ability to meet KYC requirements for banking, digital financial services, and SIM card registration. Alternative documentation—such as UNHCR-issued documents or letters from NGOs—is inconsistently accepted across institutions and, in some cases, even across branches of the same provider.

Additional challenges include limited financial literacy, language barriers, and economic insecurity, which further constrain access to and use of financial services. Many refugees rely on informal financial networks or community-based support mechanisms. In the absence of a comprehensive legal or policy framework governing the status and stay of refugees and asylum-seekers, implementation varies significantly and often depends on local practices and the discretion of service providers.

## **Other Government and Regulatory Efforts to Enhance Financial Inclusion**

India has undertaken significant efforts to promote financial inclusion through initiatives such as the Pradhan Mantri Jan Dhan Yojana (PMJDY), the Aadhaar biometric identification system, and the expansion of the microfinance sector. These programmes have improved access to basic financial services for large segments of the population.

However, refugees and asylum-seekers are not explicitly included in these initiatives. While the Reserve Bank of India (RBI) has introduced limited flexibility in KYC requirements for certain vulnerable groups, these measures have not been systematically extended to refugees and asylum-seekers. Some variation exists at the state level, and UNHCR continues to engage with authorities on issues of financial inclusion. Nonetheless, India lacks a comprehensive national framework specifically addressing the financial inclusion of refugees and asylum-seekers.

# INDONESIA



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

**7,557 / 4,473** (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:

**1,070** (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **MIXED**

For asylum-seekers: **MIXED**

Indonesia is not a State party to the 1951 Refugee Convention or its 1967 Protocol and does not have a national asylum framework. Refugee status determination and registration are carried out by UNHCR, in accordance with Presidential Regulation No. 125/2016 *On the Handling of Refugees*. UNHCR Indonesia issues identity documents to refugees and asylum-seekers, each containing a unique identification number.

For many refugees and asylum-seekers, the UNHCR ID is their sole form of legal identification. However, this documentation is not recognised by banks and financial institutions as compliant with KYC requirements, effectively preventing refugees and asylum-seekers from opening independent bank accounts or accessing formal banking services. By contrast, regulations issued by the Ministry of Communications and Digital Affairs allow refugees to legally register prepaid SIM cards, although awareness and implementation of this provision among service providers remain limited.

Refugees may use their UNHCR-issued documentation to access limited mobile-related functionalities, such as airtime top-ups and merchant payments. However, access to broader mobile and digital financial services—including money transfers and cash withdrawals—requires the presentation of a valid passport and legal residence permit, which refugees and asylum-seekers generally do not possess.

At present, Indonesia does not have financial inclusion policies or initiatives specifically targeting refugees and asylum-seekers. Nonetheless, under its National Strategy on Financial Inclusion, the government is promoting the expansion of digital financial access for unbanked populations. While these efforts do not explicitly include displaced populations, they may indirectly benefit refugees and asylum-seekers over time.



## Financial and Digital Access for Refugees and Asylum-seekers in Indonesia

Category	Refugees	Asylum-seekers
<b>Opening Bank accounts</b>	<ul style="list-style-type: none"> <li>● Legally required documentation for opening a bank account, including residence permits, is not attainable by refugees.</li> </ul>	<ul style="list-style-type: none"> <li>● Asylum-seekers face the same constraints as refugees.</li> </ul>
<b>Registering SIM cards</b>	<ul style="list-style-type: none"> <li>● No legal barriers.</li> </ul>	<ul style="list-style-type: none"> <li>● No legal barriers.</li> </ul>
<b>Opening Mobile Money Accounts</b>	<ul style="list-style-type: none"> <li>● UNHCR-issued identification is not accepted for opening mobile money accounts with full functionality. Refugees may access limited services, such as airtime topups and merchant payments.</li> </ul>	<ul style="list-style-type: none"> <li>● Similar constraints apply. Asylum-seekers may access mobile money services with restricted functionality only.</li> </ul>
<b>Opening Digital Wallets/Electronic Payment Accounts</b>	<ul style="list-style-type: none"> <li>● UNHCR-issued identification is not accepted for accessing full digital financial services, though limited functionalities may be available.</li> </ul>	<ul style="list-style-type: none"> <li>● UNHCR-issued identification is not accepted for accessing full digital financial services, though limited functionalities may be available.</li> </ul>



### Opening Bank Accounts

Refugees and asylum-seekers are treated similarly under Indonesian law. As foreign nationals, they are subject to the requirements set out in the Financial Services Authority (OJK) Circular Letter No. SE No. S246/S.01/2015 *On the Opening of a Foreign Currency Account for Foreign Nationals*. To open a bank account, individuals are required to present a valid passport, a residence permit—either a Temporary Stay Permit Card (KITAS) or a Permanent Stay Permit Card (KITAP)—and make an initial minimum deposit of USD 2,000.

Refugees and asylum-seekers are generally unable to meet these requirements. They do not have access to legal residence permits, and UNHCR-issued identity documents are not rec-

ognised by banks for KYC purposes. In addition, they often lack other documentation that may be requested by financial institutions, such as a tax identification number, proof of address, or employment verification.

At the time of this research, and based on consultations with regulators as well as guidance from the Financial Services Authority (OJK), the only available mechanism for facilitating refugees' access to banking services is the use of *subaccounts* ("qq accounts"). Under this arrangement, refugees hold individual accounts that operate under a primary account maintained by UNHCR or International Organization for Migration (IOM). This model is currently implemented by IOM in partnership with Bank Sahabat Sampoerna and reflects the approach previously explored by UNHCR with Bank Rakyat Indonesia (BRI).

## **SIM Card Registration**

There are no legal restrictions on who may register SIM cards in Indonesia. However, device registration and identity verification are mandatory under Minister of Communications and Digital Affairs Regulation No. 1/2020.

