



FINANCIAL SERVICES COMMISSION OF BELIZE

Annual Work Programme 2026

February 2026

Message from the Director General

Driving Sustainable Economic Growth

The 2026 Annual Work Programme of the Financial Services Commission marks a meaningful milestone for our institution. For the first time, we are publishing a consolidated, institution-wide plan that sets out – in plain terms, and publicly – what every department of this institution commits to accomplishing in the year ahead. This document represents both an accountability undertaking to the public and a management discipline that I believe will strengthen the quality and coherence of our work throughout the year.

The financial services sector in Belize is evolving rapidly. New business models, emerging asset classes, and advancing technologies are reshaping what it means to operate in a non-banking financial market – and reshaping, in turn, what it means to regulate one effectively. That evolution is, on balance, a source of opportunity for Belize. But it also demands that the FSC be a different kind of regulator than the institution it has traditionally been more proactive, more data-driven, and more deliberate in how it positions the Commission at the intersection of market integrity and responsible innovation.

Let me be clear about how the FSC understands that intersection. Rigorous, risk-based supervision and an environment that welcomes sound innovation are not competing objectives. They are, together, the foundation on which a credible and dynamic financial services sector is built. Our regulatory agenda for 2026 – organized around Stakeholder Awareness, Compliance with Statutes, the International Landscape, Technology Integration, and Information Security – reflects that conviction. Each of the five strategic priorities in this Programme is designed to ensure that the FSC can fulfil its supervisory mandate without impeding the development of a sector that Belize has a genuine interest in seeing thrive.

In practical terms, 2026 will see the meaningful expansion of our Risk-Based Supervision framework, the continued development of our legislative and regulatory agenda consistent with IOSCO, FATF, and OECD standards, and the deployment of foundational technology investments – including our Artificial Intelligence Strategy and a new Management Information System – that will make us more precise and effective in our work. We will also advance investor education, stakeholder engagement, and information security, each of which is essential to the Commission’s long-term institutional credibility.

Transparency is not incidental to this Programme – it is central to its purpose. The FSC will report on progress against these commitments regularly. That commitment to reporting is a discipline we impose on ourselves, because the value of a work programme lies not in its publication but in its execution and honest, public assessment.

Claude B.F. Haylock
Director General
Financial Services Commission of Belize

Annual Work Programme 2026

Executive Summary

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The 2026 Annual Work Programme is the Financial Services Commission's first consolidated, institution-wide operational plan, developed from workplan submissions across all six FSC departments. It organizes the Commission's regulatory priorities and planned initiatives around five strategic themes drawn directly from the FSC Strategic Plan 2025–2027. The Programme is modelled on the annual programmes published by leading regulatory bodies internationally, including the SEC, ESMA, and IOSCO, and is intended to serve as a public accountability document against which the Commission's performance can be assessed throughout the year.

Strategic Priorities for 2026

1. Stakeholder Awareness

The FSC will deepen its engagement with investors, licensees, and the broader public through targeted financial literacy campaigns and a formal stakeholder engagement framework. The Commission will establish and operationalize an External Relations function, formalize partnerships with foreign regulators through Memoranda of Understanding, and implement a Grievance Redress Mechanism to ensure transparent and timely resolution of complaints and disputes.

2. Compliance with Statutes

The full rollout of the Risk-Based Supervision (RBS) framework across all regulated sectors is a central commitment of the 2026 Programme. The Compliance and Licensing & Enforcement departments will conduct a structured programme of on-site inspections and desk-based reviews, with sector-specific priorities aligned to identified risk concentrations. Enforcement capacity in AML/CFT/CPF will be reinforced, and updated guidance circulars will be issued to regulated entities throughout the year.

3. International Landscape

The FSC will conduct a comprehensive review of its regulatory and legislative framework to identify and address gaps relative to IOSCO Principles, FATF Standards, and OECD guidelines. A dedicated gap analysis on FinTech and emerging asset classes will inform the development of fit-for-purpose regulatory frameworks. The Commission will also develop cybersecurity guidelines for market participants and pursue active engagement with relevant international standard-setting bodies.

4. Technology Integration

Technology investment in 2026 will be anchored by two major deployments: the FSC's Artificial Intelligence Strategy and Phases 1 and 2 of the Management Information System. These initiatives will materially improve the Commission's data management, decision-making, and supervisory capabilities. A Business Intelligence framework will be implemented to support data-driven oversight, and inter-departmental digital collaboration will be strengthened across all teams.

