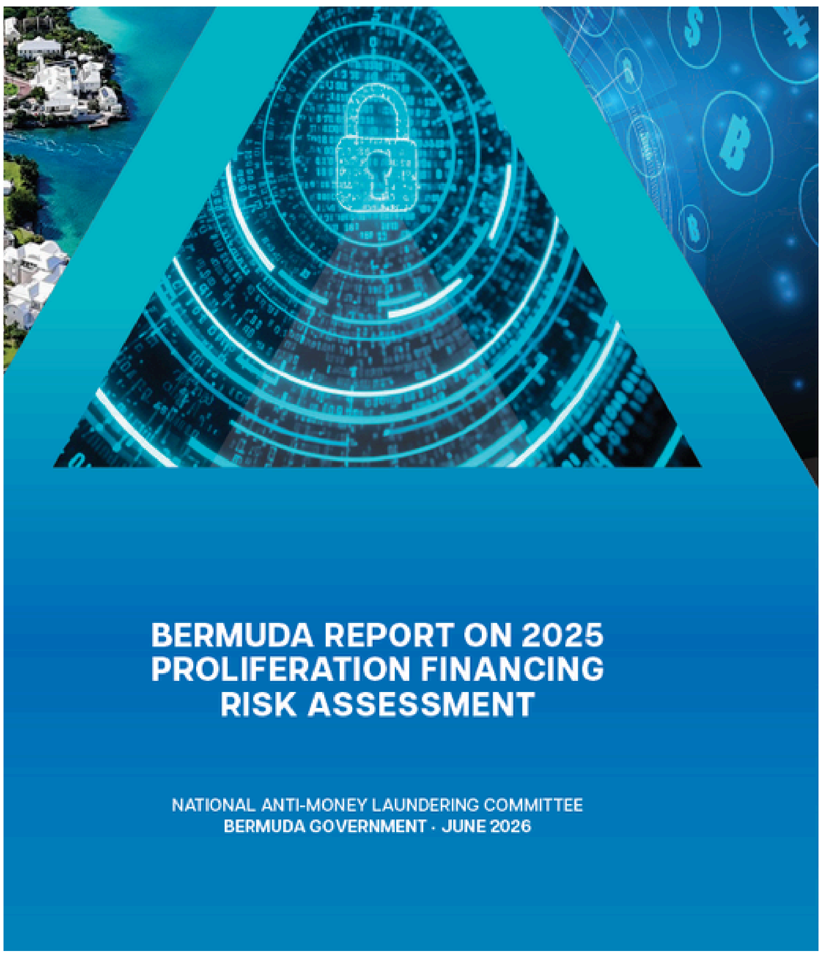
July 2026

# NAMLC NEWSLETTER

## BERMUDA'S 2025 PROLIFERATION FINANCING NATIONAL RISK ASSESSMENT (PF NRA)

**The National Anti-Money Laundering Committee (NAMLC) has officially published Bermuda's inaugural PF NRA Report**




**GOVERNMENT OF BERMUDA**
**Ministry of Finance**

**INSIDE THIS ISSUE**



**Contact Us: Office of the National Anti-Money Laundering Committee (O/NAMLC)**

Ministry of Finance, 2nd Floor Government Administration Building 30 Parliament Street, Hamilton, Bermuda HM12

441-295-5151

Info-NAMLC@gov.bm

# Bermuda's 2025 PF NRA - Background and Context

Bermuda's 2025 Proliferation Financing National Risk Assessment (PF NRA) represents a landmark achievement for the jurisdiction, its first formal, structured evaluation of proliferation financing risks. The PF NRA which was launched on January 15, 2025, was led by the National Anti-Money Laundering Committee (NAMLC) as part of Bermuda's broader efforts to ensure compliance with the revised FATF Standards.

The assessment was conducted through a collaborative, multi-agency framework in which dedicated working groups, each comprising representatives from NAMLC member agencies, led the evaluation of the individual components of the NRA. The NAMLC member agencies received support throughout the NRA process from additional public authorities and private entities coordinated by their respective supervisory authorities. The period assessed was that of January 1, 2020 to December 31, 2024.

The PF NRA was conducted in alignment with the updated Financial Action Task Force (FATF) Recommendation 1, which obligates both countries and private sector entities to systematically identify, assess, and understand risks associated with the potential breach, non-implementation, or evasion of Targeted Financial Sanctions (TFS) as defined under Recommendation 7 (R.7).

R.7 requires countries to implement TFS in compliance with United Nations Security Council Resolutions (UNSCRs) directed at the prevention, suppression, and disruption of the proliferation of weapons of mass destruction (WMD) and its financing. The regimes within scope of R.7 are those relating to the DPRK (UNSCR 1718) and Iran (UNSCR 2231).