Subsequently, Regulation No. 5/2021, issued in April 2021, and Regulation No. 7/2026, enacted in January 2026, enable refugees formally recognised by UNHCR to register prepaid SIM cards using UNHCR-issued identification. Despite this legal provision, awareness among mobile network operators remains limited, which in practice continues to restrict refugees' and asylum-seekers' access to SIM card registration and mobile services.

To ensure more consistent implementation, additional clarification—such as through a Ministerial Circular—may be required to strengthen awareness and operational compliance among service providers.

## **Mobile Money and Digital Payments**

Indonesia has a hybrid system combining e-money instruments and digital wallets, with limited mobile money characteristics.

Payment systems in Indonesia, including e-money instruments and digital wallets, are regulated by Bank Indonesia, while the Financial Services Authority oversees most fintech activities, including mobile money, digital lending, and insurtech services. Examples of bank-issued emoney instruments include Flazz (BCA), Brizzi (BRI), eMoney (Bank Mandiri), and TapCash (BNI), while widely used digital payment platforms include GoPay, DANA, OVO, ShopeePay, LinkAja, and i.Saku.

Refugees and asylum-seekers who are able to register a SIM card may open basic digital wallets or e-money accounts. These accounts typically allow electronic topups and merchant payments but are subject to regulatory limits on balances and transaction volumes.

Access to broader financial services—including higher-value transactions, person-to-person transfers, and cash withdrawals—requires the presentation of valid identity documents and proof of legal stay. As UNHCR-issued identification is not accepted for full KYC compliance, refugees and asylum-seekers who lack recognised identity documents and residence permits may face significant restrictions in accessing full digital financial services.

## **Challenges and Practical Realities**

The primary barrier to financial access for refugees and asylum-seekers remains the stringent documentation requirements. While the non-recognition of UNHCR-issued identification is a central challenge, additional requirements—such as proof of address, a tax identification number, and employment verification—further constrain access to financial services.

With respect to SIM card registration, the main challenges relate to inconsistent implementation of existing regulations. Limited awareness of the relevant provisions among both service providers and refugees, combined with the absence of supplementary guidance from the Ministry of Communications and Digital Affairs, continues to impede effective access to mobile connectivity in practice.

## **Other Government and Regulatory Efforts to Enhance Financial Inclusion**

Indonesia launched its first National Strategy on Financial Inclusion (NSFI) in 2016 and established the National Council for Financial Inclusion, chaired by the President of Indonesia. The strategy was subsequently updated in 2020 through Presidential Regulation No. 114.

The NSFI provides a comprehensive framework aimed at expanding access to and effective use of quality financial services for all Indonesians, with a particular focus on underserved and vulnerable populations. Key priorities include the promotion of digital financial services and regulatory reforms to support innovation while safeguarding financial stability. In addition, the government introduced the National Strategy on Financial Literacy in 2021 to strengthen financial capability across the population.

Although refugees and asylum-seekers are not explicitly referenced in these strategies, broader improvements in financial infrastructure, digital payment systems, and regulatory frameworks may indirectly benefit displaced populations over time.

In 2023, Indonesia became a member of the Financial Action Task Force (FATF). FATF guidance on digital identity recognises UNHCR-issued documentation as a reliable and independent source of official identity for accessing financial services, including the opening of bank accounts. While this guidance does not yet appear to be reflected in domestic KYC practices, it may provide a reference point for future regulatory considerations.

# JAPAN



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

**29,068 / 31,293** (June 2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **ENABLING**

For asylum-seekers: **MIXED**

Japan is a State party to the 1951 Refugee Convention and its 1967 Protocol. Japanese law does not explicitly restrict refugees or asylum-seekers from accessing financial services. Both groups can, in principle, open bank accounts, register SIM cards, and use mobile money and digital wallets, provided they meet standard identification requirements under KYC regulations.

Refugees who are officially registered with their local municipality and issued a residence card (*zairyū* card) or “My Number” card generally have access to these services. Stateless refugees may face challenges due to limited institutional awareness of statelessness in Japan. For asylum-seekers, access depends on their legal residence status under the *Immigration Control and Refugee Recognition Act* and their ability to obtain the required documentation. In practice, banks and service providers exercise discretion and may impose stricter requirements, particularly for foreign nationals with short-term or provisional status.





## Financial and Digital Access for Refugees and Asylum-seekers in Japan

Category	Refugees	Asylum-seekers
Opening Bank Accounts	● No legal barriers.	● No explicit legal restrictions; however, practical barriers persist. Depending on residence status, asylum-seekers may be unable to obtain the identification documents required for KYC compliance.
Registering SIM Cards	● No legal barriers.	● No explicit legal restrictions; access depends on the ability to provide required identification.
Opening Mobile Money Accounts	● No legal barriers.	● Similar practical challenges to those encountered when opening a bank account.
Opening Digital Wallets/Electronic Payment Accounts	● No legal barriers.	● Similar practical challenges to those encountered when opening a bank account.



### Opening Bank Accounts

Japanese law does not restrict refugees from opening bank accounts based on nationality. Refugees can open accounts by presenting a residence card or a “My Number” card. In some cases, alternative documents such as a health insurance card, national pension book, utility bill receipt, residency certificate, or tax payment certificate may also be accepted.

Banks must comply with strict KYC procedures under the *Foreign Exchange and Foreign Trade Act* and the *Act on Prevention of Transfer of Criminal Proceeds*. In practice, banks exercise discretion and may be cautious when opening accounts for foreign nationals due to concerns about account abandonment or unauthorised use.



