



MIDDLE EAST AND NORTH AFRICA

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

**A GLOBAL COMPARATIVE ANALYSIS**

June 2026

# Acknowledgements

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# Introduction

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

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

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

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



# Methodological Note

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

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

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

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

The findings draw on country-specific legal questionnaires completed by DLA Piper's corporate clients, including Amazon, BNP Paribas, Santander, Airbus, and Fundación Telefónica. The questionnaires were based on applicable legislation, regulations, supervisory guidance, and other publicly available sources. These questionnaires were reviewed and validated by UNHCR country-level focal points, who provided contextual insights on regulatory implementation and practical access constraints.

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

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

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

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

# Regional Overview

The Middle East and North Africa (MENA) region hosts **nearly 19 million forcibly displaced people**. As of 2025, the majority are Internally Displaced Persons (IDPs)—driven primarily by protracted and ongoing conflicts in Syria, Sudan, Yemen, and Iraq—while the region also **hosts approximately 3.7 million refugees and asylum-seekers**.

Across most countries in the region, access to formal financial and digital services remains constrained by restrictive regulatory frameworks, stringent identity requirements, and weak market infrastructure, with only a limited number of country-specific exceptions and emerging inclusive practices. While legal frameworks may, in principle, permit access to financial services for non-nationals, implementation gaps, regulatory discretion, and provider-level risk management practices frequently undermine effective access in practice.

The analysis in this report focuses primarily on refugees and asylum-seekers. Internally displaced persons are also analysed in Syria and Yemen, where internal displacement constitutes the dominant displacement modality.

Across the region, the primary barriers to financial inclusion stem from stringent AntiMoney Laundering and CounterTerrorism Financing (AML/CFT) frameworks and Know Your Customer (KYC) requirements. These frameworks typically require documentation such as valid passports, residence permits, proof of address, and proof of income—documents that many displaced persons are unable to obtain, renew, or maintain over time. As a result, even in contexts where no explicit legal prohibition exists, refugees and asylum-seekers are frequently de facto excluded from opening bank accounts, registering SIM cards, and accessing digital financial services.

A key structural challenge across MENA is the limited legal recognition of refugee and asylum-seeker status. In several countries, the absence of formal asylum frameworks—combined with restrictive documentation practices—results in refugees and asylum-seekers being treated as temporary or irregular migrants for the purposes of financial access. This legal ambiguity directly affects their ability to obtain recognised identification documents and to meet KYC requirements, reinforcing exclusion from formal financial systems despite long-term residence.

At the same time, IDPs—as nationals of their respective countries—generally face fewer formal legal barriers, as they are, in principle, entitled to national identity documents. However, IDPs often encounter significant practical constraints, including loss or destruction of documentation, administrative barriers to replacement, weak institutional capacity, and broader socioeconomic vulnerabilities linked to displacement. These factors can result in de facto exclusion even where the legal framework is enabling.



Despite these constraints, a limited number of jurisdictions across the region have introduced more inclusive practices. These include regulatory guidance enabling refugees and asylum-seekers to open basic bank accounts using recognised alternative documentation, the use of simplified KYC approaches to facilitate access to mobile wallets or limited transaction accounts, and targeted regulatory exemptions allowing the use of restricted digital wallets for the delivery of humanitarian cash assistance. Taken together, these practices illustrate the potential of tailored or risk-based KYC frameworks to expand access to financial services for displaced populations while remaining compliant with AML/CFT requirements.

However, digital financial inclusion remains underdeveloped across much of the region. Structural constraints—including low smartphone ownership among displaced populations, limited mobile money ecosystems, weak banking and telecommunications infrastructure, and strict SIM card registration regimes—continue to hinder the expansion of digital services. In several contexts, access to mobile connectivity itself is constrained by documentation requirements, further restricting the use of digital financial tools.

Geographical disparities further shape access. In conflict-affected and non-government-controlled areas, access to formal financial services is severely restricted for all populations, including host communities. Even where regulatory frameworks exist, uneven service availability, security considerations, and infrastructure limitations significantly constrain practical access.

Overall, financial inclusion for forcibly displaced populations in MENA is characterised by a combination of regulatory exclusion, documentation constraints, and structural barriers. While emerging initiatives illustrate viable pathways towards more inclusive systems—particularly through simplified KYC regimes and partnerships with humanitarian actors—scaling these approaches remains a central challenge. Strengthening regulatory clarity, promoting recognition of alternative forms of identification, and investing in financial and digital infrastructure will be essential to expanding sustainable access to financial services for displaced populations across the region.



**TABLE 1:** Financial Inclusion Regulatory Environment for Refugees and Asylum-seekers in the Middle East and North Africa

Country	Status	Number* (June 2025)	Bank Accounts	SIM Card Registration	Mobile Money Accounts	Digital Wallets/ Electronic Payments
Iraq	Refugees	315,885	●	●	●	●
	Asylum-seekers	22,184	●	●	●	●
Jordan	Refugees	541,165	●	●	●	●
	Asylum-seekers	19,268	●	●	●	●
Lebanon	Refugees	719,482	●	●	-	●
	Asylum-seekers	7,429	●	●	-	●
Morocco	Refugees	6,942	●	●	●	●
	Asylum-seekers	12,412	●	●	●	●
Saudi Arabia	Refugees	385	●	●	●	●
	Asylum-seekers	3,915	●	●	●	●
Syria	Refugees	10,983	●	●	●	●
	Asylum-seekers	4,455	●	●	●	●
	IDPs	6,468,575	●	●	●	●
Yemen	Refugees	46,827	●	●	●	●
	Asylum-seekers	14,094	●	●	●	●
	IDPs	4,795,983	●	●	●	●

\* 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

# IRAQ



NUMBER OF REFUGEES/ASYLUM-SEEKERS:  
**315,885 / 22,184** (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:  
**46,820** (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **TO BE DEVELOPED**

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

Iraq is not a State party to the 1951 Refugee Convention or its 1967 Protocol. Most asylum-seekers and refugees are Syrian nationals (88%), with approximately 80% residing in the Kurdistan Region of Iraq (KR-I) as of January 2026. This geographic concentration affects their financial inclusion, as the identification documents issued in the KRI are not recognised by federal authorities. This lack of recognition creates challenges in meeting KYC requirements and AML/CFT regulations.