Bermuda's effectiveness in implementing TFS will be measured against FATF's Immediate Outcome 11 (IO.11), which provides that:
*"Persons and entities involved in the proliferation of weapons of mass destruction are prevented from raising, moving and using funds, consistent with the relevant United Nations Security Council Resolutions (UNSCRs)."*

The robust implementation of TFS related to WMD proliferation and its financing is fundamental to building a strong Counter-Proliferation Financing (CPF) regime.

An effective CPF framework ensures that persons and entities designated under the relevant UNSCRs are identified, deprived of resources, and prevented from raising, moving, or using funds or other assets in furtherance of proliferation financing.

Such a system is underpinned by the following essential elements:

- **National Risk Assessment:** a jurisdiction-wide evaluation of proliferation financing threats, vulnerabilities, and consequences.
- **Institutional Risk Assessment:** to enable regulated institutions to identify and manage their specific TFS-related exposures.
- **Effective Legal Framework:** comprehensive legislation and regulatory infrastructure that mandates and supports TFS implementation.
- **Communication of Sanctions:** timely and accurate dissemination of sanctions designations to all relevant public and private sector stakeholders.
- **Domestic Cooperation, Coordination, and Information Sharing:** structured collaboration across government agencies, regulators, and the private sector to ensure a unified response.
- **Compliance Monitoring and Enforcement:** rigorous oversight mechanisms to assess adherence to TFS obligations and impose appropriate consequences for non-compliance.

Notably, Bermuda's assessment goes beyond these baseline requirements, by also considering potential indirect proliferation financing exposure arising from Bermuda's relationships with other jurisdictions connected to the DPRK's and Iran's broader proliferation networks, assessed in light of Bermuda's own risk profile and context. This exceeds the baseline requirements set out in R.7, reflecting the jurisdiction's commitment to a more comprehensive and proactive approach to proliferation financing risk management.

Bermuda's assessment activities spanned approximately nine (9) months, culminating in the formal Presentation of Findings hosted by NAMLC in October 2025. Conducted virtually, the event featured dedicated sessions tailored separately for the public and private sectors, drawing a combined total of approximately 255 participants. The Report on the 2025 PF NRA was widely circulated to public authorities and subsequently published.

**Overview of Findings**

The assessment showed that no direct proliferation financing activity, TFS violations, or assets linked to designated entities have been identified in Bermuda.

Nevertheless, the absence of detected activity does not preclude the existence of underlying risk. While no proliferation financing activity has been identified within the jurisdiction, the assessment recognises that as an international financial centre, Bermuda must remain vigilant to indirect risks arising from global financial flows.

**PF Threat Assessment**

A scoping exercise was conducted to identify any potential PF threat actors that could have a direct or indirect nexus with Bermuda. The threat actors within the scope of the assessment were the Democratic People's Republic of Korea (DPRK), Iran, Russia, and Syria.

The factors used in the threat assessment were:

- **Actors' Capacity** - the extent to which the actors' sophistication, resources and ability to exploit the financial system contribute to resilient, sustainable and long-term proliferation financing activities. This includes the resources of state versus non-state actors, and their use of professional or informal intermediaries.

- **Estimated Scope of Activity** - the extent to which the PF actors have a network of supporters/collaborators contributing to the resilience of PF networks and activities, including diplomatic, corporate, criminal, and expat networks.

- **Estimated Scale** - the estimated value of revenue raised, transited or held in the country related to proliferation financing. This estimate considered the financial and trade flows with not only the designated states or non-state actor, but also jurisdictions with significant links or exposure to that state or actor.

The findings of the PF threat assessment indicate that the jurisdictions within scope were broadly rated as posing a medium to low PF threat to Bermuda.

While certain threat actors demonstrated a higher capacity to exploit the financial system, notably in terms of their sophistication as PF actors and available resources, other key indicators were assessed as generally low. These include the extent of supporter and collaborator networks operating in Bermuda in connection with PF activities, as well as the estimated value of PF-related revenue raised, transited, or held within the jurisdiction.

**Sectoral Vulnerabilities Assessment**

The sectoral vulnerabilities assessment determined the sectors in Bermuda which have greater levels of exposure to the PF threat actors, considering how the sectors could be exploited for PF purposes. Each sector was evaluated against a consistent set of rating factors, namely:

- Sector's inherent characteristics
- Nature of products and services provided by the sector
- Nature of the clientele
- Geographic reach of sector's activities
- Nature of Delivery Channels

The PF NRA found that Bermuda's regulated sectors generally exhibited low to medium levels of inherent PF vulnerability.

