

BVI Update: AML Filings and Online AML Training for Reporting Entities

From 1 January 2026, the BVI Financial Investigation Agency ("FIA") has confirmed that suspicious activity reports ("SARs") / suspicious transaction reports ("STRs") under the BVI anti-money laundering ("AML") regime will have to be submitted by BVI reporting entities via the AMLive portal.

This update provides details of these requirements together with information on upcoming free online training being provided by the BVI Financial Services Commission ("FSC") in September and October 2025 to help improve AML compliance and filings by BVI reporting entities. Investment business entities in particular are being encouraged to take steps to assess their compliance with the BVI AML regime relating to SARs / STRs, including assessing the effectiveness of their controls, procedures and processes that may impact the quality of their filings. We recommend that BVI reporting entities make use of the resources provided by the FSC / FIA, as the FSC has confirmed that as part of its ongoing supervisory function, it will continue to monitor and test investment business entities' compliance with these requirements. This area could potentially form the focus of a thematic inspection of reporting entities by the FSC / FIA in the future.

AMLive Filings

The FIA has updated its website to confirm that effective 1 January 2026, all reporting entities, including regulated BVI investment businesses, and their money laundering reporting officers ("MLRO"), will be required to file SARs/STRs through the FIA's AMLive Portal. We understand that this will mean that SARs / STRs will not be able to be filed manually with the FIA from 1 January 2026.

To file through AMLive, a licence(s) must first be obtained from the FIA. From 1 January 2026, the FIA will be offering one complimentary licence for each reporting entity, with a US\$150 fee payable to the FIA for any additional licences. The FIA also reserves the right to refuse to grant additional licences to reporting entities with more than two licences per entity. Further details are available on the FIA's website¹, including the link which is now available to use to register for a licence and the process to be followed.

Reporting entities should make sure that they/their MLRO are registered on the AMLive portal in good time before 1 January 2026 so that SARs / STRs filings can continue to be submitted in accordance with their obligations under the BVI AML regime.

¹<https://fiabvi.vg/Analysis-Investigation/Suspicious-Activity-Reports/AMLive>

BVI Finance SARs Training for BVI Reporting Entities - 25 September 2025

BVI Finance has announced that, together with the FSC and the FIA, it is hosting an online forum on 25 September 2025 offering practical guidance on how to improve SARs filings, including discussion from representatives of the FSC and FIA of issues surrounding the quality of SARs submitted. The forum is designed to help reporting entities understand the requirements for customer due diligence/enhanced due diligence, risk assessments and monitoring, how to include a stronger narrative in SARs and be inspection ready. Registration is available at [Webinar Registration - Zoom](#).

FSC AML / CFT / CPF Masterclasses – September / October 2025

The HLSCC Robert Mathavious Institute for Financial Services, in collaboration with the FSC, is inviting financial services industry professionals, particularly those within the Trust and Company Service Providers, Virtual Asset Service Providers and Investment Business sectors, to attend a series of three free two day in-person and online masterclasses. These sessions are designed to enhance industry understanding and improve the execution of regulatory obligations, including focussing on practical knowledge and tools to prepare high quality SARs / STRs.

Sessions will take place as follows:

- (a) **25 / 26 September 2025** – Compliance Obligations – Customer Due Diligence
- (b) **2 / 3 October 2025** – Compliance Obligations – Suspicious Activity Reporting
- (c) **7 / 8 October 2025** – Misuse of Legal Persons for Money Laundering / Terrorist Financing and Proliferation Financing

The masterclasses will be delivered in person at the HLSCC in BVI and online for those not physically present in the BVI. Registration is available by completing the form².

How the Maples Group Can Help

The Maples Group offers expert advice on BVI AML obligations. For further guidance or assistance in complying with these requirements or with your ongoing regulatory compliance, please contact us. We would be delighted to assist.

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² Registration form:
https://forms.office.com/pages/responsepage.aspx?id=t8n9XR0Xfkq7IJ0_WBdVrayHOUZ4IOdOhYQ3_uPB5iURDBVM0pDNjI

CMEJQR0FDQUNFUIhZWTdHOC4u&origin=IprLink&route=shorturl

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