



EUROPE

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

A GLOBAL COMPARATIVE ANALYSIS

June 2026

Acknowledgements

This report was authored by Micol Pistelli and Joana Silva Afonso of the UNHCR Financial Inclusion Unit.

This research is based on a structured country-level survey jointly developed with Paola Cadoni and Hanna Mattinen of the UNHCR Cash Team, who contributed to the design of the survey and supported engagement with regional colleagues.

The analysis and interpretation of findings draw on survey responses completed by DLA Piper International lawyers, who provided country-level legal and regulatory inputs across the jurisdictions covered. UNHCR gratefully acknowledges the contributions of DLA Piper International, in particular Özgür Kahale, Anna Kalinichenko, Margaux Bia, and Maxine Rechter, as well as the support of its corporate clients—including Amazon, BNP Paribas, Santander, Airbus, and Fundación Telefónica—who contributed to the completion of the country questionnaires, the preparation of country factsheets and supported the interpretation of complex legal and regulatory frameworks.

Many thanks to the UNHCR team — in particular Dominique Hyde, Elizabeth Eyster, Lance Bartholomeusz, Kahin Ismail, Philomena Cleobury, Sandrine Flavier, Paola Cadoni, and Maximilian Zuber — for their continued collaboration and support throughout the project since its inception.

The report benefited significantly from the invaluable input of UNHCR country-level focal points, whose review and validation of the legal assessments, contextual insights on regulatory implementation, and identification of practical access barriers greatly enriched the analysis.

Valuable technical input and review were also provided by colleagues across regional bureaux and headquarters, including Maguelone Arzac, Maria Gracia Becerra Guillen, Damla Büyüktaskin, Alma Dozic, Alfred El Kareh, Jonathan Kampuzu, Susanne Klink, Anna Maria Leichtfried, Renata Pires, Giuseppe Simeon, Annika Sjoberg, Jessica Some, and Amayel Sow.

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Introduction

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
Bank Accounts	Accounts provided by licensed financial institutions, including basic, savings, and current accounts.
SIM Card Registration	Ability to obtain and register a SIM card with a mobile network operator.
Mobile Money Accounts	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.
Digital Wallets / Electronic Payment Accounts	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

Based on UNHCR 2025 figures, Europe hosts over **20 million forcibly displaced and stateless persons**, including an estimated 5 million Internally Displaced Persons (IDPs) within Ukraine. Alongside this internal displacement, the region hosts a large refugee population—estimated at around 15 million persons—as well as a smaller population of asylum-seekers, numbering approximately 2 million.

Europe has made notable progress in advancing financial inclusion for refugees and asylum-seekers, who together represent the majority of the displaced population in the region. This progress has been most pronounced within the European Union (EU), where EU-level legal frameworks have established clearer and more comprehensive entitlements; seven EU countries are covered in this brief. By contrast, countries outside the EU display significantly greater variation in both legal clarity and effective access, with wider scope for provider discretion and more pronounced documentation-related barriers.

A defining feature of the regional landscape is the strong anchoring of financial inclusion frameworks in European Union law. For the purposes of this report, the term “refugees” is used in a broad sense to refer to recognised refugees, beneficiaries of subsidiary protection, and beneficiaries of temporary protection, where applicable.

The EU Payment Accounts Directive (2014/92/EU) guarantees the right of all legally resident persons to open a basic payment account with access to essential services, including deposits, withdrawals, and transfers. Article 16 of the Directive further obliges Member States to ensure that access to such accounts is not denied on the basis of nationality or residence status alone. In principle, refugees and asylum-seekers who can present the documentation required under national law should therefore have equal access to basic banking services, including the receipt of financial assistance and participation in the formal financial system.

EU-level guidance has also supported more flexible approaches to Anti-Money Laundering and Counter-Terrorism Financing (AML/CFT) requirements, particularly following the large-scale displacement from Ukraine. In line with recommendations from the European Banking Authority, several EU countries have enabled refugees whose identity documents do not fully meet standard AML requirements to open basic payment accounts using host-country-issued documentation, such as registration certificates or proof of application for protection. These accounts are typically subject to enhanced monitoring until full identity verification is completed. Outside the EU, by contrast, comparable safeguards are less systematically embedded, and banks retain broader discretion under national legal frameworks, leading to more uneven outcomes in practice.

Overall, Europe is characterised by a broadly enabling legal and regulatory environment for finan-

cial inclusion, particularly for recognised refugees and beneficiaries of international, subsidiary, or temporary protection. However, access in practice remains uneven—especially for asylum-seekers. Documentation and identity verification requirements, together with provider-level discretion, continue to create significant gaps between formal legal entitlements and effective access, with the most restrictive outcomes concentrated in non-EU countries.

Documentation remains the principal structural constraint across the region. Access to financial and digital services is closely tied not only to possession of identity documents and residence permits, but increasingly to the issuance and recognition of personal identification or tax numbers embedded in national administrative and verification systems. Refugees and beneficiaries of temporary or subsidiary protection are generally better positioned, as they are more likely to receive residence permits and numeric identifiers integrated into national registries. Asylum-seekers, by contrast, frequently rely on temporary certificates or application receipts which often lack mandatory identification elements—such as personal identification numbers or sufficient validity—limiting their acceptance for Know Your Customer (KYC) purposes.

SIM card registration constitutes a critical gateway to connectivity and digital financial inclusion in Europe, given the central role of mobile numbers in authentication, notifications, and account onboarding. While national legislation generally permits refugees and asylum-seekers to register SIM cards, implementation varies widely across countries and operators.



Moreover, several countries are introducing stricter electronic or biometric verification requirements for SIM registration. In these contexts, access constraints increasingly stem not only from inconsistent implementation, but from formal legal and technical frameworks that require interoperable electronic or biometric identity credentials—posing particular challenges for refugees and asylum-seekers whose documents are not digitally verifiable within national systems.

Unlike regions such as Sub-Saharan Africa, Europe does not feature telecom-led mobile money systems. Mobile financial services are predominantly bank or fintech-led and closely integrated with the formal banking sector. Digital wallets and mobile payment applications are widely used but typically depend on the existence of an underlying bank or e-money account. As a result, access to mobile financial services largely mirrors access to bank accounts, amplifying the effects of banking-related documentation and identity verification barriers.

A further cross-cutting regional trend is the growing reliance on digital onboarding, automated eKYC processes, and electronic or biometric identity infrastructures. While these systems support efficiency and regulatory compliance, they also create systemic exclusion risks for displaced populations whose identity documents are not embedded in national databases or lack electronic or biometric features. Across multiple countries, refugees and asylum-seekers are excluded—by design rather than discretion—from remote or online account opening and must complete all procedures in person, incurring additional time, cost, and mobility barriers.

Temporary protection regimes constitute a notable exception within this landscape. In several countries, and particularly in response to displacement from Ukraine, temporary protection frameworks have enabled simplified access to identity documentation, personal identification numbers, and—by extension—financial and mobile services. In practice, these regimes operate as parallel inclusion pathways, producing markedly different access outcomes compared to those faced by refugees and asylum-seekers of other nationalities, whose documents are less readily integrated into national administrative and verification systems.

As Europe's financial and mobile ecosystems continue to digitalise, ensuring that forcibly displaced populations are not structurally excluded will require sustained regulatory guidance, adaptation of identity and verification systems, and continued engagement with financial and mobile service providers—especially in contexts where access is increasingly mediated by electronic and biometric infrastructure.



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

Country	Status	Number* (June 2025)	Bank Accounts	SIM Card Registration	Mobile Money Accounts	Digital Wallets/ Electronic Pay- ments
Bulgaria	Refugees	102,596	●	●	●	●
	Estonia	2,850	●	●	●	●
Estonia	Refugees	41,409	●	●	●	●
	Germany	221	●	●	●	●
France	Refugees	751,218	●	●	●	●
	Asylum-seekers	77,412	●	●	●	●
Germany	Refugees	2,703,856	●	●	●	●
	Asylum-seekers	320,133	●	●	●	●
Italy	Refugees	314,167	●	●	●	●
	Asylum-seekers	220,800	●	●	●	●
North Macedonia	Refugees	20,881	●	●	●	●
	Asylum-seekers	25	●	●	●	●
Portugal	Refugees	66,541	●	●	●	●
	Asylum-seekers	2,933	●	●	●	●

Country	Status	Number* (June 2025)	Bank Accounts	SIM Card Registration	Mobile Money Accounts	Digital Wallets/ Electronic Payments
Republic of Moldova	Refugees	133,256	●	●	●	●
	Asylum-seekers	730	●	●	●	●
Serbia	Refugees	39,403	●	●	●	●
	Asylum-seekers	200	●	●	●	●
Slovakia	Refugees	146,004	●	●	●	●
	Asylum-seekers	83	●	●	●	●
Türkiye	Refugees	2,680,658	●	●	●	●
	Asylum-seekers	132,383	●	●	●	●

* 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

BULGARIA



NUMBER OF REFUGEES/ASYLUM-SEEKERS:
102,596 / 2,850 (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:
275 (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **ENABLING**

For asylum-seekers: **ENABLING**

Bulgaria is a State party to the 1951 Refugee Convention and its 1967 Protocol, and its national legislation is aligned with these international treaties as well as with European Union asylum law. The *Asylum and Refugees Act* of 2002, as amended, governs asylum, subsidiary protection, and temporary protection in situations of mass displacement.

Bulgaria has established a financial regulatory framework that provides refugees and asylum-seekers with equitable access to financial and digital services. Key elements of this framework include Article 119(2) of the *Law on Payment Services and Payment Systems* and EU Directive 2014/92/EU, which entitle refugees and asylum-seekers to open and operate a basic payment account (PABF) without discrimination. In practice, access is conditional on possession of officially recognised personal identification documents, as required under the *Law on Measures Against Money Laundering*. Asylum-seeker registration cards and temporary protection holder cards are not accepted for this purpose. Beyond identification requirements, there are no legal restrictions on refugees' and asylum-seekers' access to digital financial services, including mobile-based accounts and digital wallets.