## **SIM Card Registration**

There are no legal restrictions preventing refugees from registering SIM cards in Japan. Required documents include a driver's license, "My Number" card, residence card, special permanent resident certificate, or valid passport. Postpaid plans also require a Japanese bank account or credit card, while prepaid SIM cards—intended for short-term visitors—are generally more accessible. Providers offering SIM cards with voice communication capabilities must verify the subscriber's identity, including full name, residential address, and date of birth.

Asylum-seekers must meet similar requirements. Those with a valid passport or residence card can register SIM cards, but individuals under provisional release or without these documents often encounter difficulties.



## **Mobile Money and Digital Payments**

Digital payment services and digital wallets are widely used in Japan and are provided through a range of platforms. These include app-based wallets such as PayPay, LINE Pay, and Rakuten Pay; prepaid card-linked wallets such as Mobile SUICA, Mobile PASMO, Mobile WAON, and Mobile NANACO; credit or debit card-linked services such as Apple Pay and Google Pay; and bank-integrated solutions such as the Mizuho Wallet.

Opening a mobile payment account or digital wallet typically requires access to a smartphone, an active SIM card, SMS authentication, and identity verification using a driver's license, a "My Number" card, or a residence card. While limited functionalities—such as small-value payments—may be available without full identity verification, access to money transfers and advanced features generally requires completion of the verification process.

Refugees are generally able to meet these requirements. Asylum-seekers who hold a residence card or a "My Number" card may also access these services, whereas those without such documentation face obstacles. In addition, most providers rely on online registration processes that require the submission of digital copies of identity documents and a facial photograph. This can pose additional challenges for individuals with limited digital literacy or restricted access to suitable devices.

## **Challenges and Practical Realities**

Although the legal framework is generally enabling, practical challenges persist. Banks and service providers may impose stricter documentation requirements for foreign nationals. Language barriers and the lack of verifiable identity documents can hinder access, especially for asylum-seekers with provisional or short-term status.

In practice, some institutions closely review residence status (e.g., visa duration) and financial credibility, and often require a residence card as the primary identification document.

## **Other Government and Regulatory Efforts to Enhance Financial Inclusion**

Japan does not have specific legislation dedicated to the financial inclusion of refugees and asylum-seekers. However, agencies such as the Financial Services Agency (FSA) and the Ministry of Internal Affairs and Communications (MIC) provide multilingual materials and guidance for foreign residents. Support is available both in person and online, though online resources are more accessible for those with digital skills and devices. Various organisations also assist refugees and asylum-seekers in accessing financial services.

Regarding the admission and residency of foreign nationals in Japan, the government published a five-year roadmap for integrating foreign residents in 2022, and it is currently developing the Second Basic Plan for Immigration and Residence Control. Meanwhile, in January 2026, it issued the *Comprehensive Policy Measures for the Acceptance of Foreign Nationals and the Realization of a Well-Ordered and Harmonious Coexistence*.

# KAZAKHSTAN



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

**65,080 / 229** (June 2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **ENABLING**

For asylum-seekers: **MIXED**

The Republic of Kazakhstan is a State party to the 1951 Refugee Convention and its 1967 Protocol. In accordance with Article 10 of Law No. 216IV (2009) *On Refugees*, asylum-seekers are issued a certificate confirming the registration of their application for refugee status. Once an asylum claim is approved, individuals are issued a refugee ID. Refugee IDs are included in the official list of identity documents under Article 6 of Law No. 73V ZRK *On Identity Documents*. By contrast, the asylum-seeker certificate, while confirming a person's lawful stay in the territory of the Republic of Kazakhstan during the asylum procedure, is not legally recognised as an identity document for general identification purposes.

Refugees' and asylum-seekers' access to financial and mobile services is governed by the same regulatory framework that applies to other foreign nationals, with service providers applying risk-based onboarding and KYC procedures. In late 2024, the Agency of the Republic of Kazakhstan for Regulation and Development of the Financial Market adopted Resolution No. 96 of 31 December 2024, introducing amendments to AML/CFT and internal control regulations applicable to second-tier banks. Although these amendments are not refugee-specific, they apply to non-resident clients and therefore have direct implications for refugees and asylum-seekers.

The revised framework strengthens risk-based customer due diligence measures and provides banks with greater discretion to apply enhanced due diligence to higher-risk customers, request documentation confirming the legal basis for stay in Kazakhstan—such as employment or education contracts, residence permits, or other supporting documents—restrict remote (non-face-to-face) onboarding for certain categories of clients, limit the validity of payment cards issued to non-residents to a maximum of twelve months (subject to specified exceptions), and apply stricter monitoring and control measures based on AML/CFT risk assessments.

In practice, these measures may result in additional documentation requests, extended compliance checks, or more cautious onboarding approaches by financial institutions. Since 2022, some major second-tier banks in Kazakhstan have reportedly begun denying financial services to Afghan nationals.



## Financial and Digital Access for Refugees and Asylum-seekers in Kazakhstan

Category	Refugees	Asylum-seekers
<b>Opening Bank Accounts</b>	● No legal barriers.	● No explicit legal barriers; however, asylum-seekers may face difficulties where the asylum-seeker certificate is not accepted by banks for identity verification, particularly in the absence of a valid passport.
<b>Registering SIM Cards</b>	● No legal barriers.	● Asylum-seeker certificates are not recognised for KYC purposes. Only asylum-seekers holding a valid passport are generally able to register SIM cards.
<b>Opening Mobile Money Accounts</b>	● No legal barriers.	● As mobile money services are typically linked to bank accounts, asylum-seekers face the same documentation barriers as for opening bank accounts and can generally access mobile money only if they possess a valid passport.
<b>Opening Digital Wallets /Electronic Payment Accounts</b>	● No legal barriers.	● Asylum-seekers face documentation and practical barriers similar to those affecting access to mobile money and bank accounts.



