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Argentina strengthens the framework against proliferation financing (UIF Resolution No. 3/2026) and updates reporting thresholds for the automotive sector

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The Financial Information Unit (UIF) issued Resolution 3/2026 (published on January 8, 2026), which defines the mechanism for reporting suspicious transactions for the financing of the proliferation of weapons of mass destruction ("PF"), as well as the procedure for freezing goods or other assets of persons and entities designated in relation to the PF. Consequently, the obligations for all the obligated entities listed in Article 20 of Law 25,246 (the "Obligated Entities") are unified, aligning the country with the standards of the Financial Action Task Force (FATF) on the matter. Likewise, as of January 15, 2026, the new thresholds applicable to the automotive sector came into force, updated in accordance with the Automotive Sector Price Index and pursuant to the mechanism established by UIF Resolutions No. 169/2023 and No. 127/2012. Each of these regulatory developments are detailed below.

The Resolution 3/2026 replicates the guidelines implemented just two months ago through Resolution 207/2025, in force since November 4, 2025, which redefined the framework against the financing of terrorism.

Although both resolutions have broad similarities in terms of the structure and obligations assigned to the Obligated Entities, there are some relevant differences, which are detailed below:

- **Extended obligation to periodically check sanctions lists**

Resolution 3/2026 expressly establishes the obligation, on the part of the Obligated Entities, to regularly and periodically verify the lists of persons and entities subject to targeted financial sanctions related to the PF, designated by the United Nations Security Council or by the respective Committee of said Security Council, as well as the registries that may eventually be created for this purpose in Argentine jurisdiction, within the framework of "Know Your Customer" procedures.

This expanded *screening* obligation is not expressly established in Resolution 207/2025, which focuses only on the regular review against the lists of the Public Registry of Persons and Entities Linked to Acts of Terrorism and their Financing (RePET), a registry in charge of the UIF.

- **Immediate judicial control**



In the face of the issuance of an administrative order to freeze assets, Resolution 3/2026 establishes that the UIF will immediately notify the Public Prosecutor's Office for his/her knowledge and/or the federal judge with criminal jurisdiction, in order to ratify, rectify or revoke the measure within a maximum period of 24 hours. Notwithstanding this, the frozen property or other assets must remain in that state until the judicial resolution is issued.

This immediate judicial review is not expressly provided for in Resolution 207/2025.

- **Communication to the Ministry of Foreign Affairs**

Within 24 hours of becoming aware of the implementation of the administrative freeze measure ordered by the UIF, the Ministry of Foreign Affairs, International Trade and Worship must be notified so that it can be informed to the United Nations Security Council through the appropriate channels.

This obligation of international communication is not contemplated in the body of Resolution 207/2025, which reflects the specific nature of the proliferation of weapons of mass destruction and the role of the United Nations Security Council in this area.

The measure contributes to correcting the observations of the last mutual evaluation carried out on the country by the FATF and the Financial Action Task Force of Latin America (GAFILAT), thereby seeking the effectiveness and efficiency of the mechanisms for the reporting of operations involving persons or entities subject to targeted financial sanctions, related to the proliferation of weapons of mass destruction, as well as the freezing of their property or other assets owned by said subjects.

The day after the publication of Resolution 3/2026 in the Official Gazette, the UIF ordered the first administrative freeze of assets for PF in Latin America. This is the first time that the UIF has applied a measure of this type since Law 27,739 incorporated the crime of Financing the Proliferation of Weapons of Mass Destruction into the Argentine Criminal Code in March 2024. This decision is part of the UIF's intention to adopt measures with an impact on the mechanisms for preventing and combating the financing of the proliferation of weapons of mass destruction.

Resolution 3/2026 entered into force on January 8, 2026.

To access the full text of the Resolution (in Spanish), click here [\(link\)](#).



- **Update of thresholds for the Automotive Sector**

As of January 15, 2026, the new applicable amounts to the automotive sector, updated according to the Automotive Sector Price Index, came into effect.

Pursuant to the mechanism set forth in UIF Resolutions No. [169/2023](#) (applicable to capitalization, savings, savings and loan, economic, capital formation, or equivalent companies) and No. [127/2012](#) (which affects the National Directorate of the Registry of Motor Vehicle Ownership and Secured Loans and sectional motor vehicle ownership registries), it was decided to update the thresholds applicable to the Systematic Reports provided for in said regulations, which became effective on January 15, 2026. The updates are determined according to the cumulative percentage increase of said index over the last six (6) months, with semi-annual updates in January and July of each year.

Accordingly, the thresholds applicable to Obligated Entities pursuant to UIF Resolution 127/2012 are now as follows:

| Description | New Thresholds | Former Thresholds |
|--|-------------------------|--------------------------|
| Vehicle registration. Customer profile. Vehicles (art. 16) | AR\$ 142,641,863 | AR\$ 115,000,000 |
| Transfer and/or re-registration and/or early cancellation of pledges (art. 26) | AR\$ 53,860,577 | AR\$ 43,423,202 |
| Acquisition of motor vehicles (art. 26) | AR\$ 62,018,201 | AR\$ 50,000,000 |

On the other hand, the thresholds that apply to Obligated Entities in accordance with UIF Resolution 169/2023 are now as follows:

| Description | New Thresholds | Former Thresholds |
|---|------------------------|--------------------------|
| Pre-cancellation of transactions (art. 38) | AR\$ 51,789,017 | AR\$ 41,753,078 |
| Change of beneficiaries and/or plan transfers (art. 38) | AR\$ 47,645,895 | AR\$ 38,412,832 |

For more details (in Spanish), click here ([link](#))

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