



GUIDANCE NOTES

LAWYERS/ACCOUNTANTS



VERSION 2.0

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FINANCIAL INTELLIGENCE AGENCY BERMUDA

**SECTOR SPECIFIC GUIDANCE NOTES FOR
LAWYERS AND ACCOUNTANTS FOR FILING A GOOD QUALITY
SUSPICIOUS ACTIVITY REPORT (SAR) AND SUSPICIOUS TRANSACTIONS REPORT (STR)**

The Financial Intelligence Agency (FIA) was established by the [Financial Intelligence Agency Act 2007](#) to act as an independent agency authorized to receive, gather, store, analyse and disseminate information relating to suspected proceeds of crime and potential financing of terrorism received in the form of Suspicious Activity Reports (SARs) and Suspicious Transaction Reports (STRs). The FIA only accepts SARs and STRs that have been submitted electronically via the FIA's designated platform (currently goAML) using the online submission form or XML transmission. In exceptional circumstances, an alternative method can be provided.

This document contains information that will assist persons with their reporting obligations pursuant to the [Proceeds of Crime Act 1997](#) (POCA) Sections 46 and 47, and [Anti-Terrorism \(Financial and Other Measures\) Act 2004](#) Sections 9,10 and 10A. This guidance does not represent legal advice. If you are unsure about your obligations in a specific case, please seek independent legal advice.

Bermuda Personal Information Protection Act (PIPA) and SAR/STR Reporting

The Bermuda Personal Information Protection Act 2016 (PIPA) establishes a framework governing the collection, use, and disclosure of personal information by organisations operating in Bermuda. PIPA requires that personal data be handled in accordance with established privacy principles, including obtaining consent and limiting disclosure to purposes for which the information was originally collected. Financial institutions and other reporting entities must be mindful of their obligations under PIPA when handling client data in the ordinary course of business.

However, obligations arising under Bermuda's anti-money laundering and anti-terrorist financing regime — including the duty to file SARs and STRs pursuant to the Proceeds of Crime Act 1997 and the Anti-Terrorism (Financial and Other Measures) Act 2004 — take precedence over the privacy protections afforded by PIPA. Section 55 of PIPA expressly provides for exemptions where disclosure is required or authorised by law, which encompasses the statutory obligation to report suspicious transactions to the Financial Intelligence Agency (FIA). Accordingly, reporting entities must not allow PIPA considerations to impede or delay the filing of a SAR/STR, and no client consent is required — nor should it be sought — when making such a report. The tipping-off provisions further underscore this point: notifying a client that a SAR/STR has been filed is itself a criminal offence, reinforcing that the duty to report operates independently of, and overrides, any data privacy obligations under PIPA.

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1. PURPOSE OF A SAR AND STR REPORT

The purpose of the Suspicious Activity Report (SAR) and Suspicious Transaction Report (STR) is to alert the FIA that certain client/customer or related business activity is in some way suspicious and might indicate money laundering, terrorist financing, fraud, and other financial crimes. The information provided in these reports play a vital role in aiding law enforcement in money laundering (ML), terrorist financing (TF) or proliferation financing (PF) investigations and assisting with identifying emerging trends and patterns connected to financial crimes. The information about those trends and patterns is vital to law enforcement agencies and provides valuable feedback to stakeholders. Reporters are required to submit reports that are complete, accurate, and filed promptly. Therefore, it is crucial that Money Laundering Reporting Officers (MLROs) and/or Nominated Officers (filers) provide narratives that are clear, concise, and comprehensive. The failure to adequately describe the indicators making the transaction or activity suspicious, delayed reporting and absence of supporting documentation undermines the purpose of the SAR/STR and minimizes its usefulness to law enforcement. Reports are reviewed and analysed by FIA Analysts, who then disseminate the relevant intelligence / information, if warranted, to the relevant law enforcement agencies, whether domestic or foreign to initiate potential investigations.

Reports filed with incomplete data will be rejected.

Individuals filing or reporting SAR/STRs to the FIA are guided to PRINT or SAVE a copy of their SAR/STR prior to final submission. Once the SAR/STR has been approved, it will no longer be visible to the filer.

