



Central Bank of The Bahamas

Access to Basic Banking & Payments Services

Consultation Paper

3rd October, 2025

1 EXECUTIVE SUMMARY

In the early 2000s, the Central Bank of The Bahamas (“the Central Bank” or “the Bank”) launched its Payments System Modernization Initiative (PSMI), targeting improved outcomes for financial inclusion and access to financial services, by making the domestic payments system more efficient and non-discriminatory. The initiative has achieved a number of milestones, including the establishment of the Real Time Gross Settlement System (RTGS), the local Automated Clearing House (ACH) and the rollout of the retail central bank digital currency (CBDC), the SandDollar. In parallel, the Central Bank continued to progress efforts to improve financial access, which is a key enabler of financial inclusion.

To improve the efficiency and affordability of access to financial services, the Central Bank proposes to introduce a basic bank or payments account, for unbanked and underbanked individuals, tackling cost barriers associated with maintaining transactional accounts. Benchmarked against international practices, a transactional or payments account would be a low-to no-cost product to facilitate payments, or more broadly deposits and withdrawals (whether electronic or by cash) of various forms, including credit transfers, card payments, and direct debit payments.

While, in international comparisons, the complete set of offerings and fee structure on basic accounts vary across countries, key access features include simplified customer due diligence during the account opening process, limits on the volume and value of transactions permissible, and thresholds on the maximum amount of funds that can be held within the accounts.

For The Bahamas, it is proposed that means-testing for basic accounts would be scaled to limit the sum of all credits and debits across the accounts to 2.5 times the annual minimum wage level currently: equivalent to 2.5 times B\$13,520 or B\$33,800 per annum.

While it is commonly accepted that the potential or actual misuse of accounts for fraud, money-laundering or illicit activity could still disqualify persons from access to basic accounts, the safeguard proposed for The Bahamas would be to constrain the range of permissible payments across the accounts. This would maintain access in a domestic environment where cashless options are an increasing preference, and the logistics of cash handling is costliest in the Family Islands. Moreover, strengthening the resilience of the payments ecosystem depends on promoting universal access to digital transactions.

The features proposed for The Bahamas are summarized in Table 1.

Table 1: A Proposed Basic Bank (Payments) Account in The Bahamas

Key Features					Exceptions for fraud or AML violations
Offered by:	Target Market	Minimum Balance.	Transactions Threshold	Services	
All commercial banks and credit unions	i) Low-income earners ii) Persons receiving social assistance iii) Persons without a bank account	None on opening or for monthly upkeep	Total debits and credits capped at to 2.5 times the annual minimum wage (B\$33,800); or at or 1/12 of this amount monthly (B\$2,817). Max. account balance: B\$13,520.	The same services as a standard savings or current account. Exclusion: cheques, overdrafts; any other credit product; no other deposit account at institution.	Downgrade to an account with reduced access to payers, and payees.
Fee Structure					
Monthly Maintenance	Govt. Stamp Tax	Deposits & Withdrawals			Other
Free	None for transactions, subject to government approval	Free: Own-institution's ATM; online activity; incoming/outgoing domestic credits and debits. Free: At least four over the counter transactions per month. Priced on par with other customers: Inter-bank access; foreign exchange linked transactions.			Free: Domestic or B\$ POS & Ecommerce payments <i>Note: VAT remains applicable for any positive fee charges</i>
Note: Fee structure applies for all foreign exchange linked debit card payments for online or point of sale transactions.					
Services					
Debit card, direct debit services, bill payment, interoperability for SandDollar and mobile/instant payments, and physical bank statements.					
Documentation Requirements					
Simplified customer due diligence: photo ID (Bahamas or other national passport, Bahamas Driver's License, or two other forms of identification such as the NIB card, etc.); evidence of proof of contact (authenticated email or local telephone number, utility bill, Bahamas voters' card, or tenancy agreement); no proof of employment.					
Administration					
Financial institutions would be required to provide approval or rejection within a maximum of five business days. Initial debit card access should also be provided immediately without charge.					

2 ISSUES FOR DISCUSSION AND FEEDBACK

The Central Bank invites comments on the proposal, responding at a minimum to the following questions:

Question 1: Should access to basic banking, payments or transactional accounts be entrenched in regulations?

Question 2: What qualification criteria should determine who gets access to basic transactional accounts? Should this be a measure of income, being unbanked (for example, not having an existing account or relationship with any bank or credit union)?

Question 3: Are there any circumstances outside of financial means, under which individuals should be disqualified from access to a basic account? Would restrictions on account usage be sufficient to address fraud and other illegal activities?

Question 4: Should limits, if any, apply to the maximum number of years that an individual may retain a basic bank or transactional account? In other words, should it be required that the account holder upgrades to a fee paying fine after a set number of years?

Question 5: What thresholds, if any, should apply for minimum opening balance, total monthly deposits and withdrawals, and maximum holding balances?

Question 6: What range of fees should be regulated for basic accounts and for transactions using these accounts?

Question 7: What is the maximum turnaround time in which a customer's request to establish a basic bank account should be completed?

Question 8: What other policy considerations or standards should the Central Bank consider in regulating access to basic transactional or payments accounts?

Comments should be submitted by 31st October, 2025, via email to the following:

Payments Unit
Research Department
Central Bank of The Bahamas
Payments_Unit@centralbankbahamas.com

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3 PROPOSAL FOR THE BAHAMAS

1. The Central Bank of The Bahamas (CBOB) proposes that commercial banks and potentially co-operative credit unions be mandated through regulations under the Payments Systems Act, 2012 **to provide basic banking (or transactional) account services** to the public. Such accounts would be available for access no later than the first half of 2026. With financial inclusion in mind, basic accounts would facilitate transactions of a payment nature (deposit, withdrawals, and holding of funds) and be interoperable with the domestic payments infrastructure, at a minimum, for electronic funds transfers, digital wallet usage (including SandDollar) and debit cards.
2. It would be **mandatory for any commercial bank** that offer retail services—that is, payments services to individuals through savings and current accounts—to provide the facility.¹ The public consultation process will help to determine how binding this requirement should be for credit unions, although the cooperatives would be able to impose eligibility criteria, according to the common bond rules that define their respective membership. Beyond the minimum regulated features, all financial institutions would also have flexibility to provide additional features for the account.

3.1 Eligibility and Features

3. The Central Bank proposes that all **legal** residents of The Bahamas would be permitted to apply for a basic account. Further, the process of applying would be based on simplified due diligence, with customers being granted **approval or rejection within five business days of submitting a completed application**. In cases where applicants are rejected, they should retain the **right to appeal** through the Office of the Financial Services Ombudsman, and be eligible for a restricted tier account.
4. Basic account holders would be allowed to make deposits and withdrawals (both debit and credit transactions), maintain balances, make electronic domestic payments, have access to a debit card, and other interoperable means of making retail payments. Given their intent, the accounts would not attract or earn mandatory interest. However, they would be protected from account maintenance fees, and would not be subject to minimum **opening or minimum maintenance balances**.

¹ Several commercial banks currently do not provide retail payments services to the general public: Citibank (Bahamas), Equity Bank Bahamas Limited, and RF Bank and Trust. Should these entities introduce retail account services, then basic accounts would also have to be provided.

