



Identomat

COMPLIANCE GUIDE

Travel & Hospitality Compliance in Ukraine

COUNTRY **Ukraine**

INDUSTRY **Travel & Hospitality**

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KEY REGULATORS **State Agency for Tourism Development of Ukraine · Ministry of Foreign Affairs of Ukraine · State Border Guard Service of Ukraine**

Key takeaways

- Tour operators need a licence from the State Agency for Tourism Development and a bank guarantee of at least €20,000 (€10,000 if they sell only domestic and inbound trips). Travel agents need no licence but must hold a €2,000 guarantee.
 - Tour operators, travel agents and hotels are not covered by Ukraine's anti-money laundering law, so there is no formal "know your customer" programme. Identity duties come from hotel and accommodation rules instead.
 - A hotel may give a room only after the guest shows an accepted identity document and completes a guest form. Ukrainian guests may show the digital passport in the state Diia app, and the hotel must verify it.
 - Online sales are allowed: tour contracts can be electronic, and a hotel booking is binding once confirmed, if the channel reliably identifies who booked. Online booking does not replace the identity check at check-in.
 - Foreign companies cannot sell tour contracts in Ukraine directly; they need a licensed Ukrainian company. Martial law, in force since February 2022, limits who may leave the country and changes some visa rules.
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Ukraine's travel and hospitality market is open to domestic and foreign-owned businesses, but under martial law since 24 February 2022, with exit restrictions for many male citizens and a body of temporary rules that changes often. Inbound visitors use visas, including an electronic visa applied for entirely online, or visa-free entry where Ukrainian law or a treaty allows it.

The principal authorities are the State Agency for Tourism Development (tour operator licensing and hotel categories), the Ministry of Foreign Affairs (visas), the State Border Guard Service (border control and biometrics) and the Ukrainian Parliament Commissioner for Human Rights (personal data).

The biggest obstacle for a new foreign entrant is structural: selling package travel in Ukraine requires a Ukrainian legal entity with a tour operator licence and a standing bank guarantee, and intermediating contracts for an unlicensed foreign operator is prohibited.

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1 Who regulates this sector

Authority	Remit	Level	Official site
State Agency for Tourism Development of Ukraine (ДАТ, DART)	Tour operator licences and licence register, supervision of licence conditions, hotel categories	National	tourism.gov.ua
Cabinet of Ministers of Ukraine	Accommodation rules, visa rules, border-crossing rules, licence conditions	National	kmu.gov.ua
Ministry of Foreign Affairs of Ukraine	Visas, including electronic visas	National	mfa.gov.ua
State Border Guard Service of Ukraine	Border control, document checks, biometric capture of foreigners	National	dpsu.gov.ua
State Migration Service of Ukraine	Extension of stay, residence permits for foreigners	National	dmsu.gov.ua
Ukrainian Parliament Commissioner for Human Rights	Personal data protection supervision	National	ombudsman.gov.ua
State Service of Ukraine on Food Safety and Consumer Protection	Consumer protection for travel and hotel services	National	dpss.gov.ua

Since an amendment of March 2025, the Ministry for Development of Communities and Territories sets the types of accommodation, the rules for using them and the primary accounting forms for accommodation services (points 10 and 12 of Cabinet Resolution No. 297 of 15 March 2006).

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Licensing and authorisation

Tour operators

Tour operator activity is a licensed activity under Article 7(1)(19) of the Law on Licensing of Types of Economic Activity (Закон України «Про ліцензування видів господарської діяльності», No. 222-VIII of 2 March 2015) and Article 17 of the Law on Tourism (Закон України «Про туризм», No. 324/95-ВР of 15 September 1995). A tour operator must be a legal entity created under Ukrainian law whose exclusive activity is organising and selling the tourist product (Article 5). Only a licensed tour operator may arrange documents for travel abroad (Article 17).

The State Agency for Tourism Development issues licences and keeps the licence register (point 4, subpoint 24 of its Regulation, Cabinet Resolution No. 1162 of 24 December 2019). According to the Agency, the licence has no expiry date and decisions take 10 working days. An applicant files a guarantee of its liability to tourists, a contract for compulsory medical and accident insurance of tourists, evidence of the manager's education and experience, and details of its business premises (point 6 of the Licence Conditions, Cabinet Resolution No. 991 of 11 November 2015). Since an amendment of 15 July 2026, applications and notices can be filed electronically through the state services portal (point 6-1).

