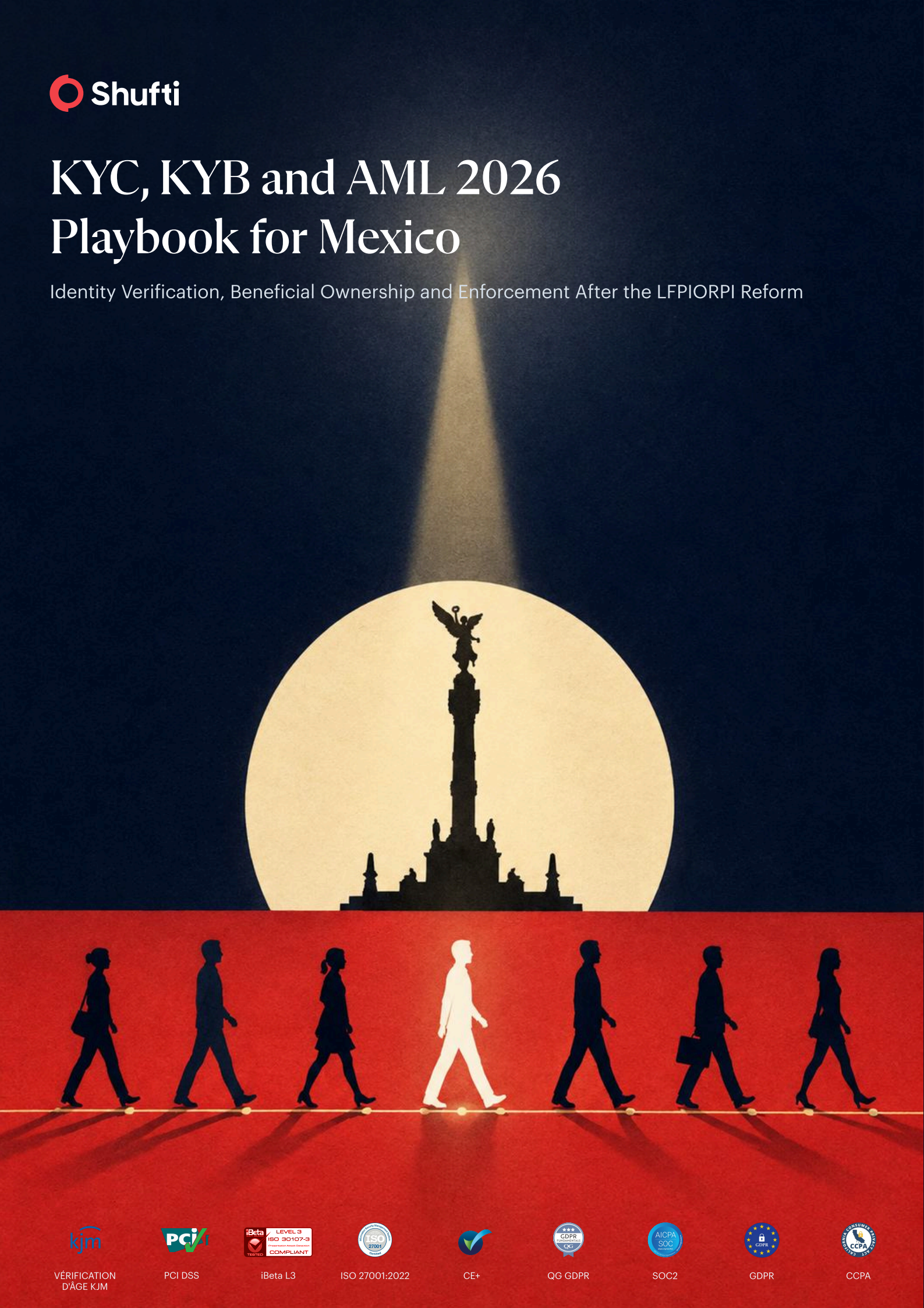


KYC, KYB and AML 2026 Playbook for Mexico

Identity Verification, Beneficial Ownership and Enforcement After the LFPIORPI Reform



VÉRIFICATION
D'ÂGE KJM



PCI DSS



iBeta L3



ISO 27001:2022



CE+



QG GDPR



SOC2



GDPR



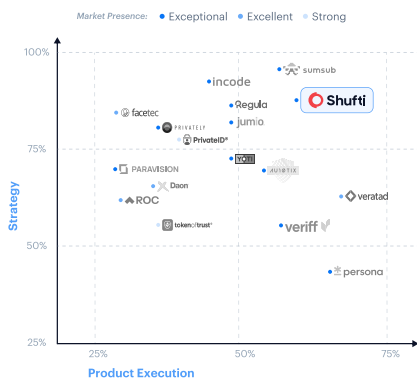
CCPA

Industry Recognition 2025–2026

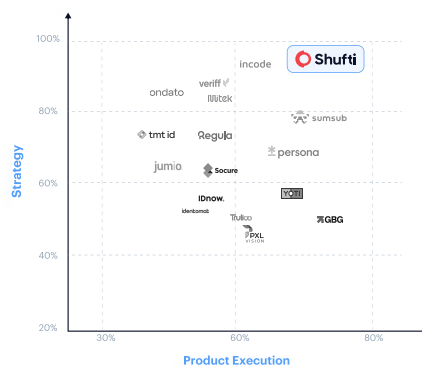
Recognised by leading analyst firms, government bodies and independent research organisations



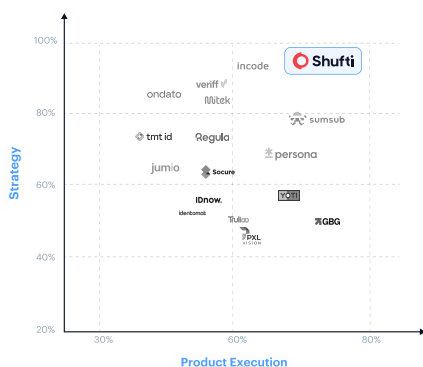
Ranked Exceptional in Liminal's 2026 Age Estimation Index