2. DEFINING SAR AND STR

A **SAR** details suspicious activity that does not currently contain any financial transactions. For example, declined business, dubious emails and requests, strange phone calls and the suspect comportment or associations of a subject or entity can be detailed in a SAR.

A **STR** details suspicious activity that involves a financial transaction. For example, unusual transactions that deviate from known client activity, unexplained large cash deposits, transactions which have no apparent lawful purpose and transactions to high-risk jurisdictions. Financial transactions must be entered into goAML to support the STR narrative along with the relevant supporting documentation.

3. QUALITY OF SARs/STRs

The FIA may reject the filing of a poor-quality or incorrectly filed report and advise the reporter to resubmit the report within five calendar days. The rejected report can be found in the draft section of the goAML platform. If a resubmission is not received before the end of five calendar days, the report will be archived, and a new SAR/STR will need to be submitted to the FIA. The FIA cannot interpret, assume, or infer what suspected money laundering, terrorist financing and/or predicate offence the reporter believes may have been committed. The FIA may also refer the consistent reporting of poor-quality SARs/STRs to the relevant supervisory body for its attention and appropriate action.

4. TIPPING OFF

Bermuda legislation requires that a financial institution, its directors, officers, employees, and agents who, voluntarily or by means of a suspicious activity report/suspicious transaction report, report suspected, or

known criminal violations or suspicious activity **may not** notify any person involved that the transaction has been reported.

5. DEVELOPING THE SAR/STR NARRATIVE

The SAR/STR report narrative should be provided in the 'REASON FOR SUSPICION' section of the submitted SAR/STR forms within the goAML platform. This narrative / reason acts as a summary of the suspicious activity or transaction being reported. It should contain enough information for the FIA to analyse alongside the supporting documentation. It is vital for the reporting party to bear in mind that the Analyst handling the disclosure may not be familiar with the specifics of your business or have an in-depth understanding of your client. Therefore, it is essential to clearly detail the relationship between your business and the named subjects within the report, and to include information on any services provided to these subjects. Without this information, it can be challenging for the Analyst to fully comprehend the reported matter.

If the reporting party has engaged with law enforcement prior to submitting a SAR/STR, this should be noted in the narrative, along with relevant contact details. The report should also include contact information for the primary and secondary contacts of the reporting party, specifying which individual is responsible for each report. *Please attach a copy of the internal SAR but ensure that your narrative is clearly stated in the "reasons for suspicion" section.*

Avoid acronyms and jargon – they may not be understood by the recipient and are open to misinterpretation. If describing a service provided or a technical aspect of your work, please provide a brief synopsis in your SAR/STR to aid the reader.

Previous SAR/STR reference if the subject has been the subject of a SAR/STR.

As a basic guide, wherever you can, try to answer the following six questions to make the report as useful as possible:

5.1. WHO is involved?

Identify the client to which the suspicious activity relates, including the full legal name, address, and length of the business relationship. For corporate clients, include both their registered office address and address(es) of operation, if different.

The following should be included when identifying involved parties:

- Include the full legal name, known aliases
- Date of birth of all individuals involved in the suspicious activity or transaction,
- Their employer, occupation, and title held
- Business and residential address (es),
- Indicate whether domestic or foreign Politically Exposed Persons (PEPs) are involved,
- Outline the relationship between involved persons (i.e. business associates, colleagues, familial relationship).

If the reported subject (e.g. client/customer) has been the subject of a previous SAR/STR submitted by your organisation, please include previous FIA references numbers.

5.2. WHAT is the activity or transaction?

Describe the suspicious activity or transaction, the criminal property involved, its monetary value and source and ultimate use of funds. Clearly outline what instruments or mechanisms (including structures, administrative services, or service delivery channels) were used to conduct or facilitate the suspicious activity e.g. bank account, wire transfer, companies, insurance policies, debit or credit cards, digital assets businesses services etc.