Despite the legal framework, refugees and asylum-seekers may encounter practical barriers when accessing banking services. These include the non-recognition of their documentation and the application of overly cautious internal risk policies by financial institutions, particularly in relation to individuals originating from countries classified as “highrisk”, including conflict-affected territories. In addition, the legal entitlement is generally limited to a basic payment account, which cannot be used for business purposes.

Ukrainian nationals benefit from simplified procedures under the EU Temporary Protection Directive, which aims to facilitate access to banking services. Nevertheless, a valid national passport remains a requirement. By contrast, refugees and asylum-seekers from other countries are often subject to more stringent documentation requests and, in some cases, do not receive the written justification required by law when applications are rejected.



Financial and Digital Access for Refugees and Asylum-seekers in Bulgaria

Category	Refugees	Asylum-seekers
Opening Bank Accounts	● No legal barriers.	● Legally entitled to a basic account, but access is constrained by documentation requirements and inconsistent bank practices.
Registering SIM Cards	● No legal barriers.	● No legal barriers.
Opening Mobile Money Accounts	● No legal barriers.	● No legal barriers.
Opening Digital Wallets/Electronic Payment Accounts	● No legal barriers.	● No legal barriers.



Opening Bank Accounts

Refugees and asylum-seekers in Bulgaria are eligible to open a “payment account with basic features” (PABF), which allows them to deposit and withdraw funds, make credit transfers, and conduct payment transactions. These accounts are subject to regulated and reasonable maintenance fees set by the Bulgarian National Bank and are generally accessible to refugees and asylum-seekers, provided they hold valid identity documents.

To open an account, applicants must provide a valid official identity document issued by the Bulgarian authorities—such as a refugee card, a humanitarian protection card, or another recognised residence or identity document. While Bulgarian law allows refugees and asylum-seekers to open a payment account with basic features (PABF) without having a permanent address—meaning they may open a bank account even without stable housing—banks may request additional documents, including proof of residence (e.g. a rental contract) or proof of employment.

Inconsistent practices are observed both across financial institutions and within them, with some banks showing greater flexibility.



SIM Card Registration

In Bulgaria, SIM card registration is open to all individuals, regardless of nationality or refugee or asylum-seeker status. Refugees and asylum-seekers may register SIM cards using officially recognised identity documents issued to them—such as refugee identity cards, humanitarian protection documents, or foreign travel certificates. While some mobile network operators may offer plans tailored to foreign nationals, often with higher fees or limited validity, refugees are not restricted to such plans.



Mobile Money and Digital Payments

Refugees and asylum-seekers are legally permitted to open mobile-based electronic value accounts, including bank or fintech-led services delivered via mobile applications (e.g. Revolut, Wise), and to use digital wallets (e.g. Google Pay, Apple Wallet) where linked to an underlying payment account. Access to these services is subject to providers’ customer due diligence requirements, which typically include officially recognised personal identification (such as a refugee ID card or foreign travel certificate), proof of residence, and an active SIM card. In practice, refugees tend to face fewer barriers than asylum-seekers, reflecting the broader acceptance of their documentation by financial service providers.

Challenges and Practical Realities

Although Bulgarian law permits refugees and asylum-seekers to open bank accounts, internal procedures and risk management policies at financial institutions may present obstacles. PABF accounts are limited in scope and cannot be used for business purposes. Banks may also decline applications if the applicant already holds a similar account in Bulgaria or if concerns arise under AML/CFT regulations.

Where an application is formally rejected, banks are legally required to provide a written explanation, and applicants may seek redress through relevant authorities or legal channels. While nongovernmental organisations may provide support in this process, legal assistance capacity in Bulgaria remains extremely limited, which may affect the practical enforceability of these safeguards.

Other Government and Regulatory Efforts to Enhance Financial Inclusion

The Bulgarian government and financial regulatory authorities have demonstrated commitment to advancing financial inclusion for refugees and asylum-seekers. A central component of this effort is the provision of payment accounts with basic features, which enable eligible individuals to access essential banking services.

Furthermore, UNHCR has expanded its support to Bulgarian authorities to strengthen the country's asylum system and promote the socioeconomic inclusion of refugees and asylum-seekers. This includes a variety of initiatives designed to expand access to education, employment, and essential public services, as well as information and legal assistance at Compass Protection and Inclusion Centres.

ESTONIA



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

41,409 / 221 (June 2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **ENABLING**

For asylum-seekers: **MIXED**

Estonia is a State party to the 1951 Refugee Convention and its 1967 Protocol. International protection is governed by the *Act on Granting International Protection to Aliens (AGIPA)*, which provides for refugee status as well as subsidiary and temporary protection. Persons granted refugee status or subsidiary protection are issued a temporary residence permit pursuant to Article 37 of AGIPA.

The residence permit card, regulated under the *Identity Documents Act (IDA)*, constitutes a valid identity document under Estonian law. Refugees, as well as holders of subsidiary and temporary protection, may also be issued a refugee travel document, which is likewise recognised for identification purposes. By contrast, the certificate of application for international protection issued to asylum-seekers is not formally recognised as a valid identity document under the IDA.

Estonia's legal framework does not impose restrictions on refugees' and asylum-seekers' access to financial and mobile services. In accordance with EU directives, all residents of Estonia—including refugees and asylum-seekers—are entitled to open a basic payment account providing access to essential banking services. Refugees can generally open a bank account using their residence permit card, which is recognised as a valid form of identification for KYC purposes. By contrast, the certificate of application for international protection issued to asylum-seekers is not recognised for KYC verification, and asylum-seekers must therefore provide an alternative form of valid identification, such as a passport or a driving licence meeting the applicable requirements.

Similarly, refugees face no legal barriers to registering SIM cards, opening mobile-based financial accounts, or using digital wallets, provided they meet applicable documentation requirements. Financial institutions and mobile service providers may request additional documentation—such as proof of address or employment—to establish links to Estonia; however, for access to basic banking and mobile services, a valid identity document is generally sufficient. By contrast, asylum-seekers frequently encounter practical difficulties in meeting documentation requirements for postpaid SIM card contracts, mobile-based financial accounts, or digital wallets, and are therefore typically limited to the purchase and use of prepaid SIM cards.



Financial and Digital Access for Refugees and Asylum-seekers in Estonia

Category	Refugees	Asylum-seekers
Opening Bank Accounts	● No legal barriers.	● Legally permitted, but access is constrained by strict KYC requirements and non-recognition of asylum documents.
Registering SIM Cards	● No legal barriers.	● Legally permitted, but access is constrained by documentation requirements for subscription contracts.
Opening Mobile Money Accounts	● No legal barriers.	● Same documentation issues as for opening a bank account.
Opening Digital Wallets/Electronic Payment Accounts	● No legal barriers.	● Same documentation issues as for opening a bank account.



Opening Bank Accounts

In line with EU directives, Article 710 of the *Law of Obligations Act (LOA)* requires financial institutions to provide basic payment accounts to individuals residing in Estonia, including refugees and asylum-seekers, even in the absence of stable housing. These accounts provide access to essential banking services, including deposits and withdrawals, payment transactions (such as transfers and direct debits), payment card use, and online banking.

While the law prohibits discrimination on the basis of nationality or residence status, it permits banks to refuse to open an account under specific circumstances—namely, where doing so would contravene AML/CFT requirements, where the applicant already holds a comparable payment account in Estonia, or where the applicant lacks legal residence within the EU.

In principle, refugees can open basic payment accounts using their residence permit card or refugee travel document, both of which are formally recognised for KYC purposes under the *Money Laundering and Terrorist Financing Prevention Act (MLTFPA)*. By contrast, asylum-seekers face considerable barriers, as they can meet KYC requirements only by presenting a valid passport or a driving licence containing the holder's name, photograph or facial image, signature or signature image, and date of birth or personal identification code.

Under Article 89 of the Credit Institutions Act (CIA), financial institutions retain discretion in client selection and may request additional documentation in accordance with internal risk policies when opening other types of bank accounts or offering credit and other financial services.

SIM Card Registration

There are no explicit legal restrictions preventing refugees and asylum-seekers from registering SIM cards in Estonia; however, KYC verification requirements may pose practical challenges, particularly for asylum-seekers. Under Article 93 of the *Electronic Communications Act*, valid identification is required to enter into subscription contracts with service providers. Refugees can meet this requirement using their residence permit card or travel document, both of which contain the necessary personal details. By contrast, asylum-seekers must present a formally recognised identity document—such as a valid passport—which they may not possess.

Nonetheless, prepaid SIM cards can be purchased without identification, offering an alternative option for those who may face documentation challenges.

Mobile Money and Digital Payments

Although Estonian law does not explicitly define “mobile money”, such services are regulated as electronic money under the *Payment Institutions and E-Money Institutions Act* (PIEIA). Mobile-based financial accounts and digital wallet providers are classified as financial institutions under Article 6(2) of the *Money Laundering and Terrorist Financing Prevention Act* (MLTFPA) and are therefore subject to standard AML/CFT and customer due diligence obligations.

Accordingly, access to these services requires the provision of valid identification. As noted above, refugees are generally able to meet these requirements using their residence permit card or travel document. By contrast, asylum-seekers often face significant barriers, as they typically lack a valid passport or a qualifying driving licence. In some cases, providers may also require proof of residence, which can be difficult to obtain for displaced individuals without stable housing.

Challenges and Practical Realities

In practice, refugees generally encounter few obstacles in accessing financial services, provided they are able to present a valid residence permit card or refugee travel document. Challenges may arise in cases of delays in the renewal of residence permits, which can leave individuals temporarily without valid identification. Some refugees have also reported difficulties in opening business bank accounts following the establishment of companies or nonprofit organisations.

