



REGULATORY UPDATE CAYMAN

Q2 2026

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GOVERNANCE
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Quick Fire Updates

1. CIMA Notice - Revisions to annual fees for mutual and private funds

An **Industry Notice** was published on Cayman Islands Monetary Authority's (**CIMA**) website on 4 February 2026 in relation to the increase and consolidation of annual fees payable by regulated mutual and private funds.

Effective **1 January 2026**, the consolidated annual fees are as follows:

- annual return fee for registered funds - US\$5,030
- annual return fee for master funds - US\$3,075
- sub-fund fee for registered mutual funds - US\$915 per sub-fund
- sub-fund or AIV fee for registered private funds - US\$640 per sub-fund or AIV.

For the 2026 calendar year, the fees will appear as separate payments to clearly show the breakdown between the base annual fee and the incremental fee increase. These details are now reflected on the CIMA's online portal (known as REEFS) under the respective account profiles.

Effective **1 January 2027**, the fees will appear as a single consolidated payment on REEFS.

The deadline for annual fee remains unchanged and continues to fall on 15 January each year. Sub-fund/AIV fees remain separate from the annual fee and must continue to be paid in accordance with current procedures.

Regulated funds that had already submitted payment were requested to ensure that the full revised annual fee, together with any applicable sub-fund/AIV fees, had been paid. Where the amount already remitted is less than the revised fee, funds were expected to settle the outstanding balance by **15 March 2026**.

No penalties will be assessed on the unpaid incremental fee increases until after 15 March 2026. Failure to remit all applicable fees in full by that date will result in non-compliance and the assessment of penalties in accordance with the relevant legislation.

2. Amendments to the beneficial ownership regime

The **Beneficial Ownership Transparency (Amendment) (No. 2) Act, 2025** came into force on 14 January 2026 to:

- provide for the submission of certain information where the legal person is a subsidiary of a listed entity;
- empower the competent authority to provide information in respect of the beneficial ownership register of a legal person to other governments;
- clarify that the administrative fines under the Beneficial Ownership Transparency Act (2026 Revision) (**BOTA**) are maximum fines; and
- ensure the continued effectiveness of the beneficial ownership legislative framework by clarifying certain other provisions.

The **Beneficial Ownership Transparency (Amendment) Regulations 2026** came into force on 23 January 2026 to make consequential amendments, including:

- adding a new definition of 'legal entity' is added to cover a legal person or any entity established overseas that is similar to a legal person
- clarifying how references to voting rights in a legal person will be construed
- removing the potential 25 per cent reduction to an administrative fine under regulation 12(2) where beneficial ownership information had been deposited by the corporate services provider within the timeframe specified by the Registrar
- reducing the time period on the obligation to notify the competent authority of any discrepancy from 30 days to 5 days.

The **Beneficial Ownership Transparency (Legitimate Interest Access) (Amendment) Regulations, 2026** came into force on 18 March 2026, adjusting the administrative fees for an application for legitimate interest access to beneficial ownership information on the search platform as follows:

- the fee for an application in relation to one legal person is increased from CI\$30 (US\$37) to **CI\$75 (US\$91)**;
- the fee for an application in relation to more than one legal person remains CI\$100 (US\$122); and
- a new **CI\$250 (US\$305)** fee for multiple applications made within a period of one year in relation to any number of legal persons is added.

3. Industry Advisory – System enhancements to company filings

On 9 March 2026, an **Industry Advisory** was published on the Cayman Islands General Registry's website providing that the majority of the system enhancements had been completed to implement changes to company filings pursuant to the **Companies (Amendment) Act, 2024** which came into force on 1 January 2026.

The following filings can now be completed:

- reduction of share capital via a solvency statement
- re-registration of an LLC to an exempted company
- re-registration of an exempted company to an ordinary resident company

Interim measures are still in place for re-registration of a foundation company to an exempted company which will require emailing the required documents to cigenreg@gov.ky under the subject "CAA FILING - [Company Name]".

4. Industry Advisory - Deadline extension for certain information to be filed under CRS 2.0

In an **Industry Advisory** issued on 21 January 2026, the Department for International Tax Cooperation (**DITC**) provided that the deadline for submitting the following information under the amended common reporting standard (**CRS 2.0**) has been extended to **31 January 2027**:

- appointment of a principal point of contact in the Cayman Islands; and
- the date on which the Financial Institution (**FI**) became a Cayman FI.

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This applies to all Cayman FIs required to register and maintain information on the DITC Portal.

The registration deadline of **30 April 2026** for FIs that became FIs in 2025 still applies to other required information. The remaining 2026 CRS and FATCA reporting deadlines (for the 2025 calendar year) are as follows:

- CRS and FATCA reporting (including any reportable accounts and/or CRS Filing Declarations) - 31 July 2026
- CRS Compliance Form - 15 September 2026.