As a result, although no law explicitly prohibits refugees and asylum-seekers from opening bank accounts, financial institutions often refuse to accept their identification documents, including those issued by UNHCR. In rare cases, refugees holding ID cards issued by the Permanent Committee of the Ministry of Interior (PC-Mol), along with an official employer letter or approved business registration, may be able to open a bank account. However, these remain exceptions. Refugees and asylum-seekers also face strict documentation requirements when attempting to open mobile money accounts.

In contrast, the use of digital wallets has been encouraged by a 2016 Central Bank of Iraq waiver on KYC requirements, which allowed refugees and asylum-seekers receiving cash assistance to use UNHCR-issued documents. In 2024, 4% of UNHCR's financial assistance was delivered through these digital "charity" wallets, while the majority continued to be distributed in cash over the counter using biometric verification.

New electronic payments regulations issued in May 2025 temporarily suspended the registration of new digital wallets for foreigners of certain nationalities, including Syrians. However, this restriction was lifted through a Central Bank of Iraq directive dated 18 January 2026, allowing Syrians to continue accessing these services.

Access to mobile services appears relatively more flexible. While SIM card registration is mandatory and, in principle, available to refugees with valid documentation, limited awareness among vendors often compels refugees to rely on pre-registered SIM cards for easier access.



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

Category	Refugees	Asylum-seekers
<b>Opening Bank Accounts</b>	<ul style="list-style-type: none"> <li>● UNHCR-issued documents and personal identification cards issued by the Kurdistan Regional Government are rarely accepted by banks.</li> </ul>	<ul style="list-style-type: none"> <li>● Similar challenges apply. Identification and residence documents are often not accepted.</li> </ul>
<b>Registering SIM Cards</b>	<ul style="list-style-type: none"> <li>● In principle, refugees can register SIM cards if they possess valid official documentation. In practice, many rely on pre-registered SIM cards.</li> </ul>	<ul style="list-style-type: none"> <li>● Similar situation. While registration is theoretically possible with valid documentation, many rely on pre-registered SIM cards in practice.</li> </ul>
<b>Opening Mobile Money Accounts</b>	<ul style="list-style-type: none"> <li>● Subject to the same documentation constraints as opening a bank account.</li> </ul>	<ul style="list-style-type: none"> <li>● Subject to the same documentation constraints as opening a bank account.</li> </ul>
<b>Opening Digital Wallets/Electronic Payment Accounts</b>	<ul style="list-style-type: none"> <li>● “Charity” digital wallets are accessible to some refugees receiving cash assistance using UNHCR-issued documents; however, functionalities are limited and access is not universal.</li> </ul>	<ul style="list-style-type: none"> <li>● Similar limitations apply to asylum-seekers regarding access to digital wallets.</li> </ul>



## **Opening Bank Accounts**

Bank account usage remains limited in Iraq, where levels of formal financial inclusion among the population—although gradually improving—are still relatively low. As of 2024, only 28% of adults held an account at a formal financial institution (Global Findex Survey).

For refugees and asylum-seekers, the primary barrier to opening a bank account is the documentation required. This challenge stems from a combination of restrictive bank risk management practices—particularly in the interpretation of AML/CFT regulations—and a regulatory framework that does not recognise alternative forms of identification.

In legal terms, the required documentation typically includes a valid passport with an active visa or residence permit. In practice, however, banks often require an Iraqi national ID and proof of residence to open accounts in Iraqi dinars, and a passport for accounts in US dollars. These requirements effectively exclude most refugees and asylum-seekers, particularly those residing in the Kurdistan Region of Iraq, where residence documents issued by regional authorities are not recognised by most financial institutions.



## **SIM Card Registration**

In Iraq, SIM card registration is mandatory. In principle, refugees with recognised official documentation are able to register SIM cards. However, limited awareness among local vendors regarding the validity of such documentation often leads refugees to rely on pre-registered SIM cards.



## **Mobile Money and Digital Payments**

Access to mobile money accounts for refugees and asylum-seekers is constrained by documentation requirements and, in practice, by challenges related to SIM card registration and vendor awareness. Digital wallets are becoming increasingly widespread in Iraq as the country adopts digital financial solutions, with a growing number of licences issued by the Central Bank of Iraq to electronic payment service providers. Popular services include NassWallet, ZainCash, AsiaPay, FastPay, FIB (First Iraqi Bank), as well as international emoney and digital payment platforms such as Neteller, Skrill, Luxon, MuchBetter, AstroPay, MiFinity and Jeton. To register a mobile wallet, users typically need to provide a valid passport and proof of residence, in line with KYC protocols.

In November 2016, the Central Bank of Iraq granted a specific exemption allowing refugees and asylum-seekers to use UNHCR-issued certificates as alternative identification to open digital wallets for the purpose of receiving humanitarian assistance.

Since then, UNHCR has delivered financial assistance to some beneficiaries through these so-called “charity” wallets. Wallets registered under this exemption offer restricted functionality, as they are primarily designed to facilitate humanitarian cash transfers rather than enable full access to financial services.

In May 2025, the Central Bank of Iraq issued new *Regulations for Electronic Payment Service Providers*, strengthening AML/CFT requirements and restricting the issuance of digital wallets to nationals of countries listed under Iraq’s financial-risk or sanctions watchlists, which initially included Syria. This restriction was lifted in January 2026 through a Central Bank of Iraq letter, restoring access to digital wallet services for Syrian nationals.

## **Challenges and Practical Realities**

Despite the absence of explicit legal prohibitions, documentation requirements constitute a de facto barrier to accessing financial and mobile services. Most refugees in the Kurdistan Region of Iraq are excluded from the formal financial system. Those residing in Baghdad and other federal areas also face significant challenges, including administrative obstacles in obtaining the required documentation from the Ministry of Interior, as well as inconsistent risk management practices across banks.

These documentation-related constraints similarly affect access to SIM card registration and mobile money services. In the KR-I, Law No. 110 (enacted in September 2021) prohibits the sale of unregistered SIM cards.