By contrast, the barriers faced by asylum-seekers are substantially greater. The certificate of application for international protection, issued within three days of lodging an asylum claim (Article 51 of AGIPA), is not recognised as a valid identity document under either the IDA or the MLTFPA. In the absence of a valid foreign passport or another accepted form of identification, asylum-seekers are therefore unable to meet legal identity verification requirements and are frequently excluded from opening bank accounts or accessing mobile-based financial accounts and digital wallet services.

Other Government and Regulatory Efforts to Enhance Financial Inclusion

There is no dedicated policy promoting financial inclusion for refugees and asylum-seekers. In line with EU regulations, Estonia's *Law of Obligations Act* mandates access to basic payment services for all lawful EU residents, including refugees and asylum-seekers.

FRANCE



NUMBER OF REFUGEES/ASYLUM-SEEKERS:
751,218 / 77,412 (June 2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **ENABLING**

For asylum-seekers: **ENABLING**

France is a State party to the 1951 Refugee Convention and its 1967 Protocol. At the national level, asylum and subsidiary protection are governed by the *Code de l'entrée et du séjour des étrangers et du droit d'asile* (CESEDA), which also contains provisions transposing the European Union Temporary Protection Directive (2001/55/EC) into French law.

Refugees benefit from a protected status granting them a ten-year residence permit (*titre de séjour*) and access to public and private services, including banking. Beneficiaries of subsidiary protection are issued a multi-year residence permit (up to four years), while temporary protection holders receive a provisional residence permit bearing the mention “*bénéficiaire de la protection temporaire*”. In this factsheet, the term “*refugees*” is used in a broad sense to refer to all three groups.

In line with EU Directive 2014/92/EU on payment accounts, refugees and asylum-seekers are entitled to open and operate a basic payment account without discrimination. They are likewise legally permitted to use their identity documents when registering SIM cards or accessing digital financial services.

While the law guarantees access to a basic payment account, it does not establish an explicit legal entitlement to open mobile-based financial accounts or digital wallets. As a result, although refugee identity documents are formally recognised for KYC purposes, financial institutions and service providers may require additional information—such as proof of income or financial activity—which refugees and asylum-seekers may be unable to provide. In practice, this can lead to delays or refusals in accessing certain digital financial services.



Financial and Digital Access for Refugees and Asylum-seekers in France

Category	Refugees	Asylum-seekers
Opening Bank Accounts	● No legal barriers.	● No legal barriers.
Registering SIM Cards	● No legal barriers.	● No legal barriers.
Opening Mobile Money Accounts	● Legally permitted, but access depends on provider requirements such as proof of income or financial activity.	● Similar to refugees.
Opening Digital Wallets /Electronic Payment Accounts	● No legal restrictions, but no established right to open a digital wallet. Refugee ID documents are generally accepted, although providers may require additional documentation.	● Similar to refugees.



Opening Bank Accounts

Any person residing in France or another EU Member State is entitled to open a basic bank account, provided they do not already hold a payment account in France (Article L. 3121, I, 1° of the *Code monétaire et financier* (CMF)). This right applies equally to French and EU nationals, refugees, and asylum-seekers. Basic accounts are subject to certain limitations—such as the absence of overdraft facilities—but guarantee access to essential banking services, including a payment card for online transactions and cash withdrawals, the ability to make money transfers, and payment by direct debit.

Where a bank in France refuses to open a basic bank account, it is required to issue the applicant with a written attestation confirming the refusal. On the basis of this attestation—or where the bank fails to respond within 15 days of the application—the applicant may refer the matter to the Banque de France. Under France's *right to a bank account procedure* (*droit au compte*), the Banque de France designates a financial institution, which is then legally obliged to open a deposit account and provide the basic banking services included under the scheme. If the designated bank nevertheless refuses, it must issue a further written refusal and notify the Banque de France accordingly.

When opening a bank account, French banks are required to carry out customer due diligence procedures in line with the *Code monétaire et financier* (CMF), including verification of the applicant's identity based on an official photo-bearing identity document.

For refugees, valid proof of identity includes residence cards or residence permits, including temporary permits such as those bearing the mention “*vie privée et familiale*”. Asylum-seekers who do not possess a valid passport may rely on alternative residence-related documents containing a photograph, including temporary permits issued during the asylum procedure. These documents are renewable pending a decision by the *Office français de protection des réfugiés et apatrides* (OFPRA).

In addition, individuals without a fixed address may obtain a residence certificate (*attestation de domiciliation*), and the absence of a permanent address cannot, in itself, be used to restrict access to a bank account where such a certificate has been issued.



SIM Card Registration

There are no legal restrictions in France preventing refugees or asylum-seekers from registering SIM cards. The process requires a valid form of identification, and for subscription-based services, additional documents such as proof of address, bank details, or a credit card may be required.

Refugees typically possess the necessary documents, such as residence permits or foreign passports, which are accepted by telecom operators. Asylum-seekers may face more uncertainty, especially if their only form of identification is a receipt of asylum application, which is not consistently accepted by all providers.



Mobile Money and Digital Payments

Mobile money accounts in France are predominantly delivered through bank or fintech-led, mobile-based electronic value accounts, as telecom-led mobile money systems do not operate in the domestic market. In practice, similar functionalities are provided through online bank or electronic money accounts (e.g. Revolut, N26, Wise) and payment accounts distributed via tobacco shops (e.g. Nickel). These mobile money accounts, as well as digital wallets (e.g. Google Pay, Apple Wallet), are legally accessible to refugees and asylum-seekers under the same conditions as French nationals.

Unlike basic payment accounts, however, access to mobile money accounts and digital wallets is not guaranteed by law. Service providers apply internal risk-management and customer-due-diligence policies and may require additional documentation, such as proof of address, proof of income, or the linkage of an existing bank account or debit/credit card. Refugees and asylum-seekers may face difficulties in meeting these requirements, which can result in delays or refusal of access to these services.

Challenges and Practical Realities

Despite an enabling legal framework, the discretionary power of banks and their internal risk policies can create barriers to accessing financial services beyond a basic bank account. Banks may impose additional requirements such as proof of income or tax returns, which refugees and asylum-seekers often struggle to provide. Banking fees can also pose challenges, particularly for those without regular income, and language barriers and unfamiliarity with procedures can further complicate access.

Other Government and Regulatory Efforts to Enhance Financial Inclusion

The *Banque de France* plays a central role in promoting financial inclusion. Its strategic plan, *Building 2025 Together*, prioritises expanding inclusive access to banking services and payment systems, digitising access to financial services, strengthening financial literacy, and supporting vulnerable populations and small enterprises.

To ensure that refugees and asylum-seekers are informed of their rights with regard to access to banking services, the *Délégation interministérielle à l'accueil et à l'intégration des réfugiés* (DIAIR), the *Direction générale du Trésor*, the *Banque de France*, and the *Direction générale des étrangers en France* jointly published an information booklet in 2022 on opening a current bank account. The guide outlines the applicable procedures, including those to be followed by the *Banque de France* and commercial banks when an application to open a basic bank account is refused.



GERMANY



NUMBER OF REFUGEES/ASYLUM-SEEKERS:
2,703,856 / 320,133 (June 2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **ENABLING**

For asylum-seekers: **ENABLING**

Germany is a State party to the 1951 Refugee Convention and its 1967 Protocol. At the national level, the *Asylum Act* sets out the eligibility criteria and procedures for granting asylum entitlements, refugee status, and subsidiary protection. The *Residence Act* regulates the issuance of residence permits for asyumentitled individuals, recognised refugees, and beneficiaries of subsidiary protection, including provisions on duration, renewal, and associated rights such as access to employment. In addition, Article 24 of the *Residence Act* transposes the EU Temporary Protection Directive (2001/55/EC) into domestic law and applies to situations of mass displacement; it was activated in 2022 for individuals fleeing Ukraine.

With respect to access to financial and mobile services, Germany provides a generally enabling legal and regulatory environment for refugees and asylum-seekers. Both groups are entitled to open basic bank accounts, register SIM cards, and access mobile money and digital wallet services, subject to standard identification and due diligence requirements under AML/CFT regulations. Acknowledging that many forcibly displaced individuals may lack valid passports, the regulatory framework allows for the use of alternative forms of identification. Special provisions have been introduced allowing Ukrainian nationals to open basic bank accounts even where their primary identity documents do not fully meet KYC requirements, provided they can present a document issued by a German authority bearing the same name.

Despite this inclusive framework, practical barriers remain. These include language constraints, inconsistent recognition of identification documents across institutions, and differing requirements applied by individual service providers, which can limit effective and consistent access to financial services in practice.



Financial and Digital Access for Refugees and Asylum-seekers in Germany

Category	Refugees	Asylum-seekers
Opening Bank Accounts	● No legal barriers.	● No legal barriers.
Registering SIM Cards	● No legal barriers.	● No legal barriers.
Opening Mobile Money Accounts	● No legal barriers.	● No legal barriers.
Opening Digital Wallets /Electronic Payment Accounts	● No legal barriers.	● No legal barriers.



Opening Bank Accounts

Refugees and asylum-seekers in Germany have the legal right to open a basic bank account. While financial institutions must comply with KYC requirements, the documentation standards applicable to basic accounts are comparatively flexible. In line with the *Residence Act (2004)* and the *Interpretation and Application Guidance to the German Money Laundering Act* issued by the Federal Financial Supervisory Authority (BaFin), alternative forms of identification may be accepted in lieu of a valid passport. These include residence permits, certificates of arrival, proof of registration, and recognised travel documents. In addition, proof of a permanent address is not required for the opening of a basic account. These provisions are particularly relevant for refugees and asylum-seekers who may be unable to provide standard documentation due to their circumstances.