### Opening Bank Accounts

The National Bank of the Republic of Kazakhstan, through Resolution No. 207 of 31 August 2016, sets out the minimum requirements for opening bank accounts. To open a current or savings account, non-residents must present an identity document and meet customer identification requirements in line with AML/CFT legislation.

While the regulation establishes baseline requirements, second-tier banks apply their own internal, risk-based procedures. In practice, banks may request additional documentation, including an Individual Identification Number (IIN), a valid foreign passport, proof of legal stay—which may include a refugee ID or an asylum-seeker certificate—confirmation of temporary registration, and, in some cases, a Kazakh mobile phone number.

An IIN can be obtained through the State Corporation Government for Citizens (Public Service Center). A refugee ID, an asylum-seeker certificate, or a valid foreign passport may be used for the purpose of generating an IIN.

However, because asylum-seeker certificates are not recognised as identity documents for general identification purposes, even if accepted for IIN issuance, asylum-seekers are generally able to meet bank account opening requirements only if they possess a valid passport.

As a result, many asylum-seekers face practical barriers in accessing banking services, despite the absence of an explicit legal prohibition.



## **SIM Card Registration**

Since 2019, Article 362 of the Law of the Republic of Kazakhstan *On Communications* requires mobile devices to be registered when using a local SIM card. Upon purchasing a SIM card, users receive an SMS prompting them to register both the SIM card and the mobile device on the Kazakhstani network. The phone number and the device must be registered under the same individual's name.

In principle, refugee certificates may be used for identity verification. In practice, however, mobile network operators typically require the presentation of a valid passport and often do not accept refugee certificates on their own. Asylum-seeker certificates are not accepted for SIM card registration.



## **Mobile Money and Digital Payments**

The regulatory framework established by the National Bank of Kazakhstan under the Law *On Payments and Payment Systems* ensures that all mobile payment services are integrated within the banking system. Consequently, mobile financial services in the country function as extensions of traditional banking services.

The Law also regulates digital wallets, defining transaction limits and maximum balances permitted for different categories of wallets. The categorisation is based on the level of user identification, including anonymous or non-personalised electronic wallets, personalised wallets or wallets with simplified identification, and fully identified personal wallets.

Popular electronic (digital) payment services in Kazakhstan include Kaspi, Qiwi, Woopay, Wallet One, and AllPay. The list of electronic money systems operating in Kazakhstan is available on the official website of the National Bank of the Republic of Kazakhstan.

Eligibility criteria and requirements to open digital wallets are aligned with standard banking onboarding procedures, including compliance with Anti-Money Laundering and Counter-Terrorism Financing (AML/CFT) regulations.

## **Challenges and Practical Realities**

Despite being legally entitled to access banking and mobile services, refugees and asylum-seekers face significant practical barriers due to limited awareness of relevant laws and documentation requirements among financial institutions and mobile operators. This is further compounded by inconsistent implementation of banks' risk policies and additional documentation requirements.

In addition, given the current stage of digitalisation in the country, access to payment cards is crucial for refugees and asylum-seekers. Government benefits, including targeted social assistance payments which refugees are entitled to receive under Article 120 of the *Social Code of the Republic of Kazakhstan*, are transferred directly into recipients' bank accounts. However, Kazakhstani banks have tightened rules for issuing debit cards to non-residents following the introduction of new regulations by the Kazakhstan Agency for Regulation and Development of the Financial Market in November 2024. Measures include limiting card validity to 12 months, requiring in-person application, introducing stricter compliance checks, and restricting card issuance. While these regulations were introduced in response to the increase in Russian customers in recent years, they also affect refugees and asylum-seekers in the country.

These regulatory changes have led some banks to temporarily restrict the opening or extension of bank accounts for certain foreign nationals, including applicants from Afghanistan and Iran. In response, UNHCR has engaged with several commercial banks to advocate for continued financial access for refugees and asylum-seekers, given their protection status and the essential role of financial inclusion in integration.



## **Other Government and Regulatory Efforts to Enhance Financial Inclusion**

One of the five key principles established under the Presidential Decree of the Republic of Kazakhstan No. 1021, dated 26 September 2022, approving the Concept for the Development of the Financial Sector of the Republic of Kazakhstan until 2030, is “ensuring inclusion”, which aims to provide equal access to financial products and services for all consumers. Although the Concept does not explicitly mention refugees or asylum-seekers, its focus on accessibility, financial inclusion, and financial literacy is intended to support low-income and socially vulnerable groups, which may indirectly benefit refugee populations.

# MALAYSIA



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

**144, 448 / 57,205** (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:

**944** (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **TO BE DEVELOPED**

For asylum-seekers: **TO BE DEVELOPED**

Malaysia is not a State party to the 1951 Refugee Convention or its 1967 Protocol, and refugee status is not legally recognised under domestic law. Access to formal financial services therefore presents significant challenges for both refugees and asylum-seekers, largely due to gaps in documentation and legal recognition.

Although Bank Negara Malaysia (BNM) does not explicitly prohibit access to financial services for displaced populations, KYC regulations and customer due diligence (CDD) procedures require the presentation of valid identity documents and additional supporting documentation. While BNM recognises UNHCR identity documents as valid proof of identity in lieu of a passport, financial institutions often do not accept them for KYC purposes. In addition, required supporting documents, such as proof of residence or employment, are frequently difficult for displaced individuals to obtain. Even when documentation requirements are met, access is often limited to basic savings accounts, while services such as credit, financing, and investment remain generally unavailable.

Refugees and asylum-seekers are not permitted to register SIM cards using UNHCR-issued identity documents, creating barriers to digital connectivity and the use of mobile numbers as identifiers for financial accounts. Despite positive initiatives, such as UNHCR's collaboration with the Touch 'n Go eWallet, which allows UNHCR document holders to access basic digital wallet services, regulatory and institutional barriers continue to restrict broader financial inclusion.