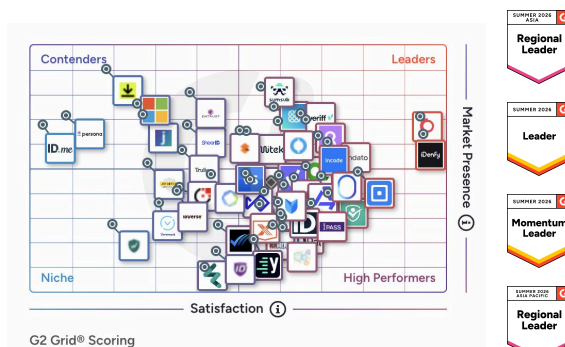
Ranked Exceptional in Liminal's 2026 Age Verification Index



Broadest global reach in the 2025 KuppingerCole Extended IDV report



Recognised as a Leader across four G2 Summer 2026 reports



Differentiated by Gartner on document diversity and country coverage



240+
Countries
& Territories

10k+
Document
Types



First EU company to achieve iBeta Level 3 Conformance to ISO/IEC 30107-3, with 0% APCER

**iBeta Level 3
Conformance**
0% APCER



Ranked Top 5 in the DHS RIVR 2025 for identity validation

0%
Extraction
Failure

0.67%
Worst-Case
FNMR





Awards Section

Awards

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Executive Summary

Mexico now enforces its anti-money-laundering rules on evidence, not intent. In July 2025 the CNBV issued 53 fines totalling MXN\$185 million against CIBanco, Intercam and Vector. The CIBanco and Intercam penalties covered AML control failures, and Vector's related penalties covered the Investment Funds Law.

Weeks earlier, FinCEN had named all three institutions under a new fentanyl authority. CIBanco then requested revocation of its banking licence, and the CNBV authorised its liquidation on 13 October 2025.

The 2025 LFPIORPI reform, effective 17 July 2025, lowered the beneficial-owner threshold from 50% to 25% and made a documented risk-based approach, automated monitoring and staff training compulsory. The first annual training and audit period starts 1 January 2026.

A follow-up reform to the LFPIORPI Regulations, in force 28 March 2026, put those duties into operation. It confirmed direct identification of beneficial owners, permanent automated monitoring, and a 24-hour reporting rule that applies even when an operation is not completed.

Verification in Mexico is never a single check. Teams reconcile local identity documents, two separate beneficial-owner thresholds, rising identity fraud, and a regulator that punishes weak evidence.

When these controls sit in separate systems, onboarding slows and audit exposure grows. The programs that hold up treat

25%

new beneficial-owner
threshold, down from
50%

MXN\$185M

CNBV fines, July 2025
(three banks)

10 yrs

minimum record-
retention period

+420%

virtual-asset alerts, Jan
to May 2025 vs 2024

WHO THIS GUIDE IS FOR

This playbook is written for the people who own onboarding and AML outcomes in Mexico. Compliance officers, MLROs and risk leads at banks, SOFOMES, fintechs, crypto platforms, lenders and iGaming operators. Product and engineering teams building remote onboarding flows will also find the identity-stack and routing sections useful.

If you onboard Mexican customers, identify beneficial owners, or answer to the CNBV, the UIF or the SAT, the chapters ahead map each duty to the control and the evidence an examiner will ask for.

WHAT CHANGED IN 2025 AND 2026

- 01** The LFPIORPI reform took effect 17 July 2025 (published in the DOF on 16 July).
- 02** The beneficial-owner threshold fell from 50% to 25% under the LFPIORPI. The Federal Tax Code keeps its separate 15% tax threshold.
- 03** A documented risk-based approach and an internal compliance manual with automated monitoring became mandatory.
- 04** The first annual staff-training and internal-audit period starts 1 January 2026.
- 05** Record retention runs to 10 years for identity, beneficial-owner and monitoring records.
- 06** The LFPIORPI Regulations reform took effect 28 March 2026. The SHCP general rules that will set official formats, PEP consultation and audit specifics are still pending, due by July 2026.
- 07** Biometric CURP registration is rolling out. As of mid-2026 it is voluntary and free, with no deadline, and the traditional CURP stays valid.

HOW MEXICO REGULATES IDENTITY AND AML

Mexico splits AML authority across several bodies, and each obligation can touch more than one. The [LFPIORPI](#) is the primary AML statute. The Federal Tax Code (CFF) adds a separate beneficial-owner regime for tax purposes. The 2018 Fintech Law governs virtual assets and payment institutions.

Money laundering itself is a criminal offence under Article 400 Bis of the Federal Criminal Code, so LFPIORPI sets a preventive duty and the criminal code sits behind it as a backstop.

WHO SETS POLICY AND WHO SUPERVISES

The SHCP sets AML policy. The [UIF](#), Mexico's financial intelligence unit, receives suspicious-transaction reports and maintains the Lista de Personas Bloqueadas (LPB). The [CNBV](#) supervises banks and fintechs and issues KYC provisions.

[Banxico](#) restricts crypto activity by regulated institutions. The SAT receives vulnerable-activity reports. The CNSF supervises insurance and the CONSAR oversees pensions. Mexico takes part in the FATF, GAFILAT and the Egmont Group.

Mexico remains in [enhanced follow-up from its 2018 FATF evaluation](#) and is due for a fifth-round assessment, though specific onsite and report dates are not yet confirmed.

In practice, two bodies matter most day to day. The CNBV sets how identity and AML controls are examined, and the UIF decides which names must be blocked and which reports must be filed. A firm can satisfy the CNBV on documentation and still fail if it misses a name on the UIF list.



BODY	ROLE	PRIMARY RESPONSIBILITY	REPORTING RECEIVED
SHCP	Ministry of Finance	AML and CFT policy coordination	Policy oversight
UIF	Financial Intelligence Unit	Receives STRs, maintains the LPB, coordinates with FinCEN and Egmont	STRs, unusual-operation reports
CNBV	Banking and Securities Commission	Supervises banks, fintechs and brokers, issues KYC provisions	Audit reports, exam findings
Banxico	Central Bank	Crypto restrictions for regulated institutions (Circular 4/2019)	Regulatory guidance
SAT	Tax Authority	Receives vulnerable-activity reports, runs the SPPLD portal	Vulnerable-activity reports, tax filings
CNSF	Insurance Commission	Insurance-sector supervision	Policy filings
CONSAR	Pension Commission	Retirement-savings supervision	Plan management

TAKEAWAY: AML duties cut across every supervisor. Compliance teams track SHCP policy, CNBV general provisions, UIF list changes and Banxico circulars together, because a single onboarding decision can answer more than one of them.