- **The Digital Asset Business (DAB)** sector was the sole exception, receiving a **high** inherent PF vulnerability rating. This elevated vulnerability level reflects the sector's expansive global reach and its intrinsic links to virtual assets, a medium that has been demonstrably exploited by proliferation financing actors across international jurisdictions. While no evidence of local exploitation has been identified within Bermuda, the complexity of DAB products and the prevalence of non-face-to-face delivery channels are closely aligned with established PF exploitation typologies observed globally.

The following sectors were assessed as carrying a **medium** level of inherent PF vulnerability:

- **Deposit-Taking (Banking):** The banking sector's vulnerability is primarily attributable to its systemic importance to Bermuda's economy, its central role in facilitating cross-border transfers, and its exposure to international business activity. However, Bermuda does not operate as an international banking centre, with only four licensed banks, and no instances of PF activity have been recorded within the sector.
- **Securities:** The securities sector is characterised by a broad international reach and a geographically diverse client base, both of which contribute to its medium vulnerability rating. However, the sector is not cash-based and exposure to jurisdictions of concern for PF remain limited.
- **Trust Service Providers (TSP):** TSPs are broadly susceptible to proliferation financing risk globally, owing largely to the complex ownership structures they administer, which can obscure beneficial ownership and impede transparency. In Bermuda, however, this inherent vulnerability is meaningfully tempered by a number of jurisdiction specific factors, including mandatory licensing requirements, face-to-face client onboarding procedures, and the legal impossibility of establishing unlicensed or illicit TSPs. There has been no evidence of TSPs interacting with sanctioned jurisdictions, and exposure to jurisdictions of concern for PF purposes remained limited.
- **Corporate Service Providers (CSP):** The CSP sector presents a medium inherent vulnerability by virtue of its role in the creation and administration of both local and international legal entities, activities that can, in certain contexts, be susceptible to exploitation. In Bermuda, however, shell companies are prohibited outright, and the jurisdiction benefits from a well-established culture of ownership transparency.
- **Legal Sector:** The legal sector's potential exposure to proliferation financing risk is principally derived from the complexity and global reach of its client base and the transactions it facilitates. These factors are, however, substantially counterbalanced by the sector's comparatively smaller size and its orientation toward domestic legal services, including real estate transactions, trust matters, and local corporate work which collectively limit the breadth of its PF exposure.

The following sectors were assessed as carrying a **low** level of inherent PF vulnerability:

**Money Service Businesses (MSB):** The MSB sector was assessed as low vulnerability, reflecting its small scale, the absence of agents operating within the sector, and zero recorded exposure to jurisdictions of concern for PF purposes.

**Credit Unions and Lending:** This sector was rated low by virtue of its predominantly domestic focus, the relatively modest value of loans extended, and the prevalence of face-to-face client interactions, characteristics that collectively limit its susceptibility to PF exploitation.

**Insurance (AML-Regulated):** While long-term direct insurance had a medium level of inherent vulnerability, this segment is negligible in practice, representing less than 0.7% of Bermuda's Gross Written Premium. The remaining sub-sectors of AML-Regulated Insurance, namely Insurance Manager, Insurance Market Place and Insurance Brokers all had low levels of inherent PF vulnerability having regard to their highly regulated client base and the structural characteristics.

**Insurance (Non-AML Regulated):** All sub-sectors within the non-AML regulated insurance sector were assessed as having low levels of inherent PF vulnerability. While international typologies have highlighted maritime and aviation (re)insurance as inherently susceptible to PF exploitation, these sub-sectors constitute only a small fraction of Bermuda's broader insurance market and contribute minimally to Bermuda's Gross Domestic Product (GDP), meaningfully limiting the jurisdiction's overall exposure in this area.

The low inherent vulnerability of the remaining sub-sectors is attributable to several factors, including client bases composed predominantly of corporate entities and publicly listed institutions, which ensure a high degree of ownership transparency, and business activities concentrated in stable, well-regulated markets, including the United States, United Kingdom, Europe, and Asia.

Furthermore, there is no intelligence or evidence to suggest that Bermuda's insurance sector has been exploited for PF purposes.

**Accounting:** The accounting sector primarily serves a local clientele, with its activities centred on liquidation and receivership work. Its inherent vulnerability is accordingly limited, reflecting the absence of meaningful links to high-risk jurisdictions or exposure to dual-use goods trade.