5. Using the current minimum wage in the public sector as the means tested criteria, maintaining access to a basic account would be conditional on being able to maintain the total value of debits and credits through the account at a maximum of B\$33,800 per annum or B\$2,817 per month. This is 2.5 times the current annualized minimum wage, indexed to adjust with any subsequent variation in the minimum wage. The maximum amount of funds that could be held on basic transactional accounts would be indexed at the annualized minimum wage of B\$13,520. Once these thresholds are exceeded, within an annual review cycle, the account holder would be required to upgrade to a regular deposit or payments account.
6. Outright disqualification of access to basic accounts would undermine the rationale digital financial inclusion and payments system resilience is expected to provide for The Bahamas. Therefore, in cases where risk of potential criminal or fraudulent abuse are suspected or elevated, it is proposed that the functionality of the account would be further constrained to a restricted tier or narrowed range of permitted transactions, such as identified employer-sourced wages, benefits and social assistance payments; and for outflows, payments for essential goods and services. An inclusive digital infrastructure would be expected to boost the resilience of payments, particularly in the case of potential disruption from natural disasters, and equally empower all to manage costly logistics of cash handling.

3.2 Scope of Fee Regulations

7. Cost restrictions for basic accounts would be controlled on two levels, based on the nature of those charges and monthly and annual transaction thresholds. Subject to the monthly and annual limits on total debits and credits across the account, basic facilities would be subject to the following:

Zero-cost services

- No monthly account maintenance fee.
- No per transactions charge for electronic funds transfers, either debits or credits via the ACH, RTGS, digital wallets or any other Bahamian dollar payments platform.
- No charges for domestic ATM usage at the institution through which the account is maintained, within the cumulative limit of B\$2,817 per month.
- A maximum of **two transactions per month** over-the counter or in-person.
- Newly issued or replacement of expired debit card, occurring at the same frequency as renewal for comparable facilities provided for fee-paying clients.

Allowed charges

- Domestic interbank ATM fees.

- Lost/stolen debit card replacement fee.
 - Government stamp taxes on domestic transactions (unless waived by the government)
 - Commission, government stamp taxes and VAT on fees for foreign exchange transactions, including via international debit card usage.
8. Outside of the cost-free transactions and thresholds, financial institutions would be permitted to levy charges, but capped at the applicable rate per the fee structure for fee-paying customers for equivalent transactions. Financial institutions would also have to be transparent, with upfront disclosure of their fee structures².

3.3 Simplified KYC for Account Opening

9. The onboarding process for basic accounts would be subject to the existing simplified process prescribed under the Central Bank's AML Guidance. Under the Guidance, an individual would be required to establish identity with a passport or other government-issued ID, following the tiered list of eligible documents listed by the Central Bank. In so far as local residents are concerned, these are defined as the eligible **Categories A, B and C in Appendix B of the AML Guidance**³.
10. Since affordability is an issue, individuals would also be allowed to convert from an existing fee-based account once the facility is relinquished, and the commercial bank or credit union is satisfied that the customer operated the relinquished facility within the annual thresholds for debits and credits that would qualify them for the basic facility. A financial institution would also be allowed to reinstate services to an unbanked person, who may have been suspended because of AML or other risk, once the customer is readmitted under the restricted-tiered arrangement.

3.4 Limitations on Access

11. There is no proposal at this time to define the entitlement to a basic account to just a single one at a national level. Instead, each supervised financial institution (SFI) would be required to provide the facility to qualifying customers. Should the alternative be to establish limits at the national level, this would likely require a costly central administrative

² Central Bank of The Bahamas Direction on Transparency in Setting of Fees and Charges - <https://www.centralbankbahamas.com/viewPDF/documents/2024-10-02-15-56-18-01102024---CBOB-Direction-on-the-Transparency-in-Setting-of-Fees-and-Charges.pdf>

³ <https://www.centralbankbahamas.com/viewPDF/documents/2023-04-06-17-20-05-CBOB-AML-CFT-Guidelines-Revised-6-April-2023.Final.pdf#:~:text=permitted%20to%20conduct%20simplified%20due%20diligence%20measures%2C,to%20a pply%20simplified%20CDD%20measures%2C%20it%20must>

mechanism to track the exclusivity of accounts. Nevertheless, the account holder would not be allowed to avail themselves of any of the following:

- Checking or overdraft facilities
- Other credit facilities
- Any other deposit facilities

4 SELECTED FEATURES FROM INTERNATIONAL BENCHMARKING

12. The Central Bank of the Bahamas' basic account proposal draws extensively on the benchmarked practices in other countries, which target affordability and inclusivity of access to basic payments.

4.1 Specification of Mandates

13. As the sampling of practices in Appendices 1 and 2 show, legal mandates are common for most basic accounts, though not exclusively. For example, the European Union's 2014 Payment Accounts Directive (PAD) is a foundational regulatory standard, mandating that member states provide all EU residents with access to a basic payment account. This approach sought more harmonization of existing practices across member countries—some predating the directive by more than a decade—while leaving national authorities with discretion to set service conditions and cost ceilings. Countries like Belgium, Italy, and Portugal operationalize this mandate through legislation requiring banks to offer fee-regulated accounts to individuals not holding other payment accounts. Even when individuals already have access to transactional accounts, the options to switch into the affordable version generally exist, provided the regular facilities are relinquished, while some EU countries are less rigid, allowing account holders to have limited access to credit products.
14. Legal mandates are also widely documented outside of the EU, throughout parts of Africa, Asia, the Americas (and emerging in the Caribbean) (see examples in the Appendix). Alternatively, some countries outside of the EU, such as South Africa, Namibia, Thailand, Canada and Australia, rely on industry codes and government agreements rather than legal mandates to provide basic payments accounts. For instance, Canada's low-cost and no-cost accounts are backed by agreements between the government and banks; while in the UK, the government only obliges the major banks to provide basic accounts, though allowing discretion in their design and distribution.

4.2 Target Demographics

15. Most national frameworks target the demographics of low-income individuals, welfare recipients, migrants, students, or unbanked populations. Some schemes impose strict eligibility thresholds. For example, Belgium limits access to individuals with less than €10,000 (US\$11,788.28) across accounts, Italy offers free accounts to those earning under €11,600 (US\$13,674.41), while Namibia's basic account is reserved for those earning less than N\$2,000 (US\$112.66) monthly. EU countries also employ economic means testing, based on constructed measures of household financial conditions. For example, Portugal makes reference to social support—a baseline measure used to determine various government benefits and assistance payments—while Italy uses the indicator of household composition and financial situation, and Spain uses the minimum vital income measure as a baseline. In Malaysia, the Dominican Republic and Trinidad & Tobago, access also covers micro and small businesses, which can be means tested.

