AML verification visits: what the SAT reviews and how to prepare



Bertin Gutiérrez
Managing Partner

For companies engaged in vulnerable activities, an SAT verification visit is the moment when the compliance program is put to the test. The 2025 and 2026 reforms expanded the authority's powers and the obligations of reporting entities, and the new General Rules set a timetable that runs from 2026 to 2028. What used to be solved by filing notices on time now requires showing that a working system is in place.

What changed

The July 2025 amendment to the Anti-Money Laundering Law and the March 2026 amendment to its Regulations expanded the powers of the Financial Intelligence Unit (UIF) and the SAT to verify, request information and impose penalties. On August 7, 2026, amendments to the General Rules were published in the Official Gazette; they generally take effect on November 30, 2026 and phase in their obligations: from March 1, 2027, the risk assessment, the updated manual and the new know-your-customer and beneficial ownership rules; from June 1, 2027, automated monitoring systems; and fiscal year 2028 as the first period subject to an annual audit.

What the authority reviews

During a visit, the SAT usually checks that the company is registered and has appointed its compliance officer, that it has filed notices and nil reports on time, that its customer identification files are complete and that it keeps the information for the legal period. Under the new rules, it will also review the policy manual, the risk assessment, training and, later, monitoring and audit. Omissions are subject to fines that, depending on the case, range from 200 to 65,000 UMAs, or 10% to 100% of the transaction value for prohibited cash transactions; the highest band applies, among other cases, to failure to file notices.

How to prepare

Experience shows that visits become difficult less because of what the company did wrong than because of what it cannot prove it did right. An organized file, with evidence of every notice, every identification and every training session, makes it possible to handle the visit on the company's own terms and to exercise the right to be heard with arguments rather than explanations.

- Assess registration, the compliance officer, notices and customer files for recent years.
- Correct any omissions found before the authority does.

- Prepare the manual, risk assessment and training plan according to the timetable of the new rules.
- Decide who will handle the visit, how information will be delivered and how actions will be documented.
- Review each observation with legal judgment before responding.

This note is for information only and does not constitute legal advice.

Let's talk

We can assess the impact on your company and the options available.

Mónica Maldonado
BUSINESS DEVELOPMENT DIRECTOR
monica.maldonado@artegia.mx
+52 722 512 6760

Bertin Gutiérrez
MANAGING PARTNER
bertin.gutierrez@artegia.mx
+52 442 127 9046

www.artegia.mx · Querétaro, México