## Financial and Digital Access for Refugees and Asylum-seekers in Malaysia

Category	Refugees	Asylum-seekers
<b>Opening Bank accounts</b>	<ul style="list-style-type: none"> <li>● Refugees face stringent documentation requirements. UNHCR-issued refugee IDs are not consistently accepted by banks, and additional requirements—such as proof of residence and employment—are often difficult for refugees to meet.</li> </ul>	<ul style="list-style-type: none"> <li>● Asylum-seekers face similar documentation barriers. UNHCR-issued asylum-seeker certificates are generally not accepted by banks, and proof of residence and employment is typically not attainable.</li> </ul>
<b>Registering SIM cards</b>	<ul style="list-style-type: none"> <li>● Stringent documentation requirements apply, including the presentation of a valid identity document and, in some cases, work or student permits. UNHCR-issued identity documents are not recognised by service providers.</li> </ul>	<ul style="list-style-type: none"> <li>● Similar documentation barriers apply. UNHCR-issued identity documents are not recognised as valid identification for SIM card registration.</li> </ul>
<b>Opening Mobile Money Accounts</b>	<ul style="list-style-type: none"> <li>● Refugees face documentation barriers similar to those encountered when opening bank accounts. In addition, the inability to register SIM cards using UNHCR-issued identity documents makes access to mobile money accounts extremely limited in practice.</li> </ul>	<ul style="list-style-type: none"> <li>● Asylum-seekers face the same documentation and SIM registration barriers, making access to mobile money accounts extremely limited.</li> </ul>
<b>Opening Digital Wallets /Electronic Payment Accounts</b>	<ul style="list-style-type: none"> <li>● Documentation requirements similar to those for bank account opening restrict access to digital wallets. Some non-bank providers (e.g. Touch 'n Go) may accept UNHCR-issued identity documents, but access remains limited.</li> </ul>	<ul style="list-style-type: none"> <li>● Asylum-seekers face similar documentation barriers when attempting to open digital wallets. Some non-bank providers may accept UNHCR-issued identity documents, though access remains restricted.</li> </ul>



## Opening Bank Accounts

Malaysia's legal framework does not explicitly prohibit refugees and asylum-seekers from opening bank accounts. In practice, however, access is constrained by the documentation requirements applied by banks in accordance with KYC and CDD procedures, as well as institutions' internal risk-based approaches to AML/CFT compliance. Much of the documentation typically required is not available to displaced populations.

[Guidance issued by Bank Negara Malaysia \(BNM\)](#) on customer verification for CDD purposes recommends that reporting institutions consider accepting UNHCR-issued identity documents as proof of identity for individuals who are unable to produce passports. Some banks, such as CIMB Bank, apply this guidance when opening basic savings accounts. Even in such cases, banks often require additional documentation, including proof of residence and proof of employment, which refugees typically cannot provide due to limited access to formal employment and unstable living conditions. Asylum-seekers face even greater barriers, as asylum-seeker certificates are generally not accepted for account opening.

Where documentation requirements can be met, refugees and asylum-seekers usually qualify only for basic savings accounts, which offer limited functionalities, such as low balance thresholds. Access to current accounts—allowing overdrafts and higher transaction volumes—as well as credit facilities, investment products, and other banking services remains largely inaccessible due to stricter eligibility criteria and more demanding documentation requirements.



## SIM Card Registration

Since 2006, SIM card registration has been legally required for all individuals aged 12 and above in Malaysia. Telecommunications providers generally require the presentation of a valid national identity card (*MyKad*) or a passport, along with proof of residence. UNHCR-issued identification documents are not recognised as valid identification for the purpose of SIM card registration. As a result, many refugees and asylum-seekers are unable to register SIM cards in their own names and may resort to informal arrangements, such as obtaining SIM cards through brokers or acquaintances.



## **Mobile Money and Digital Payments**

Digital payment services and digital wallets are widely used in Malaysia; however, refugees and asylum-seekers face significant barriers to access due to stringent documentation requirements. Most providers require valid identity documents such as a passport, supporting documentation (e.g., proof of residence), and verification of phone number ownership, which displaced individuals often cannot provide.

Some refugees may access basic digital wallet services with limited functionality through platforms such as Touch 'n Go eWallet, which has collaborated with UNHCR to promote financial inclusion. However, most providers do not accept UNHCR-issued identity documents, and access to advanced features often requires additional verification measures, such as multi-factor authentication, which many displaced individuals are unable to complete. As a result, refugees—and particularly asylum-seekers—face significant barriers to accessing full digital financial services.



## **Challenges and Practical Realities**

Refugees and asylum-seekers face persistent and overlapping barriers to accessing financial and digital services in Malaysia. Legal ambiguity, inconsistent recognition of UNHCR-issued refugee identity documents, and additional verification requirements—such as proof of income or multi-factor authentication—compound these challenges and continue to limit effective participation in Malaysia's formal financial ecosystem.



## **Other Government and Regulatory Efforts to Enhance Financial Inclusion**

Malaysia's government and regulatory authorities, notably Bank Negara Malaysia (BNM), have not introduced specific legislation or policies addressing financial inclusion for refugees and asylum-seekers. BNM maintains strict KYC requirements that rely on officially recognised identity documents, which are generally not accessible to displaced populations.

At the same time, BNM has acknowledged the practical barriers faced by refugees and asylum-seekers and has encouraged financial institutions to consider accepting UNHCR-issued identity documents as evidence of identity for customer due diligence purposes. In parallel, UNHCR has engaged with several financial institutions to promote greater acceptance of UNHCR-issued documentation and to expand access to digital financial services.

