British Virgin Islands Financial Investigation Agency
Audited Financial Statements
For the Year Ended December 31, 2019

British Virgin Islands Financial Investigation Agency

Audited Financial Statements

For the Year Ended December 31, 2019

BRITISH VIRGIN ISLANDS FINANCIAL INVESTIGATION AGENCY

For the Year Ended December 31, 2019
Table of Contents

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Independent Auditor's Report

To the Members of
British Virgin Islands Financial Investigation Agency
Tortola, British Virgin Islands

Report on the Audit of the Financial Statements

Opinion

We have audited the financial statements of British Virgin Islands Financial Investigation Agency (the "Agency"), which comprise of the statement of financial position as at December 31, 2019, and the statement of comprehensive income, statement of changes in reserves and statement of cash flows for the year then ended, and notes to the financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of the Agency as at December 31, 2019, and its financial performance and its cash flows for the year then ended in accordance with International Financial Reporting Standards ("IFRSs").

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing ("ISAs"). Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are independent of the Agency in accordance with the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants ("IESBA Code"), and we have fulfilled our other ethical responsibilities in accordance with the IESBA Code. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Responsibilities of Management and Those Charged with Governance for the Financial Statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with IFRSs, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing the Agency's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Agency or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Agency's financial reporting process.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with ISAs, we exercise professional judgement and maintain professional scepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Agency's internal control.

- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.

- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Agency's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Agency to cease to continue as a going concern.

- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with the directors regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

BDO Limited

Tortola, British Virgin Islands
May 17, 2021

BRITISH VIRGIN ISLANDS FINANCIAL INVESTIGATION AGENCY

Statement of Financial Position
As At December 31, 2019
(Expressed in United States Dollars)

	Notes	2019 $	2018 $
ASSETS			
Non-current assets			
Property and equipment, net	4	1,198,362	1,429,858
Right-of-use asset	5	1,736,127	-
Other assets	6	117,123	117,123
Total non-current assets		3,051,612	1,546,981
Current assets			
Time deposits	7	1,032,162	1,029,481
Other assets	6	13,767	12,876
Other receivables	8	12,179	-
Cash and cash equivalents		1,680,167	1,416,615
Total current assets		2,738,275	2,458,972
TOTAL ASSETS		5,789,887	4,005,953
RESERVES AND LIABILITIES			
Reserves			
General reserves	9	2,976,792	3,032,060
Liabilities			
Non-current liabilities			
Lease liability	5	1,532,554	-
Current liabilities			
Lease liability	5	240,689	-
Accounts payable and accruals	10	961,521	911,383
Retirement benefit obligations	11	78,331	62,510
Total current liabilities		1,280,541	973,893
Total liabilities		2,813,095	973,893
TOTAL EQUITY AND LIABILITIES		5,789,887	4,005,953

Approved on Behalf of the Boards

________________, Director

17th May 2021, Date

________________, Deputy Director

SS

17 MAY. 2021, Date

BRITISH VIRGIN ISLANDS FINANCIAL INVESTIGATION AGENCY

Statement of Comprehensive Income
For the Year Ended December 31, 2019
(Expressed in United States Dollars)

	Notes	2019 $	2018 $
INCOME			
Contributions from:			
British Virgin Islands Government	12	1,672,500	1,672,500
British Virgin Islands Financial Services Commission	12	750,000	750,000
Rental income		53,376	53,376
Interest income	8	7,205	4,549
TOTAL INCOME		2,483,081	2,480,425
EXPENSES			
Employee costs	13	1,420,718	1,434,416
Depreciation and amortisation	4,5	512,821	246,823
Utilities		110,923	155,619
IT support and website		104,125	54,487
Interest expense - lease	5	103,328	-
Training and conferences		70,771	51,538
Rent and service charge		61,942	379,724
Travel		39,914	82,637
Maintenance and security		30,620	29,367
Professional fees		26,000	28,412
Insurance		14,904	-
Office, postage and stationery		13,146	20,220
Egmont-related expense		10,464	21,274
Vehicle expenses		7,277	7,171
Bank charges		5,358	7,795
Advertising and promotion		4,160	700
Entertainment		2,081	7,228
Subscriptions and dues		-	2,503
Miscellaneous (credit) expenses		(203)	839
TOTAL EXPENSES		2,538,349	2,530,753
DEFICIT FOR THE YEAR		(55,268)	(50,328)

The accompanying notes form an integral part of these financial statements

BRITISH VIRGIN ISLANDS FINANCIAL INVESTIGATION AGENCY

Statement of Changes in Reserves
For the Year Ended December 31, 2019
(Expressed in United States Dollars)

	General reserves $	Total $
Balance as at December 31, 2017	3,082,388	3,082,388
Deficit for the year	(50,328)	(50,328)
Balance as at December 31, 2018	3,032,060	3,032,060
Deficit for the year	(55,268)	(55,268)
Balance as at December 31, 2019	2,976,792	2,976,792

BRITISH VIRGIN ISLANDS FINANCIAL INVESTIGATION AGENCY

Statement of Cash Flows
For the Year Ended December 31, 2019
(Expressed in United States Dollars)

	2019 $	2018 $
CASH FLOWS FROM (USED IN) OPERATING ACTIVITIES		
Net deficit for the year	(55,268)	(50,328)
Adjustments to reconcile net deficit to cash from operations before working capital changes:		
Depreciation and amortisation expense	512,821	246,823
Interest income	(7,205)	(4,549)
Interest expense - lease	103,328	-
Cash from operations before working capital changes:	553,676	191,946
(Increase) decrease in other assets	(890)	150,406
Increase in other receivable	(12,179)	-
Increase in trade and other payable	31,922	20,157
Increase in retirement benefit obligations	15,821	32,039
Net cash flows from operating activities	588,350	394,548
CASH FLOWS FROM (USED IN) INVESTING ACTIVITIES		
Purchase of property and equipment	(7,200)	(50,300)
Net increase in time deposits	(2,680)	(2,674)
Interest income	7,205	4,549
Net cash flows used in investing activities	(2,675)	(48,425)
CASH FLOWS FROM (USED IN) FINANCING ACTIVITIES		
Interest paid on lease liability	(95,201)	-
Principal paid on lease liability	(226,922)	-
Net cash flows used in financing activities	(322,123)	-
NET INCREASE IN CASH AND CASH EQUIVALENTS	263,552	346,123
CASH AND CASH EQUIVALENTS		
At beginning of year	1,416,615	1,070,492
At end of year	1,680,167	1,416,615