What Changed in 2025 and 2026: Inside the LFPIORPI Reform

[The July 2025 LFPIORPI reform](#) is Mexico's deepest AML update in a decade. It was published in the DOF on 16 July and took effect on 17 July 2025.

Beneficial-owner threshold cut to 25%

The reform lowered the beneficial-owner threshold from 50% to 25% under the LFPIORPI. A company whose two largest shareholders hold 30% and 25% must now identify both, where the old 50% rule would have captured neither.

A documented risk-based approach

Article 18, fraction VII now requires formal risk identification and mitigation. Internal policies must include automated monitoring and internal audits. Missing documentation counts as a missing control, not a paperwork gap.

Longer records and new vulnerable activities

Retention runs to a 10-year minimum for KYC, beneficial-owner and monitoring records. Real-estate development joins the vulnerable-activity list, so developers must identify beneficial owners and apply closer monitoring.

The 1 January 2026 deadline

Staff training and internal audits run by calendar year, with the first period starting 1 January 2026. Teams without documented training, a risk-based framework and updated beneficial-owner files by that date should expect findings.

THE MARCH 2026 REGULATIONS REFORM

[A decree reforming the LFPIORPI Regulations](#) took effect on 28 March 2026. It confirms direct identification of beneficial owners limited to natural persons, permanent automated monitoring, the internal compliance manual, the risk-based approach, mandatory training, annual audits, simplified identification for low-risk clients, and a 24-hour reporting rule that applies even when an operation is not completed.

The SHCP general rules that will set official formats, PEP consultation and audit specifics were due by July 2026 and remain unpublished as of August 2026.

BEFORE (UNTIL 16 JUL 2025)

Beneficial owner captured at 50% control
A 30% and a 25% holder captured no one
Periodic file refresh accepted
Reporting often after a transaction settled

AFTER (FROM 17 JUL 2025)

Beneficial owner captured at 25% control
Both are now beneficial owners
Permanent automated monitoring required
24-hour reporting, including attempted operations

DATE	MILESTONE	WHAT IT MEANS FOR YOU
16 Jul 2025	LFPIORPI reform published in the DOF	Countdown begins
17 Jul 2025	Reform effective	Threshold 50% to 25%, risk-based approach mandatory, 10-year retention starts
1 Jan 2026	First training and audit period starts	Documented training and internal audit become examinable
28 Mar 2026	Regulations reform effective	Duties operationalised, direct UBO ID, 24-hour reporting confirmed
By Jul 2026	SHCP general rules due	Official formats, PEP consultation and audit specifics still pending
To confirm	FATF fifth-round evaluation	Onsite and report dates not yet public

Reform timeline detail. Source: [Diario Oficial de la Federacion](#), 16 July 2025 and 27 March 2026.

Teams working through the new 25% ownership and automated-monitoring duties can see how a verification and screening platform handles these steps in KYC and AML compliance before committing to a vendor.

TAKEAWAY: The reform reset the enforcement standard. The CNBV now penalises the absence of documented proof, not only gaps in written policy. Documented training, a risk-based framework and current beneficial-owner files are the difference between a clean exam and a finding.

CURP, RFC and INE: Why a Valid Mexican ID Is Not Proof of a Person

Mexico's identity stack has four core identifiers, the CURP, the RFC, the INE credential and the comprobante de domicilio. Each proves something different, and knowing the difference is how teams defend against identity fraud.

CURP

An 18-character code from RENAPO built from name, date of birth, birthplace and sex. A valid [CURP](#) proves registry enrollment only. It does not verify the person presenting it, which is why fraud rings pair real CURPs with fabricated supporting documents.

INE (voter credential)

Issued by the National Electoral Institute, it carries the CURP, a photo and security features, and works as the de facto national ID. It adds photo-based binding but can still be forged.

RFC

The SAT tax ID. The 2025 reform waived it for tiered accounts at Nivel 2 and Nivel 3, so it now matters less for identity proofing than the INE, and more for business and tax linkage.

Comprobante de domicilio

Proof of address. On its own it proves only an address link. Paired with an INE or passport, it strengthens the file.

Biometric CURP

RENAPO now issues a biometric CURP that binds face, fingerprint and iris data to the registry record, created by the reform to the Ley General de Población published in the DOF on 16 July 2025. Reporting on how far mandatory use has advanced is genuinely split: the government emphasises a gradual, free rollout with the traditional CURP staying valid, while some outlets describe it as already required for certain procedures in 2026. The once-anticipated February 2026 mandatory date did not take effect, though some institutions already request the biometric version in practice.

To support the rollout, SEGOB and RENAPO [tendered up to MXN\\$520 million for cloud storage of biometric-CURP](#) data through 2028. The first tender was declared void in September 2025, a reminder that the database's security is still being built out.

A CURP is not a customer, the personhood gap.

Documents prove registry enrollment, not the living person holding them. CONDUSEF reported that identity-theft-related fraud in the banking system reached MXN\$11.3 billion (about USD\$611 million) in 2024, up 77% year on year, and that banks reimbursed about 1.4% of it.

CONDUSEF also recorded 25 cases of active corporate-identity spoofing in the first quarter of 2026. Attackers increasingly combine real registry data with fabricated or synthetic supporting documents, which is exactly the gap a document check alone cannot close.

1.4%

reimbursed to victims

About 98.6% of banking identity-theft fraud losses were never recovered in 2024.

[SOURCE: CONDUSEF, VIA MEXICO BUSINESS NEWS](#)

Closing that gap takes [Face Verification](#) with liveness detection and biometric matching, so the file is bound to a live person rather than to a document that can be copied. [Document Verification](#) confirms the document is genuine first, then the face match binds the person to it.



