

July 25th 2025

To: All Regulated Professional Firms

Subject: Enhanced Transaction Data Requirements for Annual Registration October 1st, 2025

Dear Regulated Professional Firm,

Dear MLRO/CO

As part of our continued efforts to strengthen Bermuda's Anti-Money Laundering and Anti-Terrorist Financing (AML/ATF) regime, the AML/ATF Board will be incorporating an enhanced transaction data requirement into the upcoming Annual Registration process.

Purpose of Enhanced Data Collection

The updated registration will now require firms to submit additional relevant information, which will include:

- The total number of transactions conducted across key categories
- The total value of those transactions
- A breakdown of high-value transactions, as defined per sectoral risk thresholds

This enhanced data requirement is designed to capture a more detailed and accurate picture of your sector's transaction activity. See **Appendix A** for detailed changes in the portal.

In addition to the enhanced data collection, all Regulated Professional Firms will be required to submit the following new document as part of their Annual Registration submission:

1. **AML Training Logs** – A record of AML/ATF training completed during the registration period for all relevant personnel. This should include the dates of training, names of participants, and the nature or content of the training. The Training logs should also correspond to the people listed in the RPF's Organizational Chart.

Why is this important? Including this information as part of your annual registration will:

- Allow for better risk-based supervision across sectors
- Help detect emerging trends or anomalies in financial activity
- Support Bermuda's compliance with international AML/ATF standards (e.g. FATF Recommendations)
- Improve the allocation of regulatory resources to areas of heightened risk.

We ask that you begin preparing to collect and report this information as part of your next Annual Registration submission (October 1st, 2025-October 31st, 2025).

Updated registration forms and guidance materials will be circulated shortly to assist with compliance.

Should you have any questions about the new data requirements or need clarification on definitions and thresholds, please contact Kim Wilson at kwilson@amlatfboard.bm.

We appreciate your cooperation and commitment to maintaining a robust and risk-based environment in Bermuda.

Yours sincerely,



Michael M. Fahy

Chairman

Attachments:

Appendix A