**Real Estate:** While relatively small in scale and modest in its contribution to Bermuda's GDP, the real estate sector carries some vulnerability considerations attributable to the nature of its clientele, which includes high-net-worth individuals and politically exposed persons (PEPs), both of whom can present elevated risk profiles in the context of financial sanctions compliance.

**Dealers in Precious Metals and Stones (DPMS) and Dealers in High-Value Goods (DiHVG):** Both sectors are predominantly retail-focused, with no wholesale import or export connectivity. While the inherent portability of precious metals, stones, and high-value goods remains a relevant vulnerability consideration, the predominantly domestic nature of transactions within these sectors serves to constrain their overall inherent PF exposure.

**Casino Gaming (land-based):** The casino gaming sector was assessed as carrying a low level of inherent proliferation financing vulnerability, owing primarily to the absence of operational land-based casinos throughout the assessment period, a circumstance that resulted in no cash transactions or junket activity within the sector during that time.

# Bermuda's 2025 PF NRA Findings (cont'd)

**Legal Persons and Legal Arrangements Vulnerabilities Assessment**

An assessment was also carried out in respect of inherent PF vulnerabilities of legal persons and arrangements which exist in Bermuda.

The factors assessed included:

- Population size
- Ease of Formation
- Geographic links to high risk jurisdictions
- Type of activity
- Nature of products and services
- Ability to conceal beneficial ownership information

Legal Persons and Legal Arrangements within Bermuda were each assessed as having an overall **medium** level of inherent PF vulnerability.

**Legal Persons:** This category encompasses a broad range of entity types, including limited companies, partnerships, limited liability companies, private act companies (PACs), and overseas (permit) companies and partnerships. The potential for higher inherent vulnerability is principally associated with the geographic reach of certain entities and the limited availability of beneficial ownership information for specific entity types, both of which are recognised indicators of elevated PF risk. These factors are, however, meaningfully offset by Bermuda's jurisdiction specific advantages, including its geographic isolation. Additionally, Bermuda is not a significant jurisdiction for corporate incorporations.

**Legal Arrangements:** The medium vulnerability rating for legal arrangements, principally trust structures, reflects a combination of factors, including the geographic reach of Bermuda's trust sector, the extent of foreign ownership within it, and the moderately complex and time-intensive requirements associated with trust formation. Notwithstanding these characteristics, no intelligence has indicated that trust structures in Bermuda have been directly or indirectly associated with PF activity.

**Consequences of PF**

PF enables sanctioned states and designated actors to access funds to develop nuclear, biological, or chemical weapons (WMDs). Its consequences span economic, political, and social dimensions if not controlled.

**Economic Consequences**

Bermuda's economy is heavily dependent on international business, insurance/reinsurance, and foreign investment, making reputational integrity critical. PF exposure risks:

- Erosion of international trust in Bermuda's financial sector.
- Deterrence of foreign investors and reduced economic activity.
- International sanctions, enhanced monitoring, or trade embargoes.
- Regulatory burdens, enforcement actions, fines, and licence revocations on businesses.
- Reduced investor confidence, slower financial activity, and job losses.

**Political Consequences**

- Risk of FATF blacklisting/grey-listing and classification as a "non-cooperative country".
- Increased international scrutiny, mandatory action plans, and oversight visits.
- EU and other jurisdictions distancing themselves, isolating Bermuda diplomatically.
- Damage to international relations and Bermuda's standing as a trusted IFC.
- Domestically: erosion of public trust in government, political instability, and pressure for reform.

**Social Consequences**

- Weakening of democratic and ethical standards.
- Public condemnation and increased criminal activity.
- Social divisions and threats to the rule of law
- Isolation from international partners across professional, diplomatic, and cultural exchanges.
- Economic hardship feeding a cycle of crime, instability, and moral breakdown.

# Potential Consequences of PF and Priority Actions Going Forward

**Conclusion on Consequences of PF**
Bermuda's prosperity, reputation, and stability are deeply interconnected. Any association with PF activity, whether through misuse or inadequate controls, would trigger a self-reinforcing cycle of economic decline, political isolation, and social deterioration. Robust CPF measures are therefore essential, not optional.

**Priority Actions Going Forward**
Bermuda's first PF NRA has established a clear foundation for strategic action, with several priority objectives identified for the public and private sectors. The PF NRA is designed to raise awareness of high-level threats, emerging vulnerabilities, and ongoing challenges facing Bermuda's financial system, enabling prioritised and targeted responses. It also seeks to enhance coordination and deepen collaboration among financial oversight bodies, law enforcement, and other competent authorities, collectively strengthening Bermuda's capacity to detect, disrupt, and dismantle PF activity.