IDENTIFIER	ACCEPTED FOR KYC?	WHAT IT PROVES	THE GAP	HOW TO COVER IT
CURP	Yes (Nivel 2+)	Registry enrolment	No liveness or biometric match	Liveness detection and facial matching
INE	Yes (primary)	Electoral registry plus photo	Photo can be forged or swapped	Face verification with 3D liveness
Passport	Yes (foreign)	Travel authority, biometric where supported	Depends on issuer controls	Chip and MRZ checks
Comprobante	Supporting only	Address association	Does not identify the person	Pair with INE or passport
Biometric CURP	Yes (rollout 2026)	Registry plus face, fingerprint, iris	Assurance depends on RENAPO security	iBeta-certified liveness and spoof detection

A NOTE ON MEXICAN DOCUMENT DIVERSITY

Mexico issues identity documents across federal, state and municipal bodies, and many carry holographic overlays placed directly over the data fields. Mexican names often combine multiple given names with paternal and maternal surnames, and an engine that misreads the ordering can create a screening mismatch. Reliable document reading across this variety is the first test of any verification partner.

TAKEAWAY: Mexican documents are necessary but not sufficient. Face liveness detection and biometric matching turn a valid document into a verified person, and that matters more as biometric CURP adoption grows through 2026.

KYC in Mexico: How to Onboard and Verify a Customer

Mexico's banking regulator, the CNBV, uses a four-tier account framework under Article 115 of the Ley de Instituciones de Crédito and its general provisions. Each level (Nivel 1 to Nivel 4) matches the depth of identity checks to the account's deposit limit and risk. Lower tiers allow lighter checks and small balances. Higher tiers require full identification and support larger or business accounts. The deposit caps below are set in UDIs (a Mexican inflation-indexed unit), so the peso amounts are approximate and shift over time.

NIVEL	IDENTIFICATION DATA	DOCUMENTS / VERIFICATION	MONTHLY DEPOSIT CAP	OPENING METHOD	TYPICAL USE
1	None	No identification file	Up to 750 UDIs (approx. MXN 6,600)	In person or remote	Low-value everyday payments
2	Name, date of birth, address	Name and date of birth from an official ID (e.g. INE)	Up to 3,000 UDIs (approx. MXN 26,400)	In person or remote	Everyday retail accounts
3	Full identification data	INE or passport and proof of address; entities add registry and ownership records	Up to 10,000 UDIs (approx. MXN 88,000)	In person, or by video for Mexican nationals with an INE	Higher-value retail and business
4	Complete identification file	INE or passport, proof of address and biometric checks; corporate documents for entities	No limit	In person, or by video (min. 30-second live call) for Mexican nationals with an INE	Full-service and higher-risk accounts

Enhanced due diligence applies to PEPs, vulnerable activities under Article 17, and high-risk customers. It triggers beneficial-owner chain analysis, source-of-funds documentation, business-registration verification and closer monitoring.

Remote onboarding is well established for higher tiers. Since 2020 the CNBV has allowed banks and fintechs to open Nivel 3 and Nivel 4 accounts for Mexican nationals through a non-face-to-face video procedure. The customer completes a short online form, submits a photo of their INE credential and a selfie, and joins a live video call of at least 30 seconds. The provider matches the person's face to the INE photo, checks the credential with the INE, and confirms the CURP with RENAPO. As biometric CURP adoption grows, video verification with liveness detection is becoming the norm for remote account opening.

The decision tree below shows how a new customer or entity is sorted by risk level, and which checks each level triggers.



The decision tree below shows how a new customer or entity is sorted by risk level, and which checks each level triggers.

DATA-PRIVACY NOTE (LFPDPPP)

Biometric data is sensitive personal data under Mexico's Federal Law on Protection of Personal Data Held by Private Parties. Face, fingerprint and iris capture needs a clear lawful basis, express consent where required, purpose limitation and strong security. Build privacy notices and retention limits into the onboarding flow, not as an afterthought.

KYC by customer and entity type

Different structures trigger different workflows under the dual beneficial-owner regime. Classify the entity, decide which thresholds apply (usually both 25% AML and 15% tax), pick the verification route, and set monitoring triggers.

Misclassifying a corporate entity as an individual, or stopping at 50% instead of 25%, is a leading cause of CNBV findings.

CUSTOMER / ENTITY	25% LFPIORPI	15% CFF	VERIFICATION ROUTE	ENHANCED MONITORING TRIGGER
Retail individual	No	No	Nivel 1 to 2, ID plus name, DOB, address	High-value transactions, suspicious profile
Corporate (S.A., S. de R.L.)	Yes	Yes	Nivel 3 to 4, all UBOs on both thresholds, registry and shareholder records, chain analysis	PEP link, vulnerable-activity class, watchlist screening
SOFOM E.N.R.	Yes	Yes	Nivel 3 to 4, UBOs on both thresholds, business registration	Credit operations, unusual lending patterns
IFPE / IFC (fintech)	Yes	Yes	Nivel 4, full KYC plus UBOs, licence proof, source of funds for founders	Ongoing screening, biometric CURP integration
Foreign / non-resident	Yes	Yes (tax)	Nivel 3 to 4, passport plus address proof, chain to ultimate owner	Cross-border monitoring, correspondent checks
PEP	Yes	Yes	Enhanced due diligence, source of funds, chain analysis	Mandatory periodic review, adverse-media monitoring
UBO in the chain	Yes	Yes	Standalone KYC per owner, INE or passport, declaration	PEP and sanctions screening, periodic re-check

The flowchart below walks through one individual onboarding, from the first ID capture to the final decision you keep on file.

Individual Onboarding Flowchart

Left-to-right process flow with one decision branch and three outcome paths



Onboarding a person is the simple case. Onboarding a company means tracing who really owns it, which is where the next section picks up.

Beneficial Ownership After the 25% Rule

The July 2025 reform cut the beneficial-owner threshold from 50% to 25% under the LFPIORPI. The Federal Tax Code keeps a separate 15% tax threshold under Article 32-B Quarter, so companies now identify and document beneficial owners under two regimes at once, 25% for AML and 15% for tax.