5.3. WHERE did the activity or transaction take place and where are funds involved held?

Provide the location of the activity or transaction. Indicate all local and international financial institutions involved, type of account (personal or corporate), and corresponding account numbers.

5.4. WHEN did the activity or transaction take place?

Indicate the date of the activity and its duration. If the activity takes place over a period of time. If there are multiple transactions to report, please enter each in a chronological order with individual dates and amounts under the transactions section.

5.5. WHY are you suspicious?

Clearly identify WHY the activity is considered suspicious, and what are the reasons for reporting. Provide a brief description of the nature and purpose of the client account to which to the suspicious activity or transaction relates. Include reasons and indicators for suspicion outlining the inconsistency with the client’s profile, normal behaviour, and business activity. Follow up actions such as intent to terminate business relationship and close client accounts should also be included.

5.6. HOW was the activity or transaction executed?

Provide details on how the activity or transaction occurred.

6. EXAMPLES OF COMPLETE AND INCOMPLETE REPORTS

6.1. Examples-Lawyers

Incomplete Lawyers SAR/STR

INCOMPLETE Lawyer SAR /STR

Narrative

We were engaged by Mr. Dennis Mark ZAHN, a client for 12 years, asking for assistance in selling two of his residential properties. Mr. ZAHN had arranged to sell one of the properties at half of its value. Our legal associate found this odd, but Mr. ZAHN explained he is in financial difficulties and can no longer keep up with mortgage payments on this particular property.

COMPLETE Lawyer SAR /STR

Narrative

In April 2022, a person who identified himself as the CEO of an Oceania company requested legal services from the law firm in drafting a sales and purchase agreement for a marine vessel that was in the process of being sold to a buyer in Bermuda.

The CEO was advised that a bank draft was received from the buyer to be held in escrow, and it would take approximately

Complete Lawyers SAR/STR

INCOMPLETE Lawyer SAR /STR (cont'd)

Mr. ZAHN requested that upon completion of the transaction, we direct the funds to an account held with SABADELL BANK, Spain instead of a local bank account. Prior to this, the firm has only acted for Mr. ZAHN in commercial matters. An adverse media search revealed that Mr. ZAHN and his son, Donald Michael ZAHN have been persons of interest in a drug trafficking case in Dominican Republic and may be attempting to dispose of assets and hide the proceeds of the sale of those assets to avoid confiscation proceedings.

Action
None

goAML Indicators selected

- Money Laundering
- Adverse Media
- Real Estate

Supporting documents provided

- Internal SAR
- Dennis Zahn passport
- Dennis Zahn proof of residential address
- Dennis Zahn source of wealth/funds documents
- Sale and purchase agreement for both properties

Missing Information

- Indication on status of the sale – complete, declined, in progress
- Sabadell Bank branch and account information
- Adverse media articles referenced
- No information or KYC for purchasers

COMPLETE Lawyer SAR /STR (cont'd)

20 days to clear. The CEO then asked for an urgent payment transfer before the clearance of the draft. The request was declined and seen as suspicious. The local bank also rejected the draft. The reason for rejecting the draft has not been given.

The CEO emailed additional KYC documents, as previously requested. The law firm then reiterated to the CEO that the draft was not accepted by the bank and that the firm would not be proceeding with the matter. There was no further communication from the CEO or any other party.

Reasons for Suspicion

3. Client asked the law firm to urgently wire transfer funds (for unexpected expenses) before the draft sent in escrow was cleared and showed an increasing sense of urgency.
4. Signature for the CEO on the law firm’s engagement letter and Letter of Intent from buyer does not match the signature for this CEO’s passport or driver’s licence. On the Letter of Intent, the buyer’s name is misspelled, and their signature did not match the signature of the buyer as observed in a public document. The signature of person certifying documents appears to have been pasted and is therefore suspicious.
5. A second party followed up on the status of the cheque/draft deposit, it was identified by the law firm that the second party was not a known contact and had no other identifying information in her email, other than their email address. When checking the name of the second party online, it identified a website that references online comments about fake bank draft/money orders and cites the name second party, which suggests a link to fraudulent activity.