To ensure its continued relevance and effectiveness, the NRA will be updated periodically to reflect the evolving risk landscape and safeguard the integrity of Bermuda's financial system.

**Implementation of an Ongoing Risk-Based Approach to Proliferation Financing**
Bermuda has established a robust legal and regulatory framework to mitigate the risks associated with proliferation financing. This includes comprehensive AML/ATF/CPF frameworks underpinned by operational coordination among central authorities, adoption of United Kingdom autonomous sanctions and UN sanction regimes, and risk-based supervision of regulated financial institutions (FIs) and Designated Non-Financial Businesses and Professions (DNFBPs). Compliance across the suite of legislation addressing ML, TF and PF is actively monitored and enforced.

**Legislative Updates**
To establish the necessary legislative foundation, Bermuda amended the Proceeds of Crime Act 1997 to provide the legal basis for conducting a national PF risk assessment, with NAMLC designated as the coordinating body responsible for identifying, assessing, and maintaining the currency of Bermuda's PF risks.

Building on this foundation, Bermuda has further amended the Proceeds of Crime (AML/ATF) Regulations 2008 to formally incorporate PF risk identification and mitigation obligations for financial institutions (FIs) and designated non-financial businesses and professions (DNFBPs).

Together, these legislative measures ensure that the jurisdiction’s regulatory framework comprehensively addresses PF risks at both the national and entity level, in full alignment with FATF Standards.

By embedding CPF obligations directly into the principal AML/ATF regulations, Bermuda strengthens its ability to detect, prevent, and disrupt the financing of weapons of mass destruction, and reinforces its commitment to international financial integrity ahead of the 5th Round of Mutual Evaluations.

Importantly, the FATF Standards provide that these obligations can be addressed within existing targeted financial sanctions (TFS) frameworks and/or compliance programmes, without the need to create separate processes for PF risk assessment or mitigation.

**CHECKLIST FOR PUBLIC SECTOR**

Key preparation areas for the Public Sector include:

**Risk Understanding:**

- Conducting and updating comprehensive National Risk Assessments (NRAs) to identify, understand, and mitigate ML, TF and PF risks.
- In years in which a formal risk assessment is not conducted, assessing material changes to Bermuda's risk profile and conducting thematic risk assessments on an ad hoc basis.
- Developing and maintaining national policies and strategies to effectively combat the risks.
- Development of risk-based programmes in line wth risk understanding.

**Update to Legal Framework:**

- Ensuring legal frameworks is updated to align with the revised FATF Standards.

**Internal Policies and Procedures:**

- Review and update internal policies and procedures, ensuring they reflect Bermuda's current AML/ATF/CPF legislative framework and are proportionate to the risks identified.

**Enhancing Cooperation Mechanisms:**

- Strengthening the effectiveness of domestic interagency cooperation and international cooperation for information exchange.

**Institutional Capacity Building:**

- Strengthening the Financial Intelligence Agency, law enforcement agencies, and AML/ATF/CPF supervisors with adequate resources and expertise to produce actionable financial intelligence and conduct successful investigations and to enforce and monitor compliance.

**Supervisory Effectiveness:**

- Conducting sectoral risk assessments.
- Ensuring risk-based supervision, and effective monitoring of AML/ATF regulated Financial Institutions (FIs) and Designated Non-Financial Businesses and Professions (DNFBPs).
- Regularly updating risk-based supervisory programmes, consistent with FATF Standards to ensure assessment and management of ML/TF/PF risks by AML/ATF regulated entities.

**CHECKLIST FOR PRIVATE SECTOR**

Key preparation areas for the Private Sector include:

**Risk Understanding:**

- Understanding and applying findings from Bermuda's NRAs.
- Conducting institution-specific ML/TF/PF risk assessments considering the findings of the NRAs. These should identify higher and lower risks and guide resource allocation.
- Ensuring that risk assessments are documented, regularly updated, and senior-management approved.

**Risk-Based Approach (RBA) to Policies, Procedures and Controls:**

- Reviewing and updating AML/ATF/CPF policies and procedures to reflect current legislation and risk exposure.
- Ensuring controls implemented are proportionate to risks identified.
- Demonstrating active Board/ Senior Management oversight, accountability as well as a proactive compliance culture.
- Maintaining evidence of implementation and outcomes.

**Resources, Outreach and Training:**

- Ensuring adequate staffing and financial resources.
- Delivering regular and mandatory AML/ATF/CPF training.
- Collaborating with competent authorities and supervisors.