BEFORE (UNTIL 16 JUL 2025)

Beneficial owner captured at 50% AML control
A 30% and a 25% holder captured no UBOs
Lighter files, narrower screening population

NOW (FROM 17 JUL 2025)

Beneficial owner captured at 25% or more (AML)
Both are now UBOs, and holders at 15% or more are captured for tax
Wider screening, deeper files, dual-threshold tracking

WORKED EXAMPLE, COMPANY X

Company X has five shareholders: 30%, 25%, 20%, 15% and 10%. Under the old 50% rule it had no beneficial owners at all. Under the 25% AML rule, the 30% and 25% holders are both beneficial owners. Under the separate 15% tax rule, four of the five are captured, including the 20% and 15% holders the AML rule misses. Two owners for AML, four for tax, from one cap table. That split is where the operational complexity lives.

The tax regime asks for SAT notification within 15 days of an ownership change. The AML regime asks for re-verification at account opening and every two years after. Each AML beneficial owner at 25% or more is screened against the LPB and international lists.

Real-estate developers, now a vulnerable activity, verify all beneficial owners under both thresholds and apply closer monitoring.

REGIME	OLD THRESHOLD	CURRENT THRESHOLD	DEFINITION	DOCUMENTATION
LFPIORPI (AML)	50%	25%	Natural person(s) with ultimate control or benefit	INE, declaration, chain analysis, LPB and sanctions screening
CFF (tax)	15%	15% (unchanged)	Shareholders, majority and minority interests	Corporate registration, shareholder registry, tax filings

Screening customers against the UIF list and OFAC, and identifying owners at the 25% mark, is continuous work. [AML Screening](#) and [KYB business verification](#) automate the checks so they run at onboarding and on an ongoing basis rather than as a periodic scramble.

TAKEAWAY: The 25% threshold widens the beneficial-owner population sharply, and running it beside the 15% tax rule creates real tracking work. Missing an owner at 25% exposes the institution to fines and, in severe cases, licence action. Documentation is now the control, not the paperwork.

PEPs, Sanctions and the US to Mexico Enforcement Axis

Mexico runs two sanctions tracks at once, a domestic one through the UIF's Lista de Personas Bloqueadas and an international one across OFAC, the UN, the EU and FinCEN. Continuous screening covers both.

The LPB lists persons tied to money laundering or terrorism financing. When a customer matches the LPB, the institution suspends the operation and files an unusual-operation report to the UIF within 24 hours. A politically exposed person is treated as high risk and moves to enhanced due diligence, with source-of-funds proof, beneficial-owner chain analysis and closer monitoring.

Institutions that handle US dollars or hold US correspondent accounts also screen against OFAC's SDN list and other international lists. Under the International Emergency Economic Powers Act, the 2025 maximum civil penalty is [USD\\$377,700 per violation](#), or twice the value of the transaction, whichever is greater, and it is adjusted for inflation each year.

“A decades-long banking history is no shield when controls cannot be proven. Mexico now punishes the absence of documented evidence, not only gaps in written policy.”

THE ENFORCEMENT LESSON OF THE 2025 CIBANCO, INTERCAM AND VECTOR ACTIONS

THE JUNE 2025 FINCEN ACTION, CIBANCO, INTERCAM, VECTOR

On 25 June 2025, [FinCEN issued its first orders under the FEND Off Fentanyl Act](#) against CIBanco, InterCam and Vector for handling payments tied to fentanyl-precursor procurement.

CIBanco requested revocation of its licence on 8 October 2025, and the CNBV authorised revocation and liquidation on 13 October 2025. Deposits carry the IPAB guarantee up to about MXN\$3.4 million per depositor, and depositors have until 13 October 2026 to claim insured funds. Correspondent banks worldwide reduced their Mexico exposure in response.

The pressure is not only financial. In February 2025 the US designated six Mexico-based cartels as Foreign Terrorist Organizations, which makes material support a federal crime and raises the stakes on any missed sanctions hit.

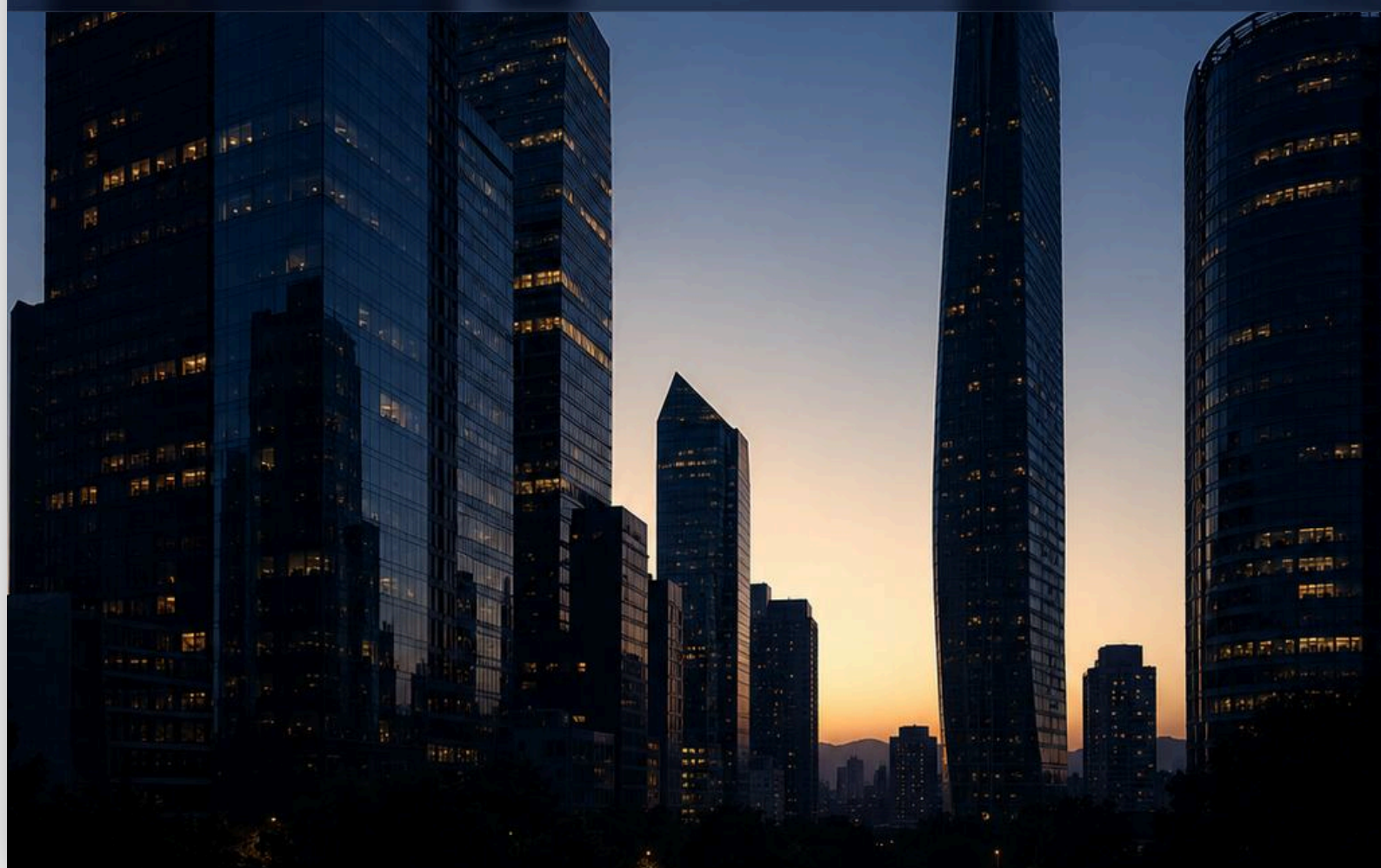
DATE	EVENT
25 Jun 2025	FinCEN issues special measures against CIBanco, InterCam and Vector
30 Jun 2025	Orders published in the US Federal Register
Jul to Sep 2025	Effective date extended as institutions and regulators respond
15 Jul 2025	CNBV issues 53 fines totalling MXN\$185M against the three institutions
8 Oct 2025	CIBanco requests revocation of its banking licence
13 Oct 2025	CNBV authorises revocation and liquidation, IPAB payouts begin
20 Oct 2025	Final effective date for the FinCEN special measures