# JORDAN



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

**541,165 / 19,268** (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:

**223,817** (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **MIXED**

For asylum-seekers: **MIXED**

In Jordan, the legal framework governing refugees and asylum-seekers is shaped primarily by national legislation and administrative practice. Jordan is not a State party to the 1951 Refugee Convention or its 1967 Protocol and has not adopted a dedicated refugee law. Instead, the applicable framework consists of national legislation—primarily the *Law of Residency and Foreigners' Affairs*—alongside internal regulations and administrative policies. The 1998 Memorandum of Understanding between the Government of Jordan and UNHCR, together with its subsequent amendments, serves as the principal reference for the management of refugee matters in the country.

Individuals registered with UNHCR in Jordan are classified as either *asylum-seekers* or *refugees*. The vast majority are of Syrian origin, with over 95% registered as asylum-seekers.

Access to financial services remains challenging for refugees and asylum-seekers, primarily due to documentation requirements—particularly the need for a valid passport. Refugees of non-Syrian nationalities often face additional barriers, including expired passports and the absence of legal residence, both of which are typically required to open a bank account.

In contrast, Syrian asylum-seekers holding Ministry of Interior (MOI) service cards benefit from broader access to public services, including health, education, and protection, as well as certain private-sector services. These include access to digital wallets and limited banking services, mainly for the withdrawal of cash assistance through banks.

Refugees and asylum-seekers of non-Syrian nationalities are not eligible to obtain MOI service cards and therefore have more limited access to both government and private-sector services. In the context of financial inclusion, UNHCR-issued identification is not recognised as a valid form of identification under KYC regulations, further constraining their access to formal financial services.

While approximately 65% of refugees receive UNHCR financial assistance through mobile wallets and an additional 20% via ATM withdrawals, these delivery mechanisms do not provide access to a broader range of financial products or services.

Although the Central Bank of Jordan (CBJ) and other national authorities have taken steps to expand access to financial services, significant challenges persist—particularly for non-Syrian refugees and asylum-seekers. Efforts to address documentation barriers, improve access to banking services, and strengthen financial literacy remain ongoing.

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

Category	Refugees	Asylum-seekers
<b>Opening Bank Accounts</b>	<ul style="list-style-type: none"> <li>● Significant documentation barriers. Syrian refugees are generally required to present a valid passport and a Ministry of Interior (MOI) service card to open a bank account. UNHCR-issued documents are not accepted for KYC purposes.</li> </ul>	<ul style="list-style-type: none"> <li>● Similar documentation barriers apply to asylum-seekers.</li> </ul>
<b>Registering SIM Cards</b>	<ul style="list-style-type: none"> <li>● Syrian refugees can register SIM cards using an MOI service card. Non-Syrians are typically required to provide a valid passport, which many do not possess.</li> </ul>	<ul style="list-style-type: none"> <li>● Similar challenges apply, with differing requirements for Syrians and non-Syrians.</li> </ul>
<b>Opening Mobile Money Accounts</b>	<ul style="list-style-type: none"> <li>● Subject to the same documentation requirements as SIM card registration. MOI service cards are accepted for Syrian refugees.</li> </ul>	<ul style="list-style-type: none"> <li>● Similar challenges apply, with differing requirements for Syrians and non-Syrians.</li> </ul>
<b>Opening Digital Wallets/ Electronic Payment Accounts</b>	<ul style="list-style-type: none"> <li>● Subject to the same documentation requirements as SIM card registration. MOI service cards are accepted for Syrian refugees.</li> </ul>	<ul style="list-style-type: none"> <li>● Similar challenges apply, with differing requirements for Syrians and non-Syrians.</li> </ul>



## **Opening Bank Accounts**

Although there are no explicit legal barriers preventing refugees and asylum-seekers from opening bank accounts in Jordan—including the basic bank account introduced in 2019 to promote financial inclusion—access remains significantly constrained by KYC requirements and related documentation obligations.

While KYC regulations are internationally mandated and essential for banking compliance, they are closely linked to national security considerations. Robust documentation requirements are necessary to mitigate risks such as money laundering and other illicit activities. However, a key challenge arises from the requirement to present a valid passport—an identification document that many refugees do not possess. Although MOI service cards issued to Syrian asylum-seekers are accepted for KYC purposes, a valid passport is still generally required. In addition, UNHCR-issued documents, such as asylum-seeker certificates and proof of registration, are not recognised for KYC verification.

Additional requirements—including proof of address, evidence of employment or income, and personal references—further compound these barriers, making it extremely difficult for many refugees and asylum-seekers to open bank accounts.



## **SIM Card Registration**

In Jordan, national regulations require proof of identity and residence to register a SIM card, meaning individuals must present a valid government-issued ID, such as a MOI service card or a passport. As a result, Syrian asylum-seekers are generally able to register SIM cards, while non-Syrian refugees and asylum-seekers face significant barriers, as they are not eligible to obtain MOI service cards.

As with bank account access, non-Syrians can only register SIM cards if they possess a valid passport—an uncommon situation. Consequently, some resort to informal arrangements to obtain SIM cards.



## **Mobile Money and Digital Payments**

The CBJ issued the *Mobile Payment Services Instructions* in 2013, establishing the regulatory framework for mobile money. These regulations do not include provisions preventing refugees and asylum-seekers from opening mobile money accounts; however, mobile money operators and licensed Payment Service Providers (PSPs) are required to comply with KYC requirements. MOI service cards are accepted as valid identification for Syrian asylum-seekers, enabling them

to open mobile wallets. Non-Syrian refugees and non-Syrian asylum-seekers may open mobile wallets only if they hold a valid passport. The CBJ monitors mobile wallet activities, applies monthly transaction limits based on user risk profiles, and freezes accounts that remain dormant for more than six months.

The CBJ also regulates digital wallets and enforces KYC compliance for all users, which in practice limits access for individuals without recognised identification or residence documentation, particularly non-Syrian refugees. Some providers, in partnership with humanitarian organisations, have begun piloting “limited KYC” solutions to enable access to basic digital payment services for asylum-seekers; however, these initiatives remain limited in scope and availability.

### **Challenges and Practical Realities**

Access to financial services remains constrained by the lack of recognised identification required for KYC verification. Syrian refugees holding MOI service cards generally experience better access, while refugees and asylum-seekers of other nationalities face significantly greater barriers.

