



VFSC Coordination Protocols
Between VFSC, FIU, Police, Tax / Customs
Department and Security Agencies for
NPOS

May 2026

LEGAL DEPARTMENT

1. Purpose

To establish clear coordination mechanisms among VFSC, FIU, Police, Tax/Customs, and Security Agencies to detect, prevent, and respond to money laundering and terrorism financing risks associated with Non-Profit Organisations (NPOs).

2. Scope

Applies to:

- All NPOs registered under VFSC.
- NPO activities involving cross-border donations, grants, or financial flows.
- Transactions with potential AML/CTF exposure, including cross-border financial flows.

3. Legal Basis

This guidance is issued under -

- Section 15A, 15AA, 15AB and 15AC of the Charitable Associations (Incorporation) Act [Cap 140], and
- Part 7 and 7A of the Foundations Act No. 38 of 2009

3. Responsibilities

VFSC (Registrar)

- Maintain registry of NPOs, including beneficial ownership and governance details.
- Monitor compliance with AML/CTF obligations.
- Share suspicious activity reports with FIU and enforcement agencies
- Suspend or de-register NPOs when violations are confirmed.

FIU (Financial Intelligence Unit)

- Receive and analyze suspicious transaction reports (STRs) from VFSC and financial institutions.
- Disseminate intelligence to police, tax/customs, and security agencies.
- Provide typologies and risk assessments to VFSC for regulatory guidance.

Police

- Investigate suspected money laundering or terrorism financing involving NPOs.
- Lead criminal enforcement actions based on FIU intelligence.

Tax/Customs

- Monitor cross-border financial flows linked to NPOs.
- Detect trade-based money laundering or fiscal irregularities in NPO operations.

Security Agencies

- Assess national security risks linked to terrorism financing through NPOs.
- Restrict or block NPO activities tied to high-risk jurisdictions or entities.

4. Coordination Procedures

Information Sharing

- VFSC provides registry and compliance data to FIU, police, tax/customs, and security agencies.
- FIU circulates intelligence reports to enforcement agencies.
- Suspicious activities reported immediately via secure channels.

Joint Investigations

- Multi-agency task forces formed for AML/CTF cases involving NPOs.
- FIU provides intelligence; VFSC supplies documentation; police lead criminal investigations; tax/customs assess fiscal breaches; security agencies evaluate terrorism financing risks

Reporting

- VFSC issues quarterly AML/CTF compliance reports on NPOs.
- FIU issues periodic intelligence briefs.
- Urgent suspicious transaction reports shared within 24 hours

Enforcement

- Police execute arrests and seizures.
- Tax/customs impose fiscal penalties and monitor trade flows.
- Security agencies enforce restrictions on high-risk NPO activities.
- VFSC suspends or deregisters non-compliant NPOs.

5. Coordination Meetings

- Monthly inter-agency AML/CTF coordination meetings by VFSC with FIU participation.
- Emergency meetings convened when urgent AML/CTF risks are detected.

6. Capacity Building

- Joint training programs on AML/CTF detection, suspicious transaction reporting, and risk assessment for NPOs.
- Shared workshops to strengthen inter-agency collaboration.

7. Review and Amendment

- Protocols reviewed annually by VFSC in consultation with FIU, police, tax/customs, and security agencies.
- Amendments adopted to reflect evolving AML/CTF risks and international standards (e.g., FATF recommendations).

Please contact the following person should you have any questions:

Mr. John Stephens Tougon
Manager, Legal Department
Email: jstougon@vfsc.vu
Phone: (678) 22247

Dated this 7th day of May 2026



.....
Branán Karae
Commissioner