MXN\$185M

53 fines issued by the CNBV in July 2025 against CIBanco, InterCam and Vector. The CIBanco and InterCam penalties covered AML control failures, and Vector's related to the Investment Funds Law.

[SOURCE: LA JORNADA, 15 JULY 2025](#)

TAKEAWAY: Enforcement against Mexican institutions is intensifying, and the CIBanco case shows that a long history is no shield when controls are undocumented. Real-time LPB screening, continuous OFAC screening and a documented escalation path for hits are the baseline now.



Industry Compliance: Fintech, Crypto, iGaming and Lending

Mexico regulates every sector through one shared AML core, the LFPIORPI, then layers licence-specific duties on top. A fintech, a crypto provider, an iGaming operator and a lender all run the same tiered KYC, documented risk-based approach and 10-year retention, yet each answers to a different supervisor and a different set of sector risks. In the following, we map each one to its governing framework and the KYC and AML controls a CNBV examiner will expect.

Fintech (IFPE and IFC)

The 2018 Fintech Law, published in the official gazette on 9 March 2018, governs Electronic Payment Fund Institutions, and virtual assets hold no legal-tender status. As of mid-2026 the CNBV's public register lists roughly 40 authorised IFPE, a count that moves with new authorisations and revocations, so check the live CNBV register for the current figure.

Fintech AML duties match those of banks, full LFPIORPI, tiered KYC, a documented risk-based approach and 10-year retention. A push for a Fintech Law update, sometimes called Fintech Law 2.0, is under discussion, with industry asking for tiered licensing and open-finance rules.

Crypto and VASPs

Banxico Circular 4/2019 bars regulated financial institutions from offering virtual-asset exchange or custody to customers, while non-financial VASPs fall under the LFPIORPI, and the 2025 reform widened VASP obligations for providers serving Mexican residents. UIF data shows virtual-asset alerts rose from 607,404 in January to May 2024 to about 3.15 million in the same period of 2025, roughly a fivefold jump (about +420%), and close to half of the 6.86 million vulnerable-activity reports the UIF received in that window (SAT/UIF via Expansión, June 2025).

In May 2026 a Senate initiative proposed amending ten financial laws and regulating a [peso-referenced stablecoin, the Activo Virtual Estable](#), whose issuer would have to guarantee convertibility to pesos at par. It is proposed, not enacted, and worth tracking through the 2026 session.

iGaming

Gaming and lotteries are vulnerable activities. The framework remains the 1947 Ley Federal de Juegos y Sorteos and its 2004 Regulation, supervised by SEGOB's Dirección General de Juegos y Sorteos. A concrete fiscal change took effect on 1 January 2026: the special production-and-services tax (IEPS) on betting games rose from 30% to 50% (published in the DOF on 7 November 2025), and it now explicitly taxes digital and online betting offered by residents and foreign operators.

A wide-ranging reform bill is in progress and would create a national gaming institute, but [the committee review deadline has moved to 31 August 2027](#). Operators still apply age verification, INE-linked identity, beneficial-owner identification and betting-pattern monitoring.

Lending

Gaming and lotteries are vulnerable activities. The framework remains the 1947 Ley Federal de Juegos y Sorteos and its 2004 Regulation, supervised by SEGOB's Direccion General de Juegos y Sorteos. A concrete fiscal change took effect on 1 January 2026: the special production-and-services tax (IEPS) on betting games rose from 30% to 50% (published in the DOF on 7 November 2025), and it now explicitly taxes digital and online betting offered by residents and foreign operators.

A wide-ranging reform bill is in progress and would create a national gaming institute, but the committee review deadline has moved to 31 August 2027. Operators still apply age verification, INE-linked identity, beneficial-owner identification and betting-pattern monitoring.