Despite these efforts, significant barriers persist. Documentation constraints, limited availability of suitable banking products, and low levels of financial literacy continue to restrict refugees' and asylum-seekers' access to Malaysia's formal financial system.

# PAKISTAN



NUMBER OF REFUGEES/ASYLUM-SEEKERS:  
**1,547,260 / 220,540** (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:  
**9,110**, of which 8,807 refugees and asylum-seekers (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **TO BE DEVELOPED**

For asylum-seekers: **TO BE DEVELOPED**

Pakistan has hosted Afghan refugees for over four decades; however, it is not a signatory to the 1951 Refugee Convention or its 1967 Protocol and does not have a formal national asylum law. Since 2023, the Government has implemented the Illegal Foreigners' Repatriation Plan (IFRP), initially targeting undocumented Afghans and subsequently expanding its scope to include Afghan Citizen Card (ACC) holders in April 2025 and Proof of Registration (PoR) card holders in September 2025.

Access to financial and digital services for refugees and asylum-seekers—most of whom are of Afghan origin—has been limited. Afghan refugees holding PoR cards issued by the National Database and Registration Authority (NADRA) previously benefited from access to formal financial services, including mobile-based financial services. In particular, PoR card holders were able to open bank accounts under a State Bank of Pakistan circular (BPRD Circular Letter No. 02, 2019), which recognised the PoR card as valid identification and proof of legal stay for KYC purposes.

In practice, however, displaced populations have long faced significant barriers to financial inclusion in Pakistan. A 2024 survey found that, by the end of that year, only 5 per cent of male and 2 per cent of female PoR card holders had access to formal financial services. According to the State Bank of Pakistan, as of October 2025, Afghan refugees holding PoR cards maintained 21,798 bank accounts, with total deposits of approximately PKR 1,277 million. In parallel, UNHCR disbursed PKR 4,805 million to 248,512 households in 2023 through digital payment mechanisms.

Access to financial services has become more constrained since September 2025 with the implementation of Phase III of the IFRP. Although the IFRP did not explicitly restrict refugees' access to financial services, the non-extension of PoR cards—documents required by financial institutions for KYC compliance—has resulted in many refugees having their bank accounts blocked, with withdrawal of existing balances often the only option available. As valid identification and proof of legal stay are generally required for all customers, refugees without renewed documentation have consequently been excluded from formal financial services.

For undocumented refugees and asylum-seekers, the situation is even more restrictive. The absence of officially recognised identification and proof of legal stay—including valid passports and visas, due to the non-recognition of their status by the Government—prevents them from meeting KYC requirements. As a result, undocumented refugees and asylum-seekers face substantial barriers to opening bank accounts, registering SIM cards, or accessing mobile-based and other digital financial services.





## Financial and Digital Access for Refugees and Asylum-seekers

Category	Refugees	Asylum-seekers
<b>Opening Bank accounts</b>	<ul style="list-style-type: none"> <li>● Access is restricted following implementation of the IFRP. Most refugees are unable to provide the required documentation. Bank accounts previously opened under earlier arrangements typically become inactive upon expiry of the PoR card, with withdrawal of remaining balances often the only option available.</li> </ul>	<ul style="list-style-type: none"> <li>● Asylum-seekers are not eligible for a Computerised National Identity Card (CNIC), Proof of Registration (PoR), or Alien Registration Card (ARC), which are generally required to open a bank account.</li> </ul>
<b>Registering SIM cards</b>	<ul style="list-style-type: none"> <li>● SIM cards linked to PoR documentation have been blocked by authorities as part of IFRP implementation, although limited reactivation mechanisms reportedly exist.</li> </ul>	<ul style="list-style-type: none"> <li>● Asylum-seekers are unable to register SIM cards, as they cannot meet the required identification and KYC documentation requirements.</li> </ul>
<b>Opening Mobile Money Accounts</b>	<ul style="list-style-type: none"> <li>● Access to mobile money accounts is largely restricted to Pakistani nationals holding a valid CNIC.</li> </ul>	<ul style="list-style-type: none"> <li>● Access to mobile financial services is largely restricted to Pakistani nationals holding a valid CNIC.</li> </ul>
<b>Opening Digital Wallets /Electronic Payment Accounts</b>	<ul style="list-style-type: none"> <li>● Similar to mobile financial services, access to digital wallets is largely limited to Pakistani nationals holding a valid CNIC.</li> </ul>	<ul style="list-style-type: none"> <li>● Similar to mobile financial services, access to digital wallets is largely limited to Pakistani nationals holding a valid CNIC.</li> </ul>



## **Opening Bank Accounts**

While refugees holding Proof of Registration (PoR) cards were previously able to open bank accounts in Pakistan, access to banking and other formal financial services has become significantly more restricted since September 2025. Following the enforcement of Phase III of the Illegal Foreigners' Repatriation Plan (IFRP), many existing refugee bank accounts were frozen, as accounts and associated debit cards expired together with the PoR cards. In most cases, account holders were only permitted to withdraw remaining balances. Further restrictions affecting Afghan refugees are anticipated as implementation of the IFRP continues.

Banks apply varying identification requirements for account opening. Pakistani nationals may present a Computerised National Identity Card (CNIC), Smart National Identity Card (SNIC), National Identity Card for Overseas Pakistanis (NICOP), or, in some cases, a Smart NICOP (SNICOP) or pension book. Non-nationals are generally required to provide a valid passport along with a visa or other government-approved stay document. Some banks—such as HBL Pakistan and Meezan Bank—reportedly accept Alien Registration Cards (ARCs) from foreign nationals who also hold valid passports and visas; however, the application of this practice has not been systematically tracked.