Action

- Request to wire funds was declined and the matter will not be proceeding.
- goAML Indicators selected
- Drafts/Managers Cheques
- Declined/ Refused business - suspected criminal activity
- Fraud
- False Documents

Supporting documents provided

- Certificate of Registration
- Extract from Company Directory
- Bank Draft
- Signature Page of Letter of Intent
- Copy of Buyer’s Signature – Register of Interests
- Copy of Passport and Driver’s Licence of CEO
- Adverse media
- Internal SAR

COMPLETE Lawyer SAR /STR (cont'd)

Supporting documents provided

- Certificate of Registration
- Extract from Company Directory
- Bank Draft
- Signature Page of Letter of Intent
- Copy of Buyer’s Signature – Register of Interests
- Copy of Passport and Driver’s Licence of CEO
- Adverse media
- Internal SAR

6.2. Examples-Accountants

Incomplete Accountants SAR/STR

INCOMPLETE ACCOUNTANT SAR /STR

Narrative

An overseas investment management company approached our firm to extend an invitation to participate in a refresh of their panel of local service providers. The stated purpose was to shortlist candidates that were capable and interested to provide a full range of corporate secretarial and accounting services. The request was received on July 25, 2022, after the imposition of sanctions on Russian entities by the UK, US and EU. Our firm declined the request after confirming that the ultimate beneficial owner of the investment company is a Russian entity subject to OFAC sanctions (Ukraine regime). This request immediately aroused suspicion when a colleague recognized the request came from the same entity the firm previously declined to serve. The initial request was for urgent tax advice on potentially trapped cash distribution by a Bermuda company to its shareholders. Our firm had not previously provided any services to said company. Therefore, the repeated requests for services by a Russian entity in the context of the invasion of Ukraine and subsequent sanctions issuances were deemed suspicious.

Action

The firm declined to participate in the investment management company’s service provider selection process and recorded the incident in the log of declined opportunities.

goAML Indicators selected

None

Supporting documents provided

None.

Complete Accountants SAR/STR

COMPLETE ACCOUNTANT SAR/STR

Narrative

The following suspicion arose while providing audit and financial due diligence services to Moore’s Residential and Commercial Cleaning Company Limited. During audit preparation for the year ending 2022, we met with the Finance Director of our client on February 4, 2023, during which we were informed that the company had been subject to fraud by now former employees of the company.

Following an internal investigation, it was identified that Ronald Baker, Joseph Doherty, and Franklin West who were employed as managers were submitting claims for expenses for subcontractors named Geoff Clark, Zaya Simos, and Beverly Williams.

It was claimed that Geoff Clark, Zaya Simos, and Beverly Williams were additional cleaning contractors brought in to assist with extra cleaning owing to Covid-19. We have been advised that it was apparent from an inspection that the cleaning had not taken place, and the frequency and level of claims was out of step with claims being submitted by managers with similar responsibilities.

The total expenses fraudulently claimed by Ronald Baker, Joseph Doherty, and Franklin West was \$110,000. \$60,000 of this money was claimed by Ronald Baker (who has therefore been named as the main subject) and the balance equally split between Joseph Doherty and Franklin West. The fraudulently obtained sums have in part been recovered from Franklin West and we have been informed that the remaining sums will be repaid over the next 6 months. We have not been provided with any further details of Ronald Baker, Joseph Doherty, or Franklin West, whose employment has been terminated. We do not know whether this matter has been reported to the police.

COMPLETE ACCOUNTANT SAR/STR (cont'd)

However, we have come to learn that Ronald Baker now owns his own cleaning company which may have been funded with the fraudulently obtained funds. We suspect Ronald Baker, Joseph Doherty, and Franklin West of being in possession of criminal property.

Action

We have taken no further action outside of conducting the audit as contracted

goAML Indicators selected

- Collusion
- False Documents
- Fraud
- Theft

Supporting Documents provided

- Minutes from February 4 audit preparation meeting
- Fraudulent invoices and corresponding payments.