**Customer Due Diligence (CDD) and Monitoring:**

- Establishing robust CDD systems, including identifying beneficial owners of legal persons and arrangements.
- Maintaining adequate, accurate and up-to-date beneficial ownership information.
- Applying enhanced due diligence (EDD) to high-risk customers, including Politically Exposed Persons (PEPs).
- Ensuring transaction monitoring systems are efficient and effective to identify, investigate, and report suspicious transactions to the Financial Intelligence Agency (FIA).

**Record Keeping and Reporting:**

- Retaining records for at least five years beyond the end of the business relationship in a manner which is easily understandable and retrievable and which can be accessed by competent authorities.
- Reviewing Suspicious Activity and Suspicious Transaction Reporting processes.
- Ensuring documents can be produced promptly during on-site visits.

# Resources

**Key Resources:**

- Bermuda's 2025 Proliferation Financing National Risk Assessment Report, which can be found at the following Office of NAMLC webpage: https://www2.gov.bm/department/office-national-anti-money-laundering-committee
- Proceeds of Crime (Anti-Money Laundering and Anti-Terrorist Financing) Amendment Regulations 2026 which can be found at the following link: Proceeds of Crime (AML/ATF) Amendment Regulations 2026
- Targeted Financial Sanctions (TFS) - Subscribe to the Financial Sanctions Implementation Unit's (FSIU's) email alerts for UK sanctions updates relevant to Bermuda via the following official link: Subscription to FSIU Sanctions Alerts
- Bermuda's 2024 Money Laundering/ Terrorist Financing National Risk Assessment Report, which can be found at the following link: Bermuda's 2024 ML/TF NRA
- Bermuda's 2020 Mutual Evaluation Report, which can be found at the following link: Bermuda's 2020 Mutual Evaluation Report

**Reference Reading - FATF Resources:**

- Revised FATF Standards, which can be found at the following link: FATF Recommendations 2012.pdf.coredownload.inline.pdf
- Revised FATF Methodology, which can be found at the following link: FATF Assessment Methodology
- Guidance on Proliferation Financing Risk Assessment and Mitigation which can be found at the following link: FATF Guidance on Proliferation Financing Risk Assessment and Mitigation
- United Nations Panel of Experts Reports on DPRK and Iran which can be found at the following link: UN Panel of Experts Reports

Websites and webpages of Competent Authorities, Supervisors, and other relevant agencies, which can be found at the following links:

- **Government of Bermuda Official Portal:** https://www2.gov.bm/
- **National Anti-Money Laundering Committee (NAMLC):** https://www2.gov.bm/what-namlc
- **Office of NAMLC (O/NAMLC):** https://www2.gov.bm/department/officenational-anti-money-launderingcommittee
- **Bermuda Gaming Commission (BGC):** https://www.bgc.bm/
- **Bermuda Monetary Authority (BMA):** https://www.bma.bm/ (AML/ATF tab on landing page)
- **Bermuda Police Service (BPS):** https://www.bermudapolice.bm/
- **Financial Intelligence Agency (FIA):** https://www.fia.bm/
- **Barristers and Accountants AML/ATF Board (AML/ATF Board):** https://www.amlatfboard.bm/
- **Registrar of Companies (RoC):** https://www2.gov.bm/department/registrar-companies
- **Superintendent of Real Estate (SoRE):** https://www2.gov.bm/services/real-estatebroker-and-agent-licence-application

## Caribbean Financial Action Task Force (CFATF) Plenary & Working Group Meetings [Trinidad and Tobago, May 24 - 26, 2026]

A multi-agency delegation representing Bermuda attended the recent Caribbean Financial Action Task Force (CFATF) Plenary.

The delegation, led by Ms. Kim Wilkerson, Attorney-General, comprised representatives from the following departments and agencies:

- Ministry of Justice
- Office of the National Anti-Money Laundering Committee
- Bermuda Monetary Authority
- Bermuda Police Service
- Customs Department
- Financial Intelligence Agency
- Registry General

The Plenary provided member jurisdictions with important updates to FATF requirements and reinforced the critical importance of proactive preparation for the upcoming 5th Round of Mutual Evaluations.


Alongside the Plenary, Bermuda's delegation participated in several ancillary meetings, including the Working Group on FATF Issues (WGFI), the Heads of FIU Forum, the CFATF Risks, Trends and Methods Group (CRTMG), and the International Co-operation Review Group (ICRG). Notably, Ms. Christal Hanna continued in her capacity as CFATF Co-Chair of the CRTMG.


A significant milestone at this year's Plenary was the first-ever participation of a legislative drafter, with Ms. Alsha Wilson attending as Bermuda's representative in that capacity. This deliberate inclusion reflects a strategic commitment to ensuring that legislative drafters have direct exposure to and a comprehensive understanding of FATF Standards, knowledge that is essential to their role in advancing Bermuda's technical compliance.

