

## Annex A

### Subject: Enhanced Transaction Data Requirements for Annual Registration

**Effective: October 1<sup>st</sup>, 2025**

The following sections of the AML/ATF Registration portal (<https://portal.amlatfboard.bm/>)

are being changed/edited or amended. The identified areas are:

- 1) Structure and Operations
  - a. Organizational Chart
- 2) Supporting Information
  - a. Re-Order and Additional Requirement-Training Logs
- 3) Risk Data Call
  - a. Transactions
  - b. Geographic
  - c. Suspicious Activity
- 4) Preventative Measures
- 5) Addition of a new section: National Risk Assessment

### 1) Portal Section: Structure and Operations

#### Subsection: Organizational Chart

##### Existing Field

Please upload your organisational chart.

The chart should show the hierarchy and relationships in diagrammatic form of each entity in the group to which the registrant firm belongs or with which it is in common ownership, disclosing ultimate beneficial ownership at each level together with lines of control or affiliation. This is sometimes referred to as the ownership tree. Disclose percentages of ownership and principal business of each entity in the group.

Insert in front of the existing text:

*“A detailed Org Chart is required regardless of company size, and should include full names, titles, roles, and reporting lines and/or structure. It should also state if the persons are an employee, partner, director, or shareholder.”*

## 2) Portal Section: Supporting Information

### Existing Field

Please check off each of the items you have uploaded:

Documents required now

☒ Policy and Procedures Manual

☒ Risk Assessment

☒ Mitigants Questionnaire

[Download Mitigants Questionnaire form/template](#)

NOT required unless registering a NEW entity or specifically requested by the AML/ATF Board.

☒ Independent Audit (Reg 17A)

Reorder and add new requirement:

- i) Independent Audit (Reg 17A)
- ii) Risk Assessment
- iii) Policy and Procedure Manual
- iv) **Training Log NEW**
- v) Mitigants Questionnaire (same blurb remains)

## 3) Portal Section: Risk Data Call

### **Subsection: Transactions**

- i) Real Estate Transactions:

### Existing Fields

Real estate

#### **Purchase and sales of real estate**

No of customers \*

0

No of transactions \*

0

Professional fees \*

BM\$ 0

#### **Transactions where the real-estate is held by trustees**

No of customers \*

0

No of transactions \*

0

Professional fees \*

BM\$ 0

Each of the above sections will have a new data field:

#### **Transactional Value**

The second question will be amended from “Transactions where the real estate is held by trustees” to “*Of the above, how many real-estate transactions are held by trustees?*”

#### Notes

“Purchase and Sale of Real estate” has been broken down into the following subsections listed below. These new fields will appear below the existing fields.

The aggregate total of the new real-estate subsections should match the totals entered in the main section of “Purchase and Sale of Real estate”.

#### **New Data Fields**

##### **Purchase and Sale of Real Estate-Residential Under \$1M (Transaction Value)**

No of customers	No of transactions	Professional Fees	Transaction Value
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##### **Purchase and Sale of Real Estate-Residential \$1M- \$499,999.99 (Transaction Value)**

No of customers	No of transactions	Professional Fees	Transaction Value
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##### **Purchase and Sale of Real Estate-Residential \$5M and above (Transaction Value)**

No of customers	No of transactions	Professional Fees	Transaction Value
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##### **Purchase and Sale of Real Estate-Commercial Under \$1M (Transaction Value)**

No of customers	No of transactions	Professional Fees	Transaction Value
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##### **Purchase and Sale of Real Estate-Commercial \$1M- \$499,999.99 (Transaction Value)**

No of customers	No of transactions	Professional Fees	Transaction Value
-----------------	--------------------	-------------------	-------------------

##### **Purchase and Sale of Real Estate-Commercial \$5M and above (Transaction Value)**

No of customers	No of transactions	Professional Fees	Transaction Value
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ii) Legal Entities

Existing Fields

Legal entities		
Managing of financial assets (money, bank accounts, securities, etc.) - excluding liquidations		
No of customers *	No of transactions *	Professional fees *
0	0	BM\$ 0

The above sections will have a new data field:

**Transactional Value**

**Notes:**

“Managing of financial assets (money, bank accounts, securities etc) excluding liquidations” has been broken down into the following subsections listed below. These new fields will appear below the existing fields.

The aggregate total of the new real-estate subsections should match the totals entered in the main section of “Managing of financial assets (money, bank accounts, securities etc) excluding liquidations”.

**New Data Fields**

**Managing financial assets: Client Bank Accounts**

No of customers	No of transactions	Professional Fees	Value of Financial Asset
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**Managing financial assets: Client Digital Accounts incl Digital Wallets**

No of customers	No of transactions	Professional Fees	Value of Financial Asset
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**Managing financial assets: Client Securities**

No of customers	No of transactions	Professional Fees	Value of Financial Asset
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iii) Company Contributions:

Existing Fields

Organizing or managing contributions for creation, operation or management of legal entities		
No of customers *	No of transactions *	Professional fees *
0	0	BM\$ 0

The above sections will have a new data field:

**Transactional Value**

Field Name will be changed to:

*“Organizing or managing capital contributions, investments and equity for the creation, operation or management of legal entities.”*

There will be a new data field under this section:

How many company capital contributions are in excess of \$5M?      No. of transactions

iv) Legal Persons or Arrangements:

Existing Fields

Creation, operation and management of legal entities		
No of customers *	No of transactions *	Professional fees *
0	0	BM\$ 0

The above section will have a new data field:

**Value of Assets**

Field Name will be changed to:

*“Creation, operation and management of legal entities including the value of assets in trusts and foundations.”*

### 3. Buying and Selling Business Entities:

#### Existing Fields

Purchase and sale of legal entities		
No of customers *	No of transactions *	Professional fees *
0	0	BM\$ 0

The above section will have a new data field:

#### Value of Capital Contributions

#### Notes to Firms

“Purchase and sale of legal entities” has been broken down into the following subsections listed below. These new fields will appear below the existing fields.