4.3 Affordability

16. Basic banking services also deliver on affordability. Regulatory frameworks often cap fees or peg them to social indices. Belgium permits fees up to €19.24 (US\$22.68) annually, adjusted by the rate of consumer price inflation. Portugal limits charges to 1 percent of the social support index annually. Ireland waives account maintenance fees for one year, extending the benefit based on income thresholds. In Italy, a fixed annual fee that covers a set number of transactions and services was established by the Ministry of Economics and Finance, and charges may apply for other transactions and any transactions exceeding the set number covered by the product, which must be reasonable and align with the purpose of financial inclusion. In some cases, the central bank or other public body has oversight of fee variations such as in Mexico, Aruba and St. Maarten.
17. Many other countries require financial institutions to offer basic bank accounts with “reasonable” fees to the customer. For example, in the EU, the European Union's Directive on Payment Accounts allows Member States to determine whether payment accounts with basic features should be offered to consumers for free or at a reasonable fee. It notes that a reasonable fee should be identified at a national level on the basis of a set of criteria, such as national income levels, average fees paid for an account in that Member State and the cost associated with the provision of payment accounts⁴. In Germany, banks are allowed to stipulate reasonable charges for the management of basic payment accounts (section 41 of the German Payments Account Act – Zahlungskontengesetz (ZKG)). When assessing

⁴ https://ec.europa.eu/commission/presscorner/detail/en/memo_14_300

the reasonableness of charges, consideration is to be given to the usual market charges and user behaviour⁵.

18. Latin America offers some of the most accessible pricing models. Chile's CuentaRUT is free for anyone to open and maintain, though out-of-network withdrawals incur minimal fees. In Trinidad and Tobago, accounts attract no maintenance fees but cap annual activity at TT\$90,000 (US\$13,247.35). Canada's accounts are free for vulnerable groups and capped at CAD\$4 (US\$2.94) per month for others.

4.4 Account Features

19. Most countries require that basic accounts support essential financial services: deposits, withdrawals, card payments, direct debits, and online banking. While the EU outlines a baseline of core features, countries such as Portugal, Spain, and Italy expand on this to include third-party payments, app-based transfers, and bill payment support. The specialist nature of facilities however is noteworthy in Mexico and the Dominican Republic, where employers can open accounts that are exclusively to receive the wages of their workers. At the same time, these two countries also mandate non-payroll accounts that can be opened by any qualifying person, similar to the basic payment accounts in other countries.
20. Transactional limits are common, especially in developing countries. For instance, Namibia allows three free monthly withdrawals, the Dominican Republic places balance and transaction limits based on account type, and the Philippines caps monthly deposits at ₱50,000 (US\$885.85). In Trinidad and Tobago, the annual account activity is capped at TT\$90,000 (US\$13,247.35). Such restrictions aim to maintain account simplicity, mitigate abuse, and provide correlation with the lower financial and economic means of the account holders.

4.5 Access and Transparency

21. Transparency and accessibility are usually emphasized in the onboarding process for basic accounts. This includes simplified customer due diligence around identification and other documentation needed to open the account. Application processes are also expected to elicit upfront disclosures about services and permitted fees—such as fees triggered when accounts have exhausted free services. There is generally an expectation of how long it should take to receive a decision on an account application, with examples ranging between three and five business days in Mexico, to ten business days in Aruba, Curacao and St.

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https://www.bafin.de/EN/Verbraucher/Bank/Produkte/Basiskonto/basiskonto_artikel_en.html;jsessionid=7DCD230CE0668C53025D3B10D691F074.internet001?nn=19584914#doc19584910bodyText14

Maarten. Italy and Spain require written notice for account rejections, along with pathways for appeal through ombudsman-styled offices or central banks. The presumption of being unbanked is also not always the case. Instead, countries like Portugal and Ireland allow customers to switch out of existing fee-based accounts into less costly basic accounts not precluding individuals who already have access to banking services.

22. Disqualification rules also determine when individuals can have access to existing basic accounts annulled. In the Dominican Republic, it is expected that individuals would eventually graduate to regular accounts; therefore, banks make periodic assessments to determine whether an individual has exceeded their monthly thresholds enough to graduate to a regular account. More commonly, fraud or suspected criminal use can be justifications to terminate basic accounts. However, the Dominican Republic tightly regulates this process, as would the framework being introduced in the Dutch Caribbean territories⁶, requiring any account termination to be sanctioned or approved through the courts.

5 CONCLUSION AND NEXT STEPS

23. In summary, countries tend to introduce policies related to basic banking services to increase financial inclusion, especially for low-income earners, and can do so through many facets. These policies can begin organically through initiatives spurred by the banking industry or mandated by regulation. The basic banking services provided are most often low-fee or no-fee accounts, with payments inclusive of deposits and withdrawal flows of various forms. The countries discussed either require all institutions that accept deposits from the public to provide basic banking services, or subsets of the larger banking institutions to do so. In cases where a small fee is charged for the service, the cost is calculated as a percentage of the social support index or the consumer price index, or countries set the maximum at a very small, seemingly arbitrary, value. The basic banking services provided can either be targeted towards the lower-income population by enforcing an income or deposit limit, or open to all consumers with no prerequisites. Numerous countries serve both groups by offering a no-fee account to underprivileged persons, and a low-fee account to those earning above certain threshold.
24. With this baseline in mind, the Bahamian framework is proposed to be means-tested against the existing minimum wage. Administrative simplicity is also proposed for transactions thresholds and values around which fees are set. However, to safeguard digital inclusion within a more resilient archipelagic payments infrastructure, a restrictive account rather than exclusionary alternative is proposed in instances of heightened risk of fraud, money laundering and other abuse. The Bahamian framework would also be provisioned through regulations rather than a voluntary standard or practice.

⁶ Aruba and Curaçao.

25. As to next steps, the Central Bank plans to release draft regulations, taking into account any salient feedback for the public consultation process. The Bank will also propose enabling amendments to the Payments System Act, 2012 to empower the regulations, with a timeline to issue the regulations into force before the end of the first half of 2026.

6 APPENDIX 1: SELECTED COUNTRY EXPERIENCES

Country	Year Started	Provided By	Cost (Jun 2025 US\$ Equiv)	Target Market	Opening Balance Required	Min Holding Balance	Features	Account Limit (per institution or national)	Forfeiture or refusal (if any)
Belgium	2003 2020 (extended to businesses)	All credit institutions by Law/Regulation	Maximum of €18.25 ⁷ per year (US\$21.51)	Households with less than €10,000.00 (US\$11,788.28)	None	None	EU required services ⁸ + standing orders, domiciliation, and bank statements	Must have no other account (on national level)	Refusal: Existing Account, Financial Crimes, AML Concerns Forfeiture: Illegal Use, Fraud, Inactivity
Italy	2003	All payment service providers by Law/Regulation	Free (for those earning less than €11,600.00) (US\$13,674.41), or a low annual fee	All consumers, especially low-income earners	None	None	EU required services	Must have no other account (on national level)	Refusal: Existing Accounts, AML Concerns, False Information Forfeiture: Illegal Use, Account Inactivity, Misuse of Service
Ireland	2012	Banks by Law/Regulation	Free for the 1 st year	All consumers	None	None	EU required services	Minimum Wage ⁹ . Account converted to regular account if total lodged is in excess of minimum wage or after 5 years.	Refusal: Existing Accounts, False Information, Lack of Documentation Forfeiture: Illegal Use, Terminated Residency
Portugal	2000	All credit institutions authorised to receive deposits from the public by Law/Regulation	Maximum of €5.22 per year (US\$6.15)	Any individual without a current account	None	None	EU required services + max. 48 per year inter-bank transfers, and max. of 5 per month transfers via third-party apps	48 transfers to accounts held in other banks and in the EU per calendar year	Refusal: existing Accounts, False Information, AML/CFT Concerns Forfeiture: Account Inactivity, Opening Another Account, Terminated Residency

⁷ Indicative amount, subject to annual indexation (<https://arthurmarin.com/basic-banking-service-in-belgium/>)

⁸ All EU Member countries are required to provide basic bank accounts with these features: deposits, withdrawals, payments, debit card, transfers, and online banking.

