Ogier

Compliance calendar for BVI Approved Managers -2025

Insights - 29/11/2024

Set out below is a legal and regulatory compliance calendar for 2025, providing the key dates for British Virgin Islands Approved Managers in the year ahead to help you keep track of upcoming deadlines.

<u>Auto-populate your calendar</u> with all of the key dates below or select the individual dates you would like to be reminded about.

Approved investment managers (**Approved Managers**) are approved by the BVI Financial Services Commission (**FSC**) under the Investment Business (Approved Manager) Regulations 2012 (as amended) (the **Regulations**).

| Deadline | Requirement | Action required / notes |
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| <u>31 January 2025</u> | Annual return deadline | An annual return must be filed with the FSC in the prescribed form providing details of the following, as at 31 December 2024: Number of persons for which the manager provides services Assets under management for each person for which the manager acts Number of investors in each person for which the manager acts Any significant complaints received by the manager Confirmation that each director and senior officer of, and shareholder holding a significant interest in, the manager is "fit and proper" That the manager is not in breach of the Regulations that entitle it to continue as a manager |
|------------------------|--------------------------------------|--|
| <u>31 March 2025</u> | Annual fee due | Annual fee of US\$1,800 is payable by the fund to the FSC. If Ogier Global is the manager's authorised representative, Ogier Global will include this fee as part of their annual bill to the manager and will make the payment to the FSC. |
| <u>31 March 2025</u> | AWL / CFT return deadline | The AML / CFT Return must be filed for the period from 1 January to 31 December 2024 on the dedicated <u>AML / CFT return portal</u> . If not already registered, the manager needs to register on the portal as a new user. The FSC have issued a user guide on how to file an AML / CFT return. <u>Access the AML / CFT return user guide.</u> |
| <u>31 May 2025</u> | FATCA / CRS reporting deadline | The manager's FATCA authorised person is required to make the relevant FATCA/CRS filings via the International Tax Authority's reporting portal - <u>BVIFARS</u> . Ogier can provide FATCA / CRS services on request. |
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| 31 March 2025(for managers with a 30 September financial year end only)30 June 2025(for managers with a 31 December financial year end only)30 September 2025(for managers with a 31 March financial year end only)31 December 2025(for managers with a 31 March financial year end only)31 December 2025(for managers with a 31 March financial year end only) | Unaudited financial statements deadline | Unaudited financial statements for the manager must be submitted to the FSC within six months of the manager's financial year end (meaning by 30 June 2025 for funds with a 31 December 2024 year end). The financial statements must be approved or signed by a director or the general partner of the manager and must be accompanied by a director's certificate, a report on the affairs of the manager made in respect of the relevant financial year and any other documents that may be prescribed by the Regulations. In limited circumstances, it is possible to request an extension to the filing deadline or an exemption from filing such accounts. The FSC will not accept late exemption / extension applications and so it is important that any such applications are made in advance of the filing deadline. The maximum extension permitted under law is six months. Ogier's Legal team can assist with the filing of the unaudited financial statements. |
|---|--|--|
| <u>30 June 2025</u> (for managers with a 31 December end reporting period - date will change if a different reporting period applies) | Economic substance | Economic substance annual self-certification is due within six months of the end of the applicable reporting period. Self-certifications are submitted via the manager's BVI registered agent by making a filing on the BVI's Beneficial Ownership Secure Search System (BOSS). The statutory definition of "fund management business" does not currently require an approved manager to maintain substance in the BVI unless its activities also require an investment business licence. |

About Ogier

Ogier is a professional services firm with the knowledge and expertise to handle the most demanding and complex transactions and provide expert, efficient and cost-effective services to all our clients. We regularly win awards for the quality of our client service, our work and our people.

Disclaimer

This client briefing has been prepared for clients and professional associates of Ogier. The information and expressions of opinion which it contains are not intended to be a comprehensive study or to provide legal advice and should not be treated as a substitute for specific advice concerning individual situations.

Regulatory information can be found under Legal Notice

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<u>Regulatory</u>

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