7. SUPPORTING DOCUMENTS

All documents referenced in the submission, and which were crucial in forming your suspicion and creating the filing should be attached to the original submission. The following key documents should also be considered when submitting a SAR/STR to determine if they provide confirmation or clarification of the report and would reduce the need for the FIA to make formal requests minimizing the time to complete the analysis. The FIA understands documentation may be limited depending on the relationship with the subject(s) being reported.

7.1. Natural Persons

- **MANDATORY** - Certified passport or other government issued identification for all citizenships held
- **MANDATORY** - Certified proof of residential address
- Declaration of source of wealth/funds where available
- Application forms detailing nature and purpose of transaction as well as client party details.

7.2. Trusts and Foundations

- Certified extract of original Deed of Settlement detailing Trustee, Settlor, Beneficiaries, Protector/Enforcer or Foundation Constitution
- Supplemental Deeds showing any changes to the original Deed of Settlement
- **MANDATORY** - Certified Due Diligence (Government issued identification showing full name; proof of residential address) for all named persons in items 1 & 2
- Most recent financials (list of all assets held)
- Source of wealth/funds

- **MANDATORY** - Evidentiary correspondence that contains supporting details, suspicious requests, incriminating statements
- Internal SAR

7.3. Corporate Entities

Where the subject may be a retail entity, please provide the equivalent documentation.

- Certificate of Incorporation
- Directors & Officers Register
- Share Register
- **MANDATORY** - Confirmation of registered address, principal business address and mailing address (if different from the registered address)
- **MANDATORY** - Certified due diligence (Government issued identification showing full name; proof of residential address) for all named persons in items 2 & 3. For item 3, where interest held is 10% or more.
- Ownership structure chart
- Most recent financials (list of all assets held)
- Source of wealth/funds
- **MANDATORY** - Evidentiary correspondence that contains supporting details, suspicious requests, incriminating statements
- Internal SAR

7.4. Non-Profit Organizations

- Register of Directors or Trustees
- **MANDATORY** - Certified due diligence (Government issued identification showing full name; proof of residential address) for all named persons in item 1.
- Most recent financials (list of all assets held)
- Source of wealth/funds
- **MANDATORY** - Evidentiary correspondence that contains supporting details, suspicious requests, incriminating statements
- Internal SAR

8. RETENTION PERIOD

Financial institutions shall retain the following for five years from the date of the filing:

- A copy of all filed SARs/STRs
- The original or business record of any supporting documentation
- All supporting documentation for the benefit and/or use of the FIA and any other appropriate local law enforcement agency or regulatory authorities.

9. SEEKING CONSENT TO CONDUCT A TRANSACTION

For detailed guidance on seeking Consent, please refer to our standalone Consent Guidance document on the FIA's website at <https://www.fia.bm/consent-regime/>.

10. RED FLAG INDICATORS

The following lists are not exhaustive and may be updated as emerging money-laundering and financing of terrorism trends and patterns evolve. The existence of an indicator may not alone imply suspicion but combined with other indicators may suggest a suspicious transaction.

10.1. Red Flag Indicators for Lawyers

1. Unusual or suspect source of funds or refusal to provide source of funds information
2. Transactions suspected to be in violation of another country's foreign exchange laws and regulations
3. Incidents where legal advice on the setting up of corporate entities, trusts or nonprofits is sought and may be misused to conceal ownership, genuine economic purpose or underlying assets
4. Non-profit organisation requests services for purposes or transactions not compatible with those declared or not typical for that body
5. Reason for client choosing the legal professional is unclear, given the firm's size, location or specialization.
6. Client provides false or misleading information
7. Multiple intercompany loan transactions and/or multijurisdictional wire transfers that have no apparent legal or commercial purpose
8. Services where legal practitioners are asked to assure the client's standing, reputation and credibility to third parties, without a commensurate knowledge of the client's affairs
9. Required service was refused by another professional or previous legal advisor terminated the relationship
10. Client uses financial intermediaries or financial institutions that are not supervised
11. Use of complex loans, or other obscure means of finance, versus loans from regulated financial institutions
12. Under- or over-valued transactions
13. Request to expedite transactions without a plausible explanation and no regard for associated costs
14. Complex or layered ownership structure for no apparent economic or business purpose
15. Client is unwilling, unable, or uncontactable to provide information for CDD purposes
16. Politically Exposed Persons particularly where status is undisclosed or denied
17. Client linked to adverse media relating to a suspect activity or law enforcement investigation
18. Client resides in or the transaction involves a jurisdiction known to have inadequate anti-money laundering and counter financing of terrorism framework or a jurisdiction in which the FATF has called for countermeasures or enhanced client due diligence measures