⁹ Ireland's annual minimum wage is based on an hourly rate, which for workers aged 20 and over is €13.50 (US\$11.45) per hour as of January 1, 2025. If working a typical 40-hour week, this is €540 (US\$458.08) weekly or €28,080 (US\$23,820.26) annually.

Country	Year Started	Provided By	Cost (Jun 2025 US\$ Equiv)	Target Market	Opening Balance Required	Min Holding Balance	Features	Account Limit (per institution or national)	Forfeiture or refusal (if any)
Spain	2017	Financial institutions by Law/Regulation	Maximum of €3.00 per month (US\$3.54)	All consumers who do not have another payment account	None	None	EU required services + limit of up to €120.00 (US\$141.46) in transfers and direct debits within the EU	Must have no other payment account (on national level) Single: 3 * IPREM ¹⁰ Family: 3 ½ * IPREM (Asset Thresholds also apply)	Refusal: Existing Account, Lack of Information, Previous Violations Forfeiture: Illegal Use, Terminated Residency, Opening Another Account
United Kingdom	2016	9 largest personal current account providers by Law/Regulation	Free	Customers who do not have a bank account or who are not eligible for a bank's standard current account	None	None	Same services as a standard personal current account, excluding cheques and overdrafts	None	Refusal: Existing Account, AML/CTF Concerns, Immigration Status Forfeiture: Illegal Use, Account Inactivity, Opening Another Account
Canada	2003	Certain financial institutions by Industry Cooperation/Collaboration	Maximum of \$4.00 CAD (US\$2.94) per month, or free for youths, students, seniors with Guaranteed Income Supplement, or Registered Disability Savings Plan beneficiaries	All residents	None	None	At least 12 debit transactions per month, cheques, a debit card, unlimited deposits, monthly printed statements, and the ability to set up pre-authorized payments	None	Refusal: History of Financial Crime, Lack of Identification Forfeiture: Illegal Use, Inactivity, Fraud
U.S.A : New York State.	1994	All banking institutions in the state, including commercial banks, savings banks and credit unions by Law/Regulation	Maximum of US\$3.00 per month	All residents	US\$25.00	US\$0.01	Account holders under 65 years old are allowed at least 8 withdrawals per month, and account holders 65 years of age or older are allowed at least 12 withdrawals	None	Refusal: Existing Account, Non-State Residency, AML Concerns, Lack of Documentation Forfeiture: Opening Another Account, Illegal Activity

¹⁰ A monthly public income indicator used to determine eligibility for social benefits, subsidies, and financial thresholds, including visa and residency requirements. For 2025, the annual IPREM amount is €7,200 (US\$6,107.76), or €600 (US\$508.98) per month.

Country	Year Started	Provided By	Cost (Jun 2025 US\$ Equiv)	Target Market	Opening Balance Required	Min Holding Balance	Features	Account Limit (per institution or national)	Forfeiture or refusal (if any)
Chile	2006	BancoEstado ¹¹ by Law/Regulation	ATM withdrawal fee of 300 Chilean pesos (US\$0.31 USD)	All citizens and foreigners with a valid National identity Card	None	None	Money transfers to other BancoEstado accounts, financial statements, debit card replacements, and purchases through the Redcompra, Compraquí, and Webpay platforms	None	Refusal: Suspicion of Fraud, History of Financial Crime, False Information Forfeiture: Illegal or Fraudulent Activity
Trinidad and Tobago	2020	All Banks by Law/Regulation	Free	All citizens and migrants with valid ID	None	None	Debit card, online banking, and ACH services.	Aggregate of all credits, withdrawals, and transfers must not exceed TT \$90,000 (US\$13,274.35) annually. If exceeded, banks must migrate customer to a regular savings account	Refusal/Forfeiture: Accounted Inactivity, AML Concerns
Dominican Republic (Basic Savings Accounts)	2019	Banking institutions, and optional for financial intermediaries (by regulatory guidelines)	Minimal	Dominicans, resident foreigners and non-resident foreigners	Minimum opening amount is the same as those offered by financial entities for similar products	Average monthly balance is the same as those offered by financial entities for similar products	Deposit and withdraw funds at the financial entity's offices via ATMs within their affiliated network, pay for credit cards and loans, access digital channels to view past transactions, make domestic transfers and conduct payments for services	None: (Maximum balance limit or a limit on the total money received monthly. This is in place to manage risk and align with AML regulations.)	Refusal/Forfeiture: AML Concerns
Mexico (Basic accounts for the general public)	2014	All institutions engaged in receiving deposits by Law/Regulation	Free	Lower income population (households monthly deposits must be less than 8,344.00 MXN or (US\$437.12))	Varies by bank	None	Debit card, cash withdrawals and bank inquiries at their respective bank's ATMs, deposits, payments, and standing orders	None: (Maximum balance limit or a limit on the total money received monthly. This is in place to manage risk and align with AML regulations.)	Refusal: Failure to meet KYC requirements, AML Concerns Forfeiture: Illegal Activities, Fraud

¹¹ Only public bank in Chile, created by government decree in 1953.

Country	Year Started	Provided By	Cost (Jun 2025 US\$ Equiv)	Target Market	Opening Balance Required	Min Holding Balance	Features	Account Limit (per institution or national)	Forfeiture or refusal (if any)
Angola (Personal Simplified Account)	2020	All banks by Law/Regulation	Free	Citizens who do not meet all of the necessary conditions when opening a conventional bank account	1,000.00 KZT (US\$1.10)	None	A demand deposit account, inter and intra-bank transfers and a debit card	None: (Maximum balance limits or a limit on the total money received monthly. This is in place to manage risk and align with AML regulations.)	Refusal: AML Concerns, Lack of Documentation Forfeiture: Illegal Activity
Namibia	2016	All banking institutions by Law/Regulation	Free	Individuals earning 2,000 NAD (US\$112.66) or less per month	20 NAD (US\$1.13)	None	Deposits, balance inquiries at ATMs, bank statements via email or internet, balance viewing in-branch, first 3 withdrawals per month are free, and online banking	30,300 NAD (US\$1,706.37)	Refusal: Lack of Identification Forfeiture: Inactivity, Illegal Activity
South Africa (Msanzi)	2004	Four major banks and the Post Office/Postbank by Industry Cooperation/Collaboration	Free	Low-income segment	None	None	Debit card, interbank transactions, free use of Post Office branches, and 1 free cash deposit per month	None	Refusal: Lack of Identification Forfeiture: Illegal Activity, AML Concerns, Inactivity
Malaysia (BSA)	2005	Banking institutions by Law/Regulation	Free	All individuals	20.00 MYR (US\$4.75)	None	6 over-the-counter visits per month, 8 ATM withdrawals per month, 2 interbank transactions per month at 0.05 MYR (US\$0.01), cheques and cash deposits, account enquires and interbank fund transfers, and online banking	None	Refusal: AML Concerns, False Information, Lack of Documentation Forfeiture: Illegal Activity, Account Inactivity
Pakistan	2005	Branchless banking providers by Law/Regulation	Free	Lower-income households	None	None	Balance inquiries, mini bank statements, transfers, mobile banking, and account linking	None	Refusal: Lack of Identification Forfeiture: Fraud, Money Laundering, Illegal Activity
Philippines	2018	Banks by Law/Regulation	Free	All citizens, especially the unserved and underserved	100.00 PHP (US\$1.77)	None	Banks can customize their product offerings	50,000 PHP US(\$885.85)	Refusal/Forfeiture: AML/CFT Concerns, Illegal Activity