1 Organisation and Objectives

The British Virgin Islands Financial Investigation Agency (the "Agency") is a statutory body that was established under the Financial Investigation Act, 2003 (as amended) (the "Act") which came into force on April 1, 2004. The Agency's registered office is 2nd Floor Ritter House Building, Road Town, Tortola, British Virgin Islands ("BVI").

The Act established the Agency as an autonomous law enforcement arm responsible for receiving, obtaining, investigating, analysing and disseminating information relating to a financial offence or the proceeds of a financial offence and requests for legal assistance from authorities in foreign jurisdictions. Under the Act, the Agency is also designated as the receiver of all disclosures of information required to be made pursuant to any financial services legislation relevant to its functions including suspicious transactions, reports and disclosures from foreign authorities.

2 Significant Accounting Policies

(a) Presentation of financial statements

(i) Basis of Preparation

These financial statements have been prepared in accordance with International Financial Reporting Standards ("IFRSs") as issued by the International Accounting Standards Board ("IASB"). The principal accounting policies adopted in the preparation of the Agency's financial statements are set out below. The policies have been consistently applied to all the years presented, unless otherwise stated.

The financial statements are prepared under the historical cost convention.

(ii) Presentation and functional currency

The financial statements are presented in United States Dollars ("$"), which is the Agency's functional and presentation currency.

(iii) Significant accounting estimates and judgement

The preparation of financial statements in accordance with IFRS requires the use of certain critical accounting estimates. Management is also required to exercise its judgement in the process of applying Agency's accounting policies. Estimates and underlying assumptions are reviewed on an ongoing basis and are based on historical experience and other factors, including expectations of future events that are believed to be reasonable under the circumstances. Revisions to accounting estimates are recognised in the period in which the estimate is revised and in any future periods affected. Significant judgments, estimates and assumptions made by management in the preparation of these financial statements are disclosed in Note 3.

(b) IFRS compliance and adoption

(i) Standards, amendments and interpretations to existing standards effective and relevant to the Agency

The Agency applied IFRS 16 Leases for the first time. The nature and effects of the changes as a result of adoption of this new accounting standard are described below.

Several other amendments and interpretations apply for the first time in 2019, but do not have an impact on the financial statements of the Agency. The Agency has not early adopted any standards, interpretations or amendments that have been issued but are not yet effective.

- **IFRS 16 Leases**

  IFRS 16 supersedes IAS 17 *Leases*, IFRIC 4 *Determining whether an Arrangement contains a Lease*, SIC 15 *Operating Leases- Incentives* and SIC- 27 *Evaluating the Substance of Transactions Involving the Legal Form of a Lease*. The standards set out the principles for the recognition, measurement, presentation and disclosure of leases and requires lessees to recognise most leases on the statement of financial position.

(Expressed in United States Dollars)

2 Significant Accounting Policies (Continued)

(b) IFRS compliance and adoption (Continued)

(i) Standards, amendments and interpretations to existing standards effective and relevant to the Agency (Continued)

The Agency adopted IFRS 16 using the modified retrospective approach, with recognition of transitional adjustments on the date of initial application (January 1, 2019), without restatement of comparative figures. The Agency elected to apply the practical expedient to not reassess whether a contract is, or contains a lease at the date of initial application. Contracts entered into before the transition date that were not identified as leases under IAS 17 and IFRIC 4 were not reassessed. The definition of a lease under IFRS 16 was applied only to contracts entered into or changed on or after January 1, 2019.

IFRS 16 provides for certain optional practical expedients, including those related to the initial adoption of the standard. The Agency applied the following practical expedients when applying IFRS 16 to leases previously classified as operating leases under IAS 17:

(a) Exclude initial direct costs from the measurement of right-of-use assets at the date of initial application for leases where the right-of-use asset was determined as if IFRS 16 had been applied since the commencement date, and

(b) Reliance on previous assessments on whether leases are onerous as opposed to preparing an impairment review under IAS 36 as at the date of initial application.

As a lessee, the Agency previously classified leases as operating leases based on its assessment of whether the lease transferred substantially all of the risks and rewards of ownership. Under IFRS 16, the Agency recognises right-of-use assets and lease liabilities for its leases.

IFRS 16 changes how the Agency accounts for leases previously classified as operating leases under IAS 17, which were off statement of financial position. On adoption of IFRS 16, the Agency recognised right-of-use assets and lease liabilities as follows:

Operating lease

- Lease liabilities are measured at the present value of the remaining payments, discounted at the Agency's incremental borrowing rate as at January 1, 2019. The Agency's incremental borrowing rate is the rate at which a similar borrowing could be obtained from an independent creditor under comparable terms and conditions. The rate applied was 5%.
- Right-of-use assets are measured at an amount equal to the lease liability, adjusted by the amount of any prepaid or accrued lease payments.
- Measured based on the carrying values for the lease assets and liabilities immediately before the date of initial application (i.e. carrying values brought forward, unadjusted).

The following table presents the impact of adoption IFRS 16 on the statement of financial position as at January 1, 2019:

	December 31, 2018 As originally presented $	IFRS 16 $	January 1, 2019 $
Assets			
Right-of-use asset	-	2,010,252	2,010,252
Liabilities			
Lease liabilities	-	(2,010,252)	(2,010,252)

2 Significant Accounting Policies (Continued)

(b) IFRS compliance and adoption (Continued)

(ii) Standards, amendments and interpretations to existing standards in issue but not yet effective and relevant to the Agency

A number of new standards, amendments to standards and interpretations are effective for annual periods beginning after January 1, 2019 and have not been early adopted in preparing these financial statements. None of these are expected to have a material effect on the financial statements of the Agency.