Financial guarantees

Article 15 of the Law on Tourism requires a bank or credit institution guarantee of at least the equivalent of €20,000 for a tour operator, €10,000 for a tour operator serving only domestic and inbound tourism, and €2,000 for a travel agent. The tour operator must keep the guarantee at the minimum for the whole life of the licence and restore it by the next working day after any payout (point 21-1 of the Licence Conditions).

Travel agents, accommodation and foreign businesses

Travel agents do not need a licence. Accommodation needs no licence, but Article 19 of the Law on Tourism states that accommodation services may not be provided without a certificate of the relevant category, which the Agency assigns on the operator's

application for five years. Since 13 June 2026, accommodation with 10 or more places counts as "collective" and those with fewer than 10 as "individual" (point 2 of Resolution No. 297, as amended by Resolution No. 743 of 10 June 2026, which lowered the threshold from 30). Individuals running collective accommodation must register as a business (point 6).

Foreign companies may act as tour operators or agents only by establishing a Ukrainian company and obtaining a licence; intermediation in Ukraine for contracts with foreign tour operators is not permitted except through Ukrainian tour operators, and contracts made in breach are void (Article 37 of the Law on Tourism). Operating without a licence is a violation of tourism law (Article 30) and leads to administrative liability under the Code on Administrative Offences (Article 20 of the Licensing Law).

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Identity framework (AML rules do not apply)

Ukraine's anti-money laundering law (Закон України «Про запобігання та протидію легалізації (відмиванню) доходів, одержаних злочинним шляхом...», No. 361-IX of 6 December 2019) lists the businesses that must carry out financial monitoring in Article 6(2): banks and other financial institutions, payment system operators, capital and commodity market participants, postal operators offering payment or currency exchange services, professionals such as auditors, lawyers and notaries, real estate intermediaries, dealers in precious metals and stones and in cultural goods, gambling and lottery operators, and virtual asset service providers. Tour operators, travel agents, hotels and other accommodation providers are not on the list. They therefore have no statutory customer due diligence, beneficial ownership, threshold reporting or suspicious transaction reporting duties.

Two points still reach the sector: currency exchange for travellers sits with the banks, financial institutions and postal operators the law covers, and any business that receives a request from the State Financial Monitoring Service, obliged or not, may not tell the persons concerned or third parties about it (Article 16(10)).

The identity framework that does apply is sector law:

Hotels and collective accommodation

A room is provided on presentation of a passport or other identity document and completion of a guest form in the prescribed sample (point 4.1 of the Rules for the Use of Hotels, State Tourism Administration Order No. 19 of 16 March 2004).

Individual accommodation

Private hosts with fewer than 10 places keep a register of each guest's name, year of birth, place of residence, identity document, dates of arrival and departure and price, and file income declarations (point 7 of Resolution No. 297).

Tour operators and agents

Tourists must provide the personal information needed to deliver the tourist product (Article 25 of the Law on Tourism). The operator issues the contract or voucher, the insurance contract and travel documents (point 20 of the Licence Conditions).

Sanctions apply through licensing: a tour operator licence may be revoked as a sanction under the AML law or the Law on Sanctions (Article 16 of the Licensing Law), and control of a licensee by residents of the aggressor state is a ground for administrative liability (Article 20).

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Identity verification and onboarding

Accepted documents at check-in

Point 4.1 of the Rules for the Use of Hotels accepts a broad list: the Ukrainian passport and passport for travel abroad, diplomatic and service passports, a seafarer's identity document, a residence permit, a foreign national's passport (or a document replacing it) together with a visa where one is required, a birth certificate for children under 16, a driving licence, a military identity document, and an employer-issued identity card, among others. The rules speak of presenting the document; keeping a copy or scan is personal data processing that must meet the tests in section 6.

Digital passports in Diia

Ukrainian citizens may generate an e-passport and an e-passport for travel abroad in the state services app and portal, Diia. Inside Ukraine it is presented instead of the physical

passport, and legal entities and individuals must verify it (Article 14-1 of the Law on the Unified State Demographic Register, No. 5492-VI of 20 November 2012). It cannot be used to cross the state border (except to confirm a citizen's identity on entry), to enter or leave temporarily occupied territory, or in the border zone (Article 14-1(3)).