For Ukrainian nationals, specific temporary provisions were introduced allowing persons whose Ukrainian identity documents did not fully meet KYC requirements to open a basic bank account, provided they could present a document issued by a German authority—such as a certificate of arrival or registration certificate—bearing the same name as the identity document.

The legal framework does not prohibit refugees and asylum-seekers from accessing other types of bank accounts. However, such accounts are subject to more stringent due diligence requirements, which may include proof of permanent residence, evidence of income, and, in some cases, a credit history. These requirements vary across financial institutions in line with their internal risk management policies. Some institutions may also apply countryrisk restrictions or exclusion lists for compliance purposes, which can further constrain access in practice.



SIM Card Registration

There are no legal restrictions preventing refugees and asylum-seekers in Germany from registering SIM cards. Under Sections 172, 173, and 174 of the *Telecommunications Act* (1996, as amended in 2021), telecommunications providers are required to collect and verify personal data from their customers. Where a valid passport is not available, alternative identity documents may be accepted. In addition, a registration certificate issued by an accommodation provider is generally sufficient as proof of address. As a result, access to prepaid SIM cards is typically available to refugees and asylum-seekers.

By contrast, access to postpaid SIM cards may be more constrained, as providers often impose additional requirements such as the provision of a bank account, a credit check, and, in some cases, proof of employment or income.



Mobile Money and Digital Payments

Fintech-led digital payment solutions - including wallets such as Google Pay, Apple Pay, and PayPal - are commonly used in Germany. The requirements to access these services are similar to opening a traditional bank account, with the acceptance of alternative forms of identification varying across service providers.



Challenges and Practical Realities

Refugees and asylum-seekers are generally able to access basic financial and mobile services provided they possess identity documents recognised for KYC purposes. While legislation itself is not a barrier to financial inclusion, practical challenges remain, including language barriers and unfamiliarity with the local financial system and available products.



Other Government and Regulatory Efforts to Enhance Financial Inclusion

In the context of the Financial Literacy Initiative launched by the Federal Ministry of Finance and the Federal Ministry of Education and Research, and with support from the OECD, Germany developed a [proposal for a National Financial Literacy Strategy](#) in 2024. The strategy aims to increase the financial well-being of all people living in Germany and addresses the needs of several groups, including individuals with low income and/or education levels, such as the unemployed, immigrants, and refugees.

ITALY



NUMBER OF REFUGEES/ASYLUM-SEEKERS:
314,167 / 220,800 (June 2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **ENABLING**

For asylum-seekers: **MIXED**

Italy is a State party to the 1951 Refugee Convention and its 1967 Protocol. At the national level, Legislative Decree No. 286/1998 (*Consolidated Immigration Act*) governs asylum procedures and humanitarian protection. Legislative Decree No. 251/2007 transposes EU Directive 2004/83/EC, establishing the eligibility criteria for refugee status and subsidiary protection and setting out the rights attached to each status. In addition, Legislative Decree No. 85/2003 implements the EU Temporary Protection Directive (2001/55/EC), granting the Council of Ministers the authority to activate temporary protection in situations of mass displacement.

For the purposes of this factsheet, the term “*refugees*” is used broadly to refer to recognised refugees, beneficiaries of subsidiary protection, and beneficiaries of temporary protection.

Italy’s banking system operates within the European Union regulatory framework, notably Directive 2014/92/EU on payment accounts, which guarantees access to a basic payment account for all legally resident persons, including recognised refugees and asylum-seekers. This right to nondiscriminatory access to basic financial services is enshrined in Italian law under Article 126noviesdecies of the *Consolidated Banking Act (Testo Unico Bancario, TUB)*. While financial institutions are required to comply with KYC and customer due diligence obligations, the requirements applicable to the opening of a basic bank account are comparatively less stringent than those for other types of accounts.

There are no explicit legal restrictions preventing refugees and asylum-seekers in Italy from registering SIM cards or accessing mobile money accounts and digital wallets, provided they meet service providers’ documentation requirements, including proof of residence.

However, despite this generally enabling legal framework, gaps in implementation and limited awareness continue to impede effective financial inclusion, particularly for asylum-seekers.

Legislation and related guidance remain unclear with regard to the acceptance of asylum-seekers' residence permits, leading many financial institutions and mobile network operators to refuse these documents in practice. In addition, delays in the issuance of tax identification numbers (*codice fiscale*) and the limited acceptance of alternative forms of proof of residence create further obstacles for both refugees and asylum-seekers.



Financial and Digital Access for Refugees and Asylum-seekers in Italy

Category	Refugees	Asylum-seekers
Opening Bank Accounts	● No legal barriers.	● Legally permitted, but access may be constrained by inconsistent acceptance of asylum documents and additional requirements such as proof of residence.
Registering SIM Cards	● No legal barriers.	● Legally permitted, but access may be constrained by documentation requirements and inconsistent acceptance of residence permits.
Opening Mobile Money Accounts	● No legal barriers.	● Legally permitted, but access may be constrained by documentation requirements and proof of residence.
Opening Digital Wallets /Electronic Payment Accounts	● No legal barriers.	● Legally permitted, but access may be constrained by documentation requirements and reliance on underlying bank accounts.



Opening Bank Accounts

Italy's legal framework guarantees that all individuals legally residing in the country—including refugees and asylum-seekers—have the right to open a bank account and access basic banking services, such as deposits, withdrawals, and transfers, as established under Article 126-*noviesdecies* of the *Consolidated Banking Act* (TUB).

To open a basic bank account, financial institutions typically require proof of identity and a tax identification number issued by the Revenue Agency. These requirements can generally be met by refugees and asylum-seekers, as alternative forms of identification—including refugee and asylum documentation—are recognised for KYC purposes, and both groups are entitled to apply for a tax number.

Financial institutions often also request a residence permit or other document demonstrating the right to stay in Italy. However, the flyer *Welcome to the Bank* published by the Italian Banking Association (ABI) mentions a five-year reference period for residence permits, which does not align with the renewable six-month permits issued to asylum-seekers. In addition, the receipt confirming an application for international protection—legally equivalent to a residence permit—does not carry an expiry date and often remains the applicant’s only document for extended periods, sometimes up to 18 months, exceeding the typical validity of a residence permit. In practice, many banks treat the receipt as expired after six months due to the absence of clear guidance on its validity, leading to uncertainty and frequent nonacceptance of these documents.

As a result, asylum-seekers may face practical barriers to accessing banking services, including inconsistent acceptance of temporary documentation and requests for proof of residence. Although a permanent address is not required by law for a basic account, banks in practice often request a residence certificate issued by municipalities. Refugees and asylum-seekers may report discriminatory practices to the Italian authorities, but most are likely unaware of the relevant procedures.

Access to other types of bank accounts and additional banking services requires further documentation, including proof of residence, in line with requirements applied to other bank clients.



SIM Card Registration

SIM card registration is mandatory under Italian law. There are no legal restrictions preventing refugees and asylum-seekers from registering a SIM card; however, they may encounter practical barriers. Mobile service providers typically require a valid form of identification, a residence permit, and a tax identification number. As with bank account opening, alternative forms of identification are legally accepted, and refugees and asylum-seekers are entitled to apply for a tax number. In practice, delays in the issuance of tax identification numbers and the inconsistent acceptance of asylum-seeker documentation can hinder access. In addition, some providers require proof of residence, which may pose challenges for individuals without a permanent address.



Mobile Money and Digital Payments

Mobile money accounts and digital wallets are widely used in Italy. These services are provided through bank or fintech-led payment accounts, as telecom-led mobile money systems do not operate in the domestic market. Commonly used services include PostePay Evolution (Poste Italiane), HYPE (Banca Sella), N26, and Revolut.

These accounts are often used in combination with digital wallets and mobile payment applications such as Satispay, Apple Pay, Google Pay, PayPal, XME Pay (Intesa Sanpaolo), and Buddy-bank (UniCredit).

There are no legal restrictions preventing refugees and asylum-seekers from accessing mobile money accounts and digital wallets. In practice, however, access may be constrained by documentation requirements. As with SIM card registration, service providers often request proof of residence, and some may not accept provisional residence permits issued to asylum-seekers.

Challenges and Practical Realities

Recognised refugees and asylum-seekers have, in principle, access to essential financial and mobile services in Italy. In practice, however, access is often hindered by a range of barriers. These include bureaucratic constraints, such as delays in the issuance of tax identification numbers, as well as limited awareness of applicable legislation and restrictive risk-management approaches, which result in inconsistent practices across service providers.



Other Government and Regulatory Efforts to Enhance Financial Inclusion

Italian authorities have implemented a range of initiatives to promote the financial inclusion of refugees and asylum-seekers, often in collaboration with relevant stakeholders. The National Observatory on the Financial Inclusion of Migrants, established in 2011 as a joint initiative between the Ministry of the Interior and the Italian Banking Association (ABI), serves as a key platform for analysing and monitoring financial inclusion among migrants and other displaced populations, including refugees and asylum-seekers. Its work focuses on providing updated information on the financial inclusion landscape, supporting the development of financial profiles and migrant entrepreneurship, facilitating dialogue between financial operators, institutions, and displaced communities to inform inclusion strategies, and promoting financial education to improve understanding of and access to financial services.

To raise awareness among foreign citizens, ABI has also published “*Welcome to the Bank*,” an online flyer available in ten languages—Italian, English, French, Spanish, German, Arabic, Chinese, Ukrainian, Tagalog, and Hindi—aimed at promoting financial inclusion and simplifying relations with banks. UNHCR contributed to the development of this document, which is available on ABI’s website and explicitly addresses refugees and individuals in need of international protection.

