

September 2025

On-Line Guidance Notes for 2025/2026 Registration

NON-REGULATED PROFESSIONAL FIRMS

Annual registration with the AMLATF Board for 2025/2026 will officially start on 1 October 2025 and conclude 31 October 2025.

ALL information MUST be submitted along with COMPLETE payment by 31 October 2025.

All registrations are to be submitted via the portal https://portal.amlatfboard.bm/

It should be noted that successful registration with the AML/ATF Board requires that ALL requested information be submitted, including payment of the registration and cost defrayment fees (See separate notice regarding fees).

Non-Regulated Entities

- If your company was classified as "Not Regulated" in the previous year, you are simply required to submit the Basic Registration Information, complete the Declaration, and submit payment.
- If your company was classified as "Not Regulated" in the previous year, and you wish to be reclassified as "Regulated", please refer to the "Regulated Professional Firm" Online Guidance Notes for 2025.

New Registrations

• If your company is a "NEW Registration" you will be required to submit a <u>Client Transaction Report</u> within 6 months of registration for the preceding 6 months regardless of your classification. <u>It is YOUR responsibility to submit this document within the required time frame.</u> The Technical Officer will provide this document for completion.

General "File Housekeeping"

- 1) Documents required should be provided in pdf format unless stated otherwise
- 2) Document Name should start with YOUR Company Name e.g "XYZ Law Org Chart 25"

NOTE: Please ensure that all submitted documents are in a machine-readable pdf or ppt format



Registration Process

New Registrations

When you first access the portal, it will prompt you to set up a User Account:

Sign up to use Portal

This Portal will allow you to provide in digital format, the statutory information required under Section 30C(1) of the Proceeds of Crime (Anti-money Laundering and Anti-terrorist Financing Supervision and Enforcement) Act 2008.

Click here to sign up

Previously Registered

Log into the portal and click on: Start a new blank statutory registration.

And then select: "□ 2025/2026 Registration Year."

This encompasses information for the period: October 1st, 2024, to September 31st, 2025.

(You may disregard any messages or notices pertaining to the previous registration period.)

If you have previously started a registration for 2025, click on:

Continue with latest registration.

Registration Information:

General Information Required from All Registrants:

 General Information: Key Persons- MRLO, Deputy MRLO, Compliance Officer and CFO should not be blank. If there is no dedicated person for the named role, it should contain the name and email address of the person in the Firm tasked with the responsibility of that Role.

The Board uses the Compliance Officer and related email address as the key contact for all communications.

- Structure & Operations
- o Ownership & Control
- Subsidiaries & Affiliates



- Organizational Chart (<u>regardless of company size or structure</u>) Should include full names, titles, roles, and reporting lines and/or structure. Should also state if persons are a partner, director, or shareholder.
- Fit & Proper Persons certificates for non-lawyer/non-accountants only. Bermuda Bar Council and CPA will share FPPs Lists for their respective organizations. Thus, no need to upload.
- Business Administration

Once this information has been submitted, Companies that are "Not Regulated" can make a Declaration that:

"I/we do not participate in, by way of assisting clients, in the planning of transactions or the execution of transactions related to "specified activities" as defined in 49(5) POCA 1997"

I declare that the above statements are correct."

You will then be directed to the formal Declaration page where you will Declare:

"To the best of my knowledge and belief all the information I have given in this application is correct. I understand that non-compliance with the Proceeds of Crime Act 1997, the Anti- Terrorism (Financial and Other Measures) Act 2004 and the Proceeds of Crime (Anti- Money Laundering and Anti-Terrorist Financing Supervision and Enforcement) Act 2008 and its related legislation and regulations may be met with criminal prosecution and or civil penalties.

I declare that the above statements are correct."

Following the Declaration, you will be directed to the Payment Page where your registration fee can be paid online via credit card, or you can indicate how payment will be submitted (online or cheque). If payment has been made previously, the Board will update your registration accordingly after registration completion.

This completes the registration process for Non-Regulated Entities.



AMLATF Board Review

Once the Registration Information has been submitted, reviewed for completeness, and payment received, the AMLATF Board will issue an *Annual AML/ATF Registration Certificate*.

Note that COMPLETED submissions are reviewed in the order that they are received.

For assistance or questions regarding the registration process please contact technicalofficer@amlatfboard.bm