A recent UNHCR report, *Refugee Financial Inclusion and Financial Health in Jordan 2024* (May 2025), notes that mobile wallet initiatives targeting Syrian asylum-seekers have improved access to digital financial services; however, access to traditional banking products remains limited and savings rates are low. Strengthening financial literacy and financial inclusion programmes remains critical to enable refugees and asylum-seekers to effectively access and use available financial services.

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

In 2017, CBJ, in collaboration with the Bill & Melinda Gates Foundation, launched the *Mobile Money for Resilience (MM4R)* initiative to enhance financial inclusion for refugees, asylum-seekers and low-income Jordanians. Building on this effort, the [National Financial Inclusion Strategy \(NFIS\) 2023–2028](#) targets the bottom 40% of the population, explicitly including refugees and asylum-seekers, and outlines reforms such as simplified documentation requirements for mobile money access, permission for individuals aged 15 and above to open basic accounts, and strengthened cooperation with UNHCR and humanitarian partners.

In parallel, UNHCR, the Ministry of Digital Economy and Entrepreneurship (MODEE), MOI and the World Bank are collaborating on the development of a digital ID platform aimed at streamlining identity verification and registration processes. While this initiative remains at an early stage, the planned rollout will include refugees and asylum-seekers of all nationalities.

# LEBANON



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

**719,482 / 7,429** (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:

**998,542**, of which 977,349 refugees and asylum-seekers (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **TO BE DEVELOPED**

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

Lebanon is not a State party to the 1951 Refugee Convention or its 1967 Protocol and does not formally recognise refugees. In the absence of a national asylum framework, people who have fled to Lebanon in search of international protection typically approach UNHCR to obtain support, access humanitarian assistance, and, in some cases, pursue resettlement opportunities.

Since 2019, Lebanon has experienced overlapping crises, including a sharp devaluation of the Lebanese pound and hyperinflation. These developments have severely affected the financial sector and restricted access to financial services, particularly for vulnerable populations.

In addition, stringent AML/CFT regulations and enhanced due diligence requirements for opening bank accounts have effectively excluded displaced populations from Lebanon's formal financial system. To meet basic needs, UNHCR and WFP provide financial assistance primarily through the LOUISE Common Prepaid Card system, which is linked to a dedicated digital wallet. However, these wallets have limited functionalities and do not provide access to broader financial services.



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

Category	Refugees	Asylum-seekers
<b>Opening Bank Accounts</b>	<ul style="list-style-type: none"> <li>Stringent documentation requirements. UNHCR-issued documentation is not accepted for banking purposes.</li> </ul>	<ul style="list-style-type: none"> <li>Same as for refugees. Most often asylum-seekers cannot meet documentation requirements.</li> </ul>
<b>Registering SIM Cards</b>	<ul style="list-style-type: none"> <li>Most often refugees cannot meet documentation requirements, particularly for residence permit.</li> </ul>	<ul style="list-style-type: none"> <li>Most often, asylum-seekers cannot meet documentation requirements.</li> </ul>
<b>Opening Mobile Money Accounts</b>	N/A - Mobile money does not exist as a distinct service category separate from regulated digital wallets.	N/A
<b>Opening Digital Wallets/ Electronic Payment Accounts</b>	<ul style="list-style-type: none"> <li>Similar issues as for opening a bank account. Most often refugees cannot meet documentation requirements.</li> </ul>	<ul style="list-style-type: none"> <li>Similar issues as for opening a bank account. Most often asylum-seekers cannot meet documentation requirements.</li> </ul>



### Opening Bank Accounts

Law No. 44 (2015), together with several circulars issued by the *Banque du Liban*—including Basic Circular No. 147 of 2019—establishes stringent anti-money laundering and counter-terrorism financing (AML/CFT) obligations. These requirements have become even more restrictive since the onset of Lebanon’s financial crisis in 2019.

While Lebanon’s legal framework does not explicitly prohibit refugees or asylum-seekers from opening bank accounts, the documentation typically required by financial institutions—such as valid passports, residence permits, proof of address, and proof of income—is often inaccessible to displaced populations. According to the 2025 Vulnerability Assessment of Syrian Refugees (VaSyR), only 17% of Syrian refugees possess valid legal residence, and many rely on informal employment, further limiting their ability to meet these requirements.



## **SIM Card Registration**

SIM card registration is mandatory in Lebanon and requires a valid identity document and legal residence. Refugees and asylum-seekers, who frequently lack these documents, are therefore effectively unable to complete formal SIM registration. While some may obtain SIM cards through informal channels, mobile phones must also be registered with the Ministry of Interior, which similarly requires valid documentation. These conditions create significant barriers to accessing mobile connectivity and digital services.



## **Mobile Money and Digital Payments**

Lebanon does not operate a telecom-led mobile money regime. Digital wallets and electronic payment accounts are regulated separately under Law No. 81 (2018) and several *Banque du Liban* circulars, including Intermediate Circular No. 539 (2020). Their use has expanded in recent years, with available platforms including WeePay, Purpl, Whish, OMT Pay, Suyool, and, since June 2025, Google Wallet.

Service providers must verify users' identities and comply with AML/CFT requirements. To access a digital wallet, refugees and asylum-seekers must provide valid identification, proof of address, and verification of their source of funds—requirements they often cannot meet. Although no explicit legal restrictions exist, these regulatory conditions result in their de facto exclusion from digital financial services.



## **Challenges and Practical Realities**

Displaced populations in Lebanon face significant barriers to accessing formal financial services. In the absence of a legal framework governing the stay and protection of refugees and asylum-seekers, they are generally unable to obtain documentation recognised for KYC purposes.

Additional barriers—including economic vulnerability, poverty, discrimination, and administrative hurdles—further limit their ability to engage with formal financial institutions. Consequently, refugees and asylum-seekers mostly rely on humanitarian assistance and informal financial systems. The broader financial crisis compounds these challenges, as many Lebanese citizens also experience limited access to traditional banking services.

# MOROCCO



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

**6,942/ 12,412** (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:

**2,757** (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **ENABLING**

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

Morocco is a State party to the 1951 Refugee Convention and its 1967 Protocol. UNHCR conducts refugee status determination in the country and provides the *Bureau des Réfugiés et Apatriés* (BRA) with the list of individuals recognised as refugees. Based on this list, BRA issues refugee cards (commonly known as “BRA cards”). This card is a pre-requisite for applying for a residence permit, which in turn enables refugees to access a range of public services and banking services.