- IAS 1 *Presentation of Financial Statements* and IAS 8 *Accounting Policies, Changes in Accounting Estimates and Errors* (Amendment Definition of Material) In October 2018, the IASB issued amendments to IAS 1 *Presentation of Financial Statements* and IAS 8 *Accounting Policies, Changes in Accounting Estimates and Errors* to align the definition of 'material' across the standards and to clarify certain aspects of the definition. The new definition states that, "Information is material if omitting, misstating or obscuring it could reasonably be expected to influence decisions that the primary users of general purpose financial statements make on the basis of those financial statements, which financial information about a specific reporting entity."

The amendment to the definition of material is not expected to have a significant impact on the Agency's financial statements.

(c) Property and equipment

All property and equipment held for use in the production or supply of goods or services, or for administrative purposes.

The cost of an asset comprises its purchase price and directly attributable cost of bringing the asset to working condition for its intended use. Expenditures for additions, major improvements and renewals are capitalised; expenditures for repairs and maintenance are charged to expense as incurred. When assets are sold, retired or otherwise disposed of, their cost and related accumulated depreciation and impairment losses are removed from the accounts and any resulting gain or loss is reflected in the profit or loss for the period.

Depreciation is computed on a straight-line basis over the estimated useful life of the assets as follows:

Furniture and equipment	6.6 years
Computer and software	3 years
Leasehold improvements	10 years
Motor vehicles	5 years

Leasehold improvements are amortised over the term of the lease.

An asset's carrying amount is written down immediately to its recoverable amount if the asset's carrying amount is greater than its estimated recoverable amount (see Impairment of non-financial asset).

The residual values and estimated useful life of property and equipment are reviewed and adjusted if appropriate, at each reporting date.

An item of property and equipment is derecognised upon disposal or when no future economic benefits are expected to arise from the continued use of the asset. Any gain or loss arising on derecognition of the asset (calculated as the difference between the net disposal proceeds and the carrying amount of the item) is included in the profit or loss in the year the item is derecognised

(d) Cash and cash equivalents

Cash and cash equivalents include short-term investments and highly liquid investments in money market instruments with a maturity date of three months or less from the acquisition date. These are valued at cost which approximates market value.

2 Significant Accounting Policies (Continued)

(e) Impairment of non-financial assets

Non-financial assets are tested for recoverability whenever events of changes in circumstances indicate that its carrying value may not be fully recoverable. Where the carrying value of an asset exceeds its recoverable amount, which is the higher of value in use and fair value less cost to sell, the asset is written down accordingly.

For the purpose of assessing value in use, the estimated future cash flows are discounted to their present value using discount rate that reflects current market assessments of the time value of money and the risk specific to the asset.

Impairment charges are included in net income, except to the extent they reverse gains previously recognised in other comprehensive income.

(f) Leases

All leases are accounted for by recognising a right-of-use asset and a lease liability except for:

- Leases of low value assets; and
- Leases with a duration of 12 months or less.

For these leases, the Agency recognises the lease payments as an operating expense on a straight-line basis over the term of the lease unless another systematic basis is more representative of the time pattern in which economic benefits from the leased assets are consumed.

IFRS 16 was adopted January 1, 2019 without restatement of comparative figures. For an explanation of the transitional requirements that were applied as at January 1, 2019, see Note 2.b. The following policies apply subsequent to the date of initial application, January 1, 2019.

Lease liabilities are measured at the present value of the contractual payments due to the lessor over the lease term, with the discount rate determined by reference to the rate inherent in the lease unless (as is typically the case) this is not readily determinable, in which case the Agency's incremental borrowing rate on commencement of the lease is used. Variable lease payments are only included in the measurement of the lease liability if they depend on an index or rate. In such cases, the initial measurement of the lease liability assumes the variable element will remain unchanged throughout the lease term. Other variable lease payments are expensed in the period to which they relate.

The lease liability is presented as a separate line in the statement of financial position.

On initial recognition, the carrying value of the lease liability also includes:

- amounts expected to be payable under any residual value guarantee;
- the exercise price of any purchase option granted in favour of the Agency if it is reasonably certain to assess that option;
- any penalties payable for terminating the lease, if the term of the lease has been estimated on the basis of termination option being exercised.

Right-of-use assets are initially measured at the amount of the lease liability, reduced for any lease incentives received, and increased for:

- lease payments made at or before commencement of the lease;
- initial direct costs incurred; and
- the amount of any provision recognised where the Agency is contractually required to dismantle, remove or restore the leased asset.

2 Significant Accounting Policies (Continued)

(f) Leases (Continued)

Subsequent to initial measurement lease liabilities increase as a result of interest charged at a constant rate on the balance outstanding and are reduced for lease payments made. Right-of-use assets are amortised on a straight-line basis over the remaining term of the lease or over the remaining economic life of the asset if, rarely, this is judged to be shorter than the lease term as follows:

Leasehold premises	7.3 years

The right-of-use assets are also subject to impairment. Refer to the accounting policies in Note 2.e.

The right-of-use assets are presented as a separate line in the statement of financial position.

When the Agency revises its estimate of the term of any lease (because, for example, it re-assesses the probability of a lessee extension or termination option being exercised), it adjusts the carrying amount of the lease liability to reflect the payments to make over the revised term, which are discounted using a revised discount rate. The carrying value of lease liabilities is similarly revised when the variable element of future lease payments dependent on a rate or index is revised, except the discount rate remains unchanged. In both cases an equivalent adjustment is made to the carrying value of the right-of-use asset, with the revised carrying amount being amortised over the remaining (revised) lease term. If the carrying amount of the right-of-use asset is adjusted to zero, any further reduction is recognised in profit or loss.

