

QUARTERLY NEWSLETTER

INSIDE THIS ISSUE

- **Legal Updates**
- **Compliance Updates**
- **Registry Updates**
- **Samoa Foundations as a Wealth Preservation Tool**
- **Trust company service provider spotlight**
- **Events**

[CLICK HERE TO SUBSCRIBE TO UPDATES](#)



MESSAGE FROM THE Acting CEO

Welcome to the third edition of our 2026 Newsletter, covering the period from July to September 2026.

The third quarter has been another active period for the international finance services sector, with continued progress across our market engagement, regulatory priorities, service delivery and industry development.

A key focus during the quarter has been strengthening our engagement with international partners and ensuring that our work continues to respond to the changing needs of the markets we serve. The commencement of our Asia Market Series provided an important opportunity to engage directly with industry partners in Hong Kong, gain valuable market insights and identify areas for further development. These engagements reinforced the importance of maintaining strong relationships with our industry and ensuring that Samoa remains responsive and relevant within an increasingly competitive international environment.

We have also continued to progress important regulatory and compliance priorities, including preparations for Samoa's FATF AML/CFT Mutual Evaluation in 2028, where engagement with assessors will start in early 2027 on legislative matters affecting the sector. This work remains central to maintaining confidence in Samoa's regulatory framework while ensuring that we continue to support the practical needs of our industry.

At an operational level, the ongoing modernisation of our Registry remains a priority. Further progress in the digitalisation of services during the quarter reflects our commitment to improving accessibility, efficiency and the overall experience for our industry and clients with Certificates of Good Standing now processing online.

As we enter the final quarter of 2026, we look forward to a busy programme of international engagement, industry development and promotional activity. This includes our participation in key regional conferences, further training and webinar opportunities, and our involvement with the Rugby League World Cup. November will also mark the annual renewal period for international companies, and I encourage our industry partners to attend to renewal requirements in a timely manner.

This edition provides further insight into these developments and the work being undertaken across SIFA and Samoa IBFC. I encourage you to explore the articles and updates throughout the Newsletter for more information on the initiatives shaping our work during this period and in the months ahead.

I would like to acknowledge our trustees and wider stakeholders for their continued support and collaboration. Your contribution remains important as we work together to strengthen Samoa's international finance services sector and build on the progress achieved throughout the year.

As we approach the final months of 2026, our focus remains on delivering our strategic priorities, strengthening our international relationships and positioning Samoa to take advantage of emerging opportunities in our key markets.

Thank you for your continued confidence and partnership. I hope you enjoy this edition of our Newsletter, and I look forward to sharing our progress as we close out the year.

Fa'afetai tele lava,

AMENDMENTS UPDATE

The FIA is being amended under the Foreign Investment Bill 2026 that was tabled in Parliament during its sitting in August 2026, which has been referred to Parliamentary Committee for consultation with the public. SIFA with the support of the Offshore Industry has made submissions to the said Committee to object to the conditional exemption granted to TCSPs (a huge change from the FIA where it is a full exemption).



COMPLIANCE DIVISION UPDATE: 2026

Compliance is an essential part of maintaining trust and stability in the financial system. As financial activities are increasingly complex in their cross-border nature, effective compliance measures are critical to preventing financial crime, protecting the integrity of financial markets, and maintaining confidence in financial centres.

For Samoa, a strong and effective compliance framework is important not only for meeting international standards, but also for supporting a stable and reputable international financial sector. The Compliance Division therefore continues to focus on practical, proportionate, and risk-based supervision, while working with the industry to strengthen understanding and compliance with regulatory requirements.

In this edition, we provide updates on three key areas: the implementation of the AML/CFT Risk-Based Supervision framework for Trust and Company Service Providers, Samoa's ongoing preparations for its upcoming Mutual Evaluation, and the progress of the AEOI questionnaire exercise focusing on Non-Financial Entities under the Common Reporting Standard.

Risk-Based Supervision (AML/CFT)

The Compliance Division has completed the development of its AML/CFT Risk-Based Supervision (RBS) Tool, with technical assistance from the International Monetary Fund (IMF). The tool provides a structured and consistent framework for assessing risk across Trust and Company Service Providers (TCSPs), enabling supervisors to identify, monitor, and respond to higher-risk areas more effectively.

To support implementation, the Division held an awareness session with TCSPs on 28 August 2026 to introduce the RBS framework and explain the supervisory questionnaires for information that is required. The session was aimed at strengthening the industry understanding of the supervisory process and improving the quality and completeness of information submitted by licensed entities.

The supervisory questionnaires were subsequently distributed during the first week of September 2026. The Division is working towards full implementation of the RBS framework by the end of 2026, ahead of Samoa's Risk and Context's submission to APG assessors deadline in February 2027.