For asylum-seekers, UNHCR issues a registration certificate confirming that they are under its protection. However, this document does not carry the same legal status as the BRA card and does not guarantee access to services.



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

Category	Refugees	Asylum-seekers
Opening Bank Accounts	● No legal barriers.	● UNHCR-issued identification documents are not legally recognised as a valid form of identification and are often not accepted by banks for account opening.
Registering SIM Cards	● No legal barriers.	● UNHCR-issued identification documents are not legally recognised as valid identification and may not be accepted by mobile operators.
Opening Mobile Money Accounts	● No legal barriers.	● UNHCR-issued identification documents are not legally recognised as valid identification and are often not accepted for opening a mobile money account.
Opening Digital Wallets/ Electronic Payment Accounts	● No legal barriers.	● UNHCR-issued identification documents are not legally recognised as valid identification and are often not accepted for opening a digital wallet.



### Opening Bank Accounts

Article 150 of Law No. 10312 on credit institutions and similar bodies, promulgated by *Dahir* No. 114193 of 1 Rabi' I 1436 (24 December 2014), provides that any person may open a current bank account in Morocco.

However, financial institutions must verify the identity of their customers under AML/CFT regulations. This typically entails the presentation of valid proof of identity—such as a passport or resident permit for non-nationals—and often proof of address. Recognised refugees may obtain a resident permit on the basis of their BRA issued refugee card, enabling them to meet these requirements. For asylum-seekers, access is more constrained, as UNHCR-issued registration certificates are frequently not accepted by banks as valid identification. Banks may also request proof of employment or a salary certificate, which can present an additional barrier.



### SIM Card Registration

SIM card registration is regulated by the *Agence Nationale de Réglementation des Télécommunications (ANRT)*, notably under Law No. 24190 and its subsequent amendments. The legal framework does not impose restrictions on who may register a SIM card, provided the applicant is at least 18 years old (or has parental authorisation if younger) and can present valid identification.

In practice, refugees are generally able to register SIM cards without difficulty. Asylum-seekers may face constraints where they do not hold a valid passport, as acceptance of UNHCR registration certificates varies across service providers.



## **Mobile Money and Digital Payments**

Morocco mobile money system is built around payment accounts issued under the supervision of Bank Al-Maghrib (BAM) and interoperable through the national scheme MarocPay. Mobile money providers are regulated as payment institutions (non-bank or fintech-led), or credit institutions (bank-led) under Law No. 10312 on credit institutions and similar bodies. This law introduced the legal status of “payment institutions”, authorizing non-banks to hold payment accounts, issue electronic money, and provide payment services (P2P, merchant payments, bill pay).

While mobile operators are involved in the market, they cannot directly issue mobile money as telecommunication companies. Instead, they must operate through separately licensed entities subject to financial regulation. Examples include MT Cash (Maroc Telecom group), Orange Money Maroc and Inwi Money. Other digital financial services available include Chari (fintech-led) and CIH Mobile (bank-led).

As with bank accounts, providers must verify users’ identities. Refugees who hold a BRA card and residence permit can generally access these services without issues. In contrast, asylum-seekers may face challenges because their UNHCR-issued documentation is not always accepted for identity verification.



## **Challenges and Practical Realities**

Although refugees are not explicitly targeted in Morocco’s financial inclusion policies, once they receive a BRA card and a residence permit, they can access most banking and mobile services. For asylum-seekers, the situation is more precarious. Without an identity document recognised by financial institutions, they are frequently excluded from formal financial services.



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

Morocco’s 2019 National Financial Inclusion Strategy, led by Bank AlMaghrib, seeks to expand access to financial services for underserved population segments, with particular emphasis on women, youth, rural communities, and very small enterprises. The Strategy is structured around five pillars: expanding access to banking services; strengthening financial education; enhancing competition and consumer protection; further developing the microcredit sector; and establishing outcome-focused measurement indicators.

# SAUDI ARABIA



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

**385 / 3,915** (June 2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **TO BE DEVELOPED**

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

Saudi Arabia (KSA) is not a State party to the 1951 Refugee Convention or its 1967 Protocol and does not have a formal legal framework recognising refugee or asylum-seeker status. As a result, refugees and asylum-seekers are treated as other non-nationals and must meet standard requirements to open bank accounts or register SIM cards. These typically include presenting a valid passport and an Iqama (for residents), along with biometric data such as fingerprints. In practice, most refugees and asylum-seekers are unable to provide these documents, which effectively excludes them from accessing formal financial and mobile services.





## Financial and Digital Access for Refugees and Asylum-seekers in Saudi Arabia

Category	Refugees	Asylum-seekers
<b>Opening Bank Accounts</b>	<ul style="list-style-type: none"> <li>Legal barriers linked to documentation requirements for opening a bank account.</li> </ul>	<ul style="list-style-type: none"> <li>Similar barriers, with significant challenges related to identification and proof of residency.</li> </ul>
<b>Registering SIM Cards</b>	<ul style="list-style-type: none"> <li>Documentation requirements create legal barriers to SIM card registration.</li> </ul>	<ul style="list-style-type: none"> <li>Similar documentation-related barriers prevent SIM card registration.</li> </ul>
<b>Opening Mobile Money Accounts</b>	<ul style="list-style-type: none"> <li>Similar barriers as for opening a bank account; holding an account with a licensed KSA bank is typically a prerequisite.</li> </ul>	<ul style="list-style-type: none"> <li>Similar barriers, with additional challenges related to identification and proof of residency.</li> </ul>
<b>Opening Digital Wallets/ Electronic Payment Accounts</b>	<ul style="list-style-type: none"> <li>Similar barriers as for opening a bank account due to documentation requirements.</li> </ul>	<ul style="list-style-type: none"> <li>Similar barriers, with significant challenges related to identification and proof of residency.</li> </ul>



### Opening Bank Accounts

Banking activities in Saudi Arabia are regulated by The Saudi Arabian Monetary Authority (SAMA). To open a bank account, individuals must provide valid identification and proof of legal residence. This means that non-nationals who hold a valid passport and an Iqama (residence permit) are eligible to open accounts.