The Agency leases its main office building in the jurisdiction from which it operates.

The Agency did not make any such adjustments during the periods presented.

When the Agency renegotiates the contractual terms of a lease with the lessor, the accounting depends on the nature of the modification:

- if the renegotiation results in one or more additional assets being leased for an amount commensurate with the standalone price for the additional rights-of-use obtained, the modification is accounted for as a separate lease in accordance with the above policy,
- in all other cases where the renegotiated increases the scope of the lease (whether that is an extension to the lease term, or one or more additional assets being leased), the lease liability is remeasured using the discount rate applicable on the modification date, with the right-of-use asset being adjusted by the same amount, and
- if the renegotiation results in a decrease in the scope of the lease, both the carrying amount of the lease liability and right-of-use asset are reduced by the same proportion to reflect the partial of full termination of the lease with any difference recognised in profit or loss. The lease liability is then further adjusted to ensure its carrying amount reflects the amount of the renegotiated payments over the renegotiated term, with the modified lease payments discounted at the rate applicable on the modification date. The right-of-use asset is adjusted by the same amount.

The Agency did not make any such adjustments during the periods presented.

For contracts that both convey a right to the Agency to use an identified asset and require services to be provided to the Agency by the lessor, the Agency has elected to account for the entire contract as a lease, i.e. it does allocate any amount of the contractual payments to, and account separately for, any services provided by the supplier as part of the contract.

(g) Financial assets

(i) Recognition and measurement

The classification of financial assets at initial recognition depends on the financial asset's contractual cash flow characteristics and the Group's business model for managing them. The Group initially measures a financial asset at its fair value plus, in the case of a financial asset not at fair value through profit or loss ("FVTPL"), transaction costs.

2 Significant Accounting Policies (Continued)

(g) Financial assets (Continued)

(i) Recognition and measurement (Continued)

Subsequent measurement

For purposes of measurement, financial assets are classified in four categories:

- Financial assets at amortised cost;
- Financial assets at fair value through other comprehensive income ("FVOCI") with recycling of cumulative gains and losses (debt instruments);
- Financial assets designated at FVOCI with no recycling of cumulative gains and losses upon derecognition (equity instruments); and
- Financial assets at FVTPL.

In order for a financial asset to be classified and measured at amortised cost or FVOCI, it needs to give rise to cash flows that are solely payments of principal and interest ("SPPI") on the principal amount outstanding. This assessment is referred to as the SPPI test and is performed at an instrument level.

The Agency’s strategic model for managing financial assets refers to how it manages its financial assets in order to generate cash flows. The strategic model determines whether cash flows will result from collecting contractual cash flows, selling the financial assets, or both.

Purchases or sales of financial assets that require delivery of assets within a time frame established by regulation or convention in the market place (regular way trades) are recognised on the trade date i.e., the date that the Agency commits to purchase or sell the asset.

(ii) Financial assets at amortised cost

This category is most relevant to the Agency. The Agency measures financial assets at amortised cost if both of the following cosnditions are met:

- The financial asset is held within a business model with the objective to hold financial assets in order to collect contractual cash flows, and
- The contractual terms of the financial assets give rise on specified dates to cash flows that are SPPI on the principal amount outstanding.

Financial assets at amortised cost are subsequently measured using the effective interest ("EIR") method and are subject to impairment. Gains and losses are recognised in the statement of comprehensive income when the asset is derecognised, modified or impaired.

The Agency's financial assets measured at amortised cost comprise trade and other receivables and cash and cash equivalents in the statement of financial position.

Cash and cash equivalents include cash in hand, deposits held at call with banks with original maturities of three months or less from the acquisition date and bank overdrafts.

(iii) Impairment of financial assets

The Agency recognises an allowance for expected credit losses ("ECLs") for all debt instruments not held at FVTPL. ECLs are based on the difference between the contractual cash flows due in accordance with the contract and all the cash flows that the Agency expects to receive, discounted at an approximation of the original EIR method. The expected cash flows will include cash flows from the sale of collateral held or other credit enhancements that are integral to the contractual terms.

For receivables, the Agency applies a simplified approach in calculating ECLs. Therefore, the Agency does not track changes in credit risk, but instead recognises a loss allowance based on lifetime ECLs at each reporting date. The Agency has established a provision matrix that is based on its historical credit loss experience.

2 Significant Accounting Policies (Continued)

(g) Financial assets (Continued)

(iv) Derecognition of financial assets

Financial assets are derecognised and removed from the statement of financial position when the rights to cash flows from financial assets expire, or the financial assets have been transferred and the Agency has transferred substantially all the risks and rewards of ownership of the financial assets. Any interests created or retained on the transferred financial assets are recognised separately as assets or liabilities.

On derecognition of financial assets, the difference between carrying amounts and the total of considerations received and cumulative gains or losses that had been recognised in the statement of comprehensive income.

When the Agency retains substantially all of the risks and rewards of ownership for transferred financial assets, the financial assets continue to be recognised and the consideration received is recognised as a financial liability.

When financial assets are transferred and the Agency neither transfers nor retains substantially all of the risks and rewards of ownership of the financial assets, nor transferred control of the assets, the financial assets continue to be recognised to the extent of the continuing involvement in the financial assets.

(h) Financial liabilities

(i) Recognition and measurement

All financial liabilities are recognised initially at fair value. The Agency's financial liabilities include trade and other payables and retirement benefit obligations.

Subsequent measurement

All trade and other payables and retirement benefit obligations are measure at amortised cost using the effective interest rate method.

(ii) Derecognition of financial liabilities

Financial liabilities are derecognised and removed from the statement of financial position when the obligation specified in the contract is discharged, cancelled, or expires. The difference between the carrying amount of the financial liabilities derecognised and the consideration paid, is recognised in profit or loss.