Country	Year Started	Provided By	Cost (Jun 2025 US\$ Equiv)	Target Market	Opening Balance Required	Min Holding Balance	Features	Account Limit (per institution or national)	Forfeiture or refusal (if any)
Thailand	2018	16 banks by Law/Regulation	Free	Persons aged 65 and older, and low-income earners that receive welfare and/or subsidies from the government	None	None	Deposits, withdrawals, and transfers through ATMs or debit cards	THB 50,000 (US\$1,537.52)	Refusal: Non-Resident or National Forfeiture: Improper Use
Australia	2002	All banks by Industry Cooperation/Collaboration	Free	Low-income earners	None		Debit card, free unlimited transactions, overdraft, monthly statements, and online banking	Eligibility Based	Refusal: AML Concerns, Incorrect or Misleading Information Forfeiture: Illegal Activity

7 APPENDIX 2: EXPANDED COUNTRY EXAMPLES ON BASIC PAYMENTS/BANKING ACCOUNTS

7.1 Europe

26. Banks in the **European Union (EU)** member countries¹² were mandated in 2014 to provide a basic banking or payments account to all EU residents. The directive issued by the European Parliament, intended to remove the hindrances faced by many in accessing basic banking services across borders by enforcing a right to a basic payment account, irrespective of a citizen's place of residence or financial situation (European Commission, 2014). The directive broadens access to payment accounts, allows consumers to easily compare the fees charged by each payment service provider (PSP), and decreases the cost of switching between PSPs. A basic account must accommodate standard transactions such as making deposits, withdrawing cash, and reviewing and carrying out payments, i.e., direct debits and card purchases, and a payment card, as well as online banking services (Your Europe, 2022). Before opening the account, banks must provide a Fee Information Document¹³ outlining the services provided and any related fees. An applicant can be refused a basic bank account if they already hold a similar account with another bank in the same country, or if they do not comply with the EU's legislation on money laundering and terrorist financing. The specific parameters of the basic bank account, aside from those already mentioned, vary across EU Members. Each has national flexibility to establish the thresholds which trigger fees, provided that such charges are never discriminatory compared to the usual pricing policy of the financial institution. Financial institutions are not allowed to condition the access to the basic accounts to subscription to other products and services on offer.¹⁴

27. In **Belgium**, basic current accounts with a debit card must be provided by all banks. With a basic account, individuals can carry out transfers, standing orders, domiciliation, and receive account statements, provided that the account has sufficient funds (Federal Public Service Economy, 2024). The conditions required for an individual to access a basic current account include: not already having basic banking services or another current account, not having accounts of at least €10,000 (US\$11,788.28), including money in accounts with other banks, and not having credit contracts of at least €10,000 (US\$11,788.28).¹⁵ Yearly bank fees for the basic bank account can reach a maximum price of €19.24 (US\$22.68) (as of 1 January 2024), and this maximum is indexed to the annual consumer price inflation.

¹² The EU member countries include Austria, Belgium, Bulgaria, Croatia, Republic of Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, and Sweden.

¹³ https://www.handbook.fca.org.uk/techstandards/PAD/2018/reg_impl_2018_34_oj/?view=chapter

¹⁴ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32014L0092>

¹⁵ <https://economie.fgov.be/fr/themes/services-financiers/services-de-paiement/service-bancaire-de-base/service-bancaire-de-base-pour-0>

28. The **Italian** basic current account is referred to as a ‘conto corrente di base’ and must be provided by all payment services providers (banks, Poste Italiane and other Italian authorized providers of payment services) and target all consumers, including low-income households (Banca D’Italia, 2019). The Ministry of Economics and Finance establishes a fixed annual fee applicable to the accounts that covers a set number of transactions and services. Fees may be applied beyond these thresholds, although they must be reasonable and aligned with the purpose of financial inclusion. Within the stratified assessment of household state, the basic account must be offered free of charge and is exempt from stamp duty to consumers whose ISEE (indicator of household composition and financial situation) is currently below €11,600 (US\$13,674.41). A special type of basic account must be offered free of charge, but without the exemption from stamp duty, to eligible households with a gross annual pension income below €18,000 (US\$21,218.91). Individuals who earn more than €11,600 (US\$13,674.41) annually would need to pay a low yearly fee, which varies depending on the bank. Disqualification criteria for basic accounts include whether an applicant already holds another payment, are not consumers, are not staying in the country legally, or if the bank has reason to believe the account would be used for illegal purposes.
29. **Ireland** imposes time and financial condition limits on access to basic banking, in addition to the other constraints, which appear across most countries. The accounts accrue no maintenance or day-to-day fees for the first 12 months, after which the financial institution would outline the fees necessary (IBCB, 2022). Fees for maintaining the facility may be charged after 12 months, depending on account turnover. The financial institution is allowed to review the customer’s account to see if they are still eligible for free banking. If the total amount lodged into the account within the year is less than the national minimum wage, the customer would continue to get fee-free banking. If over this limit, or if the customer has had a basic account for five years, the account would be converted to a normal current account and subject to pay fees and charges (Competition and Consumer Protection Commission, 2024). Additionally, charges may be incurred for a small range of services, such as debit card transactions in a foreign currency (Bank of Ireland, 2024). To apply for the account, individuals must be over a certain age, as outlined in the financial institution’s terms and conditions, legally living in the European Union, and not already in possession of another payment account in Ireland. With the basic bank account, cheque books and overdrafts are not provided.
30. **Portugal’s** example highlights various quotas on free services obtained with basic accounts. Also known as ‘serviços mínimos bancários’, these combine a set of essential banking services for qualified citizens at reduced costs. The accounts must be provided by all deposit taking credit institutions, to anyone who does not possess a current account (Banco de Portugal, 2024). In meeting this obligation, financial institutions also allow customers to convert existing current accounts into basic bank facilities. Such accounts

facilitate a maximum of 48 inter-bank transfers per year, and a specified number of free monthly transfers (based on value) via third party apps. Credit institutions were also constrained to charge fees, expenses, or other charges that equate to a maximum of one percent of the value of the social support index (IAS), which was €5.09 (US\$6.00) for 2024.