NORTH MACEDONIA



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

20,881 / 25 (June 2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **ENABLING**

For asylum-seekers: **MIXED**

North Macedonia is a State party to the 1951 Refugee Convention and its 1967 Protocol. At the national level, refugee status is regulated under Article 5 of the *Law on International and Temporary Protection* (No. 146/2009). Recognised refugees may be issued a refugee identity card or a travel document, while beneficiaries of temporary protection—such as individuals displaced from Ukraine—receive a temporary protection identity document. Asylum-seekers are typically issued an asylum-seeker certificate. All such documents are issued by the Ministry of the Interior and constitute official forms of identification under national law.

The regulatory framework in North Macedonia is generally supportive of the financial inclusion of recognised refugees, temporary protection holders, and asylum-seekers. These groups are, in principle, legally entitled to open basic bank accounts, register SIM cards, and access mobile money accounts and digital wallets. In practice, however, compliance with AML/CFT requirements can create barriers, particularly for asylum-seekers.

Financial and mobile service providers retain discretion to request additional documentation, such as proof of residence or income. Moreover, AML/CFT regulations require providers to collect specific client information, including a Personal Identification Number (PIN). While the PIN is generally included in most identity documents, asylum-seeker certificates often do not contain this information. As a result, asylum-seekers may be unable to meet standard KYC requirements, and service providers may refuse to accept their certificates for account opening or service registration.



Financial and Digital Access for Refugees and Asylum-seekers in North Macedonia

Category	Refugees	Asylum-seekers
Opening Bank Accounts	● No legal barriers.	● Legally permitted, but access is constrained by missing PINs and additional KYC requirements.
Registering SIM Cards	● No legal barriers.	● Legally permitted, but access is constrained by documentation requirements, including the absence of a PIN.
Opening Mobile Money Accounts	● No legal barriers.	● Legally permitted, but access is constrained by KYC requirements and lack of required identification elements.
Opening Digital Wallets /Electronic Payment Accounts	● No legal barriers.	● Legally permitted, but access is constrained by documentation requirements and dependence on bank account access.



Opening Bank Accounts

Refugees and asylum-seekers are eligible to open a payment account with basic functions, as regulated under Articles 72 and 73 of the *Law on Payment Services and Payment Systems* (No. 90/2022). These accounts provide standard banking services such as deposits, withdrawals, direct debits, card payments, and credit transfers, and are available in Macedonian denars.

To open such an account, individuals must submit an application with personal details and identification, proof of residence or legal stay, and an affidavit confirming they do not hold another account in denars. Identification documents issued to refugees and asylum-seekers are recognised as official identity documents and, in principle, are accepted by financial institutions for opening these accounts.

Access to other types of bank accounts or additional banking services is, however, subject to each bank's internal policies. Many banks require supplementary documentation—such as proof of income, employment, or evidence of ties to the country. Although Article 70 of the *Law on Payment Services and Payment Systems* prohibits discrimination based on nationality or residence status, refugees and asylum-seekers may, in practice, be excluded from opening more advanced types of accounts due to these discretionary requirements.

In addition, KYC obligations under AML/CFT regulations require financial institutions to collect a

Personal Identification Number (PIN). Asylum-seeker certificates do not include this number, and delays in the issuance of identity documents can create further barriers to opening a bank account.

SIM Card Registration

There are no explicit legal restrictions preventing refugees and asylum-seekers from registering SIM cards in North Macedonia. Under the *Law on Electronic Communications* (No. 21/2018), individuals are required to present valid identification and provide basic personal information. In principle, identity documents issued to refugees and asylum-seekers are accepted for this purpose, and both prepaid and postpaid SIM cards are available through a generally straightforward registration process.

In practice, however, mobile operators may require a Personal Identification Number (PIN) as part of their verification procedures. Where identity documents—such as asylum-seeker certificates—do not include a PIN, registration requests may be declined, creating practical barriers to accessing mobile connectivity.

Mobile Money and Digital Payments

Refugees and asylum-seekers can, in principle, access mobile money services and digital wallets in North Macedonia. Mobile money accounts are not explicitly defined in legislation but are generally understood as services that enable financial transactions via mobile phones. These services are regulated under the *Law on Payment Operations* (No. 31/2020), which also covers micropayments—up to MKD 1,000—processed by telecommunications or information technology service providers.

Access to mobile money services requires a registered SIM card and the provision of basic identification. Digital wallets, including Apple Pay, Google Pay, Samsung Pay, and PayPal, are also available in North Macedonia, although some functionalities remain limited, such as the ability to receive payments via PayPal. While no specific documentation is prescribed by law to open a digital wallet, access is typically linked to holding a bank account and a compatible device.

In practice, access to both mobile money services and digital wallets depends largely on the ability to register a SIM card or open a bank account. As such, delays in the issuance of identity documents and the absence of a Personal Identification Number (PIN) create practical barriers for asylum-seekers, limiting their effective access to mobile and digital financial services.



Challenges and Practical Realities

While the financial inclusion of refugees and asylum-seekers in North Macedonia is underpinned by international human rights obligations and national legislation, the implementation of existing regulations remains uneven and often depends on the internal policies and risk assessments of individual service providers.

In particular, some banks are reluctant to accept refugee or asylum-seeker documentation due to uncertainty around compliance with AML/CFT requirements, notably the obligation to collect a Personal Identification Number (PIN). This may result in delays or refusals, especially when individuals seek to open accounts beyond the basic level or access additional banking services such as credit. Financial institutions may also impose supplementary requirements, including proof of income or residence, which refugees and asylum-seekers may struggle to provide in practice.



Other Government and Regulatory Efforts to Enhance Financial Inclusion

North Macedonia has made progress in aligning its financial inclusion framework with European Union standards. The *Law on Payment Services and Payment Systems* explicitly includes refugees and asylum-seekers among those eligible to open basic payment accounts and prohibits discrimination in access to financial services on the grounds of nationality or residence status.

As the country continues its alignment with EU and the Financial Action Task Force (FATF) standards, refugees and asylum-seekers originating from countries classified as highrisk for AML/CFT purposes—such as Syria, Iran, and Afghanistan—may be subject to enhanced due diligence measures when accessing financial and mobile services. At present, there are no dedicated national strategies or programmes specifically aimed at promoting the financial inclusion of refugees and asylum-seekers. In addition, regulatory authorities have not established systematic oversight or auditing mechanisms to assess whether financial service providers effectively implement inclusive practices.

PORTUGAL



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

66,541 / 2,933 (June 2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **ENABLING**

For asylum-seekers: **ENABLING**

Portugal is a State party to the 1951 Refugee Convention and its 1967 Protocol. At the national level, Law No. 27/2008, as amended, sets out the procedures and conditions for granting asylum and subsidiary protection and defines the status of asylum-seekers, recognised refugees, and beneficiaries of subsidiary protection. In addition, Law No. 67/2003 transposes the *EU Temporary Protection Directive* (2001/55/EC) into Portuguese law, establishing the legal regime applicable in situations of mass displacement.

In line with relevant European Union directives, Portugal's legal framework provides that refugees, beneficiaries of subsidiary and temporary protection, and asylum-seekers are entitled to access financial and mobile services on the same basis as Portuguese nationals. For the purposes of this factsheet, the term “*refugees*” is used broadly to refer to recognised refugees, beneficiaries of subsidiary protection, and beneficiaries of temporary protection.

DecreeLaw No. 27C/2000 introduced the Minimum Banking Services Account (MBSA), which provides access to essential banking functions at low cost to all residents, including individuals without a fixed residence. In addition, Law No. 83/2017 *on Anti-Money Laundering and Counter-Terrorism Financing* allows for simplified customer due diligence measures for low-risk financial products, enabling banks to accept alternative forms of identification and easing administrative requirements for vulnerable populations.

There are also no legal restrictions preventing refugees and asylum-seekers from registering SIM cards or accessing mobile money services and digital wallets. SIM cards may be registered under the same conditions applicable to Portuguese nationals, for both prepaid and postpaid plans. Despite this generally supportive regulatory framework, refugees and asylum-seekers continue to face practical barriers in accessing financial and mobile services. While the Agency for Integration, Migration and Asylum (AIMA) plays an important role in issuing documentation and supporting individuals through administrative procedures, implementation varies across service providers. In practice, financial institutions may apply inconsistent requirements or request additional documentation—such as proof of address or employment—which can be difficult for displaced individuals to provide.



Financial and Digital Access for Refugees and Asylum-seekers in Portugal

Category	Refugees	Asylum-seekers
Opening Bank Accounts	● No legal barriers.	● No legal barriers.
Registering SIM Cards	● No legal barriers.	● No legal barriers.
Opening Mobile Money Accounts	● No legal barriers.	● No legal barriers.
Opening Digital Wallets /Electronic Payment Accounts	● No legal barriers.	● No legal barriers.



Opening Bank Accounts

Refugees and asylum-seekers are legally entitled to open a bank account. The Minimum Banking Services Account (MBSA) includes basic services such as deposits, withdrawals, bank transfers within set limits, and a debit card. The annual maintenance fee is capped, and in 2026, it cannot exceed €5.23.

While the legal framework is inclusive, practical challenges may arise due to documentation requirements. Banks typically request an identification document (such as a passport or refugee card), a Portuguese tax number, proof of address, and evidence of employment or registration with the Employment Centre. However, these requirements are not rigid. In many cases, banks waive certain documents, recognising the difficulties refugees and asylum-seekers may face obtaining them.

Despite this flexibility, the lack of standardised procedures across financial institutions can lead to inconsistent treatment, with access and experience often depending on the discretion of individual banks.



SIM Card Registration

There are no legal barriers preventing refugees or asylum-seekers from registering a SIM card. Mobile operators generally require a form of identification, and refugee cards or asylum-seeker certificates are accepted for this purpose. Both prepaid and postpaid SIM cards are available, although postpaid contracts may require additional documentation, such as a Portuguese tax number.