Where financial liabilities are replaced with the same lender or the terms are substantially modified, the original financial liabilities are derecognised and new financial liabilities have been recorded.

(iii) Offsetting of financial liabilities

Financial assets and financial liabilities are offset and the net amount presented in the statement of financial position when, and only when the Agency has a legally enforceable right to offset the recognised amounts and there is an intention to settle on a net basis, or to realise the asset and settle the liability simultaneously.

(i) Equity instruments

An equity instrument is any contract that evidences a residual interest in the assets of the Agency after deducting all of its liabilities. Equity instruments issued by Agency are recognised at the proceeds received, net of direct issue costs.

(i) General reserves

General reserves represent accumulated surplus of the Agency after deducting associated cost. General reserves may also include effect of changes in accounting policy as may be required by the standard's transitional provisions.

2 Significant Accounting Policies (Continued)

(j) Provisions

Provisions are recognised when the Agency has a present obligation (legal or constructive) as a result of a past event, and it is possible that an outflow of resources embodying economic benefits will be required to settle the obligation and a reliable estimate can be made of the amount of the obligation. Where the Agency expects some or all of a provision to be reimbursed, the reimbursement is recognised as a separate asset, but only when the reimbursement is virtually certain. The expense relating to a provision is presented in the statement of comprehensive income net of any reimbursement. If the effect of the time value of money is material, a provision is discounted using a rate that reflects, where appropriate, the risks specific to the liability. Where discounting is used, the increase in the provision due to the passage of time is recognised as a finance cost.

(k) Retirement benefits

The Agency's retirement benefits are provided under a defined contribution pension plan. Under this plan, the Agency pays fixed contributions into separate entities and will have no legal or constructive obligation to pay further amounts. The contributions payable to defined contribution plans are recognised as a liability and expense during the periods which employees render services. Prepaid contributions are recognised as an asset to the extent that the prepayment will lead to a reduction in future payments or cash refund.

(l) Government grants

Government grants includes contributions received from the BVI Government as well as additional voluntary funding from the British Virgin Islands Financial Services Commission ("BVIFSC"). There are no conditions nor contingencies attached to these grants.

(m) Foreign currency

Transactions in foreign currency are initially translated into the functional currency at the exchange rates prevailing at the transaction date. At the statement of financial position date, financial assets and monetary liabilities expressed in foreign currencies are translated at the closing foreign currency rate. Foreign exchange gains and losses arising from the settlement of such transactions and from the translation of year-end exchange rates of financial assets and monetary liabilities expressed in foreign currencies are recognised in the statement of comprehensive income in the period in which they arise.

(n) Related party transaction and balances

A related party transaction is a transfer of resources, services or obligations between the Agency and a related party, regardless of whether a price is charged.

Parties are considered related if one party has control, joint control, or significant influence over the other party in making financial and operating decisions. An entity that is a post-employment benefit plan for the employees of the Agency and key management personnel of the Agency are also considered to be related parties.

(o) Revenue recognition

Government grant

The Agency derives revenue from contributions by the BVI Government and the BVIFSC based on the contributions designated per Section 12 of the Act. Revenue from contributions are recognised on an accrual basis.

Rental income

Revenue from rental income is recognised in the accounting period in which the services are rendered. Revenue is recognised over time as the services are provided. Revenue is recognised based on the actual service provided to the end of the reporting period as a proportion of the total services to be provided because the customer receives and uses the benefits simultaneously. This is determined based on the time.

Interest income

The Agency also generates revenue through interest income from its investments and deposits with banks. Interest income is recognised as interest accrued on a time basis by reference to the principal outstanding and to the effective interest rate applicable.

2 Significant Accounting Policies (Continued)

(p) Taxation

In accordance with Section 16 of the Act, the Agency is exempted from the payment of taxes on its income and operations and from payment of taxes, duties and rates on its property and documents.

Under the Virgin Islands Payroll Taxes Act, 2004, payroll tax is payable by the employer at the rate of 14% (8% being recoverable from the employees). The first US$10,000 of each employee's remuneration is tax exempt. The Agency and its employees are subject to payroll taxes.

(q) Expense recognition

All expenses are recognised in the statement of comprehensive income on the accrual basis.

3 Critical accounting estimates and judgements

In the application of the Agency's accounting policies, the management is required to make judgements, estimates and assumptions about the carrying amounts of assets and liabilities that are not readily apparent from other sources. The estimates and associated assumptions are based on historical experience and other factors that are considered to be relevant. Actual results may differ from these estimates.

The estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognised in the period in which the estimate is revised if the revision affects only that period, or in the period of the revision and future periods if the revision affects both current and future periods.

(a) Critical judgements in applying accounting policies

The following are the critical judgements, apart from those involving estimates, that the management has made in the process of applying the Agency's accounting policies and that have the most significant effect on the amounts recognised in the statement of financial position.

(i) Going concern

A key assumption in the preparation of financial statements is that the entity will continue as a going concern. The going concern assumption assumes that the Agency will continue in operation for the foreseeable future and will be able to realise its assets and discharge its liabilities in the normal course of operations. A significant amount of judgement has been required is assessing whether the entity is a going concern as described in Note 2.a.iii.

(ii) Determining the lease term of contracts with renewal options

The Agency determines the lease term as the non-cancellable term of the lease, together with any periods covered by an option to extend the lease if it's reasonably certain to be exercised, or any periods covered by an option to terminate the lease, if it is reasonably certain not to be exercised.

The Agency has lease contracts that include extension options. The Agency applies judgement in evaluating whether it is reasonably certain whether or not to exercise the option to renew or terminate the lease. That is, it considers all relevant factors that create an economic incentive for it to exercise either the renewal or termination. After the commencement date, the Agency reassesses the lease term if there is a significant event or change in circumstances that is within its control and affects its ability to exercise or not to exercise the option to renew or to terminate (e.g., construction of significant leasehold improvements or significant customisation to the leased asset).