31. In **Spain**, entitlement to a basic account is also conditional on not having any other payment account, with charge caps on certain charges (European Consumer Centre Spain, 2022). Further, financial institutions are obliged to offer basic accounts without making them conditional on subscription to other services, and provide information about their features, which are completely free of charge to vulnerable persons or persons who are at risk of financial exclusion. Access is available to any legal resident in the EU, even if they have no fixed address, is an asylum seeker, lack valid documentation, or be in an exceptional situation¹⁶ that prevents them from being deported from the country. With these accounts, users can contract basic services, such as water, electricity or gas, access public aid, apply for benefits such as the Minimum Vital Income (IMV), and carry out transactions with a limit of 120 movements per year.

7.2 The United Kingdom

32. In the **United Kingdom (UK)**, the nine largest personal current account providers have been legally required to offer basic accounts to customers who do not have a bank account or who are not eligible for a bank's standard current account, i.e., those with a bad credit history, an Individual Voluntary Agreement, a Debt Management Plan, a Debt Relief Order, or who have been declared bankrupt (His Majesty's Treasury, 2022). Basic bank accounts must be fee-free for standard operations, not have an overdraft facility or a cheque book attached, but offer the same services as a standard personal current account. Basic bank accounts are free, but individuals may be charged if the debit card is used overseas or in a foreign currency transaction, if duplicate statements are requested, and are sometimes charged a spending and cash machine charge (MoneyHelper, 2024). Applicants must be at least 16 years old, provide an ID and proof of address to open a basic bank account. Individuals often must apply for one of the bank's other accounts first, such as their standard current account, and if not eligible, would be informed if they are eligible for a basic bank account in its place.

7.3 North America

33. The Government of **Canada** and certain financial institutions have an agreement to provide low-cost basic banking services, where customers can be charged up to a maximum of CAD\$4.00 (US\$2.94) per month in banking fees (Government of Canada, 2023). No-cost accounts are also available, with the same features as their fee-levied counterpart, for customers who are either youths, students, seniors that are Guaranteed Income Supplement,

¹⁶ Pregnant women, for example.

or Registered Disability Savings Plan beneficiaries. The services available with these accounts include at least 12 debit transactions per month, including at least two in-branch transactions where available, the ability to write cheques, a debit card, unlimited deposits, monthly printed statements, pre-authorized payments, and cheque image return or online cheque image viewing. Financial institutions offering low-cost accounts must specify the features and extra service charges associated with low-cost and no-cost accounts in a clear, simple and non-misleading way, display information about the availability of low-cost and no-cost accounts in branches and online, and display information, in branches and online, on how to access the Account Comparison Tool¹⁷.

34. Whereas the **United States of America** does not have a federal mandate regarding a basic banking service, the state of New York has enacted the Basic Banking Services law that requires banks to offer lower-cost banking services (Department of Financial Services, 2024). All banking institutions in the state, including commercial banks, savings banks, and credit unions, are required to offer basic banking accounts and ‘lifeline accounts’, to all customers (Office of the New York State Attorney General, 2024). The low-fee bank accounts have the following requirements: the initial deposit amount required to open the account cannot be more than USD\$25.00, the minimum balance required to maintain the account is not more than USD\$0.01, and the monthly charge for the maintenance of the account cannot be more than USD\$3.00. Account holders under 65 years old are allowed at least eight withdrawals¹⁸ per month, and older account holders are allowed at least 12 withdrawal transactions. Banking institutions are permitted to require an account holder to be a resident of New York State, ask an account holder to provide the same documents that anyone else is asked to provide when opening an account at that institution, require the account holder to close all other transaction accounts, and require that an account holder use direct deposit for any recurring payments such as Social Security payments, paycheck payments, pension payments, etc.

7.4 Latin America & the Caribbean

35. In 2007, the **Chilean** state-run bank, BancoEstado, introduced the CuentaRUT account, a basic savings account coupled with a debit card, to encourage financial inclusion (Bnamericas, 2019). CuentaRUT accounts have zero fees or maintenance costs; however, there are transactional costs largely related to ATM cash withdrawals (Bank for International Settlements, 2017). There are no fees on money transfers to other BancoEstado accounts, for financial statements, card replacements, and all purchases through the Redcompra, Compraquí, and Webpay platforms (BancoEstado, 2020). The bank charges CLP\$300.00 (US\$0.31) for each wire transaction at an out-of-network bank or ATM, CLP\$100.00 (US\$0.10) for balance inquiries at other banks’ ATMs, 1.9% of the

¹⁷ A service provided by the Financial Consumer Agency of Canada where individuals can compare the features of different chequing and savings accounts, including interest rates, monthly fees, and transactions to find an account that best suits their needs.

¹⁸ Withdrawals can include checks, ATM withdrawals, and purchases using a debit card attached to the account.

amount of each international transaction with a minimum of CLP\$0.50 (US\$0.00052), CLP\$1,000.00 (US\$1.04) for card replacement, and 0.05 Chilean Units of Account (UF) (US\$0.00052) plus Value Added Tax per transaction for copies of bank statements. BancoEstado is authorized to readjust fees every February, according to the variation in the CPI accumulated during the previous year. Applications do not require proof of income or business history and are open to citizens and foreigners with a valid National Identity Card. People aged 65 or over have an additional benefit, as they are not charged for the first three fund transfers to other banks each month.

36. **Mexico** instituted a reform in 2007 to introduce a basic deposit bank product, including a payroll product, where customers do not have to pay entry costs and allow certain transactions free of charge (Negrín et al., 2009). Two products may be offered: a basic payroll account, an account generally opened by employers with a particular bank and it is only in this bank that employees can open their accounts, and/or a basic account accessible by the general public. Customers receive a debit card with both account types and cannot be charged for cash withdrawals and bank inquiries at their respective banks' ATMs and for deposits, payments, and standing orders. To successfully apply for a basic deposit account, an individual's monthly deposits must be less than MX\$8,344.00 (US\$437.12), as these accounts are tailored for lower-income populations. Basic accounts for the general public differ from basic payroll accounts, as banks are free to determine minimum monthly average balances, but both have the same monthly deposit limit. All credit institutions engaged in receiving demand bank deposits from individuals must offer these basic accounts, although they can limit each person to one basic account.
37. **Aruba** has drafted legislation on a basic payment account for disadvantaged citizens. According to the National Ordinance Basic Payment Account bill, a credit institution that provides payment accounts to consumers in Aruba offers consumers who are lawfully resident in Aruba the opportunity, upon request, to apply for and use a basic payment account in Aruban florin, regardless of the nationality or place of residence of the consumer. The credit institution must open a basic payment account no later than ten working days after receipt of a consumer's complete application and will inform the consumer in writing. The basic payment account is to be offered free of charge or at a reasonable compensation of a maximum of AFLf30 (US\$16.64) per year. The Central Bank of Aruba may adjust the amount by generally binding regulation. A credit institution would also be not permitted to offer basic payment accounts to consumers exclusively via the internet.
38. **Curacao and Sint Maarten** are also in the drafting stage of legislation to provide basic banking for citizens. In May 2023, the Social and Economic Council (SER) of Curacao issued its advice to the country's Minister of Finance on a draft National Ordinance containing rules regarding basic payment accounts for consumers (National Ordinance Basic Payment Account). The bill seeks to guarantee a local currency payment account,

free of charge or for a reasonable fee, that is accessible and affordable to all, regardless of income, social status or other personal circumstances (EA News Author, 2023). According to the draft ordinance, the PSP would be required to open the account within 10 days of the application. The financial institutions are not allowed to force the bundling to the account with any other products or services.