Mobile Money and Digital Payments

Refugees and asylum-seekers can access mobile money services and digital wallets without legal impediments. These services are typically linked to existing bank accounts and debit cards, which can be obtained through the MBSA. Popular platforms such as MB WAY, Millennium App, Caixa Directa, and Santander App are widely used for everyday transactions, including transfers, purchases, and bill payments.

International digital wallets like PayPal, Apple Pay, and Google Pay are also available and commonly used. No additional documentation is required beyond what is needed to open a bank account, and the setup process is generally simple and user-friendly. As long as the individuals have a bank account and a compatible smartphone, they can access these services on equal footing with Portuguese nationals.

Challenges and Practical Realities

Although the legal framework in Portugal is supportive, refugees and asylum-seekers may still encounter practical challenges when accessing financial services. A key issue is the variability of procedures across banks. While some institutions are flexible and accommodating, others may strictly enforce documentation requirements. This inconsistency stems from the absence of specific legislation targeting the financial inclusion of refugees and asylum-seekers.

Other Government and Regulatory Efforts to Enhance Financial Inclusion

Portugal has taken proactive steps to promote financial inclusion for refugees and asylum-seekers, even without dedicated legislation. Following a European Banking Authority (EBA) recommendation in March 2022, Portuguese banks actively promoted the MBSA for Ukrainian nationals under temporary protection.

Banco de Portugal has encouraged credit institutions to offer basic banking services to all residents, including refugees and asylum-seekers. Additionally, AML/CFT regulations allow for simplified KYC requirements, facilitating the acceptance of refugee identification documents, and AIMA plays a key role in supporting refugees and asylum-seekers through administrative processes.



REPUBLIC OF MOLDOVA



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

133,256 / 730 (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:

23,050 (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **MIXED**

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

The Republic of Moldova is a State party to the 1951 Refugee and its 1967 Protocol and has established a national legal framework governing international protection. This includes Law No. 270/2008 *on Asylum*, and Government Decision No. 21/2023 on Temporary Protection (TP) for individuals displaced from Ukraine. Recognised refugees are issued a Refugee ID valid for five years, while beneficiaries of humanitarian protection receive an ID valid for three years. Asylum-seekers are issued a temporary identity document renewable on a monthly basis, and TP beneficiaries receive an ID card confirming their status. All foreigners entering the country, including refugees, beneficiaries of humanitarian protection, asylum-seekers, and TP holders, are automatically assigned a Personal Identification Number (IDNP), which also functions as a tax identification number and is required to access banking services.

For the purposes of this factsheet, the term “*refugees*” is used broadly to refer to individuals granted international protection—namely recognised refugees and beneficiaries of humanitarian protection—as well as holders of temporary protection status.

The financial sector is regulated by the National Bank of Moldova (NBM). There are no legal restrictions preventing non-residents, including displaced individuals, from opening bank accounts or accessing mobile and digital financial services. In practice, however, strict AML/CFT and KYC requirements—particularly those set out in Law No. 308/2017—pose significant barriers, especially for asylum-seekers who lack a valid passport issued by their country of origin.

SIM card registration is generally accessible for recognised refugees and TP holders but remains more challenging for asylum-seekers, who often struggle to meet documentation requirements. Moreover, Law No. 72/2025 on *Electronic Communications*, expected to enter into force in 2026, will introduce stricter identity verification requirements, which may further affect access for refugees and TP beneficiaries.

UNHCR provides financial assistance to refugees affected by the Ukraine crisis, primarily through prepaid cards, to support the coverage of essential needs such as food, shelter, and healthcare.



Financial and Digital Access for Refugees and Asylum-seekers in the Republic of Moldova

Category	Refugees	Asylum-seekers
Opening Bank Accounts	<ul style="list-style-type: none"> No explicit legal restrictions, but access is constrained by strict KYC requirements and inconsistent acceptance of refugee documents. 	<ul style="list-style-type: none"> Not effectively accessible due to strict KYC requirements and non-recognition of temporary identity documents.
Registering SIM Cards	<ul style="list-style-type: none"> No legal barriers. 	<ul style="list-style-type: none"> Not effectively accessible due to strict documentation and upcoming biometric verification requirements.
Opening Mobile Money Accounts	<ul style="list-style-type: none"> Not effectively accessible due to strict KYC requirements and limitations of digital verification systems. 	<ul style="list-style-type: none"> Not effectively accessible due to strict KYC requirements and non-recognition of asylum documentation.
Opening Digital Wallets /Electronic Payment Accounts	<ul style="list-style-type: none"> Not effectively accessible due to strict KYC requirements and limited recognition of refugee documents. 	<ul style="list-style-type: none"> Not effectively accessible due to strict KYC requirements and exclusion from digital verification systems.



Opening Bank Accounts

The banking sector in the Republic of Moldova is regulated by the National Bank of Moldova (NBM). Under Article 13(3) of Law No. 62/2008, non-residents may open bank accounts provided they meet the KYC requirements set out in Law No. 308/2017. In practice, opening a bank account generally requires the presentation of a valid identity document—such as a passport, Moldovan ID, refugee ID card, or temporary protection (TP) document—together with a Personal Identification Number (IDNP), proof of address (for example, a utility bill or lease agreement), and information on the source of funds. While refugee and TP identity documents are usually accepted, practical barriers persist, as acceptance of documentation and KYC requirements vary across banks. Access is even more constrained for asylum-seekers, whose temporary identity documents are frequently rejected due to their short validity, and who often face difficulties providing proof of address and source of funds, resulting in exclusion from formal banking services.



SIM Card Registration

Access to prepaid SIM cards in the Republic of Moldova has traditionally been simple, as registration was not required. Postpaid services, however, require a valid ID and proof of address. Legislation adopted in 2025, and due to enter into force in 2026, will significantly tighten SIM card registration procedures by introducing biometric ID requirements. This new framework is expected to create substantial barriers for refugees and TP holders and make it nearly impossible for asylum-seekers to formally register SIM cards without a valid passport from their country of origin.



Mobile Money and Digital Payments

Mobile money services (such as Moldcell Money) and digital wallets (such as Paynet) operate in the Republic of Moldova under Law No. 114/2012 on *Payment Services and Electronic Money* and the AML/CFT provisions of Law No. 308/2017.

As with bank accounts, opening mobile money or digital wallet accounts requires a valid ID, an IDNP, proof of address, and full KYC compliance. Providers rely heavily on automated e-KYC systems and a digital identity infrastructure designed primarily around national IDs. As a result, non-standard identification—including documents issued to refugees, TP holders, and asylum-seekers—is often not recognised. Additionally, many displaced individuals struggle to provide proof of address.



Challenges and Practical Realities

Displaced individuals face multiple barriers when attempting to access financial and mobile services in the Republic of Moldova. These include the inconsistent acceptance of refugee and temporary protection identity documents by service providers, as well as the frequent rejection of asylum-seekers' temporary identity documents due to their 30-day validity. Additional challenges arise from difficulties in securing proof of address, particularly for individuals living in informal accommodation, and from financial inclusion measures and tools that are not sufficiently tailored to the needs and circumstances of displaced populations. As a result, access to the formal financial system remains constrained, increasing reliance on cash-based solutions or prepaid cards, often provided through humanitarian assistance programmes such as those implemented by UNHCR.



Other Government and Regulatory Efforts to Enhance Financial Inclusion

Although there is no legislation specifically addressing the financial inclusion of forcibly displaced persons, the introduction of temporary protection in 2023—along with the automatic issuance of IDNPs—has facilitated access to banking services for Ukrainian nationals.

NBM supports broader digitalization of the financial sector through initiatives such as the MIA Instant Payments System and the development of an e-KYC mechanism intended to streamline remote verification. However, because these systems are designed around national IDs, they often do not recognise identification documents issued to refugees, TP holders, and asylum-seekers, leaving these groups excluded from digital onboarding processes. Moldovan authorities continue to collaborate with UNHCR and selected banks—such as MAIB—to distribute prepaid assistance cards.

SERBIA



NUMBER OF REFUGEES/ASYLUM-SEEKERS:
39,403 / 2003 (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:
45 (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:
For refugees: **MIXED**
For asylum-seekers: **MIXED**

Serbia is a State party to the 1951 Refugee Convention and its 1967 Protocol. The national legal framework governing asylum and international protection is primarily set out in the Law on *Asylum and Temporary Protection* (Official Gazette Nos. 24/2018 and 31/2019).

Recognised refugees, temporary protection (TP) holders, and asylum-seekers are issued identity documents by the Asylum Office. These documents, however, do not contain biometric features and do not include the Foreigner Registration Number (EBS)—a 13digit personal identification number required to access a range of public and private services. As a result, individuals holding these statuses must submit a separate application to obtain an EBS confirmation document.

There are no explicit legal restrictions preventing refugees, TP holders, and asylum-seekers from accessing basic financial and mobile services. The *Decision on Payment Accounts with Basic Services* issued by the National Bank of Serbia requires banks to offer basic bank accounts to all individuals with lawful residence in Serbia who do not already hold a payment account. In practice, however, strict documentation requirements and inconsistent procedures across financial institutions limit effective access. Many banks request additional documentation, including proof of residence—particularly where applicants seek to open nonbasic bank accounts or access additional financial services.

Similar challenges arise in the telecommunications sector, where mobile operators frequently require identity documents containing biometric data. The absence of biometric features and delays in obtaining the EBS confirmation document can therefore impede SIM card registration and access to mobile services.

The mobile and digital financial ecosystem in Serbia remains relatively underdeveloped. Several service providers either exclude foreign nationals or require permanent residence status to access their products. While digital wallets linked to bank accounts are, in principle, available to refugees, TP holders, and asylum-seekers, documentation requirements and procedural barriers continue to constrain access in practice.