The Agency included a renewal period as part of the lease term for leases of its main office building. The Agency included a period of 5 years. The Agency typically exercises its option to renew for these leases because there will be a significant negative effect on operations to relocate.

3 Critical accounting estimates and judgements (Continued)

(b) Key sources of estimate uncertainty

The following are the key assumptions concerning the future, and other key sources of estimate uncertainty at the end of the reporting period, that may have significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next financial year.

(i) Useful life of property and equipment

The Agency estimates the useful life of property and equipment based on the period over which the assets are expected to be available for use. The estimated lives of property and equipment are reviewed periodically and are updated if expectations differ from previous estimates due to physical wear and tear, technical or commercial obsolescence and legal or other limits on the use of the assets. The carrying amounts of property and equipment are analysed in Note 4. Based on management's assessment as at December 31, 2019, there is no change in estimated useful life of fixed assets during the year. Actual results, however, may vary due to changes in estimates brought about by changes in factors mentioned above.

(ii) Impairment of non-financial assets

The Agency's policy on estimating the impairment of non-financial assets is discussed in note 2.e. Though management believes that the assumptions used in the estimation of fair values reflected in the financial statements are appropriate and reasonable, significant changes in these assumptions may materially affect the assessment of recoverable values and any resulting impairment loss could have a material adverse effect on the result of operations.

(iii) Borrowing rates used for leases

The Agency estimates the incremental borrowing rates used in the calculation of its right-of-use assets and lease liabilities in relation to its adoption of the IFRS 16. IFRS 16 requires that lease payments shall be discounted using the interest rates implicit in the lease if those rates can be readily determined. If the rate cannot be readily determined, the incremental borrowing rate shall be used. The borrowing rate was determined to be 5%.

(Expressed in United States Dollars)

4 Property and equipment

The breakdown of the Agency's property and equipment as of December 31, 2019 and 2018 is presented below:

December 31, 2019	Furniture and equipment $	Computer and software $	Leasehold improvements $	Motor vehicles $	Total $
Cost					
Balance at December 31, 2018	450,213	265,820	1,394,000	62,000	2,172,033
Additions	5,196	2,004	-	-	7,200
Balance at December 31, 2019	455,409	267,824	1,394,000	62,000	2,179,233
Accumulated depreciation					
Balance at December 31, 2018	172,364	245,319	312,725	11,767	742,175
Depreciation	63,461	19,085	143,750	12,400	238,696
Balance at December 31, 2019	235,825	264,404	456,475	24,167	980,871
Carrying amount					
Balance at December 31, 2019	219,584	3,420	937,525	37,833	1,198,362

December 31, 2018	Furniture and equipment $	Computer and software $	Leasehold improvements $	Motor vehicles $	Total $
Cost					
Balance at December 31, 2017	442,737	263,021	1,434,868	24,000	2,164,626
Additions	7,476	2,799	2,025	38,000	50,300
Impairment	-	-	(42,893)	-	(42,893)
December 31, 2018	450,213	265,820	1,394,000	62,000	2,172,033
Accumulated depreciation					
Balance at December 31, 2017	107,313	218,895	169,144	-	495,352
Depreciation	65,051	26,424	143,581	11,767	246,823
December 31, 2018	172,364	245,319	312,725	11,767	742,175
Carrying amount					
December 31, 2018	277,849	20,501	1,081,275	50,233	1,429,858

Compensation for impairment

Compensation from third party for portion of leasehold improvements that were given up was set-off against retention payable included in accounts payables and accruals in the statement of financial position. The amount of compensation impairment as at December 31, 2019 was $ NIL (2018: $ 42,893).

(Expressed in United States Dollars)

5 Leases

The Agency leases an office space for its operational head office. The details of right-of-use asset and lease liability are as follows:

(a) Right-of-use asset

The following table detail the right-of-use asset as at December 31, 2019.

	Building **$**
Cost	
Balance at January 1, 2019	2,010,252
Amortisation	(274,125)
Balance at December 31, 2019	1,736,127

(b) Lease liability

The following table detail the lease liability as at December 31, 2019.

	2019 **$**
Balance at January 1, 2019	2,010,252
Interest expense	95,201
Lease payments	(332,210)
Balance at December 31, 2019	1,773,243
Less: current portion	(240,689)
Non-current portion	1,532,554

The following table detail the maturity for the lease liability as at December 31, 2019.

	2019 **$**
Up to three months	58,940
Between 3 and 12 months	181,749
Between 1 and 2 years	254,266
Between 2 and 5 years	852,134
Over 5 years	426,154
	1,773,243

(Expressed in United States Dollars)

6 Other assets

The following tables details the other assets as at December 31, 2019 and 2018.

	2019 $	2018 $
Other assets - current		
Recoverable expenses	9,142	2,876
Due from officer	4,625	10,000
	13,767	12,876
Other assets - Non-current		
Security deposit	117,123	117,123
	130,890	129,999

Upon the signing of the lease agreement, the Agency paid a security deposit of $117,123. As at December 31, 2019 and 2018, the amount is showing as other assets in the statement of financial position.

7 Time deposits

As at December 31, 2019, the Agency holds investments in the form of certificates of deposit placed in local banks with a total principal and interest amount of $1,032,162 (2018: $1,029,481). All deposits have original deposit terms of at least one year and mature in November 2020. For the year ended December 31, 2019, Time deposits earned total interest of $7,205 (2018: $4,549).

Asset Fund

Under the Act the Agency is required to maintain bank accounts known as Asset Fund, into which monies provided by the House of Assembly and proceeds arising out of an asset sharing agreement shall be paid.

Included in time deposits are proceeds received from the BVI Government for the conviction and settlement of the IPOC case (see Note 10).

An amount of $822,218 (2018: $822,218) remains payable to the Financial Investigation Unit of the Bermuda Police Service ("BPSFIU") relating to the IPOC International Growth Fund Limited ("IPOC") court order.

8 Other receivables

The following table details the other receivables as at December 31, 2019.