Refugees who lack valid identification and proof of legal stay, as well as all asylum-seekers, are unable to meet KYC requirements for opening a bank account, as they are not eligible to obtain the documents required for compliance. Both refugees and asylum-seekers also face additional challenges in meeting supplementary documentation requirements—such as proof of residence or proof of employment—which are particularly difficult to fulfil for individuals living in temporary accommodation or relying on informal sources of income.



## **SIM Card Registration**

As with bank accounts, access to SIM card registration varies significantly between Afghan refugees, other refugees, and asylum-seekers. Afghan refugees holding a Proof of Registration (PoR) card were previously permitted to register SIM cards through NADRA's biometric verification system, enabling access to mobile services on terms broadly comparable to those available to Pakistani citizens holding CNICs. However, enforcement of the IFRP has resulted in the blocking of SIM cards linked to PoR documentation. Opportunities to (re)activate blocked SIM cards through local mobile network operator outlets appear to be limited in practice.

By contrast, asylum-seekers face systematic exclusion from SIM card registration. They are not eligible for CNICs or PoR cards and frequently lack valid passports or visas, preventing them from meeting registration requirements from the outset. While eSIM technology could, in theory, circumvent certain identity verification barriers, its limited device compatibility effectively excludes most displaced individuals, who predominantly rely on older or basic mobile handsets.



## Mobile Money and Digital Payments

In Pakistan, mobile money wallets offered by telecommunications companies—such as JazzCash and EasyPaisa—as well as digital wallets remain largely inaccessible to refugees and asylum-seekers. Access to these services typically requires a Computerised National Identity Card (CNIC), which is issued exclusively to Pakistani citizens, as service providers' systems are generally configured to verify only this form of identification. Although Afghan refugees holding Proof of Registration (PoR) cards were previously biometrically registered with NADRA and permitted to open traditional bank accounts, telecommunications companies and digital financial service providers were, in most cases, not technically equipped to accept PoR cards. Enabling such acceptance would require substantial system upgrades and associated investment. As a result of sustained advocacy by UNHCR, some progress has reportedly been achieved in this area, although access remains limited.

The situation is even more restrictive for asylum-seekers, who are not issued CNICs or PoR cards. Consequently, both asylum-seekers and undocumented refugees are effectively excluded from mobile-based financial services, significantly limiting their ability to participate in the digital economy.



## Challenges and Practical Realities

Refugees and asylum-seekers in Pakistan face significant regulatory and practical barriers to accessing financial and digital services. As noted above, the implementation of the IFRP has further reinforced existing restrictions. Most displaced individuals lack formal identification and the supporting documents—such as proof of residence or proof of employment—required to meet regulatory compliance standards. These documentation gaps make it difficult for them to access even basic financial or digital services.

# THAILAND



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

**84,489 / 2,738** (June 2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **MIXED**

For asylum-seekers: **TO BE DEVELOPED**

Thailand is not a signatory to the 1951 Refugee Convention or its 1967 Protocol, and does not formally recognise refugee status under domestic law. As a result, refugees and asylum-seekers—most of whom originate from Myanmar—are not granted legal immigration status.

Although some (mainly urban) refugees possess UNHCR-issued documents, these are not accepted under Thai law for official purposes such as opening bank accounts or registering SIM cards. In practice, only individuals with a valid passport, government-issued ID, or temporary travel documents—which is rare—can meet KYC requirements. This barrier continues to affect both urban refugees and asylum-seekers.

However, progress has been made for refugees residing in the nine “Temporary Shelters”. In August 2025, the Cabinet approved a resolution granting these refugees the right to work in 43 provinces across Thailand. The resolution came into effect on 1 October 2025, and since then, advocacy from employers has prompted the Ministry of Interior (MOI) to increasingly acknowledge the importance of enabling refugee workers to access banking services. As a result, the MOI has agreed to issue government ID cards and a 13-digit identification code for camp-based refugees—credentials that will be accepted for KYC purposes. Once implemented, this measure will permit refugees in the shelters to access formal financial services.

Thailand also hosts a significant stateless population – over 612 thousand individuals - for whom the Thai government issues a stateless identification document. This ID enables access to services, including opening bank accounts and registering SIM cards.

Previously, UNHCR delivered financial assistance to urban refugees in Thailand through pre-paid cash cards - provided by Kasikorn Bank - and over the counter. This assistance helped refugees access cash through ATMs to cover essential needs such as food, shelter, and education.



## Financial and Digital Access for Refugees and Asylum-seekers in Thailand

Category	Refugees	Asylum-seekers
<b>Opening Bank Accounts</b>	<ul style="list-style-type: none"> <li>Urban refugees often lack official identity documents. UNHCR-issued documentation is not legally recognised for KYC purposes. Opening a bank account is only possible with a valid passport.</li> </ul> <p>In 2026, the government agreed to issue an official ID and a 13-digit code for camp-based refugees. Once IDs are rolled out, these refugees will become eligible to open bank accounts.</p>	<ul style="list-style-type: none"> <li>Asylum-seekers often lack official identity documents, excluding them from opening bank accounts.</li> </ul>
<b>Registering SIM Cards</b>	<ul style="list-style-type: none"> <li>Urban refugees often lack official identity documentation required for KYC verification.</li> </ul> <p>For camp-based refugees, the new government-issued IDs and 13-digit codes will allow them to comply with KYC requirements.</p>	<ul style="list-style-type: none"> <li>Asylum-seekers often lack required documentation for KYC verification when registering a SIM card.</li> </ul>
<b>Opening Mobile Money Accounts</b>	<ul style="list-style-type: none"> <li>Similar documentations issues as for opening a bank account.</li> </ul>	<ul style="list-style-type: none"> <li>Similar documentation issues as for opening a bank account.</li> </ul>
<b>Opening Digital Wallets/Electronic Payments</b>	<ul style="list-style-type: none"> <li>Similar documentation issues as for opening a bank account.</li> </ul>	<ul style="list-style-type: none"> <li>Similar documentation issues as for opening a bank account.</li> </ul>



## **Opening Bank Accounts**

Thailand’s legal framework does not explicitly prohibit refugees or asylum-seekers from opening bank accounts. Relevant regulations—such as Bank of Thailand (BOT) Notification No. SorNor-Sor. 19/2562 applicable to commercial banks and BOT Notification No. SorGorSor. 31/2562 applicable to specialized financial institutions—do not impose restrictions based on nationality or immigration status.