Financial and Digital Access for Refugees and Asylum-seekers in Serbia

Category	Refugees	Asylum-seekers
Opening Bank Accounts	<ul style="list-style-type: none"> ● Legally permitted, but access is constrained by documentation requirements, including obtaining an EBS number. 	<ul style="list-style-type: none"> ● Legally permitted, but access is constrained by documentation requirements and limited eligibility for non-basic accounts.
Registering SIM Cards	<ul style="list-style-type: none"> ● Legally permitted, but access is constrained by documentation requirements, including EBS and biometric data. 	<ul style="list-style-type: none"> ● Legally permitted, but access is constrained by documentation requirements and inability to meet postpaid contract conditions.
Opening Mobile Money Accounts	<ul style="list-style-type: none"> ● Legally permitted, but access is constrained by limited availability and provider restrictions. 	<ul style="list-style-type: none"> ● Legally permitted, but access is constrained by provider restrictions and reliance on remittance services.
Opening Digital Wallets /Electronic Payment Accounts	<ul style="list-style-type: none"> ● Legally permitted, but access is constrained by documentation requirements and dependence on bank account access. 	<ul style="list-style-type: none"> ● Legally permitted, but access is constrained by documentation requirements and limited access to banking services.



Opening Bank Accounts

Refugees and asylum-seekers in Serbia are legally entitled to open bank accounts; however, in practice, access is largely limited to basic bank accounts due to regulatory and operational constraints. These accounts are regulated under the *Decision on Payment Accounts with Basic Services* issued by the National Bank of Serbia (Official Herald No. 89/2022), which obliges banks to provide basic accounts to any individual with lawful residence in Serbia. Basic bank accounts offer essential services, including account opening, maintenance and closure, cash deposits and withdrawals, domestic payment transactions such as transfers and direct debits, access to mobile and online banking, and the issuance of a debit card.

Beyond basic accounts, some banks may offer foreigncurrency or current (checking) accounts, depending on whether the client receives income from abroad or within Serbia. Eligibility to open a resident or non-resident account depends on the duration of lawful stay; resident status generally requires legal residence of at least one year, which effectively excludes most asylum-seekers. Non-resident accounts are subject to functional limitations and typically do not allow access to overdrafts or credit.

In practice, the main barriers faced by refugees and asylum-seekers include the absence of biometric identity documents and inconsistent procedures across financial institutions. Banks usually require a valid identity document, the Foreigner Registration Number (EBS), proof of address, and a completed application form. As the EBS is essential for KYC verification, refugees and asylum-seekers must obtain this number through an additional administrative process, which creates further obstacles to accessing banking services.

SIM Card Registration

Serbian law does not explicitly restrict refugees or asylum-seekers from registering SIM cards. Article 158 of the *Law on Electronic Communications* (Official Herald No. 35/2023) prohibits discrimination based on nationality or residence status in the provision of mobile services.

In practice, prepaid SIM cards can generally be registered using refugee or asylum-seeker identity documents together with an EBS confirmation document. By contrast, access to postpaid SIM cards is more constrained, as mobile operators typically require additional documentation, including proof of residence for at least one year and a temporary residence permit valid for a minimum of six months. Moreover, remote SIM card registration requires access to Serbia's electronic administration portal, which is generally unavailable to refugees and asylum-seekers. Taken together, these requirements create practical barriers, particularly for individuals in the early stages of the asylum process.

Mobile Money and Digital Payments

Serbia's mobile money ecosystem remains limited in scope, with access largely mediated through banks and remittance service providers rather than standalone digital payment platforms.

While there are no explicit legal restrictions, electronic money institutions (EMIs) often limit access to their services to Serbian nationals or foreign nationals with permanent residence, effectively excluding most refugees and asylum-seekers. For displaced individuals, access to mobile financial services is therefore largely confined to remittance transfers through payment agents, where users can send and receive funds by presenting a valid identity document and providing basic sender and recipient details.

Digital wallets linked to bank accounts are, in principle, accessible provided the individual holds a bank account and a registered SIM card. In practice, however, documentation requirements and barriers to bank account access also constrain the use of digital wallets, leaving mobile-money-based payment solutions largely inaccessible to refugees and asylum-seekers.

Challenges and Practical Realities

Refugees and asylum-seekers in Serbia face several practical barriers when accessing financial services. The most significant obstacle is the lack of standardised, biometric identification documents, which complicates KYC verification and limits access to banking and mobile services. Current refugee and asylum-seeker ID cards do not contain the Foreigner Registration Number (EBS), which is essential for many financial transactions. Obtaining this number requires a separate procedure through the Asylum Office, adding administrative burden.

Additionally, inconsistent and discriminatory practices by some banks and mobile operators persist, despite legal protections. Refugees and asylum-seekers have limited access to non-basic bank accounts and postpaid mobile services, and mobile money and digital wallets are inaccessible unless tied to bank accounts. Low levels of financial literacy among refugees and asylum-seekers further exacerbate these challenges, collectively hindering the financial inclusion of displaced populations in Serbia.

Other Government and Regulatory Efforts to Enhance Financial Inclusion

Serbia currently has no specific legislation promoting financial inclusion for refugees and asylum-seekers. However, following the Commissioner for the Protection of Equality's 2024 *Recommendation of Measures to the Banking Sector* - which included significant input from UNHCR - 18 out of 20 banks responded, affirming that they would provide services without discrimination. Additionally, one bank, in communication with UNHCR, confirmed its willingness to include refugee entrepreneurs in its social banking program, which provides small loans combined with mentorship.

These developments have resulted in improved access to banking services: all individuals who sought UNHCR's support to open payment accounts during 2025 have successfully done so. Moving forward, UNHCR, in cooperation with the Association of Serbian Banks, will continue efforts to inform bank employees through workshops, training sessions, and the sharing of information on personal documentation, rights, and the legal status of refugees in Serbia.

SLOVAKIA



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

146,004 / 83 (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:

189 (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **ENABLING**

For asylum-seekers: **ENABLING**

Slovakia is a State party to the 1951 Refugee Convention and its 1967 Protocol. At the national level, Act No. 480/2002 Coll. on Asylum (*Asylum Act*) governs international protection; under this framework, individuals granted asylum are legally referred to as *asylum holders*. Slovakia also recognises subsidiary protection and temporary protection, the latter being particularly relevant for individuals displaced from Ukraine.

Slovakia's legal framework allows refugees and asylum-seekers to access financial and mobile services, including basic payment accounts, SIM card registration, and digital wallets. Act No. 483/2001 Coll. on Banks (*Banking Act*) entitles individuals with lawful residence to open basic bank accounts, which provide access to core services such as deposits, withdrawals, and domestic transfers. In the telecommunications sector, Act No. 452/2021 Coll. on *Electronic Communications* establishes the principle of nondiscrimination on the basis of nationality or residence status, enabling refugees and asylum-seekers to register SIM cards provided they meet applicable documentation requirements. Similarly, there are no explicit legal barriers preventing access to mobile money accounts and digital wallets. UNHCR uses bank accounts, where available, to deliver financial assistance to displaced individuals, particularly in the context of the Ukraine crisis.

Despite this generally inclusive legal environment, practical barriers to accessing formal financial services persist. Banks and service providers may fail to recognise refugee-related documentation or may request additional documents or proof of ties to Slovakia, especially when individuals seek to open standard (non-basic) bank accounts or access additional banking services.

Furthermore, online account opening mechanisms are currently unavailable to refugees and asylum-seekers, as they are not included in the national biometric database.

While Ukrainian nationals benefit from certain simplified procedures—including the use of Ukrainian identity cards for identification—displaced persons of other nationalities face more significant practical barriers when accessing financial and mobile services.



Financial and Digital Access for Refugees and Asylum-seekers in Slovakia

Category	Refugees	Asylum-seekers
Opening Bank Accounts	● No legal barriers.	● No legal barriers.
Registering SIM Cards	● No legal barriers.	● No legal barriers.
Opening Mobile Money Accounts	● No legal barriers.	● No legal barriers.
Opening Digital Wallets /Electronic Payment Accounts	● No legal barriers.	● No legal barriers.



Opening Bank Accounts

Refugees and asylum-seekers in Slovakia are legally entitled to open basic payment accounts. These accounts are regulated under Section 27d of the *Banking Act*, in line with relevant EU directives, and are intended to provide access to essential banking services—such as deposits, withdrawals, and card payments—at a nominal monthly cost. To open a basic payment account, applicants must submit an application form containing personal details, present valid identification (for example, a passport or asylum-seeker card), and provide a sworn declaration confirming that they do not already hold another payment account in Slovakia. In principle, identity documents issued to refugees and asylum-seekers are accepted for this purpose. Ukrainian nationals may alternatively present Ukrainian identity documents, supplemented by sworn statements where required information is missing.

Despite this formal eligibility, refugees and asylum-seekers frequently encounter practical obstacles when seeking to access banking services. Many banks do not recognise refugee or asylum-seeker specific identity documents, particularly those issued to asylum-seekers.

Access to standard (nonbasic) bank accounts and additional banking services is subject to individual bank policies, which commonly require proof of ties to Slovakia, such as a lease agreement or an employment contract. Furthermore, because refugees and asylum-seekers are not included in the biometric identity database maintained by the Ministry of the Interior, they are excluded from remote or online onboarding processes. As a result, all bank account applications must be submitted in person.

SIM Card Registration

Slovak law does not restrict refugees or asylum-seekers from registering SIM cards. Section 82(2) of Act No. 452/2021 Coll. on *Electronic Communications* explicitly prohibits discrimination in access to mobile services based on nationality or residence status. Refugees and asylum-seekers can use their asylum documents or proof of tolerated stay to meet registration requirements. However, in practice, mobile operators may still request a national ID or passport, which many displaced individuals are unable to provide.