Under Saudi law, banks are prohibited from opening any type of account for non-Saudi or non-Gulf Cooperation Council (GCC) nationals who do not reside in the Kingdom (Article 200.2.3, *Rules for Bank Accounts*). The only exception requires written approval from the Ministry of Interior or the Ministry of Foreign Affairs, submitted through SAMA. If such approval is granted, an account may be opened using the applicant's passport as the identification document.

Refugees and asylum-seekers are generally unable to meet these documentation requirements, which include not only a valid passport and residence permit but also supporting documents such as salary certificates or evidence of stable housing. Consequently, many refugees and asylum-seekers face significant practical barriers to accessing formal banking services.



## **SIM Card Registration**

Restrictions also apply to individuals seeking to register SIM cards if they are not citizens or residents of Saudi Arabia. When registering a SIM card, citizens and residents must present their National Identification Card or Iqama, in addition to completing biometric verification. Visitors may obtain a SIM card by presenting a valid passport, but these SIM cards are temporary and may be deactivated after a certain period.



## **Mobile Money and Digital Payments**

Mobile money accounts in Saudi Arabia are linked to bank accounts and fall under the regulatory oversight of SAMA. As a result, the core eligibility and onboarding requirements for mobile money accounts mirror those applicable to bank accounts. Digital wallets are similarly regulated by SAMA under the *Payments and Services Law*. Service providers are required to verify applicants' identity, legal residence, address and contact details, as well as to confirm ownership of the mobile phone number associated with the digital wallet.



## **Challenges and Practical Realities**

In the absence of a formal legal framework recognising refugee or asylum-seeker status, access to financial and digital services in Saudi Arabia remains contingent on standard residence and documentation requirements. While these requirements are applied uniformly to non-nationals, refugees and asylum-seekers are rarely able to meet them in practice. Gaps between regulatory requirements and the documentation typically available to displaced populations—combined with additional expectations related to stable housing, employment, and provider discretion—result in persistent barriers to accessing banking services, SIM cards, and digital payment solutions.

# SYRIAN ARAB REPUBLIC (SYRIA)



NUMBER OF REFUGEES/ASYLUM-SEEKERS:  
**10,983 / 4,455** (June 2025)



NUMBER OF IDPS:  
**6,468,575** (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:  
**2,757** (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **TO BE DEVELOPED**

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

For IDPs: **ENABLING**

Syria is not a State party to the 1951 Refugee Convention or its 1967 Protocol, and there is no dedicated legal framework for the protection of Internally Displaced Populations (IDPs).

The Syrian banking sector has been severely affected by years of conflict, political instability, and economic sanctions. These factors have disrupted financial operations and undermined confidence in the banking system. In areas controlled by the Syrian Democratic Forces (SDF) and in former Northwest Syria (NWS) areas, access to formal financial services is heavily restricted for all residents, including host communities. Nevertheless, in government-controlled areas, licensed financial institutions operate under a regulatory framework set by the Central Bank of Syria, which includes AML/CFT and KYC obligations.

These regulations pose significant challenges for refugees and asylum-seekers. UNHCR-issued documentation is not sufficient on its own to meet KYC requirements. Refugees and asylum-seekers must also present a valid passport or a residence permit—documents whose issuance depends

on holding a passport or national ID from the country of origin. In addition, residence permits have been issued only on a limited basis. As a result, refugees and asylum-seekers are largely excluded from accessing both financial and mobile services.

In contrast, IDPs do not face legal barriers to accessing these services, as they are eligible to obtain the national smart ID card. However, they may still encounter practical challenges, such as administrative hurdles when renewing or replacing their documents.

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

Category	Refugees	Asylum-seekers	IDPs
<b>Opening Bank Accounts</b>	<ul style="list-style-type: none"> <li>Stringent KYC requirements, including a valid passport and residence permit. UNHCR-issued IDs alone are not sufficient to open bank accounts.</li> </ul>	<ul style="list-style-type: none"> <li>Similar KYC requirements as for refugees.</li> </ul>	<ul style="list-style-type: none"> <li>No legal barriers. IDPs are eligible for the national ID smart card and can legally open bank accounts. Practical challenges may arise when reissuing documents.</li> </ul>
<b>Registering SIM Cards</b>	<ul style="list-style-type: none"> <li>Stringent KYC documentation requirements, similar to those for opening a bank account.</li> </ul>	<ul style="list-style-type: none"> <li>Stringent KYC documentation requirements, similar to those for opening a bank account.</li> </ul>	<ul style="list-style-type: none"> <li>No legal barriers to SIM card registration. Registration is also possible in SDF and NWS areas, though with different providers.</li> </ul>
<b>Opening Mobile Money Accounts</b>	<ul style="list-style-type: none"> <li>Stringent KYC documentation requirements, similar to those for opening a bank account.</li> </ul>	<ul style="list-style-type: none"> <li>Stringent KYC documentation requirements, similar to those for opening a bank account.</li> </ul>	<ul style="list-style-type: none"> <li>Similar conditions as for opening a bank account.</li> </ul>
<b>Opening Digital Wallets / Electronic Payment Accounts</b>	<ul style="list-style-type: none"> <li>Stringent KYC documentation requirements, similar to those for opening a bank account.</li> </ul>	<ul style="list-style-type: none"> <li>Stringent KYC documentation requirements, similar to those for opening a bank account.</li> </ul>	<ul style="list-style-type: none"> <li>Similar conditions as for opening a bank account.</li> </ul>



## Opening Bank Accounts

There are no explicit legal provisions preventing refugees, asylum-seekers, or IDPs from opening bank accounts in Syria. However, KYC requirements set out under the Central Bank of Syria's AML/CFT Law No. 33 of 2005 pose major challenges for refugees and asylum-seekers.

Access is further complicated by geographical constraints. In areas controlled by the Syrian Democratic Forces (SDF) and in formerly opposition-held areas of northwest Syria (NWS), formal financial services have long been largely inaccessible to all groups. Some progress has been made in recent months, with Bank Bemo Saudi Fransi (BBSF)—which operates the country's largest retail network—reopening branches in Idleb and Deir ez-Zor.

To open an account, financial institutions must verify both identity and legal residence. Standard requirements include a national smart ID card for Syrian nationals, including IDPs, in accordance with the *Basic Monetary Law No. 23 of 2002* and the *Private Banks Law No. 28 of 2001*; a valid passport and residence permit for non-nationals, including refugees and asylum-seekers; proof of address; proof of employment or income (where available); and an active phone number. Applicants must also be over 18 years old.