**Contact Us: Office of the National Anti-Money Laundering Committee (O/NAMLC)**

Ministry of Finance, 2nd Floor Government Administration Building 30 Parliament Street, Hamilton, Bermuda HM12

441-295-5151

Info-NAMLC@gov.bm

# NAMLC Activities and Highlights

## CFATF Plenary cont'd - Key Takeaways for 5th Round Preparation

**Risk Assessment as a Foundation**

- Bermuda must develop a thorough and nuanced understanding of their risk landscape through rigorous national risk assessments. This understanding is fundamental to the accurate identification of risks and the timely implementation of targeted preventative measures.

**Inter-Agency Coordination and Jurisdictional Narrative**

- A clear and well-defined governance structure, underpinned by strong inter-agency coordination, is essential to ensuring a consistent jurisdictional narrative across all competent authorities. This coordination should be facilitated through the National Anti-Money Laundering Committee (NAMLC), operating effectively at both policy and operational levels.

**Targeted Financial Sanctions & Iran Snapback Mechanism**

- Supervisors must ensure that all regulated entities are fully aware of their Targeted Financial Sanctions (TFS) obligations, including the implications of the snapback mechanism as it relates to Iran.

**Risk-Based Supervision**

- Supervision must transition toward a genuinely risk-based approach that delivers measurable and effective outcomes. This requires:
- Increased sectoral engagement through structured information and awareness sessions;
- More frequent on-site inspections targeting higher-risk sectors; and
- Enhanced off-site monitoring through the deployment of targeted questionnaires.

**Implementation Over Legislation**

- A strong legal framework, while necessary, is not sufficient in isolation. Consistent and effective implementation remains essential to achieving meaningful compliance outcomes.

**5th Round Mutual Evaluation Readiness**

- The 5th Round demands that all supervisory activity be conducted on a risk basis. This requires formal risk-rating of regulated entities, with supervisory decisions demonstrably grounded in risk assessments. Evidence of risk-based decision-making must be clearly documented and reflected across examinations, monitoring activities, and enforcement actions.

**Data and Statistics**

- Effectiveness must be supported by robust, reliable data and statistics. Credible evidence of outcomes is integral to demonstrating an effective supervisory regime.

**Contact Us: Office of the National Anti-Money Laundering Committee (O/NAMLC)**

Ministry of Finance, 2nd Floor Government Administration Building 30 Parliament Street, Hamilton, Bermuda HM12

441-295-5151

Info-NAMLC@gov.bm

## 11th Asset Recovery Interagency Network – Asia Pacific (ARIN-AP) Asset Recovery Training Seminar [Seoul, South Korea, April 21 -22, 2026]


Acting Detective Chief Inspector Leroy Mathurin and Acting Detective Inspector Zoenique Williams of the Bermuda Police Service's Specialist Investigations Department represented Bermuda at the 11th Asset Recovery Interagency Network – Asia Pacific (ARIN-AP) Asset Recovery Training Seminar, held in Seoul, South Korea, from April 21–22, 2026.

The specialised training hosted asset recovery practitioners, prosecutors, investigators, financial intelligence experts, and international law enforcement representatives from multiple jurisdictions. Participants examined emerging trends, legislative developments, investigative strategies, and best practices across asset tracing, restraint, confiscation, forfeiture, and international cooperation.

Bermuda's participation carries strategic significance as the jurisdiction continues to strengthen its AML/ATF/CPF and sanctions enforcement framework ahead of its 5th Round Mutual Evaluation, which takes place from 2026 to 2027.

The seminar deepened the officers' operational knowledge and technical expertise in both conviction-based and non-conviction-based asset recovery regimes, essential tools for disrupting organised crime, depriving criminals of illicit proceeds, and protecting the integrity of Bermuda's financial system. Beyond the technical instruction, the event offered valuable opportunities to build professional networks with international asset recovery specialists and partner agencies. Such relationships are vital to intelligence sharing, cross-border cooperation, and the timely execution of asset recovery enquiries spanning multiple jurisdictions.

Participation in forums such as ARIN-AP reflects the BPS's ongoing commitment to enhancing institutional capacity, operational effectiveness, and international cooperation in the fight against financial crime.

**Contact Us: Office of the National Anti-Money Laundering Committee (O/NAMLC)**

Ministry of Finance, 2nd Floor Government Administration Building 30 Parliament Street, Hamilton, Bermuda HM12

441-295-5151

Info-NAMLC@gov.bm

# NAMLC Activities and Highlights

## Tabletop exercise by NAMLC Operational Working Group [Bermuda, April 28, 2026]

On April 28, 2026, the NAMLC Operational Working Group conducted a terrorist financing tabletop exercise to test the operational effectiveness of Bermuda's National Counter-Terrorist Financing Strategy.