	2019 $	2018 $
Rental income	12,179	-
	12,179	-

9 General reserves

The Agency was established as a statutory corporation and no share capital was assigned to it. The Agency is funded mainly by grants from the BVI Government and the BVIFSC.

The General reserves account was established according to Section 12 (5) of the Act, where the Agency is required to establish a reserve account into which the surplus on the budget approved for the Agency's expenditure for any financial year is allocated.

(Expressed in United States Dollars)

10 Accounts payable and accruals

The following tables details the Accounts payable and accruals as at December 31, 2019 and 2018.

	2019	2018
	$	$
IPOC investigation costs	822,218	822,218
Other accrued expenses	139,303	89,165
	961,521	911,383

IPOC investigation costs

On July 10, 2007, the Agency entered into a Memorandum of Understanding ("MOU") with the BPSFIU with respect to the investigation of IPOC, a BVI-registered entity, its related companies and persons. IPOC was suspected of engaging in criminal conduct and/or holding property representing the proceeds of criminal conduct. Under the MOU, the Agency and BPSFIU would cooperate, on the basis of reciprocity, in the analysis of information concerning transactions suspected of being related to IPOC, its related entities and persons.

In accordance with the MOU, it was agreed that BPSFIU and the Agency would share equally all proceeds received from (and by extension, all expenses incurred in) the investigation. Investigations of the IPOC case incurred costs of $2,542,268 of which BPSFIU paid $992,809. Proceeds of $2,200,000 was received by the Agency, on behalf of both parties. A refund of $822,218 is due to BPSFIU.

On April 30, 2008, the High Court of the Virgin Islands (the "High Court") convicted IPOC and its related companies of two qualifying offences under the Proceeds of Criminal Conduct Act, 1997 (the "Criminal Conduct Act"). The High Court ruled that the benefit and pecuniary advantage obtained by IPOC as a result of the offences under the Criminal Conduct Act, including interest, was $45,455,431. A cost order of $2,200,000 was issued by the High Court whereby the Agency and BPSFIU recovered a significant portion of their expenses relating to their investigations. This was received by the Agency in 2009. As at December 31, 2019, a total of $822,218 (2018: $822,218) remained outstanding and payable to BPSFIU related to this court order. The above outstanding amount is presented as part of accounts payable and accruals in the statement of financial position.

11 Retirement benefit obligations

In accordance with the BVI Labour Code, 2010, the Agency as an employer is required to make provisions for retirement benefits to be paid to permanent employees. To comply with this requirement, the Agency provides retirement benefits as follows:

Employees of the Agency

The Agency which has not established its own pension plan, opted to join the defined contribution pension plan (the "Plan") established by the BVIFSC.

Under the Plan which is administered by Trustees appointed by the BVIFSC, the BVIFSC and the Agency (as employers) contribute 15% of employees' basic salary and the employees contribute a minimum of 5%. The employees' interest in the employers' contribution commences to vest after 7 years employment and is fully vested after 10 years.

For the year ended December 31, 2019, the Agency incurred pension expense of $114,856 (2018: $120,647) for employees participating in the Plan, of which $14,676 (2018: $13,162) is payable.

Employees Seconded from Central Government

Employees seconded to the Agency from the BVI Government continue their entitlement to receive retirement benefits from the BVI Government.

The BVI Government offers post-employment benefits in the form of gratuities which are calculated according to set formulas based on the length of service and salaries or wages in the final year of service.

(Expressed in United States Dollars)

11 Retirement benefit obligations (Continued)

Depending in the length of service, employees may be entitled to one or more of the following:

- compassionate gratuities;
- reduced pension plus gratuities; and
- full pension.

The Agency is obligated to compensate the BVI Government for the amount of contributions that are due for these seconded employees.

For the year ended December 31, 2019, the Agency incurred pension expense of $14,307 (2018: $21,068) for the seconded employees, of which $63,655 (2018: $49,348) is payable.

The retirement benefit obligations are broken down as follows:

	2019 $	2018 $
BVI Government	63,655	49,348
BVIFSC	14,676	13,162
	78,331	62,510

12 Contributions from the BVI Government and the BVIFSC

Under section 12 of the Act, the Agency is funded by monies appropriated by the House of Assembly of the Virgin Islands. Additional funding is provided by a portion of such assets obtained by the BVI Government under an asset sharing agreement, as the House of Assembly may, by resolution approve.

The BVIFSC has voluntarily contributed 5/12th of the Agency's budget up to a maximum of $500,000 per year to assist in the funding of the Agency's operations which is complementary to the BVIFSC's role as regulator of financial services within and from the BVI.

During the year ended December 31, 2019, the Agency received contributions from the BVI Government and the BVIFSC amounting to $1,672,500 (2018: $1,672,500) and $750,000 (2018: $750,000), respectively. During the year, there was no funding provided from any asset sharing agreement.

13 Employee costs

The following tables details the employee costs as at December 31, 2019 and 2018.

	2019 $	2018 $
Salaries	1,029,080	1,029,640
Pension expense	131,483	140,652
Allowances and other benefits	107,301	111,493
National health insurance	73,954	71,630
Payroll tax	49,531	50,848
Social security	29,369	30,153
	1,420,718	1,434,416

The Agency had an average number of full-time employees during the year of 22 (2018: 22).

(Expressed in United States Dollars)

14 Operational risk management

Operational risk is the risk of loss arising from system failure, human error, fraud or external events. When controls fail to perform, operational risk can cause damage to reputation, have legal or regulatory implications or can lead to financial loss. The Agency cannot expect to eliminate all operational risks, but by initiating an effective control framework and by monitoring and responding to potential risks, the Agency is able to manage risks.