These requirements are, in principle, met by IDPs, who generally have access to the same documentation as other Syrian nationals. Unless they reside in camps with movement restrictions or in areas controlled by the SDF or in northwest Syria (NWS), they do not face legal obstacles to opening a bank account.

In contrast, refugees and asylum-seekers face systemic barriers. Many lack valid passports and rely on UNHCR-issued documentation, which is generally insufficient on its own for KYC purposes. Even when passports are available, residence permits are often temporary and may not be accepted by banks. Moreover, as refugees and asylum-seekers are typically not authorised to work in Syria, providing proof of income is challenging—particularly as any income is often informal or unregistered. They may also face difficulties in providing proof of address.



## SIM Card Registration

KYC regulations also apply to mobile service providers. Under *Telecommunications Law No. 18 of 2010*, individuals registering a SIM card must provide valid identification and a residence permit. As a result, despite the absence of explicit legal prohibitions, refugees and asylum-seekers face limited access to mobile communications due to strict documentation requirements.

IDPs do not face legal barriers and can generally register SIM cards without difficulty, including in areas controlled by the SDF. In these regions, although the main service providers—MTN Syria and Syriatel—do not operate, an alternative provider registered with the Self-Administration authorities is active.



## Mobile Money and Digital Payments

Mobile money and digital wallet services are increasingly used in Syria, particularly in areas with limited access to traditional banking infrastructure. The main providers are Syriatel and MTN Syria, which offer mobile wallet services linked to users' SIM cards. Additional digital payment platforms have emerged in recent years, including Cham Cash—used in cooperation with Syrian authorities for certain salary and payment transactions—and RedRose.

The provision of mobile and digital financial services falls under the supervision of the Central Bank of Syria and is subject to the same KYC regulations as traditional banking. In principle, IDPs are able to access these services, as no explicit legal barriers apply; however, practical challenges may arise where identity documents need to be renewed or reissued. By contrast, refugees and asylum-seekers face significant limitations. The absence of KYC-compliant identification—such as valid passports, residence permits or permanent identification cards—combined with the temporary nature of any available documentation, makes it extremely difficult, if not impossible, for them to register for mobile money accounts or digital wallet services.



## Challenges and Practical Realities

Access to financial and mobile services for displaced populations in Syria remains significantly constrained after years of conflict and amid an ongoing transitional period. Although there have been some positive developments—such as the European Union's lifting of sanctions on certain banking activities in February 2025—political instability, economic deterioration, and limited infrastructure continue to restrict access, particularly in conflict-affected areas. As a result, many displaced individuals rely heavily on cash assistance from humanitarian organisations, including UNHCR.

Infrastructure limitations also affect the issuance and renewal of residence permits and identification documents required by financial and mobile service providers. Other documentation requirements—such as proof of address and proof of income—are difficult for refugees and asylum-seekers to meet and can also pose challenges for some IDPs. In addition, displaced persons often lack information about available financial services and procedures, while frontline staff in financial institutions may be unfamiliar with refugee and asylum-seeker documentation and related KYC requirements.



## Other Government and Regulatory Efforts to Enhance Financial Inclusion

There are no government initiatives specifically targeting financial inclusion for displaced populations in Syria. However, state-linked sectoral banks—such as the Agricultural Cooperative Bank—aim to promote financial inclusion among low-income groups more broadly. Despite the challenging operational context, four microfinance institutions remain active and are working to rebuild their networks and client bases: Al Wataniya, The First Microfinance Bank, Al Ibdaa Bank – Syria, and Banque Bemo Saudi Fransi Microfinance. Two of these institutions have partnered with UNHCR community centres to disseminate information on their services and products.

# YEMEN



NUMBER OF REFUGEES/ASYLUM-SEEKERS:

**46,827 / 14,094** (June 2025)



NUMBER OF IDPS:

**4,795,983** (June 2025)



NUMBER OF PEOPLE RECEIVING UNHCR FINANCIAL ASSISTANCE:

**127,776**, of which 18,747 refugees and asylum-seekers, and 109,029 IDPs (2025)



FINANCIAL INCLUSION REGULATORY ENVIRONMENT:

For refugees: **TO BE DEVELOPED**

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

For IDPs: **ENABLING**

Yemen is a State party to the 1951 Refugee Convention and its 1967 Protocol, which establish the core definitions and protections for refugees and asylum-seekers. However, Yemen has not adopted specific national legislation to implement these instruments. As a result, matters relating to refugees and asylum-seekers are governed through a combination of existing legal frameworks, including the *Law On the Entry and Residence of Aliens* (1991) and relevant provisions of the Yemeni Constitution.

Access to financial and mobile services is heavily shaped by AML and KYC regulations, which require valid identification and proof of residence. Refugee and asylum-seeker documentation issued by the Immigration, Passports and Naturalisation Authority (IPNA) is legally grounded in national legislation, including Article 2(5) and (6) of Republican Decree No. (39) of 2010, which mandates IPNA to receive refugee claims and issue refugee documentation. However, no specific legislation or sector-level regulatory guidance requires financial institutions or telecommunication providers to recognise documentation issued by IPNA or UNHCR for KYC purposes. As a result, despite the formal legal validity of IPNA-issued documents, limited institutional familiarity and inconsistent recognition persist in practice, while UNHCR-issued documentation is frequently not accepted by service providers.



In contrast, IDPs are Yemeni citizens and fall under national law and the direct responsibility of the State. The 2013 *National Policy for Addressing Internal Displacement* guarantees IDPs the right to obtain personal identification documents and assigns the State responsibility for issuing or replacing them. As citizens, IDPs are not subject to formal legal or regulatory restrictions when opening bank accounts, registering SIM cards or accessing mobile money and digital payment services. However, in practice, many IDPs face substantial barriers to access due to difficulties obtaining or renewing civil documentation, financial constraints, limited institutional capacity, geographic barriers and weak financial and telecommunications infrastructure, particularly in rural and hard-to-reach areas. These challenges are frequently linked to displacement-related factors, including the loss of supporting documents, weakened community networks required to attest to identity, economic instability, low literacy levels and limited awareness of financial products. As a result, despite the absence of legal barriers, many IDPs experience *de facto* exclusion from formal financial and mobile services.