Jointly led by the Financial Intelligence Agency and the Bermuda Police Service, the exercise brought together representatives from across the NAMLC framework, including Customs, the Department of Public Prosecutions, the Attorney General's Chambers, the Registry General, the Bermuda Monetary Authority, and the Financial Sanctions Implementation Unit.

Participants worked through a scenario testing detection, information sharing, inter-agency coordination, the application of targeted financial sanctions, and operational and prosecutorial decision-making, with findings from the facilitated debrief to inform Bermuda's ongoing CTF preparedness.

**Contact Us: Office of the National Anti-Money Laundering Committee (O/NAMLC)**

Ministry of Finance, 2nd Floor Government Administration Building 30 Parliament Street, Hamilton, Bermuda HM12

441-295-5151

Info-NAMLC@gov.bm

## Caribbean Financial Action Task Force (FATF) Assessor Training Course [Cayman Islands, April 27 - May 1, 2026]

Detective Sergeant Crai-Che Hall of the Bermuda Police Service (BPS) attended the CFATF Assessor Training, held in the Cayman Islands from April 27 to May 1, 2026. The training was delivered by the CFATF Secretariat in conjunction with the Cayman Islands' Office for Strategic Action on Illicit Finance.

Assessor training prepares national experts to evaluate a country's compliance with anti-money laundering, anti-terrorist financing, and counter-proliferation financing (AML/ATF/CPF) standards through instruction in the FATF Recommendations and Assessment Methodology. This equips participants to contribute effectively to the peer review of other CFATF jurisdictions, a critical component of the mutual evaluation of AML/ATF/CPF frameworks and their effectiveness.

The course covered key components of the Mutual Evaluation Process, including the scope and requirements of mutual evaluations, risk and context considerations, the assessment of technical compliance, and the evaluation of effectiveness under each Immediate Outcome.

Sessions also addressed the role of data and statistics in assessments, practical guidance for onsite interviews, and techniques for writing and presenting the Mutual Evaluation Report (MER), with particular focus on drafting Key Findings, Recommendations, and Key Recommended Actions (KRAs). Alongside the theoretical instruction, participants engaged in practical exercises, including dynamic mock onsite interviews.

## Counter Terrorism Financing Forum [Miami, June 1 – 2, 2026]

From June 1–2, 2026, a Bermuda delegation which comprised the NAMLC Chair and a representative from the Financial Intelligence Agency, attended a Counter-Terrorism Financing (CTF) Forum hosted in Miami.

The forum brought together representatives from the United Kingdom and other Overseas Territories, and featured presentations by United States officials on initiatives to address terrorist financing issues. The discussions yielded valuable insights to advance Bermuda's Immediate Outcome 9 submissions, while also addressing aspects of Immediate Outcome 10.

**Contact Us: Office of the National Anti-Money Laundering Committee (O/NAMLC)**

Ministry of Finance, 2nd Floor Government Administration Building 30 Parliament Street, Hamilton, Bermuda HM12

441-295-5151

Info-NAMLC@gov.bm

## Financial Intelligence Agency's Anti-Money Laundering and Compliance Session [Bermuda, May 7, 2026]

On May 7, 2026, the Financial Intelligence Agency (FIA) of Bermuda partnered with the Bermuda Chapter of The Institute of Internal Auditors to host a session titled *"Safeguarding Bermuda – Practical Insights into AML, Sanctions, and Reporting."* The session addressed Bermuda's money laundering and terrorist financing risks, sanctions regimes, and reporting obligations within the jurisdiction's evolving regulatory landscape.

The forum was designed to equip local business leaders and compliance professionals with actionable strategies to combat financial crime. It offered practical, real-world perspectives on evolving AML and sanctions expectations, key risk indicators, and effective engagement with the FIA, all grounded in Bermuda's unique risk environment.

Participants gained the knowledge needed to identify risks, strengthen compliance frameworks, and support effective reporting practices. Ultimately, the initiative sought to strengthen governance, accountability, and financial crime prevention across the island, reinforcing a collaborative effort to safeguard Bermuda's reputation as a trusted international financial centre.


Contact Us: Office of the National Anti-Money Laundering Committee (O/NAMLC)
Ministry of Finance, 2nd Floor Government Administration Building 30 Parliament Street, Hamilton, Bermuda HM12
441-295-5151
Info-NAMLC@gov.bm