



# 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.

Auto-populate your calendar 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
<u>31 January 2025</u>	Annual return deadline	<p>An annual return must be filed with the FSC in the prescribed form providing details of the following, as at 31 December 2024:</p> <ul style="list-style-type: none"><li>• Number of persons for which the manager provides services</li><li>• Assets under management for each person for which the manager acts</li><li>• Number of investors in each person for which the manager acts</li><li>• Any significant complaints received by the manager</li><li>• Confirmation that each director and senior officer of, and shareholder holding a significant interest in, the manager is "fit and proper"</li><li>• That the manager is not in breach of the Regulations that entitle</li></ul>

		<p>it to continue as a manager</p> <p>Ogier's Legal team can assist with the preparation and filing of the annual return.</p>
<u>31 March 2025</u>	Annual fee due	<p>Annual fee of US\$1,800 is payable by the fund to the FSC.</p> <p>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.</p>
<u>31 March 2025</u>	AML / CFT return deadline	<p>The AML / CFT Return must be filed for the period from 1 January to 31 December 2024 on the dedicated <a href="#">AML / CFT return portal</a>.</p> <p>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.</p> <p><a href="#">Access the AML / CFT return user guide.</a></p>
<u>31 May 2025</u>	FATCA / CRS reporting deadline	<p>The manager's FATCA authorised person is required to make the relevant FATCA/CRS filings via the International Tax Authority's reporting portal - <a href="#">BVIFARS</a>.</p> <p>Ogier can provide FATCA / CRS services on request.</p>
<p><u>31 March 2025</u></p> <p>(for managers with a 30 September financial year end only)</p> <p><u>30 June 2025</u></p> <p>(for managers with a 31 December financial year end only)</p> <p><u>30 September 2025</u></p> <p>(for managers with a 31 March financial year end only)</p>	Unaudited financial statements deadline	<p>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).</p> <p>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.</p> <p>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</p>

<p><u>31 December 2025</u></p> <p>(for managers with a 30 June financial year end only)</p>		<p>months.</p> <p>Ogier's Legal team can assist with the filing of the unaudited financial statements.</p>
<p><u>30 June 2025</u></p> <p>(for managers with a 31 December end reporting period - date will change if a different reporting period applies)</p>	<p>Economic substance</p>	<p>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).</p> <p>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.</p>

## About Ogier

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Regulatory information can be found under [Legal Notice](#)

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