

Are You Ready for CIMA's New AML Effectiveness and Sanctions Rules?

CIMA's new Rule on Effective Compliance Programmes and Rule on Compliance with Financial Sanctions and Targeted Financial Sanctions (the "**Rules**") will come into force on 18 September 2026. From this date, regulated entities can expect a stronger regulatory focus on the following core AML areas: (i) AML governance; (ii) sanctions controls; (iii) documented and effective risk-based assessments; (iv) independent AML-focussed audits; and (v) evidence of overall programme effectiveness.

The message is clear: regulated entities must be able to show that their AML/CFT/CPF and sanctions frameworks are not only documented, but operate effectively in practice.

So - what now? Whatever your compliance situation is, Conyers' highly skilled professionals can help you move quickly from "we have policies" to "we can evidence an effective programme."

AML Officer Services

Under the Cayman Islands Anti-Money Laundering Regulations ("**AML Regulations**"), a financial services provider conducting relevant financial business must ensure that they have appointed suitably qualified and experienced individuals to act as their AML Compliance Officer ("**AMLCO**"), Money Laundering Reporting Officer ("**MLRO**") and Deputy MLRO (together the "**AML Officers**").

Conyers can provide you with AML experts who will step confidently into the roles of AMLCO, MLRO, and Deputy MLRO. Our Cayman Islands-based team brings their deep regulatory knowledge to help:

- **Proactively manage your AML framework**, ensuring your programs, systems, and controls remain robust and fully aligned with regulatory expectations.
- **Translate complex regulations into clear, actionable guidance**, keeping you informed of best practices and regulatory developments
- **Handle suspicious activity reporting with precision and care**, ensuring timely investigation and escalation where required
- **Act as your trusted regulatory interface**, maintaining strong, professional relationships with CIMA and other relevant authorities
- **Deliver clear, insightful reporting to your governing body**, giving you confidence and visibility over your compliance position

Remember: Non-compliance comes at a cost. As regulator, CIMA has the power to impose significant fines for AML breaches—ranging from US\$6,100 for minor issues up to US\$1.2 million for serious violations. Staying compliant isn't optional—it's essential.

Other Ancillary AML Services

We're more than just AML officers—we're your compliance partner. We know you're busy, so let us simplify the rest with tailored solutions that keep you covered and confident.

AML Risk Assessment

Not sure where to start on your risk assessment? Our bespoke risk assessment process can help give you a practical roadmap to manage your AML risk — and meet regulator expectations.

Independent AML Audit

Turn compliance into your advantage. Our independent AML audits cut through complexity—pinpointing gaps, strengthening controls, and delivering practical insights to keep your business confident and audit-ready.

AML Training

Stay sharp and compliance-ready. Our engaging AML training modules and training plans simplify Cayman requirements for boards and senior management—making annual obligations quick, clear, and easy to apply with confidence.

AML/CFT/CPF Policies and Procedures Manual

Build compliance that works for you. We design tailored AML/CFT/CPF policies that align with your business and risk profile—giving you clear, practical guidance from onboarding through to monitoring and reporting, all in one streamlined framework.

Consultancy Services

Expert guidance, when you need it most. Our tailored consultancy services deliver practical AML solutions. Whether it's updating your global policies or assisting with an AML gap analysis — Conyers has you covered. Let us do the heavy lifting, so you can stay compliant and confident.

Your Conyers Contacts

Compliance can be complex, but navigating it doesn't have to be. Whatever your arrangements, our experienced AML team is here to guide you through it. Contact us to discuss how we can support your AML compliance needs.

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