5. Participating and reportable jurisdictions lists for CRS

The DITC published an [Industry Advisory](#) providing that the [CRS Participating Jurisdictions and CRS Reportable Jurisdictions Lists](#) were gazetted on 30 March 2026, with the following effect:

- Rwanda and Uganda have been added as Participating Jurisdictions
- Mongolia, Papua New Guinea and Paraguay have been added as Reportable Jurisdictions for reports due in 2027 and onwards
- Fiji, Tunisia and Zambia have been added as Reportable Jurisdictions for reports due in 2028 onwards.

6. Legislative amendments for tokenised funds

The new statutory framework for tokenised investment fund structures came into force on 24 March 2026, pursuant to the:

- [Mutual Funds \(Amendment\) Act 2026](#)
- [Private Funds \(Amendment\) Act 2026](#)
- [Virtual Asset \(Service Providers\) \(Amendment\) Act 2026](#)

Tokenisation refers to the digital representation of an investor's equity or investment interest in a fund using blockchain or similar distributed ledger technology. The underlying legal rights and investor protections remain unchanged, but tokenisation offers potential efficiencies in recordkeeping, transfer controls, settlement processes and investor onboarding.

The new legislative framework confirms that tokenised funds are regulated within the existing funds regulatory framework and includes targeted amendments to support technological innovation while maintaining investor protection and AML/CFT standards.

It should be noted that tokenised funds providing virtual asset services to third parties (such as custody, exchange or transfer services) remain fully within the scope of the Virtual Asset (Service Providers) Act (2024 Revision).

For more details, please see our update on [Cayman Islands legislative framework for tokenised funds now in force](#).

7. Regulatory measures for VASPS

The following CIMA regulatory measures for virtual asset service providers (**VASPs**) were gazetted on 2 February 2026:

- [Rule and Statement of Guidance - Market Conduct for Virtual Asset Service Providers \(February 2026\)](#)
- [Rule - Obligations for the provision of virtual asset services - Virtual Asset Custodians and Virtual Asset Trading Platforms \(February 2026\)](#).
- [Statement of Guidance – Guidance for the provision of virtual asset services – Virtual Asset Custodians and Virtual Asset Trading Platforms \(February 2026\)](#)

8. CIMA Notice - Importance of a Comprehensive Crisis Management Framework and CIMA's Commitment to Implementation

On 2 March 2026, CIMA published an [Industry Notice](#) in relation to the recent consultation on a proposed Rule and Statement of Guidance for Recovery Planning, (the **Recovery Planning RSoG**) which closed on 30 January 2026.

Following feedback on an initial combined proposal for both recovery and resolution planning, which was issued in January 2025, CIMA decided to separate recovery planning from resolution planning, prioritising the implementation of a recovery planning framework. This approach was supported by findings from an IMF technical assistance mission hosted in March 2025.

The Recovery Planning RSoG has a narrowed scope of application for deposit-taking institutions (ie, banks, including credit unions and development banks) and aligns with the Regulatory Policy on Domestic Systemically Important Deposit Taking Institutions, which came into effect in May 2024. It is expected to come into effect in 2026 and will ensure that recovery planning forms part of the regulatory requirements for regulated entities, enabling effective preparation for periods of financial stress.

9. CIMA publishes Thematic Review on Outsourcing

CIMA issued a [Thematic Review on Outsourcing](#) in January 2026, providing feedback from the thematic review of the Statement of Guidance – Outsourcing Regulated Entities (the **Outsourcing SoG**) conducted in 2025 across sixteen cross-sector regulated entities.

The Thematic Review provides details of:

- overall best practices observed; and
- common areas requiring improvement, including:
 - failure to evidence the review and approval of outsourcing policies and procedures;
 - inadequate policies, procedures and outsourcing agreements;
 - failure to notify CIMA of the termination of material outsourcing arrangements;
 - outdated or incomplete logs relating to material outsourcing arrangements;
 - failure to conduct initial and ongoing due diligence, risk and materiality assessments;
 - lack of policies and procedures for oversight of intra-group outsourcing arrangements; and
 - failure to formalise termination and exit strategies.

10. CIMA's Regulatory Handbook – Enforcement Manual updated

An updated version of the CIMA [Regulatory Handbook - Enforcement Manual \(Volume 2\)](#) was gazetted on 2 March 2026 and came into immediate effect. Part III: Discretionary Publication has been updated with the following new sections:

- Procedure for Discretionary Publication of Enforcement Actions and Administrative Fines
- Criteria Applied to Determine Discretionary Publication
- What May be Published
- When Publication May Occur
- Place of Publication
- Approval Process to Publish a Relevant Action
- Appendix I – Mandatory Statutory Publication Requirements

11. Special Economic Zones (Amendment) Regulations

The [Special Economic Zones \(Amendment\) Regulations, 2026](#) were gazetted on 27 February 2026 and came immediately into force to increase the following fees:

- Issuance of trade certificate – CI\$500
- Annual fee for trade certificate – CI\$750
- Amendment to trade certificate – CI\$250
- Inspection of trade certificate register – CI\$10.