39. For **Sint Maarten**, the "Right to Bank Account" law was approved by the Council of Ministers (CoM) of St. Maarten in May 2023 and officially entered into Parliament in December 2023 (Soualiga News, 2023). The legislation would guarantee every St. Maarten citizen access to a bank account for essential banking services and actively participate in digital payment transactions. Banks must provide such an account within 10 business days (The Daily Herald, 2023). The draft law stipulates that banks must offer, on request, basic bank accounts to "consumers who legally reside in St. Maarten." This must be done without considering the nationality or the economic standing of the consumer. Banks would offer these services without cost or against a maximum amount established in a ministerial decree (St. Maarten News, 2022).
40. In each of Aruba, Curacao and Sint Maarten, banks would be allowed to refuse opening an account if there is a conflict with legislation related to money laundering and the financing of terrorism. Banks in Sint Maarten would also be able to refuse accounts for consumers who have been irrevocably sentenced to less than two years (eight years in the case of Aruba and Curacao) for six specific crimes: forgery, providing incorrect information, fraud, fraudulent bankruptcy and money laundering.¹⁹ Banks in Aruba and Curacao can refuse to open an account for persons who had a basic bank account that was terminated less than two years ago. The draft also sets limits on the reasons why a bank would be allowed to close an account, which include: (1) if there was no activity on the account for more than 24 months; (2) if the account holder has not resided legally in the country for more than 24 consecutive months; and (3) if the account holder has provided incorrect or incomplete information to gain access to a bank account. Banks must give a two-month notice if they intend to close an account. Further, banks are not allowed to unilaterally terminate a banking relationship "without a preceding irrevocable court ruling."
41. **Trinidad and Tobago** amended their Financial Institutions Act (2008), Central Bank Act, and the Financial Obligations Regulations (2010) to include governance of basic bank accounts. A Simplified Due Diligence (SDD) framework, for individuals and micro-enterprises, was drafted to guide qualifications for the account type, and explicitly state the requirements to which commercial banks must adhere. All unbanked persons could qualify

¹⁹ Although no reason was provided for these criteria, Curacao has strengthened its legal and regulatory anti-money laundering and financing of terrorism framework in 2016, with the adoption of a new Penal Code, and various National Ordinances and Ministerial Decrees. This was in response to deficiencies identified in the Mutual Evaluation Report (MER) adopted by the CFATF Plenary in May 2012.

for a basic bank account; however, there are functionality limitations to the account type. The aggregate of all credits, withdrawals, and transfers must not exceed TT\$90,000 (US\$13,247.35) annually. International wire transfers and access to credit or overdraft facilities are prohibited. Interested applicants would present one (1) valid photo identification, and in exceptional cases where identity cannot be verified by government-issued identification, banks may obtain alternative forms of identification (i.e., a reference from a credible person). The individual's full legal name, date and place of birth, residential address, nationality, and source of funds should also be recorded and retained. For migrants unable to satisfy national identification requirements, the acceptance of a government-issued residency card may also be considered by banks. Moreover, qualified applicants obtain access to a debit card, online banking, and ACH services. Further, account opening and maintenance fees do not apply to the account type, though other fees attached to services (i.e., domestic transfers, purchase of bank drafts, etc.) are applicable. Risk-based transaction monitoring controls must also be implemented on all basic bank accounts to ensure that the prescribed limits are not breached and that transactions match the initial low-risk profile. According to a [Circular](#) document released in March 2023, these accounts should, at a minimum, be reviewed annually to determine whether transactional activity is within the established thresholds. Where thresholds have been exceeded and on the basis of risk, financial institutions should conduct standard customer due diligence on the customer and determine whether a.) to migrate the customer to a regular savings account or b.) the relationship should be terminated and a suspicious transaction or activity report be filed with the Financial Intelligence Unit of Trinidad and Tobago.

42. In 2020, the **Dominican Republic** introduced basic banking with less onerous due diligence and Know-Your-Customer (KYC) requirements. There are two types of basic bank accounts within the Dominican Republic's financial system, a basic savings account and a payroll account. Basic savings accounts are focused on individuals' access to banking services and allowing those previously excluded from the system, to have a bank account for the first time. While, the basic payroll account targets those working individuals who were penalized in the past for their credit history, mishandling of financial products, or having a criminal record.²⁰ These basic savings accounts use a risk-based approach with limits on transactions, account balances, and aggregate amounts, aligned with AML-CFT recommendations. To ensure that the account is offered to those currently excluded from the financial system, accounts are only offered to nationals and foreign individuals who, at application initiation, did not have a savings account or credit products in the system. Meanwhile, basic payroll accounts are exclusively used for salary payments and accounts are aimed at workers who, for legal or credit reasons, were excluded from the banking system. Concerning functionality limitations, unlike basic savings accounts, basic payroll accounts do not limit the number of transactions permitted per month.²¹ Once the eligibility

²⁰ <https://www.afi-global.org/newsroom/blogs/basic-accounts-foster-financial-inclusion-in-dominican-republic/>

²¹ <https://www.afi-global.org/newsroom/blogs/basic-accounts-foster-financial-inclusion-in-dominican-republic/>

requirements are met, applicants generally 1) complete and sign an application form 2) present a valid ID 3) present a source of income document (paystub, a reference letter, a bank statement, etc.) and 4) a minimum opening deposit.

7.5 Africa

43. **Angola** introduced regulation on simplified bank accounts in 2020, to facilitate access to the banking system for citizens who do not meet all of the necessary conditions when opening a conventional bank account (AFI, 2021). The simplified account is a demand deposit account, held by a single national resident holder, with a minimum account opening value of Kz 1,000.00 (US\$1.09) for a personal account, and Kz 5,000.00 (US\$5.45) for a commercial account (Standard Bank Angola, 2023). The benefits include inter and intra-bank transfers, no monthly fees, no proof of income required, no Identity Card required, no registration with the General Tax Administration, and a debit card.
44. The Bank of **Namibia**, in consultation with the banking industry, launched the basic bank account at all banking institutions to promote financial inclusion (Bank of Namibia, 2024). The basic bank account is intended for individuals earning N\$2,000 (US\$112.66) or less per month and requires no proof of income to open an account. The standards for a basic bank account include the following: banks can charge no more than N\$20 (US\$1.13) to open a basic bank account, there is no minimum balance required, the first card issued must be free but can charge for a replacement, and there must be no monthly fee (Government Gazette of the Republic of Namibia, 2019). Individuals' first three monthly ATM withdrawals are free, whereas they can be charged for withdrawals at other banks' ATMs, in-branch, and at bank agents/merchants. The other benefits include deposits through any channel, balance inquiries at ATMs, bank statements via email or internet, balance viewing in-branch, and online banking at no cost. The Bank of Namibia monitors the charges applied to other banking services to ensure that the Basic Bank Account offering remains affordable to the target market.
45. Whilst **South Africa** has not had a basic bank account enforced in the legislature, the banking industry committed to the Financial Sector Charter (FSC) in 2004. The FSC is a social pact between government, labour, organised civil society and the financial services sector to play a measurable and impactful role in steering the use of financial services toward specific developmental objectives, one of which is financial inclusion (The National Treasury, South Africa & AFI Financial Inclusion Data Working Group, 2014). Four major banks and the Post Office/Postbank mutually developed the 'Mzansi' basic bank account geared towards the low-income segment. The benefits of a Mzansi account are as follows: a debit card, zero fees for interbank transactions, no monthly fee, free use of Post Office branches, and one free cash deposit per month. Applicants need to have their identities verified, but proof of address is not required. The Mzansi initiative has been successful in promoting the uptick of bank accounts but has struggled with low average balances and low rates of active accounts compared to other banking products. Since its

