



VANUATU FINANCIAL
= SERVICES COMMISSION =

**Guideline on Compliance Obligations for
International Companies Engaged in
Shipping Activities**

(February 2026)

REGISTRATION DEPARTMENT

1. Purpose

This Guideline establishes compliance standards for International and Local Companies registered in Vanuatu that own, operate, manage or charter vessels engaged in international shipping. The objective is to prevent the use of Vanuatu entities or vessels for illicit activities including transport of prohibited weapons, sanctions evasion, proliferation financing and terrorism financing.

2. Scope

This Guideline applies to International Companies, Local Companies, Beneficial Owners, Ship Managers, Charterers and Operators engaged in maritime trade.

3. Regulatory Framework

This Guideline aligns with FATF Recommendations 6, 7, 10, 24 and 30, and relevant United Nations Security Council Sanctions Resolutions including but not limited to:

- DPRK Sanctions Regime (UNSCR 1718 and subsequent resolutions)
- Iran Sanctions Regime (UNSCR 2231)
- Libya Sanctions Regime (UNSCR 1970)
- Somalia/Eritrea Sanctions Regime (UNSCR 751)
- Russia-related sanctions adopted under various international frameworks

Companies must comply with all applicable international sanctions obligations.

4. Prohibited Activities

- Transport of arms or military equipment to sanctioned jurisdictions.
- Transport of dual-use goods without proper licensing.
- Ship-to-ship transfers designed to conceal cargo origin.
- Deliberate AIS disabling or manipulation.
- False cargo documentation or misrepresentation of destination.

5. Mandatory Compliance Controls

- Sanctions screening of charterers, cargo owners and ports.
- Verification of cargo manifests and end-user certificates.
- Continuous AIS transmission.
- Maintenance of updated Beneficial Ownership records.

6. Enhanced Due Diligence (EDD)

EDD must be conducted where cargo involves military or dual-use goods, trade routes involve high-risk jurisdictions, or adverse media exists regarding counterparties.

7. Reporting Obligations

Suspicious cargo, counterparties or transactions must be reported immediately to relevant authorities. Shipping documentation must be retained for a minimum of seven (7) years.

8. Supervisory Powers

VFSC shall request additional documentation, conduct inspections, require independent audits, and suspend or revoke company registration for non-compliance.

9. Consequences of Non-Compliance

Non-compliance shall result in administrative penalties, vessel deregistration, blacklisting and criminal referral.

10. Risk Assessment Matrix

Risk Category	Risk Indicator	Risk Level	Mitigation Required
Sanctions Exposure	Cargo destined for sanctioned country	High	Reject shipment, escalate to Compliance & notify authorities
Proliferation Risk	Dual-use goods without export license	High	Require verified end-user certificate & export authorization
Counterparty Risk	Opaque charterer ownership structure	Medium	Conduct enhanced beneficial ownership verification
Operational Risk	AIS disabled during voyage	High	Immediate investigation & mandatory reporting
Documentation Risk	Incomplete or altered cargo manifest	Medium	Request full documentation before departure

Please contact the following person should you have any questions:

Mr. Webster Alilee
Manager, Registration Department
Email: walilee@vfsc.vu
Phone: (678) 22247

Dated this 17th day of February 2026



Branan Karae
Commissioner