12. Industry Advisory - Deadline extended for registration under CARF

The DITC issued an [Industry Advisory](#) on 25 March 2026, extending the registration deadline under the Crypto-Asset Reporting Framework ([CARF](#)) for all Cayman Reporting Crypto-Asset Service Providers ([RCASPs](#)).

The extension is to allow time for the relevant portal functionality to become available on the DITC Portal. In the interim, the deadline for registration is being extended from 30 April 2026 to **31 January 2027**.

The required information to be reported in due course is as follows:

- RCASP name and any number given to it by the General Registry, CIMA or a regulatory or supervisory body;
- full name, address, business entity (where applicable), position and contact details of:
 - the person located in the Cayman Islands who is authorised by the Cayman RCASP to be the principal point of contact ([PPoC](#)) for compliance with the CARF; and
 - another person the RCASP has authorised to give change notices for its PPoC; and
- the date on which the RCASP became a RCASP.

The PPoC requirement is intended to ensure that the DITC has a locally reachable point of contact. Sufficient PPoC contact details will therefore be required to allow the DITC to communicate directly with the PPoC and reasonably expect timely receipt of, and response to, official communications.

13. Proceeds of Crime (Amendment) Bill, 2026

The [Proceeds of Crime \(Amendment\) Bill, 2026](#) was published in the Cayman Islands Gazette on 31 March 2026.

If enacted as drafted, the Bill would amend the Proceeds of Crime Act (2025 Revision) to:

- appoint the Minister responsible for financial services, or a designate of the Minister, as chair of the Anti-Money Laundering Steering Group ([AMLSG](#))
- provide for the continuing establishment of the Inter-Agency Coordination Committee and permit information sharing between members of that Committee and members of the AMLSG, where the disclosure is made in good faith for the purpose of performing functions under the legislation or in the exercise of any statutory power
- add a new requirement for annual performance reports by every competent authority responsible for investigating or prosecuting money laundering, associated predicate offences and terrorist financing setting out key achievements, strategic priorities and performance indicators
- provide that none of the AMLSG, the Inter-Agency Coordination Committee or any member of each will be liable in damages for anything done or omitted in the discharge of their respective functions or duties under the legislation unless it is shown that the act or omission was in bad faith or constituted wilful misconduct or negligence.

14. Companies Act (2026 Revision) - Erratum

The [Companies Act \(2026 Revision\) - Erratum](#) was gazetted on 18 March 2026 to correct an error in the [Companies Act \(2026 Revision\)](#) (at Schedule 5, Part 6(e)(i)) in relation to the fee for filing a plan of merger or consolidation per constituent entity which should have read CI\$1,000 (US\$1,220).

15. Mourant Regulatory Conference and Workshops

Mourant will be hosting its annual Regulatory Conference on the afternoon of **Thursday 21 May 2026** at Hotel Indigo.

This year we are also pleased to offer two regulatory workshops in addition to the conference. Please click the links below for more details and to register your interest:

- [Business Risk Assessments for Virtual Asset Service Providers](#) – 4-6pm, Wednesday 20 May, Hotel Indigo
- [AML inspection readiness workshop for DNFBPs](#) – 9.30-11.30am, Thursday 21 May, Hotel Indigo.

16. Mourant Guides and Updates

Mourant has uploaded the following Cayman Updates and Guides to our website over the last quarter:

- [Cayman Islands legislative framework for tokenised funds now in force](#)
- [Reducing a Cayman Islands company's share capital without going to court](#)
- [Navigating a return of funds to shareholders of a Cayman Islands exempted company](#)

Quick Fire Updates

- What you need to know about the Cayman Islands statutory merger
- Statutory mergers, schemes of arrangement and tender offers under Cayman Islands law - a comparison
- Voluntary liquidation and strike-off of Solvent Cayman Islands companies
- Sub lines through a fund's life cycle: a Cayman Islands perspective
- The Cayman Islands administrative fines regime
- CIMA rules on segregation of assets for mutual funds and private funds
- CIMA rules on calculation of asset values for regulated mutual funds and registered private funds

17. Mourant online AML and AEOI compliance training

Mourant offers specialised online [Cayman AML Training](#) and [BVI/Cayman AEOI compliance training](#) programmes for financial institutions, their directors and service providers to assist them in understanding their obligations and demonstrating compliance. Please contact ClientTraining@Mourant.com for further information.

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