Foreign travellers

Foreigners enter with a valid passport document and a visa unless Ukrainian law or a treaty provides otherwise (Article 9 of the Law on the Legal Status of Foreigners and Stateless Persons, No. 3773-VI of 22 September 2011). They must submit biometric data at border control (Article 9(2)) and when applying for a visa (Article 10). Visa applications include ten fingerprints and a facial image, given in person (points 5 and 8-1 of the Visa Rules, Cabinet Resolution No. 118 of 1 March 2017).

No rule requires a hotel, tour operator or booking platform to use biometric matching. Where a business chooses face matching or liveness checks, biometric data is a special category of personal data (Article 7 of the Law on Personal Data Protection).

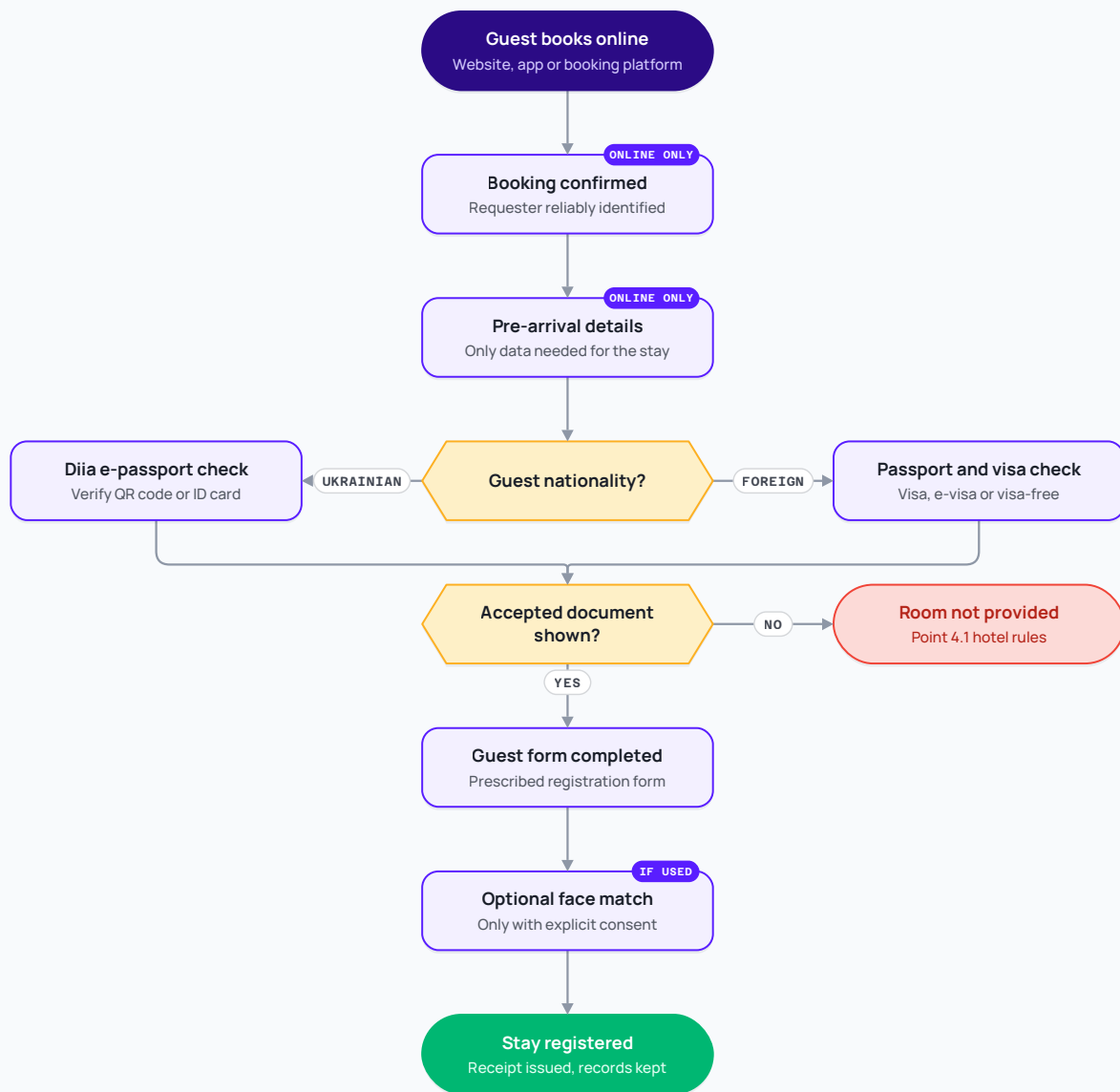


Figure 1. Online booking and check-in for accommodation in Ukraine.

