VANUATU FINANCIAL SERVICES COMMISSION

CYBERSECURITY AND OPERATIONAL RESILIENCE

Revised Version (January 2026)

SUPERVISION DEPARTMENT

1. Application of Guidelines

Applies to all VASPs, ITO issuers, and sandbox operators, including outsourced technology services and custodial arrangements.

2. Purpose

To establish minimum cybersecurity and operational resilience expectations for VASPs, including governance, access controls, incident management, and third-party security.

3. Legal Basis

These Guidelines are issued under section 59 of the Virtual Asset Service Providers Act No. 3 of 2025 (the Act), and support VFSC's licensing, supervision and enforcement functions.

4. Core Regulatory Expectations

- Must establish board and senior management accountability for cyber risk, including a designated CTO (or equivalent).
- Must implement secure architecture, MFA for privileged access, encryption, logging and monitoring, and secure SDLC practices.
- Must maintain incident response, business continuity and disaster recovery plans; test at least annually.
- Must apply third-party risk management to vendors and custodians, requiring equivalent security controls.
- Must report material cyber incidents promptly to VFSC and affected customers where relevant.

5. Reporting, Notifications and Records

- Must maintain records of security incidents, remediation actions, penetration tests and vulnerability management.
- Must provide VFSC with incident reports, post-incident reviews and evidence of control testing upon request.

6. Supervisory Approach and Enforcement

- VFSC may require independent cyber assessments, restrict systems changes, impose conditions, or suspend activities where cyber risks are unmanaged.

7. Benchmarking Consistency (non-exhaustive)

- BMA Bermuda: Digital Asset Business Operational Cyber Risk Management Code of Practice (cyber and operational resilience baseline).
- FSC Mauritius: AML/CFT Guidance Notes for VASPs and IITOs (risk-based AML/CFT and supervisory expectations under VAITOS).
- CIMA Cayman Islands: Rule and Statement of Guidance - Market Conduct for VASPs (conduct, custody, disclosures, incident reporting).
- FSRA Saint Lucia: Virtual Asset Business Regulations (licensing, operational capability, cyber and AML/CFT expectations).
- MFSA Malta: VFA Rulebook Chapters (governance, systems audits, custody/ITA certification, and conduct obligations).

Please contact the following person should you have any questions:

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Dated this 29th day of January 2026

Branan Karae
Commissioner

COMMISSION DES AFFAIRES FINANCIERES
VANUATU
FINANCIAL SERVICES COMMISSION