10.2. Red Flag Indicators for Accountants

1. Unusual or suspect source of funds or refusal to provide source of funds information
2. Multiple bank accounts opened with various banks for no apparent economic or business purpose
3. Transactions suspected to be in violation of another country's foreign exchange laws and regulations
4. Frequent large incoming remittances into bank accounts from different individuals and companies, mainly located overseas with no apparent economic or business purpose
5. Irregularities related to goods/services billing such as, over or under invoicing, multiple invoicing for the same goods/services, falsely described goods/services, over or under shipments
6. Multiple intercompany loan transactions and/or multijurisdictional wire transfers that have no apparent legal or commercial purpose
7. Client uses financial intermediaries or financial institutions that are not supervised
8. Use of complex loans, or other obscure means of finance, versus loans from regulated financial institutions
9. Under- or over-valued transactions
10. Request to expedite transactions without a plausible explanation and no regard for associated costs
11. Transaction patterns in the bank accounts are often not in line with the company's principal business
12. Complex or layered ownership structure for no apparent economic or business purpose
13. Client is unwilling, unable, or uncontactable to provide information for CDD purposes
14. Politically Exposed Persons particularly where status is undisclosed or denied
15. Client linked to adverse media relating to a suspect activity or law enforcement investigation
16. Transactions with companies whose identity is difficult to establish as they are registered in countries known for their commercial secrecy
17. Structuring of transactions to avoid dealing with identification requirements or regulatory record-keeping and AML/CFT reporting thresholds
18. Client resides in or the transaction involves a jurisdiction known to have an inadequate AML/CFT framework or a jurisdiction in which the FATF has called for countermeasures or enhanced client due diligence measures

For a more extensive list of red flags ML/TF indicators categorised, consult the FIA's Indicators list document located on its website [HERE](#).

11. REPORTING RESPONSIBILITIES

It is the responsibility of all Bermuda-supervised reporting entities to ensure that a Reporting Officer (Money Laundering Reporting Officer (MLRO)) is appointed or designated and is adequately trained, in accordance with section 17(1) and (3) of the Proceeds of Crime Act 1997.

The MLRO must be registered with, and have access to, the Financial Intelligence Agency of Bermuda's designated reporting platform in order to submit Suspicious Activity Reports (SARs) and Suspicious Transaction Reports (STRs) where the reporting officer knows, suspects, or has reasonable grounds to suspect that a person or entity is engaged in money laundering or terrorist financing.

It is strongly recommended that reporting entities establish internal policies and procedures to ensure that:

1. A Reporting Officer (MLRO or other designated reporting person) is appointed at all times.
2. An Alternate Reporting Officer is registered and authorised to submit reports in the absence of the Reporting Officer.
3. The Reporting Officer and/or Alternate Reporting Officer are adequately trained to use the FIA's reporting system, submit SARs/STRs, and receive and respond to additional requests from the FIA, including requests made pursuant to section 16 notices.
4. A group notification email address is maintained to ensure that the compliance department, or other designated personnel, receive all confirmations of receipt and follow-up communications issued by the FIA.
5. In the event of the departure, resignation, or termination of the MLRO or Alternate MLRO, the reporting entity must immediately appoint a suitably trained replacement and ensure continuity of reporting obligations through the FIA's designated reporting platform.

12. goAML SUPPORT CONTACT DETAILS

For assistance registering on goAML platform or with submitting SARs and STRs, the FIA can be contacted as follows:

Tel: 441-292-3422 ext. 8005 (Option 3)

Email: goaml_support@fia.bm

-END-