5 Digital channels: what's different

Bottom line: the rules let travel be sold and booked entirely online, but the identity check stays physical: online booking changes how the contract is formed, not the obligation to see an accepted document at check-in.

Requirement	In person / at the desk	Online / remote	Difference
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Hotel contract formation	On registration and receipt (hotel rules, point 3.6)	On confirmation of a booking from an identifiable requester (Law on Tourism, Art. 22)	Differs
Tour contract form and signature	Written contract or voucher	Electronic contract (Art. 20); e-signature or one-time identifier (E-commerce Law, Art. 12)	Differs
Identity document at check-in	Required (point 4.1)	Still required on arrival	Same
Diia e-passport	Accepted; must be verified	Electronic copies usable where passport copies are allowed	Same
Visa application	Consular application, biometrics in person	E-visa online, up to 30 days, decision in 3 working days	Differs
Pre-contract information to tourists	Before the contract (Art. 19-1)	Same duties, plus licence and agent details on the operator's website	Differs
Proof of payment	Payment document issued	No operator payment document when paid through a bank or electronic means (Licence Conditions, point 19); seller issues an electronic receipt	Differs
Biometrics	Not required at check-in	Not required; explicit consent if used	Same

Bookings and contracts

A hotel contract may be made by accepting a booking by post, telephone or "other communication" that allows the identity of the requester to be reliably established, and it takes effect from the hotel's confirmation (Article 22 of the Law on Tourism). Tour contracts may be concluded in written or electronic form (Article 20). Under Article 12 of the Law on Electronic Commerce (No. 675-VIII of 3 September 2015), an electronic transaction is signed with an electronic signature, an electronic signature by one-time identifier, or an agreed analogue of a handwritten signature.

Electronic visa

The electronic visa is issued remotely online through the visa information system (point 2 of the Visa Rules), as a single or double-entry visa for up to 30 days for business, private, tourist, medical, cultural, scientific, educational, sports and media purposes (point 33). The consular fee is US\$20 for a single and US\$30 for a double-entry e-visa, doubled for urgent processing; processing takes three working days, or one working day if urgent (points 34 to 36). Foreigners who travel on an e-visa still give biometric data at border control (Article 9(2) of Law No. 3773-VI).

Website duties for tour operators

A tour operator must publish on its website its licence decision and the travel agents selling its products (point 29 of the Licence Conditions) and, for outbound packages with transport, any flight delay of four hours or more (point 25-1).

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Data protection and biometrics

The Law on Personal Data Protection (No. 2297-VI of 1 June 2010) governs guest and traveller data and is supervised by the Ukrainian Parliament Commissioner for Human Rights. Check-in data rests on the contract and on legal duties (Article 11(1)(3) and (5)), must not be excessive (Article 6(3)), and guests must be told at collection who holds it and why (Article 12(2)).

Biometric data, such as a facial template used for contactless check-in, falls in the special categories whose processing is prohibited unless an exception applies, most relevantly the person's unambiguous consent (Article 7). Processing that poses a particular risk to people's rights must be notified to the Commissioner within 30 working days of starting it (Article 9); the Commissioner defines which processing types qualify.

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Sector-specific obligations

Insurance and information duties

Tourism businesses must arrange medical and accident insurance for tourists, unless the tourist proves their own policy (Article 16 of the Law on Tourism). Before the contract, the tourist must be told the passport and visa requirements of the destination and the time needed to obtain them, the operator's licence, its guarantee and the guarantor, and the

insurance terms (Article 19-1). Entry rules for the destination are an essential term of the contract (Article 20).

Martial law and travel by Ukrainian citizens

While martial law is in force, the right to cross the border is limited for male citizens liable for military service to the categories listed in points 2-1 to 2-14 of the Rules for Crossing the State Border by Citizens of Ukraine (Cabinet Resolution No. 57 of 27 January 1995), last amended on 15 July 2026. Outbound sellers need to account for these limits.

Martial-law changes for foreigners

Law No. 4816-IX of 12 March 2026 exempts foreigners, other than Russian citizens, who come to work for registered branches of foreign humanitarian-aid recipients or to volunteer, from the long-stay visa requirement for a temporary residence permit, during martial law and for one year after it ends (Law No. 3773-VI, final provisions, point 1-1).

