Have You Appointed Your AML Officers?

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AML Compliance Officer, Money Laundering Reporting Officer and Deputy Money Laundering Reporting Officer Deadline for Cayman Islands registered funds.

Further to our April 2018 Alert and July 2018 Alert, time is running out for funds that are regulated by the Cayman Islands Monetary Authority ("CIMA") to confirm the appointment of their AML Compliance Officer, Money Laundering Reporting Officer and Deputy Money Laundering Reporting Officer via CIMA's REEFS portal on or before 30 September 2018[1].

All Cayman domiciled funds (regulated and unregulated) and Cayman domiciled fund managers are required to appoint suitably qualified and experienced individuals to these roles. If you have not already done so, we recommend that you act now to ensure that your Cayman funds and fund management companies are compliant to avoid any administrative fines or penalties being levied by CIMA.

Please contact your usual Conyers Dill & Pearman contact if you have any questions or require any assistance.

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[1] 30 September is a Sunday so the last date for filing purposes is Friday, 28 September 2018.