5. Information Security

The Commission will implement a comprehensive Information Security Management System aligned with ISO 27001 standards, establishing the policies, procedures, and controls required to protect organizational data and mitigate cyber risk. A Business Continuity and Disaster Recovery Plan will be developed and tested. Staff cybersecurity awareness and resilience will be strengthened through targeted training, and an interim data collection system will be deployed to support national and international reporting obligations.

Preface

The Financial Services Commission of Belize (the “Commission” or “FSC”) is pleased to present its Annual Work Programme for 2026, setting out its supervisory, regulatory, and operational priorities for the year ahead.

This publication reflects the Commission’s commitment to international standards of regulatory transparency and accountability. The IOSCO Objectives and Principles of Securities Regulation call on regulators to be transparent in their operations and use of resources and to make their actions publicly known to the market. The Principles further require regulators to adopt clear and consistent regulatory processes, including by making their policies, priorities, and planned activities available to the public. The publication of an Annual Work Programme demonstrates how the Commission deploys its resources to achieve its regulatory objectives, consistent with the expectation that regulators demonstrate risk-based approaches to resource allocation.

The Commission intends to present these priorities at the FSC Speaks conference in early 2026 and to report publicly on progress against these commitments on a yearly basis. This cycle of forward-looking disclosure and public reporting on progress is an important component of the Commission’s regulatory transparency.

1. The FSC Strategic Plan 2025–2027

The Commission is Belize’s non-banking financial services sector regulator, established under the Financial Services Commission Act (2023) and responsible for administering, among others, the Securities Industry Act (2021) and overseeing the Belize Companies and Corporate Affairs Registry. The FSC holds regulatory and supervisory responsibility for a diverse and growing range of non-banking financial services, including securities businesses, financial service providers, registered agents, and managing services providers.

In January 2025, the Commission published its Strategic Plan 2025–2027, establishing the institutional direction for a three-year period. The Plan is anchored in the Commission’s vision of being “an adaptable regulator that fosters competitiveness, fairness, safety, and soundness in the financial sector and facilitates capital formation,” and its mission “to protect investors; ensure fair, efficient, and transparent markets; reduce systemic risks and support the growth and development of Belize’s evolving financial services industry.” It is guided by three core values: Adaptability, Integrity, and Accountability.

The Strategic Plan is organized around four Key Result Areas: **Stakeholder Cooperation**, fostering collaboration and mutual understanding with market participants and the broader Belizean community; **Financial Safety and Stability**, ensuring a secure and transparent financial sector through robust regulatory frameworks and proactive oversight; **Technology Optimization**, leveraging technology to enhance operational efficiency, decision-making, and cybersecurity; and **Governance and Management**, strengthening institutional structures, accountability, and human resource capacity.

The Commission’s strategy is designed to achieve these objectives through three operational pillars: Financial Literacy, to ensure that market participants and the public can

engage meaningfully with the financial sector; Consumer Protection, directed at risk-based supervision and targeted regulation of high-risk products; and Responsible Innovation, fostering market development while managing the risks associated with new financial products and technologies. Rather than treating financial inclusion as a separate initiative, the Commission views it as the supporting infrastructure for a thriving capital market.

For 2026, the Director General has designated five priorities for the Commission: 1) increasing public and stakeholder awareness of the regulatory regime; 2) ensuring compliance with financial services statutes; 3) addressing the evolving international regulatory landscape; 4) improving internal processes through technology; and 5) strengthening information security. The sections that follow describe how the Commission will execute against these priorities.

2. Licensing, Authorization, and Market Development

For most market participants, engagement with the Commission begins with the licensing or registration process. The Licensing and Authorization Department's 2026 programme is designed to ensure that the rules governing market entry are clear, that the cost of compliance is predictable, and that the licensing process operates efficiently. The programme sequences policy clarity first, reinforcement through training and engagement second, and system improvements third.

Regulatory Clarity. The Commission will publish and operationalize updated guidelines and rules across several areas in the first half of the year, including digital asset services, nominee services, mortgage brokering and lending, the role of compliance officers under the Securities Industry Act, and license categories under the Financial Services Commission Act. Webinars will provide practical guidance on these regulatory texts, and capital requirements will be aligned with the applicable regulations. Mid-year, additional guidance will be issued for registered entities operating as approved trading systems, regulations for contracts for difference and leveraged products, processes for mutual funds, and support for upgrading the Municipal Securities Act and its regulations.