The aggregate total of the new real-estate subsections should match the totals entered in the main section of “Purchase and sale of legal entities”.

#### New Data Fields

##### Purchase and sale of legal entities Under \$1M (Transaction Value)

No of customers	No of transactions	Professional Fees	Transaction Value
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##### Purchase and sale of legal entities \$1M- \$499,999.99 (Transaction Value)

No of customers	No of transactions	Professional Fees	Transaction Value
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##### Purchase and sale of legal entities \$5M and above (Transaction Value)

No of customers	No of transactions	Professional Fees	Transaction Value
-----------------	--------------------	-------------------	-------------------

v) Cash Transactions

Cash transactions		
No of customers *	No of transactions *	Professional fees *
<input type="text"/>	<input type="text"/>	BM\$ 0

The above section will have a new data field:

**Transactional Value**

There will be a new data field beneath the above question:

**Digital Currency Transactions**

No of customers      No of transactions      Professional Fees      Transaction Value

#### 4. Portal Section: Risk Data Call

##### Subsection: Geographic

Existing Field:

FATF and FATF style regional bodies and countries identified as having weak AML/CFT regimes.		
No of customers *	No of transactions *	Professional fees *
<input type="text"/>	<input type="text"/>	BM\$ 0

The above section will have a new data field:

**Transactional Value**

**The question will be amended to be called:**

*“FATF and FATF style regional bodies and countries identified as having weak AML/ATF regimes.*

Add Link: <https://www.fatf-gafi.org/en/countries/black-and-grey-lists.html>”

Existing Field:

High risk money laundering countries (esp. corruption, drug trafficking, etc.)		
No of customers *	No of transactions *	Professional fees *
<input type="text"/>	<input type="text"/>	BM\$ 0

The above section will have a new data field:

**Transactional Value**

**The question will be amended to be called:**

*“High risk money laundering countries (esp. corruption, drug trafficking, etc)*

*Add link: <https://www.transparency.org/en/cpi/2023>”*

## 5. Portal Section: Risk Data Call

### Subsection: Suspicious Activity

**There will be a new question at the beginning of this section:**

Have you registered with the FIA on goAML? Y/N

Section: Suspicious Transactions

Risk data call - Suspicious activity	
Suspicious Activity Reports (SARs) in the last 12 months	
Number of Internal SARs filed *	Number of External SARs filed *
<input type="text"/>	<input type="text"/>

There will be a new data field beneath the above question:

Number of reports filed with the FSU:



## 6. Portal Section: Risk Data Call

### Subsection: There will be a NEW section called “Sanctions”

1. Does the company screen clients and beneficiaries (where relevant) to determine if they are subject to measures imposed under the Bermuda Sanctions Regime? Y/N
2. Does the company screen employees to determine if they are subject to measures imposed under the Bermuda Sanctions Regime? Y/N
3. Has the company frozen any assets in the last 12 months under the Bermuda Sanctions Regime? Y/N
  - a. If Yes, how many? [number]
  - b. Please provide the following details for those asset freezes from the consolidated list:

Group ID	Name of Designated person given on the consolidated list	if owned/controlled by a designated person	Value of assets

## 7. Portal Section: Preventative Measures

The following NEW questions will be inserted at the end of the existing section:

1. Have you developed AML/CFT internal controls or policies? Y/N
2. Have you identified and assessed the ML/TF risks related to your activities? Y/N
3. Have you implemented risk mitigation strategies for higher risk situations? Y/N
4. Have you organized training for your employees related to AML/CFT risks and obligations? Y/N
5. Have you conducted an audit of your internal controls and policies? Y/N
6. Do you conduct enhanced due diligence for politically exposed persons? Y/N
7. Do you maintain transactions records for 5 years? Y/N

8. Have you established a mechanism to monitor United Nations and national related sanctions? Y/N
9. Have conducted or participated in AML/CFT training in the last year? Y/N

**8. Portal Section: NEW: National Risk Assessment**

1. Number of anonymous transactions conducted by your firm (transactions where it is impossible to identify the physical person who provided funds or controlled the conduct of the transaction): **No of transactions**
2. Have you ever invoked professional secrecy regarding information requests from law enforcement, the FIA or another government agent regarding specified activities? **Y/N**
3. How would you evaluate the integrity of your staff? (select one)  
Excellent/Close to Excellent/Very High/High/Medium High/Medium/Medium Low/Low/Very Low/Close to Nothing/Does not Exist
4. How would you evaluate the AML knowledge of your staff? (select one)  
Excellent/Close to Excellent/Very High/High/Medium High/Medium/Medium Low/Low/Very Low/Close to Nothing/Does not Exist
5. How would you evaluate the ATF knowledge of your staff? (select one)  
Excellent/Close to Excellent/Very High/High/Medium High/Medium/Medium Low/Low/Very Low/Close to Nothing/Does not Exist
6. Do you consider the administrative penalties associated with not complying with AML/ATF requirements dissuasive? (select one)  
Very effective/Somewhat effective/Not very effective/Not effective at all/Unsure
7. Do you consider criminal penalties associated with not complying with AML/ATF requirements dissuasive? (select one)  
Very effective/Somewhat effective/Not very effective/Not effective at all/Unsure