SECTOR	GOVERNING FRAMEWORK	KYC / AML EMPHASIS
Fintech (IFPE / IFC)	2018 Fintech Law + LFPIORPI	Bank-grade AML: full LFPIORPI, tiered KYC, documented risk-based approach, 10-year retention. Roughly 40 authorised IFPE on the CNBV register (mid-2026); verify the live count.
Crypto / VASPs	Banxico Circular 4/2019 + LFPIORPI	Regulated institutions barred from virtual-asset exchange or custody; non-financial VASPs fall under LFPIORPI. Track the proposed peso-stablecoin Senate initiative (May 2026).
iGaming	Ley Federal de Juegos y Sorteos (1947) + LFPIORPI; SEGOB DGJS	Age verification, INE-linked identity, beneficial-owner identification and betting-pattern monitoring. IEPS betting tax rose 30% to 50% from 1 Jan 2026, including online betting. Reform bill review moved to 31 Aug 2027.
Lending	CNBV supervision + LFPIORPI vulnerable activity	Enhanced KYC, corporate beneficial-owner identification and fraud monitoring at origination. Identity fraud is the acute risk.

TAKEAWAY: Sector duties vary inside one LFPIORPI frame. Fintechs carry bank-grade obligations, crypto operators work around Banxico limits while watching the stablecoin initiative, iGaming waits on a reform now pushed to 2027, and lenders fight identity fraud at origination.

How to Choose an Identity Verification Partner for Mexico

Choosing a verification partner for Mexico comes down to five practical tests, document coverage, liveness quality, screening breadth, data residency, and configurability for local rules. A vendor that scores well on a global demo can still fail on Mexican documents, so the evaluation has to be Mexico-specific.

DOCUMENT COVERAGE COMES FIRST

Mexico issues identity documents across federal, state and municipal bodies, and layouts, security features and data-field placements differ across them. Many carry holographic overlays placed directly over the data fields where verification engines read critical information.

Mexican names often combine several given names with a paternal and a maternal surname, and an engine that misreads the ordering can create a screening mismatch that blocks a genuine customer or lets a wrong match through. A partner that cannot read these reliably pushes false rejections onto real customers and adds risk to every AML check downstream.

THEN LIVENESS AND SCREENING

Certified liveness, tested against presentation attacks, is what stops a photo or a replayed video from passing as a live person. Screening breadth decides if a vendor can cover the UIF blocked-persons list and the US OFAC and cartel FTO designations in one pass, which matters for any firm with dollar flows.

DATA RESIDENCY AND CONFIGURABILITY

Regulated banks often need an on-premise or in-region option. The flow has to bend to the risk-based tiers the Regulations demand rather than force a single path on every customer.



CRITERION	WHAT TO CHECK	WHY IT MATTERS IN MEXICO
Document coverage	Support for INE plus state and municipal IDs	Documents differ across federal, state and municipal issuers
Liveness	Certified, presentation-attack-tested liveness	Binds a live person to the CURP or INE
Screening	UIF, OFAC, UN, PEP and cartel FTO lists	Cross-border USD exposure demands OFAC coverage
Data residency	On-premise or in-region option	Regulated banks need control over identity data
Configurability	Tiered flows and risk-based routing	Matches the LFPIORPI risk-based approach
Certifications	ISO 27001, SOC 2 Type II, GDPR	Evidence of security maturity

Ask each vendor to run Mexican test documents through the platform, not a curated sample. The difference between a partner that handles holographic INE fields and multi-surname parsing and one that does not show up only on real documents.

Teams that want to see how a platform handles holographic INE fields and multi-surname parsing can [book a demo](#) for a walkthrough on Mexico onboarding flows.

TAKEAWAY: Evaluate on document coverage, liveness, screening breadth, data residency and configurability. Mexico's document diversity and holographic overlays make document coverage the decisive test. Run Mexican documents through any trial, not the vendor's sample set.

Your Mexico AML Compliance Checklist

This checklist maps each obligation to the control it needs and the evidence an examiner will ask for. Use it as a self-assessment and a remediation roadmap.

OBLIGATION	CONTROL REQUIRED	AUDIT EVIDENCE
Customer due diligence	Collect ID, verify identity, capture name, DOB and address, identify UBO if an entity, screen the LPB and international lists, document a risk rating	Signed CDD file, ID copy, verification timestamp, liveness result, risk-rating memo
Enhanced due diligence	Request source-of-funds documents, run beneficial-owner chain analysis, assess geopolitical risk, review on a set cadence	Source-of-funds docs, ownership chart, periodic monitoring memos
Vulnerable-activity identification	Check the Article 17 list, flag and apply EDD	Transaction-profile review, activity-classification memo
Record-keeping (10 years)	Retain all KYC, CDD, EDD, verification proofs, monitoring alerts and UBO records	Central repository, encryption and audit log, retention schedule
Ongoing monitoring	Screen against updated lists on a set cadence, run automated monitoring, flag off-profile transactions	Screening reports, alert logs, escalation decisions
LPB hit protocol	Suspend the operation, file the unusual-operation report to the UIF within 24 hours, notify the customer in writing	Suspension record, report timestamp, notification letter, UIF receipt
Internal compliance structure	Name a compliance officer, document the internal manual, run annual training and internal audit, document the risk-based approach	Officer appointment, manual, training sign-off, audit report, risk memo
Biometric CURP readiness	Update document-verification tooling, train staff, plan the transition, test spoof detection	Update log, training

MILESTONE DEADLINES

BY 1 JAN 2026 Staff training, internal audit, risk-based documentation and beneficial-owner re-verification.

ONGOING List screening on a set cadence, suspicious-transaction reporting, and record-retention audits.

THROUGH 2026 Biometric CURP tooling updates and staff training as adoption grows.

COMMON CNBV FINDINGS, 2024 TO 2025

✗ No documented proof that KYC happened, such as unsigned CDD files or missing timestamps.

✗ Beneficial-owner thresholds misapplied, for example stopping at 50% instead of 25%.

✗ LPB screening only at account opening rather than continuously.

✗ Monitoring alerts left unreviewed with no escalation decision on file.

✗ Training not completed by the 1 January 2026 deadline.

TAKEAWAY: Regulators penalise absent documentation more harshly than absent policy. A program with documented procedures, training sign-offs, internal audits and monitoring trails is defensible. One with policies but no execution evidence is not.