However, these regulations, issued under the *Financial Institutions Business Act (2008)*, establish KYC requirements that pose significant challenges for displaced populations. In accordance with the *Anti-Money Laundering Act (1999)* and related ministerial regulations, individuals are required to present formally recognised identity documents, such as a passport, Thai national ID card, or other government-issued identification.

Urban refugees and asylum-seekers typically possess only UNHCR-issued documentation, which is not accepted for KYC purposes. In addition, digital verification systems—such as the National Digital ID platform—currently recognise only Thai national 13-digit identification numbers and do not accommodate passports or UNHCR-issued documents.

Camp-based refugees are also issued a 13-digit code; however, to date, these codes have begun with “000” and follow a structure that differs from those issued to Thai nationals or migrant workers, limiting their usability for KYC purposes. As noted above, the government has announced plans to issue official identity cards and 13-digit codes that will be recognised for KYC purposes to refugees residing in the nine “Temporary Shelters,” with rollout expected to begin in the first quarter of 2026.

As a result, while both urban refugees and asylum-seekers generally remain unable to meet identification requirements and are excluded from banking services, camp-based refugees are expected to become eligible to open bank accounts once the new identification documents are issued.



## **SIM Card Registration**

SIM card registration in Thailand is governed by the National Broadcasting and Telecommunications Commission (NBTC) Notification (2019). While the regulation does not explicitly prohibit refugees or asylum-seekers from registering prepaid or postpaid SIM cards, the applicable documentation requirements create significant barriers in practice.

Non-Thai nationals are required to present a valid passport to register a SIM card. NBTC guidelines also allow for the use of alternative documents—such as non-Thai identification cards issued by the Department of Provincial Administration (DOPA), work permits, or unregistered person cards—but these documents are generally not available to refugees and asylum-seekers.

Verification procedures further require biometric checks, including fingerprinting and facial recognition, as well as the submission of personal details and address information. Due to the lack of formally recognised identity documents, urban refugees and asylum-seekers are, in practice, largely unable to register SIM cards in their own names. Similar to access to banking services, camp-based refugees are expected to become eligible to register SIM cards once they receive the government-issued identity cards and 13-digit identification codes.



## **Mobile Money and Digital Payments**

Thailand has a well-developed digital finance ecosystem, including mobile banking apps (e.g., SCB Easy, K PLUS) and e-wallets (e.g., TrueMoney, Rabbit LINE Pay, PromptPay). Mobile banking services are governed by BOT Notification No. SorNorSor. 15/2563 for commercial banks and BOT Notification No. SorNorSor. 12/2564 for specialized financial institutions, while digital wallets fall under the *Payment Systems Act* of 2017 and BOT Notification No. SorNorChor. 1/2563 on KYC for e-money services.

As with bank accounts and SIM registration, KYC requirements remain the main barrier, particularly for urban refugees and asylum-seekers. Opening a mobile money account or digital wallet typically requires two forms of identification, such as a Thai national ID card, bank account number, or verified mobile number. Advanced services—like international transfers—require identification from “reliable sources,” with Thai national ID cards as the primary example.

Urban refugees and asylum-seekers, who generally lack such documentation, are therefore excluded from these services in practice. For camp-based refugees, this barrier is expected to be addressed through the planned introduction of government-issued ID cards and 13-digit identification codes.



## **Challenges and Practical Realities**

Although Thailand’s legal framework does not explicitly exclude refugees and asylum-seekers from accessing financial services, they continue to face significant regulatory and practical barriers. Requirements relating to valid immigration status and formally recognised identification—such as passports, Thai national ID cards, or other government-issued documents—effectively prevent many refugees and asylum-seekers from accessing the formal financial system.

These barriers are particularly acute for urban refugees and asylum-seekers and are further compounded by the application of stricter KYC practices by financial institutions than those required under existing regulations. In addition, digital verification platforms and biometric authentication systems are not designed to accommodate refugee-specific documentation, and there is currently no official guidance on how such cases should be handled.

While recent government initiatives targeting refugees residing in temporary shelters have the potential to significantly reduce legal barriers to accessing financial and mobile services, the issuance of the new identity documents has not yet commenced. Moreover, acceptance of these documents by financial institutions and mobile network operators may not be immediate or consistent. Awareness raising among service providers, together with clear and targeted guidance from supervisory authorities, will therefore be essential to ensure effective and uniform implementation.



### **Other Government and Regulatory Efforts to Enhance Financial Inclusion**

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Thailand does not have policies specifically targeting the financial inclusion of refugees. However, in August 2025, the Cabinet adopted a resolution granting refugees residing in the nine “Temporary Shelters” the right to work in 43 provinces across the country. Building on this measure, the Ministry of Interior agreed in 2026 to the issuance of government-recognised identity cards that will be accepted for KYC purposes, thereby facilitating access to financial services.

In parallel, broader initiatives aimed at expanding access to financial services include the *Thirteenth National Economic and Social Development Plan (2023–2027)*, which promotes inclusive growth, digital transformation, and financial literacy, as well as the Bank of Thailand’s 2022 *Consultation Paper on the Financial Landscape*, which outlines reforms to modernise the financial ecosystem through digital finance, open banking, and regulatory innovation.







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