Mutual Evaluation Preparations (2027/2028)

Samoa's upcoming Mutual Evaluation by the Asia/Pacific Group on Money Laundering (APG) scheduled for 2027/2028 will assess the effectiveness of Samoa's AML/CFT framework against the FATF Recommendations.

The Compliance Division continues to support Samoa's Mutual Evaluation preparations including contributing technical and supervisory input where required to support the proposed AML/CFT legislative reforms.

In parallel, the Compliance Division is progressing work on AML/CFT guidance for the Trust and Company Service Provider (TCSP) sector. The guidance is intended to support industry understanding of regulatory obligations, promote more consistent compliance across the sector, and contribute to the overall effectiveness of Samoa's AML/CFT framework.

AEOI Questionnaire Exercise

Preparation – Compliance and Legal joint forces in creating SIFA's ME Readiness Strategy that looks at all milestones that SIFA must complete before Samoa's ME set to commence in March 2027. On the side of Compliance, the Risk-based tool has been finalized, approved by both Management and Board, already presented to the Offshore Industry; and has already been distributed to TCSPs for compilation of input. For Legal, already undertaken is a review of Samoa's ME Report in 2015 to assess legal gaps reported and their current status to date to ascertain remaining gaps that must be before March 2027.

INSIDE THE REGISTRY: NUMBERS, TRENDS, AND TRANSITIONS

	July –September 2025	July –September 2026
New incorporations	619	442
Live	30,136	30,404

New incorporations recorded a downward trend this quarter compared to the same quarter in the last financial year. However, the continued growth in live companies demonstrates the sustained demand for our service and the confidence clients place in Samoa as a jurisdiction.

Navigating The Latest Process Enhancements:

The Registry continues to advance its vision of: ‘Moving with the Times’ through the ongoing modernization and digital transformation of its services. At the commencement of this financial year, the Registry introduced electronic company searches capitalizing on the significant effort invested by the team in scanning and digitizing all historical company files. This initiative represents another important step towards becoming a paperless registry. We acknowledge and appreciate the cooperation and support of our stakeholders in the successful implementation of this service enhancement.

Building on the success of Phase 1 of our electronic Certificate of Good Standing (eCOGS) which was initially available only to the trustee companies, Phase 2 has now been fully implemented and operational.

This completion of Phase 2 expands access to the service, allowing any person, to apply online for a COGS of any international company. In addition, the trustee companies may also utilize this feature to obtain an eCOGS for ICs that are not under its administration, providing greater flexibility and accessibility for all users. This expansion marks the completion of the digital transformation of the Certificate of Good Standing service.

TRUST COMPANY SERVICE PROVIDER SPOTLIGHT

Sustained Growth Rate – ATSL (July – September 2026)

The July to September 2026 results marks another strong period of continued growth for ASIACITI Trust Samoa Limited (ATSL), which recorded the highest growth rate in new company incorporations for the quarter.

ATSL has now led the quarterly growth rate for the first three quarters of 2026, maintaining the highest rate of increase from one quarter to the next throughout the year so far. What makes this performance particularly noteworthy is the consistency of the growth trend. While incorporation volumes can fluctuate from quarter to quarter, ATSL has maintained the strongest growth momentum throughout 2026, signaling a sustained upward trajectory in new business activity.



This quarter's results reflect ATSL's positive performance over successive quarters and its ongoing contribution to Samoa's international business portfolio. Maintaining this momentum is particularly encouraging as the international finance sector moves into the final months of 2026, and we continue our efforts to attract and retain international business in an increasingly competitive global environment.

Congratulations to Asiaciti Trust Samoa Limited on this achievement and recognize the sustained growth reflected in its incorporation figures throughout the year.

Highest Number of New Company Incorporations Spotlight – Intershore and PFSL

The third quarter of 2026 continued to show steady activity across Samoa's international business sector, with trust companies maintaining a strong level of new company incorporations.



For the July to September 2026 period, Intershore Consult (Samoa) Limited once again recorded the highest number of new company incorporations among trust company service providers.

Intershore has held the top position for the number of new incorporations in each of the first three quarters of 2026, making it the leading provider by incorporation volume for the period to date. Maintaining this position for three consecutive quarters reflects a consistent level of incorporation activity and reinforces Intershore's position as the leading contributor to new company formation during 2026 to date.

Pacific Fiduciaries Samoa Limited (PFSL) recorded the second highest number of new incorporations during the third quarter. Its position in this quarter recognizes that new business continues to be generated by the wider network of trust companies and different Trustees within the sector.



PACIFIC FIDUCIARIES (SAMOA) LIMITED

As we approach the final quarter of 2026, these results provide an encouraging indication of continued incorporation activity across the jurisdiction. The final quarter of 2026 will include a busy period of participation at international conferences and promotional initiatives. These events will provide valuable exposure for Samoa and its international finance sector, as well as create potential avenues for new business, complementing the positive results recorded so far this year.