15 Financial risk management

The Agency is exposed to the following risks from its use of financial instruments:

- credit risk
- liquidity risk
- market risk (including currency risk, interest rate risk, other price risk)

The Board of Directors has overall responsibility for the determination of the Agency's risk management objectives and policies and, whilst retaining ultimate responsibility for them, they have delegated the authority for designing and operating processes that ensure the effective implementation of the objectives and policies to the Agency's management. The Board of Directors receive regular reports from management through which it reviews the effectiveness of the processes put in place and the appropriateness of the objectives and policies it sets.

The Agency's overall risk management programme seeks to maximise the returns derived for the level of risk to which the Agency is exposed and seeks to minimise potential adverse effects on the Agency's financial performance. The Agency uses different methods to measure and manage the various types of risk to which it is exposed.

(a) Credit risk

Credit risk is the risk of financial loss to the Agency if a counterparty to a financial instrument fails to meet its contractual obligations. The Agency is mainly exposed to credit risk from cash and cash equivalents, time deposits and other assets.

The maximum exposure to credit risk, before any credit enhancement at December 31, 2019 and December 31, 2018 is the carrying amount of the financial assets as set out in the statement of financial position as follows:

	2019 $	2018 $
Cash and cash equivalents	1,680,167	1,416,615
Time deposits	1,032,162	1,029,481
Other assets	13,767	12,876
	2,726,096	2,458,972

The Agency does not have significant exposure to any individual customer or counterparty. To reduce exposure to credit risk, the Agency holds its cash and cash equivalents and time deposits with several financial institutions whose parent companies have credit ratings as rated by Moody's Investors Services and Standard and Poor's Financial Services LLC as follows:

	2019 $	2018 $
A-3	375,842	376,577
Ba1	1,304,326	1,040,038
Ba2	627,716	626,150
BBB-	404,445	403,331
Total Rated	2,712,329	2,446,096
Non-rated	13,767	12,876
Total	2,726,096	2,458,972

(Expressed in United States Dollars)

15 Financial risk management (Continued)

(a) Credit risk (Continued)

The table below summarises the aging of the Agency's financial assets:

December 31, 2019	Current $	31-60 days $	Above 60 days $	Total $
Other assets	725	6,123	6,919	13,767
Time deposits	-	-	1,032,162	1,032,162
Cash and cash equivalents	1,680,167	-	-	1,680,167
	1,680,892	6,123	1,039,081	2,726,096

December 31, 2018	Current $	31-60 days $	Above 60 days $	Total $
Other assets	625	3,501	8,750	12,876
Time deposits	-	-	1,029,481	1,029,481
Cash and cash equivalents	1,416,615	-	-	1,416,615
	1,417,240	3,501	1,038,231	2,458,972

(b) Liquidity risk

Liquidity risk is the risk that the Agency will encounter difficulty in meeting its short-term obligations associated with financial liabilities. The Agency is exposed to liquidity risk from its financial liabilities.

Liquidity needs are monitored by the Agency to ensure it has sufficient funds to meet its liabilities when due, under normal and unexpected conditions, without incurring unacceptable losses or breaches in borrowing limits or covenants. Liquidity is managed by monitoring forecasted and actual cash flows, maintaining sufficient funds to meet expected operational expenses and matching maturity profiles of financial assets and liabilities.

The table below shows the liquidity profile of the financial liabilities based on their undiscounted cash flows and their earliest maturity:

December 31, 2019	On demand $	1 to 3 months $	Total $
Account payables and accruals	822,218	139,303	961,521
Retirement benefit obligations	63,121	15,210	78,331
	885,339	154,513	1,039,852

December 31, 2018	On demand $	1 to 3 months $	Total $
Account payables and accruals	822,218	89,165	911,383
Retirement benefit obligations	49,348	13,162	62,510
	871,566	102,327	973,893

Refer to Note 5 for the liquidity profile for the lease liability.

(c) Market risk

Market risk is the risk that changes in market prices, through foreign exchanges rates, interest rates, and equity prices, will cause fluctuations to the fair values and cash flows of financial instrument holdings.

15 Financial risk management (Continued)

(c) Market risk (Continued)

(i) Interest rate risk

Interest rate risk is the risk that changes in market interest rates will cause fluctuations to the fair values and cash flows of the Agency's financial instrument holdings. Floating rate instruments expose the Agency to cash flow interest rate risk whereas fixed rate instruments expose the Agency to fair value interest rate risk.

Interest rate sensitivity

At December 31, 2019 and 2018, the Agency has minimal interest bearing financial instruments. As a result, the Agency is not exposed to significant interest rate risk.

(ii) Currency risk

Currency risk is the risk that changes in foreign exchange rates will cause fluctuations to the fair values and cash flows of the Agency's financial instrument holdings.

Foreign currency sensitivity

At December 31, 2019 and 2018, the Agency has no financial instruments denominated in currencies other than United States Dollars. As a result, the Agency is not exposed to significant foreign currency risk.

(iii) Equity price risk

Equity price risk is the risk that changes in market prices of equity securities will cause fluctuations to the fair values and cash flows of Agency's financial instrument holdings.

Equity price risk sensitivity

At December 31, 2019 and 2018, the Agency did not hold any investments and thus is not exposed to equity price risk.

16 Subsequent events

No events have occurred subsequent to December 31, 2019 and before the date of the report that would have a significant effect on these financial statements other than those already disclosed in the note below:

(I) COVID-19

On March 11, 2020, the World Health Organization declared the outbreak of a respiratory disease caused by a new coronavirus as a “pandemic”. First identified in late 2019 and known now as COVID-19, the outbreak has impacted thousands of individuals worldwide. In response, many countries have implemented measures to combat the outbreak which have impacted global business operations. As of the date of issuance of the financial statements, the Agency’s operations have not been significantly impacted, however, the Agency continues to monitor the situation. No impairments were recorded as of the balance sheet date as no triggering events or changes in circumstances had occurred as of yearend; however, due to significant uncertainty surrounding the situation, management's judgment regarding this could change in the future. In addition, while the Agency’s results of operations, cash flows and financial condition could be negatively impacted, the extent of the impact cannot be reasonably estimated at this time.