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Risk indicators and red flags

IDENTITY AND COMPLIANCE RED FLAGS IN TRAVEL AND HOSPITALITY

- **No accepted document:** a guest cannot present any document on the accepted list at check-in.
- **Unverifiable e-passport:** a Diia e-passport whose QR code or data fails verification.
- **Digital passport at the border:** a traveller relying on a Diia e-passport for a cross-border trip, which the law excludes.
- **Visa mismatch:** a foreign guest whose visa, e-visa or permitted period of stay has expired.
- **Anonymous booking:** a booking channel that does not let the business reliably identify the person booking.
- **Unguaranteed agent:** a travel agent that cannot produce a current bank guarantee.
- **Foreign seller without a licence:** a foreign operator selling tour contracts in Ukraine directly or through local intermediaries.
- **Aggressor-state control:** ownership or trading links to residents of the aggressor state in a licensee or partner.

Enforcement and penalties

Article 30 of the Law on Tourism lists the violations of tourism law, including tour operator activity without a licence or in breach of licence conditions, failing to give tourists accurate information, unlawful use of an accommodation category, breach of the tourist contract, ignoring orders to remedy licence breaches, obstructing inspections, and disclosing confidential information.

For licensed activity, the Licensing Law sets three tiers. The Agency can order a licensee to remedy breaches; it can suspend the licence in whole or in part; and it can revoke it, including as a sanction under the AML law or the Law on Sanctions (Article 16). Unlicensed activity, ignoring an order and controlled ownership by aggressor-state residents attract administrative fines under the Code on Administrative Offences (Article 20).

The Agency publishes its licensing decisions as orders, including the refusal of a tour operator licence to TOB «AHIMAP Бізнес Тревел» (Order No. 162 of 4 September 2026) and its plan of scheduled supervision measures for 2027 (Order No. 169 of 7 October 2026).

Recent changes and what to watch

- **In force 7 October 2026:** the State Agency for Tourism Development approved its 2027 plan of scheduled supervision (Order No. 169). Licensed tour operators should expect scheduled inspections.
- **In force 15 July 2026:** Resolution No. 960 allows tour operator licence applications and notices to be filed electronically through the state services portal.
- **In force 15 July 2026:** Resolution No. 954 amended the border-crossing rules for male citizens under martial law. Outbound sellers should recheck eligibility rules.
- **In force 13 June 2026:** Resolution No. 743 lowered the collective accommodation threshold from 30 to 10 places. Larger private rentals now need business registration.
- **In force 12 March 2026:** Law No. 4816-IX waived the long-stay visa requirement for humanitarian staff and volunteers during martial law.

What this means for identity verification

Design for document presentation at arrival, not remote proofing. The accepted list is wide (point 4.1 of the hotel rules), so document capture should support Ukrainian ID cards and passports, foreign passports with visa details, residence permits, driving licences and

children's birth certificates. For Ukrainian guests, verifying the Diia e-passport (QR or data check) should be built in, because the law obliges businesses to verify it; it must not be offered for any cross-border service.

Online flows should identify the person booking reliably enough to form the contract (Article 22) and collect only what the stay requires (Article 6(3) of the data protection law). Biometric matching is optional and needs recorded, unambiguous consent. Re-check identity when someone other than the booker arrives, and check foreign guests' visa validity against stay dates.

IDENTOMAT

How Identomat helps

Identomat runs identity verification, screening and monitoring for regulated businesses on one platform, with workflows you configure for each market. For the requirements in this guide, that means:

- ID document capture and verification at online or desk check-in, covering Ukrainian ID cards and passports, foreign passports and residence permits.
- Face match and biometric liveness as an optional contactless check-in step, configured to collect explicit consent.
- No-code workflow builder to collect only the guest data each stay requires and keep an audit trail of every check.
- KYB and beneficial owner verification for screening travel agents and partners, including ownership links relevant to licensing.
- AML screening against sanctions and watchlists for partners and counterparties.

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DISCLAIMER

This article is intended for informational purposes only and does not constitute legal advice. It is a compilation of information from various sources and reflects the information available as of the last updated date indicated above. Laws, regulations, and regulatory guidance may change, so readers should consult qualified legal professionals for advice specific to their circumstances.

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