



VANUATU FINANCIAL
= SERVICES COMMISSION =

Guideline for Processing CIIP Citizens Registering Entities with VFSC

(February 2026)

REGISTRATION DEPARTMENT

1. Purpose

This guideline sets out the procedures to be followed by the Registration Department when processing applications from individuals who obtained Vanuatu citizenship through the Capital Investment Immigration Plan (CIIP) and who apply to register a Local Company, International Company, Partnership or Charitable Association.

2. Scope

This procedure applies to all CIIP citizens listed as shareholders, directors, beneficial owners, partners, founders, officers or members of entities registered with VFSC.

3. Risk Context

Although CIIP citizens are legally naturalised citizens of Vanuatu, enhanced due diligence (EDD) is required in accordance with AML/CFT obligations and FATF Recommendations due to potential cross-border risk exposure.

4. Mandatory Documentation Requirements

Registration Officers must obtain:

- Current Vanuatu Passport
- Previous (Old) Passport(s)
- Declaration of Former Nationality
- Proof of Address (if applicable)
- Police Clearance

5. Mandatory Screening Requirements

Before registration approval, the following checks must be completed:

A. Dow Jones Sanctions Screening:

- Must search full name, date of birth, previous nationality and old passport number.
- Must save evidence of search results.
- Must escalate positive matches.

B. World-Check Passport Verification:

- Must verify old and current passport numbers.
- Must check PEP status, adverse media and criminal exposure.
- Must save verification results.

C. Check through other Law Enforcement Agencies including Interpol, FBI, US Homeland Securities, IRS

D. Use open source to carry out checks, including Google.

6. Risk Rating & Escalation

Low Risk: Clean screening results – Proceed.

Medium Risk: Minor adverse findings – Escalate for review.

High Risk: Sanctions/PEP/high-risk jurisdiction – Refer to Compliance & Commissioner.

7. Record Keeping

All documentation and screening evidence must be retained electronically for a minimum of seven (7) years in accordance with AML/CFT requirements.

8. Refusal Criteria

Registration must be refused if:

- Individual appears on sanctions list.
- Passport cannot be verified.
- False declaration of former nationality.
- Significant unresolved adverse findings.

9. Process Flow Chart

START



Receive Registration Application



Identify CIIP Citizen



Request Old Passport + Current Passport



Conduct Dow Jones Sanctions Screening



Conduct World-Check Passport Verification



Assign Risk Rating (Low / Medium / High)



Escalate if Required



Approve or Refuse Registration



Save Documentation & Close File



END

Please contact the following person should you have any questions:

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Manager, Registration Department
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Phone: (678) 22247
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Dated this 17th day of February 2026



Branan Karac
Commissioner