introduction, South African banks have introduced several entry-level bank accounts that differ in form, functionalities, and fees, but are an evolution of the Mzansi bank account (Tuba, 2022). Many of them share comparable features, as they exclude identification and verification requirements and have no minimum eligibility criteria.

7.6 Asia

46. **Malaysian** banking institutions provide Basic Saving Accounts (BSA) and Basic Current Accounts (BCA), which allow individuals to access basic banking services at low or no cost (BankingInfo, 2009). The former targets individuals, whilst the latter is aimed towards both individuals and small and medium-sized enterprises. The minimum amount required to open a BSA can be no more than RM\$20.00 (US\$4.75), and no more than RM\$500.00 (US\$118.62) for a BCA. Account holders receive, on a monthly basis, six (6) over-the-counter visits²², eight (8) ATM withdrawals, two (2) interbank transactions at RM\$0.05 (US\$0.012), cheques and cash deposits, account enquiries and interbank fund transfers, and online banking at no cost. There are no maintenance charges for BSAs, but BCA holders may pay RM\$10.00 (US\$2.37) if their average balance is less than RM\$1,000.00 (US\$237.25) for half of the year.
47. In **Pakistan**, the Asaan Mobile Account (AMA) platform was launched under the National Financial Inclusion Strategy to encourage households, particularly lower-income households, to digitally open branchless bank accounts (BBAs) and utilize financial services in an accessible and affordable manner. AMA is an initiative of the State Bank of Pakistan and Pakistan Telecommunication Authority, in collaboration with branchless banking providers, telecom operators, and other development partners (State Bank of Pakistan, 2022). Through the AMA platform, any citizen holding a valid Computerised National Identity card can open a bank account digitally with any of the thirteen AMA-participating banks, using the SIM of any mobile operator. The scheme allows individuals to access the AMA platform using a short code and conduct transactions through mobile phones without the need for internet connectivity. Customers can access balance inquiries, mini bank statements, money transfers, mobile banking, account closure, change their account PIN, and account linking at no cost.
48. The Central Bank of the **Philippines** (2018) directed banks to offer a basic deposit account in [Circular No. 992](#), referring to an interest or non-interest-bearing account, to promote financial inclusion. These accounts enable all citizens, especially the unserved and underserved, to receive and make payments, and have a facility for store of value. The regulator allows banks to customize their product offerings based on the needs of the identified market, provided that the banks adopt the minimum key features of a basic deposit account. These required attributes include banks following simplified Know-Your-

²² Several transactions at each visit are permitted.

Customer (KYC) for low-risk customers²³, the opening amount required should be no greater than ₱100.00 (US\$1.72), the maximum balance must be no greater than ₱50,000.00²⁴ (US\$857.71), no minimum maintaining balance, no dormancy charges, and a 0.00% reserve requirement.

49. The Bank of **Thailand** collaborated with 16 banks to deliver basic bank accounts with fee-free deposits and no minimum balance requirement, to widen opportunities for the unbanked to access financial services and digital banking (Banchongduang, 2018). Basic bank account holders can make transactions including deposits, withdrawals, and transfers through ATMs or debit cards without any fees. Entrance and annual fees are also waived. In the early stages of the rollout, interest-bearing bank accounts are offered only to those aged 65 and older, as well as low-income earners who receive welfare and/or subsidies from the government. The rest of the population will be able to access the basic accounts in the next phase of the rollout.
50. The Pradhan Mantri Jan Dhan Yojana (PMJDY) scheme is a nationwide scheme launched by the Government of **India** in August 2014 to ensure financial inclusion of every individual who does not have a bank account. This scheme aims to provide access to financial services; namely, banking/savings and deposit accounts, remittances, credit, insurance, and pension. Additionally, the scheme seeks to promote financial literacy by offering information about the importance of saving, insurance and responsible borrowing. PMJDY are zero-balance accounts which do not require any minimum balance. Account holders are provided with a RuPay debit card for easy transactions. They can also avail of an overdraft facility of up to ₹10,000 (Indian Rupee) (US\$112.55), subject to eligibility criteria and account performance. Further, account holders are eligible for life and accidental insurance cover of ₹30,000 (US\$337.66) and ₹2 lacs²⁵(US\$2,251.03) respectively, provided they access their account at least once in 45 days (Gyanchandani, 2023). Creating a pull for opening bank accounts among the underserved population was a key challenge and to overcome this, the government focused on bottlenecks that restricted citizens from opening accounts. These included a long list of required documents, bank criteria of a minimum balance (otherwise the account holder would pay an account maintenance charge) and limited banking infrastructure availability. To address this and create consumer interest in banking, the PMJDY links several government facilities with these accounts. Some 14 ministries and departments are routing their subsidy payments through 57 national programmes into PMJDY accounts (IBEF, 2024).

²³ Identifying the customer and verifying their true identity may be based on any document or information reduced in writing which the covered person deems sufficient to establish customer's identity or other reliable, independent source documents, data, or information.

²⁴ In the event that the depositor exceed the 50,000.00 PHP maximum balance, the bank should convert the basic deposit account to a regular deposit account.

²⁵ One lac is equal to 100,000.

7.7 Australia

51. **Australian** banks must offer basic bank accounts to low-income persons according to the Australian Banking Association's Banking Code of Practice, that have no account-keeping fees, free monthly statements, no minimum deposit amount, and no overdraft fees (ACCC, 2019; MoneySmart, 2024). The accounts also allow access to a debit card and free unlimited transactions, both in-branch and by phone, online banking, and bank-owned and networked ATMs across Australia (Australian Bankers' Association Inc., 2016). The basic bank accounts are intended for customers who qualify for a concession card issued by the government such as a Pensioner Concession Card, Health Care Card or Commonwealth Seniors Health Card. They are aimed at ensuring those on lower incomes have access to affordable banking services. If a bank requires a customer to hold a Concession Card or Health Care Card, they will typically require that income support or family assistance payments be paid into this account. However, some banks offer a free transaction account to all their customers.

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