

September 2025

On-Line Guidance Notes for 2024-2025 Registration

REGULATED PROFESSIONAL FIRMS

Annual registration with the AML/ATF 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.

Regulated Entities

- If your company was classified as a “Regulated Entity” in the previous year, you are required to complete the FULL registration process.
- If your company was classified as a “Regulated Entity” in the previous year, and you wish to be re-classified, written notification of the change of classification must be submitted to the the AML/ATF Board AFTER completing the FULL registration.

New Registrations

- If your company is a “NEW Registration” you will be required to submit a Client Transaction Report within 6 months of registration for the preceding 6 months regardless of your classification. It is YOUR responsibility to submit this document within the required time frame.

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

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: 1 October 2024 to 31 September 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
- Ownership & Control
- Subsidiaries & Affiliates
- Organizational Chart (regardless of company size) **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 Information (*Bar Council and CPA will provide for their members*)
- Business Administration
- Nature of business
 - Practice areas
 - Teams
 - Product types
- Client Transactions

The requirement to complete this section does **NOT** apply to firms who are already Regulated by the Board unless specifically requested or directed.

This section ONLY need be completed by Firms who are:

- Registering with the Board for the **FIRST** time and are participating 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.) or
- Firms who were previously Registered with the Board and their business practices **NOW** include the participating by way of assisting clients, in the planning of transactions or the execution of transactions related to “specified

- Upload data
- Review data
- CFO approval

- Financial information

For the Renewal/Registration 2025-2026, you will submit Financial Information for the period, 1 October 2024, to 31 September 2025.

- Supporting Documents for Registration (Upload)
 - Policy and Procedure Manual (reviewed in the last 12 months)
 - Risk Assessment (reviewed in the last 12 months)
 - Independent AML/ATF Audit
 - Completed within 6 months of the registration deadline.
 - Refer to email “Independent Audit Guidance” sent July 23rd, 2025
 - Mitigant’s Questionnaire
 - NOT required for unless registering a NEW entity or specifically requested by the AML/ATF Board.
 - AML Training Logs ***NEW***
 - 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.

- *Refer to email "REGULATED FIRMS-Additional Data Fields & Information Required for Registration 2025/2026" sent July 25th, 2025*

- Risk data:

You will submit Risk Data for the period 1 October 2024, to 31 September 2025.

- Customers
- Geographic
- Channels of delivery
- Suspicious activity
- Adequacy of Preventative Measures (cannot be blank)
IMPORTANT NOTE: In the section where it says "Explain" or "Describe" please do NOT put "See Policy & Procedure Manual" or "See Risk Assessment" etc. This will delay your registration being processed. A brief response is required.
- Declaration
- Payment

Once this information has been submitted, you will make the following Declaration:

"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 transfer). If payment has been made previously, the Board will update your registration accordingly after registration completion.

This completes the registration process for 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