## Financial and Digital Access for Refugees, Asylum-seekers and IDPs in Yemen

Category	Refugees	Asylum-seekers	IDPs
<b>Opening Bank Accounts</b>	<ul style="list-style-type: none"> <li>● Strict KYC requirements. IPNA-issued refugee documents have a legal basis but are frequently not recognised by banks due to limited familiarity and the absence of regulatory guidance mandating its acceptance for KYC purposes. UNHCR-issued documents are not formally recognised for KYC.</li> </ul>	<ul style="list-style-type: none"> <li>● Strict KYC requirements. Same constraints as for refugees.</li> </ul>	<ul style="list-style-type: none"> <li>● No regulatory barriers. However, practical challenges—such as difficulties in renewing or replacing IDs—may hinder access.</li> </ul>
<b>Registering SIM Cards</b>	<ul style="list-style-type: none"> <li>● Stringent KYC documentation requirements, similar to those for opening a bank account.</li> </ul>	<ul style="list-style-type: none"> <li>● Similar barriers as for opening bank accounts, compounded by the absence of regulatory guidance mandating recognition of asylum-seeker documentation and limited institutional familiarity.</li> </ul>	<ul style="list-style-type: none"> <li>● No legal barriers. As with bank accounts, practical hurdles—particularly access to valid IDs—may limit access to mobile services.</li> </ul>
<b>Opening Mobile Money Accounts</b>	<ul style="list-style-type: none"> <li>● Similar barriers as for opening bank accounts.</li> </ul>	<ul style="list-style-type: none"> <li>● Similar barriers as for opening bank accounts.</li> </ul>	<ul style="list-style-type: none"> <li>● No legal barriers. As with bank accounts, practical hurdles—particularly access to valid IDs—may limit access to opening a bank account.</li> </ul>
<b>Opening Digital Wallets / Electronic Payment Accounts</b>	<ul style="list-style-type: none"> <li>● Similar barriers as for opening bank accounts, primarily due to ID requirements for opening a bank account.</li> </ul>	<ul style="list-style-type: none"> <li>● Similar barriers as for opening bank accounts, primarily due to ID documentation requirements.</li> </ul>	<ul style="list-style-type: none"> <li>● No legal barriers. As with bank accounts, practical hurdles—particularly access to valid IDs—may limit access to opening a bank account.</li> </ul>



## **Opening Bank Accounts**

Yemen's legal framework does not explicitly prohibit refugees or asylum-seekers from opening bank accounts. However, in line with Law No. (1) of 2010 *on Combating Money Laundering and Financing of Terrorism*, financial institutions require individuals to present a valid national ID or a passport with a residence permit, along with proof of residence such as a utility bill or rental contract.

Refugee documentation issued by the Immigration, Passports and Naturalisation Authority (IPNA) is legally mandated under Article 2 (5) and (6) of the Republican Decree No. (39) of 2010. In practice, however, financial institutions demonstrate limited familiarity with IPNA-issued refugee and asylum-seeker documents, and there is no regulatory guidance requiring their acceptance for KYC purposes. UNHCR-issued identification documents are likewise not formally recognised for KYC. As a result, most refugees and asylum-seekers are unable to meet the documentation requirements necessary to open bank accounts.

At the time of the study, UNHCR was engaged in preliminary discussions with Al Kuraimi Islamic Microfinance Bank to raise awareness of IPNA-issued documentation and promote its acceptance for account-opening purposes.

For Yemeni IDPs, documentation challenges are primarily administrative rather than legal. While IDPs are entitled to the documents required by financial institutions, access is often constrained by financial hardship, limited capacity of the Civil Registration Authorities (CRA), weak infrastructure with significant regional disparities, low financial literacy, and broader vulnerabilities associated with displacement.



## **SIM Card Registration**

Under Law No. (38) of 1991 *on Wired and Wireless Telecommunications*, registering a SIM card requires valid identification—such as a national ID card or passport—and proof of residence. Refugees and asylum-seekers often struggle to meet these requirements because, while IPNA-issued refugee documentation is legally grounded, telecommunication operators are not required by regulation to accept it for KYC verification, and they demonstrate limited familiarity in practice. UNHCR-issued documentation is also not formally recognised for SIM registration.

IDPs generally possess the required documents but may face difficulties when IDs need to be issued, renewed, or replaced.



## **Mobile Money and Digital Payments**

Mobile money accounts and digital wallets are regulated by the Central Bank of Yemen and subject to AML and KYC requirements. To open a mobile money account, individuals must provide valid ID documentation, proof of residence, an active mobile number, and be at least 18 years old. Digital wallets—where available—generally require linkage to a debit or credit card and therefore depend on access to formal banking services.

As with banking services, refugees and asylum-seekers face significant barriers due to the absence of passports and residence permits, as well as challenges related to documentation recognition and institutional familiarity. IDPs do not face legal restrictions, but practical obstacles remain. Although platforms such as ONE Cash, Kuraimi Jawal, and Cash EWallet are expanding in Yemen, access for displaced populations remains limited.



## **Challenges and Practical Realities**

Despite IPNA's legal mandate to issue refugee documentation, the absence of sector-specific legislation or regulatory guidance requiring recognition of refugee and asylum-seeker documents for KYC purposes remains a central barrier to financial access.

Beyond regulatory challenges, financial exclusion is reinforced by limited smartphone ownership, high service costs, unreliable electricity and internet connectivity, language barriers, and low financial and digital literacy. These factors also limit the scalability of digital cash-based assistance modalities, resulting in continued reliance on cash and informal financial systems.

IDPs, while not subject to the same legal barriers, face similar practical challenges, including economic hardship, infrastructure gaps with regional disparities, low financial literacy, and difficulties obtaining or replacing civil documentation.



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

In collaboration with international organisations such as UNHCR, Yemeni financial regulators are exploring tailored KYC approaches to enable financial institutions to serve refugees and asylum-seekers while remaining compliant with AML requirements. Broader initiatives—such as the Joint Government of Yemen–UN Project and the Humanitarian Needs and Response Plan—also aim to support local authorities in developing durable solutions to displacement, with a focus on economic empowerment and improved access to basic services.





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