Mexico Verification Performance

Verification performance is the proof point that ties this playbook together. It measures how often genuine Mexican customers pass on the first attempt, and how reliably documents are authenticated across the country's many issuers.

98.95%

MEXICO PASS RATE WITH SHUFTI

A high first-time pass rate matters for two reasons. It keeps real customers from dropping out of onboarding, and it lowers the manual-review load that slows AML checks downstream. On documents with holographic overlays and multi-surname fields, the gap between a partner that reads them and one that does not shows up directly in the pass rate.

About Shufti

Shufti is a Glocal Platform that manages the full compliance lifecycle, from sign-up and onboarding through authentication and monitoring to remediation. Built for every industry, every region and every use case, it operates across 240+ countries and territories, with SaaS, private-cloud and on-premise deployment and ISO 27001, SOC 2 Type II and GDPR alignment. For teams verifying customers in Mexico, four capabilities map directly to the LFPIORPI duties in this guide.

Each capability answers a gap this guide has already named. A biometric CURP proves registry enrollment, not the person presenting it, and face verification with 3D liveness and biometric matching closes that personhood gap.

Beneficial ownership now runs under two thresholds at once, the 25% AML test and the separate 15% tax test, so KYB and ownership mapping check both in a single pass. Screening covers customers and beneficial owners together against sanctions, PEP and adverse-media lists, with ongoing monitoring that keeps LPB and OFAC coverage current between reviews.

CAPABILITY	WHAT IT DOES FOR MEXICO
Document verification	Recognises 10,000+ actively processed document types, including the Mexican INE, passport, comprobante and biometric CURP, with OCR across 150+ languages, so onboarding reads local documents without manual triage.
Face verification	Binds a document to a live person with 3D liveness detection, biometric matching and iBeta-certified liveness, which is how a team closes the personhood gap and catches deepfakes and synthetic identities.
AML screening	Screens customers and beneficial owners in parallel against global sanctions, PEP and adverse-media watchlists with ongoing monitoring, covering the dual 25% and 15% threshold checks and continuous LPB and OFAC coverage.
KYB and beneficial ownership	Verifies corporate entities and maps ownership chains, with manual and automated UBO analysis for the dual LFPIORPI and CFF regimes across 240+ countries and territories.

Deployment matches how Mexican teams already operate. Video-based identity verification adds live, agent-led sessions with in-session screening for higher-risk onboarding. The platform runs as SaaS, in a private cloud, or on-premise.

It ships through a REST API, mobile and web SDKs, and a no-code workflow builder, so a compliance team can configure Nivel-based flows and the dual-threshold ownership checks without rebuilding the onboarding stack. Read more on the [Mexico compliance page](#) or the [KYC and AML overview](#).

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Glossary

- 01 **15% tax threshold:** The separate beneficial-owner test under the Federal Tax Code (Article 32-B Quarter), applied alongside the 25% AML rule.
- 02 **Banxico:** Banco de México. The central bank; it restricts crypto activity by regulated institutions.
- 03 **Beneficial owner (25% rule):** The natural person who ultimately owns or controls 25% or more of a legal entity under the reformed LFPIORPI.
- 04 **CNBV:** Comisión Nacional Bancaria y de Valores. Supervises banks and fintechs and issues KYC provisions.
- 05 **CONDUSEF:** Comisión Nacional para la Protección y Defensa de los Usuarios de Servicios Financieros. The financial-consumer protection body.
- 06 **CURP:** Clave Única de Registro de Población. An 18-character population registry code issued by RENAPO.
- 07 **EDD:** Enhanced Due Diligence. The heightened checks applied to higher-risk customers, including PEPs.
- 08 **FATF / GAFILAT:** The Financial Action Task Force and its Latin American body; the global and regional AML standard-setters in which Mexico participates.
- 09 **IEPS:** Impuesto Especial sobre Producción y Servicios. The special production-and-services tax that applies to betting games.
- 10 **INE:** Instituto Nacional Electoral. Issues the voter credential used as the de facto national ID.
- 11 **LFPIORPI:** Ley Federal para la Prevención e Identificación de Operaciones con Recursos de Procedencia Ilícita. Mexico's federal anti-money-laundering law.
- 12 **LPB:** Lista de Personas Bloqueadas. The UIF's blocked-persons list, screened during onboarding and monitoring.
- 13 **Niveles (tiered accounts):** CNBV account levels (Nivel 1 to Nivel 4) with graduated identification requirements based on risk and transaction limits.
- 14 **PEP:** Politically Exposed Person. Treated as high risk and subject to enhanced due diligence.
- 15 **Reglamento (LFPIORPI Regulations):** The regulations that put the LFPIORPI into operation, most recently reformed in 2026.
- 16 **RENAPO:** Registro Nacional de Población. The national population registry that issues the CURP, including the biometric CURP.
- 17 **RFC:** Registro Federal de Contribuyentes. The federal taxpayer registry code.
- 18 **SAT:** Servicio de Administración Tributaria. The tax authority; issuer of the RFC.
- 19 **SEGOB:** Secretaría de Gobernación. The interior ministry; oversees RENAPO and gaming through the Dirección General de Juegos y Sorteos.
- 20 **SHCP:** Secretaría de Hacienda y Crédito Público. The finance ministry that sets AML policy.
- 21 **UIF:** Unidad de Inteligencia Financiera. Mexico's financial intelligence unit; it receives suspicious-transaction reports and maintains the LPB.

Disclaimer: This guide is educational and does not constitute legal advice. Verify current obligations against the LFPIORPI, its Regulations, and CNBV and UIF provisions before acting.



Verify Mexico Customers Accurately and at Scale

The 2025 LFPIORPI reform tightened beneficial-owner identification to 25%, made automated monitoring mandatory, and set the 1 January 2026 training and audit deadline. Shufti's document verification, face verification, AML screening and KYB support identity proofing against the biometric CURP, beneficial-owner verification under the dual 25% and 15% thresholds, and continuous LPB monitoring.

Walk through the platform configuration before a vendor decision.

[Book a Mexico KYC Demo](#)

[Explore Shufti for Mexico](#)

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