SIFA congratulates ASIACITI Trust Samoa Limited (ATSL), Intershore Consult (Samoa) Limited and Pacific Fiduciaries Samoa Limited (PFSL) on their respective achievements during the third quarter of 2026. We also acknowledge the continued contribution of all licensed trust company service providers whose activities support the growth and development of Samoa's international business sector.

EVENT HIGHLIGHTS

Asia Market Series – Business Development and Market Engagement.

The Samoa International Business and Finance Centre (Samoa IBFC) together with the Samoa International Finance Authority (SIFA), in July 2026 undertook Part One of the Asia Market Series engagement across Hong Kong, meeting with the Head Offices of several of the licensed trust and company service providers in Samoa.

The Asia Market Series is the first part of its strategic approach to strengthen relationships with existing industry partners, while gaining direct insight into market expectations and the practical issues affecting clients using Samoa's international finance services.



A key message throughout meetings was the importance of certainty, simplicity, and clear communication, particularly following the removal of Samoa from the EU Blacklist in February 2026. Industry representatives welcomed Samoa's ongoing regulatory developments but emphasized the importance of providing sufficient notice and practical guidance when changes are introduced.

The engagement provided an opportunity to strengthen relationships with existing industry partners while gaining direct insight into market expectations, emerging opportunities and the practical issues affecting clients using Samoa's international financial services. SIFA reaffirmed its commitment to continued industry consultation and to keeping the regulatory framework pragmatic while meeting international standards.

The meetings also identified opportunities to further diversify and develop Samoa's international financial services offering. Trusts and foundations were highlighted as areas of growing interest, particularly within Asian markets, alongside mutual funds and other wealth-management structures. There was also interest in greater education and awareness of Samoa's foundation framework, including the potential for an online seminar hosted by Samoa IBFC.

Technology and digitalisation emerged as another area for future development. Industry representatives encouraged greater use of electronic records, remote services, artificial intelligence, and other technology-enabled solutions to improve efficiency and accessibility. SIFA also identified opportunities to explore electronic inspection processes and further digitalisation of services, considering Samoa's infrastructure and resource capacity.

The discussions further highlighted the importance of supporting the wider professional and financial services ecosystem. Banking access for Samoa structures remains an important consideration for clients, while stronger legal, accounting, and financial services capability could support further growth of the sector.

The engagements also reinforced the importance of maintaining regular and targeted engagement with key Asian markets. SIFA and Samoa IBFC will continue to explore opportunities to promote Samoa's international companies, trusts and foundations across Hong Kong and the wider Asian region, while maintaining ongoing communication with industry partners between in-market visits.

Overall, part one of the Asia Market Series provided valuable market intelligence and identified several practical areas for follow-up, supporting Samoa's continued development as a reputable, well-regulated, and accessible international financial centre.

UPCOMING EVENTS

An Exciting Quarter Ahead: Finishing 2026 Strong.

The next quarter promises to be an exciting and active period for Samoa IBFC, with a strong programme of international engagement, industry development, and promotional opportunities ahead.

In October, Samoa IBFC will continue strengthening its presence in the Asian market through participation in two key regional events: the STEP Asia Conference 2026 in Singapore, taking place from 20–21 October, and the Asia Outbound Summit, Shanghai 2026, from 27–29 October. These events bring together leading professionals in private wealth, international finance, succession planning and cross-border structuring, and are great platforms to promote Samoa's international finance solutions, strengthen existing relationships and develop new connections across the region.



November also marks an important period for SIFA and the renewal of international company registrations. We strongly encourage registered companies and their service providers to attend to their annual renewal requirements in a timely manner to ensure continued good standing. Early attention to renewals will help facilitate a smooth process and avoid unnecessary delays. We value to continued confidence of our international clients and partners in Samoa and look forward to supporting them through the upcoming renewal period.

We also look forward to seeing the result of our concerted efforts to improve the rating of Samoa's overall AEOI assessment by the APRG that is tentatively scheduled for November 2026.

The coming months will also feature a range of online webinars, training and professional development opportunities, aimed at keeping industry stakeholders informed of emerging developments and strengthening knowledge and capability within Samoa's international finance sector.

Closer to home, Samoa IBFC is also looking forward to its involvement with the Rugby League World Cup, where IBFC will proudly feature as the Naming Rights Sponsor of Samoa's National teams: the Toa Samoa and Fetu Samoa. This provides an exciting opportunity to strengthen the visibility of the Samoa IBFC brand and connect with new audiences through one of the most widely followed sporting codes.

With a busy calendar ahead, the next quarter reflects our continued commitment to building international relationships and raising Samoa's profile as a competitive and well-regulated international finance centre.