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REGULATORY BRIEFING

Approved Manager Regime

British Virgin Islands

The complete guide for fund managers seeking an efficient and regulated offshore structure.

What is the Approved Manager?

A simplified regulatory regime created by the BVI Financial Services Commission (FSC) — an alternative to a full Investment Business licence for managers and advisers whose portfolios remain below specified thresholds.

In force since 10 December 2012.

8 reasons to choose the Approved Manager

01 Commence in 7 days	02 No mandatory audit
03 Global fund management	04 No compliance officer
05 No minimum capital	06 Light regulatory burden
07 Fast time to market	08 Respected jurisdiction

Assets under management limits

US$400M

Open-ended funds

Hedge · Multi-asset · Credit

US$1B

Closed-ended funds

PE · VC · Real Estate · Private Credit

Limits are calculated separately — open-ended and closed-ended are not aggregated.

Approval process

01

Preparation

Corporate documents, CVs, fit & proper, IMA, AML/CFT manual

02

Filing with the FSC

Application filed at least 7 days before commencement

03

Deemed Approval

Manager may carry on business for 30 days; a further 30 days must be applied for

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04

Certificate

FSC issues the Certificate of Approval

Approved Manager vs. SIBA Licence

	Approved Manager	SIBA Licence
Approval timeline	✓ 7 days to commence	Months
Compliance officer	✓ Not required	Required
Min. capital / insurance	✓ Not required	Required
Audit	✓ Not required	Frequent
Economic Substance	✓ Does not apply	Applies

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Who is it for?

- ✓ Managers seeking a lighter structure before transitioning to a full licence
- ✓ Closed-ended PE, VC, Real Estate and Private Credit funds — and smaller open-ended funds within the cap
- ✓ Offshore structures for Brazilian funds — Brazil is a recognised jurisdiction
- ✓ Managers prioritising speed to market for fundraising and operations
- ✓ Strategies with lower initial AUM but a clear growth trajectory within caps

07

Economic Substance & AML/CFT

ECONOMIC SUBSTANCE	AML / CFT / CPF
– No effective substance required in the BVI	– Regime applies in full
– “Fund management business” requires a SIBA licence — the AM falls outside	– Mandatory MLRO — the MLRO need not be resident in the BVI or an employee of the Approved Manager, but must be of sufficient seniority and meet the requirements of the BVI Anti-money Laundering Regulations, Revised Edition 2020 (as amended).
– Annual self-certification via BOSS, within 6 months of year-end	– Annual AML/CFT return filed with the FSC by 31 March

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Is your fund ready to go offshore?

The BVI Approved Manager is the most efficient structure for managers looking to go offshore without excessive regulatory burden.

Speak to the Ascentium team →

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