Mobile Money and Digital Payments

There are no legal restrictions preventing refugees or asylum-seekers from opening mobile money accounts or using digital wallets in Slovakia. Electronic payment services are governed by Act No. 492/2009 Coll. on *Payment Services*, which is aligned with the *EU Payment Services Directive*.

Platforms like Revolut and digital wallets such as Apple Pay, Google Pay, Samsung Pay, and PayPal are widely available and increasingly used. These services typically require basic personal information, a phone number, and valid identification—requirements most refugees and asylum-seekers can meet.

Nonetheless, practical barriers persist. Using these services typically requires owning a registered SIM card and a bank account. As a result, the non-recognition of asylum documents or requests for additional documentation can hinder access to these services.

Challenges and Practical Realities

Despite inclusive legal provisions, refugees and asylum-seekers in Slovakia continue to face practical challenges in accessing financial and mobile services. Limited awareness of applicable legislation and inconsistent implementation can lead banks to reject applications, particularly where individuals are unable to demonstrate sufficient ties to Slovakia or stable income. In addition, remote onboarding for bank account opening is unavailable, as refugees and asylum-seekers are not included in the national biometric identity database. Further obstacles arise from provider-level requirements, which can complicate SIM card registration and access to mobile services in practice.

Other Government and Regulatory Efforts to Enhance Financial Inclusion

The Slovak authorities have introduced targeted measures to enhance financial inclusion for individuals displaced from Ukraine. In particular, the Ministry of Finance has simplified bank account opening procedures, allowing the use of Ukrainian-issued identity documents supplemented by sworn affidavits where necessary.



TÜRKIYE



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

2,680,658 / 132,383 (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:

29,348 (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **MIXED**

For asylum-seekers: **MIXED**

Türkiye is a State party to the 1951 Refugee Convention and its 1967 Protocol. The national legal framework governing international protection is set out in Law No. 6458 *on Foreigners and International Protection* (2013), which establishes procedures for individual applications as well as mechanisms for granting temporary protection in situations of mass influx where arrival numbers exceed the State's processing capacity. Currently, Syrian nationals, refugees, and stateless persons arriving from Syria are placed under temporary protection, while nationals of other countries are subject to individual refugee status determination procedures as international protection applicants.

International protection status holders include refugees, conditional refugees, and beneficiaries of subsidiary protection. Due to Türkiye's geographical limitation, individuals recognised as conditional refugees are expected to be resettled to a third country where voluntary repatriation is not a viable option. Following status determination interviews conducted by the Turkish authorities, international protection applicants may be recognised as conditional refugees or beneficiaries of subsidiary protection. Those granted one of these statuses are classified as international protection status holders, while individuals whose applications are still under assessment are considered international protection applicants.

Pursuant to Law No. 6458, international protection applicants are issued an *International Protection Applicant Identity Document* bearing a Foreigner Identification Number and valid for one year. Upon recognition as a refugee, conditional refugee, or beneficiary of subsidiary protection, individuals are issued an *International Protection Status Holder Identity Document*, which carries the same identification number and is valid for three years. Persons granted temporary protection are issued a *Temporary Protection Identity Document*. Both International Protection (IP) and Temporary Protection (TP) identity documents include a Foreigner Identification Number.

In Türkiye, there are no explicit legal restrictions preventing refugees or asylum-seekers from accessing financial and mobile services. In principle, identity documents issued by the Presidency of Migration Management (PMM) should be recognised for KYC purposes. These documents enable refugees and asylum-seekers to open bank accounts, register SIM cards, and access mobile money services and digital wallets. In practice, however, access may be uneven. Variations in serviceprovider policies and practical barriers—such as limited familiarity with refugee documentation, unadapted IT systems, or requests for additional documentation—can hinder effective access and use of these services.

UNHCR provides financial assistance to displaced individuals, which is delivered through bank accounts where feasible.



Financial and Digital Access for Refugees and Asylum-seekers in Türkiye

Category	Refugees	Asylum-seekers
Opening Bank Accounts	<ul style="list-style-type: none"> ● Legally permitted, but access is constrained by limited familiarity with refugee documents, unadapted systems, and strict risk policies. 	<ul style="list-style-type: none"> ● Legally permitted, but access is constrained by documentation barriers, including the shorter validity of asylum-seeker documents.
Registering SIM Cards	<ul style="list-style-type: none"> ● Legally permitted, but upcoming biometric verification requirements are likely to constrain access due to non-compatible ID documents. 	<ul style="list-style-type: none"> ● Legally permitted, but upcoming biometric verification requirements are likely to significantly constrain access due to lack of compatible ID documents.
Opening Mobile Money Accounts	<ul style="list-style-type: none"> ● Legally permitted, but access is constrained by provider discretion and additional documentation requirements. 	<ul style="list-style-type: none"> ● Legally permitted, but access is constrained by provider discretion, documentation requirements, and operational barriers.
Opening Digital Wallets /Electronic Payment Accounts	<ul style="list-style-type: none"> ● Legally permitted, but access is constrained by provider requirements and additional documentation. 	<ul style="list-style-type: none"> ● Legally permitted, but access is constrained by documentation requirements and provider discretion.



Opening Bank Accounts

Refugees and asylum-seekers are legally eligible to open bank accounts, provided they meet the documentation requirements set out in the applicable regulatory framework. Banking Law No. 5411 (2005), implemented by the Banking Regulation and Supervision Agency (BDDK), and Law No. 5549 on *Prevention of Laundering Proceeds of Crime* (2006) require customers to present an identity document, proof of address, and a phone number.

Despite this generally enabling legal framework, enforcement remains inconsistent. A letter dated 13.11.2015 from the PMM affirmed refugees and asylum-seekers' right to open bank accounts and access financial services; however, there is no binding or operational directive from BDDK ensuring uniform implementation. As a result, refugees and asylum-seekers continue to face practical challenges that limit their ability to open a bank account. These include the inability to complete account opening procedures online, limited recognition of refugee documentation by bank staff or internal IT systems, and the application of stricter risk management policies. In practice, some banks do not open accounts without a valid passport or require additional documentation.

Although the PMM letter recognises refugees' and asylum-seekers' identity documents valid for KYC procedures, in practice, these documents are not consistently recognised or accepted. Regarding proof of address, BDDK Guideline 2024/41 recognises the e-State *Yerleşim Yeri Belgesi* (residence certificate) as valid. Refugees and asylum-seekers can obtain this certificate using their foreigners ID numbers via their e-State accounts.



SIM Card Registration

SIM card registration in Türkiye is formally permitted for refugees and asylum-seekers using identity documents issued by the Presidency of Migration Management (PMM), including for individuals under temporary protection. In principle, refugees and asylum-seekers are therefore legally entitled to register SIM cards.

In practice, access has long been uneven due to providers' limited familiarity with refugee documentation, the inability to complete registration remotely, and IT systems not consistently configured to verify Foreigner Identification Numbers (99 ID numbers). As a result, individuals have often been required to present a valid passport despite the legal recognition of PMM-issued identity documents.

Following legislative amendments entering into force on 1 June 2026, the framework governing SIM card registration for foreign nationals has been significantly tightened. Under the revised rules, mobile subscriptions must be linked to electronically or biometrically verifiable identity credentials, with mandatory periodic verification and the risk of disconnection where identity requirements are not met. For individuals whose documents do not support electronic or biometric verification, these requirements now constitute a formal legal barrier to SIM card registration, rather than a purely practical constraint.



Mobile Money and Digital Payments

In Türkiye, mobile payment services, including mobile money accounts, are offered by licensed electronic money institutions and payment service providers operating under the supervision of the Central Bank of the Republic of Türkiye (CBRT). Digital wallets have also been regulated since October 2023.

Licensed service providers are required by law to implement identity authentication systems, and account verification is mandatory for nearly all services, except for transactions below TRY 2,750. Although official ID documents issued to refugees and asylum-seekers are legally recognised as valid for KYC purposes, remote verification is not possible because these documents lack an ICAO-compliant electronic chip.

Moreover, many financial service providers classify refugees and asylum-seekers as higher-risk clients, applying enhanced due diligence procedures and requiring additional documents—such as proof of income or source of funds. Documentation standards and onboarding procedures vary across institutions, and in practice, some digital wallet providers do not offer services to foreign nationals.

Challenges and Practical Realities

Türkiye's legal framework recognises identity documents issued to refugees and asylum-seekers as valid forms of identification. Nevertheless, significant practical barriers persist, primarily linked to the identity verification obligations imposed on financial and mobile service providers under KYC regulations. In particular, remote identity verification is not possible because refugee and asylum-seeker identity documents do not contain ICAO compliant electronic chips. Limited familiarity among frontline staff with refugee documentation, together with IT systems that are not configured to verify Foreigner Identification Numbers (99ID numbers), further complicate access.

In addition, refugees and asylum-seekers are frequently subject to enhanced due diligence measures, including requests for supplementary documentation such as proof of source of funds. These challenges are compounded by inconsistent practices across institutions, reflecting differing risk-management approaches and the absence of standardised regulatory guidance requiring service providers to adapt internal policies and IT systems to accommodate refugee documentation.

Other Government and Regulatory Efforts to Enhance Financial Inclusion

Türkiye does not have a dedicated policy or regulatory framework specifically aimed at promoting the financial inclusion of refugees and asylum-seekers. However, in 2015 the Presidency of Migration Management (PMM) issued a letter affirming the right of refugees and asylum-seekers to open bank accounts and access financial services. This letter was addressed to the General Directorate of Local Authorities and shared with the Banking Regulation and Supervision Agency (BDDK) as guidance for financial institutions. In addition, BDDK Guideline No. 2024/41 recognises residence certificates issued through the eGovernment system as valid proof of address. While implementation of these measures remains uneven across institutions, they represent important steps towards improving access to financial services for refugees and asylum-seekers in Türkiye.





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