Economic Substance and Market Integrity. The Commission will implement its upgraded Economic Substance framework and resume on-site inspections for a selected portfolio of entities, in coordination with the Compliance Department. Subject to legislative passage, the Commission will conduct outreach on the Digital Asset Act to assist market participants in understanding its requirements. The Commission will also prepare supervisory and licensing frameworks to operationalize the Digital Asset Act in a manner consistent with international regulatory standards.

System Modernization. The Commission will deploy new modules in its LicenSys digital licensing platform to support nominee services and licence surrendering. These enhancements will move additional licensing and registration processes into structured digital workflows, improving turnaround times and auditability.

Industry Engagement. Throughout the year, the Commission will maintain direct engagement with licensees and registrants to identify challenges and improve the regulatory experience. A comprehensive review of registered-agent information will ensure market data remains accurate and up to date. Market participants are encouraged to participate in

quarterly webinars, provide feedback during consultations, and respond to outreach from supervision teams.

3. Supervision Priorities

Once licensed or registered, entities are subject to ongoing supervision. The Commission's supervision programme for 2026 is anchored in the Strategic Plan's designation of risk-based supervision as a strategic priority.

Risk-Based Supervision Framework. The Commission's risk-based supervision framework is structured around six core supervisory areas: 1) conditions for license or registration; 2) the compliance function within regulated entities; 3) conflicts of interest identification and management; 4) segregation and separate holding of client assets; 5) disclosure, sales, and marketing practices; and 6) complaints handling and redress. The Commission is conducting a benchmarking exercise across all six areas to assess its supervisory approach against international standards and identify gaps requiring attention.

For 2026, the Commission has selected two areas for focused benchmarking and examination: **conditions for license and registration**, to ensure that regulated entities are operating in line with the standard terms, conditions, and limitations set for them; and the **compliance function**, to assess whether regulated entities maintain a compliance function that enables them to prevent and mitigate risk.

Cyber Resilience. The Commission will establish supervisory expectations for cyber security and data protection across regulated entities, followed by outreach to assist entities in meeting those expectations and thematic examinations to test cyber resilience.

Supervisory Examination Follow-Through. The Commission will continue to address weaknesses identified through prior supervisory examinations, including follow-up examinations focused on business risk assessments, beneficial ownership information, and record maintenance. Dedicated guidance on accounting records obligations will assist registered agents in understanding compliance expectations.

AML/CFT Compliance. The Commission will address weaknesses identified in the national risk assessment and the Caribbean Financial Action Task Force mutual evaluation by issuing guidelines, conducting outreach, and examining the development and implementation of risk-based AML/CFT compliance programmes, including business risk assessments, suspicious activity monitoring, and reporting. Continued risk-based supervision of NPOs and NGOs will ensure awareness of terrorist financing risks and compliance with recordkeeping and audit requirements.

4. Regulatory Development and Enforcement

Where supervision detects ongoing non-compliance or emerging gaps, the Commission must have the ability to respond through enforcement actions and regulatory reforms. This section outlines the Commission's plans to enhance its enforcement framework, modernise its regulatory scope, and strengthen international cooperation.

Market Feedback and Engagement. Effective regulation requires a clear understanding by the regulator of the practical challenges, concerns, and experiences faced

by market participants. The Commission will establish new channels for market participants and the public to give direct input, such as feedback mechanisms, structured surveys, and public engagement through investor education events, including participation in World Investor Week.

Enforcement Credibility and Consistency. The Commission plans to strengthen its enforcement framework to ensure that enforcement outcomes are consistent, proportionate, and predictable. This aims to reinforce deterrence and promote compliance in the market. These efforts include enhancing cross-departmental coordination on enforcement referrals, increasing transparency of enforcement activities, and developing an Administrative Penalty Guideline. This guideline will outline the principles for imposing sanctions, facilitate tracking enforcement trends, and help identify common risk areas.

Expanding the Regulatory Scope. The Commission will identify and advance new areas for regulatory development, with the objective of ensuring that the regulatory framework keeps pace with market evolution and addresses gaps in the current regime.

Market Securities Regulations. The Commission is finalizing its review of the Market Securities Regulations, with planned amendments scheduled for Board review and gazetting later in this year. Public information-sharing sessions will be held to accompany the publication of any new or amended provisions.

International Alignment and Cooperation. The Commission will keep incorporating insights from its international engagements, such as the IOSCO Annual Meeting, into its domestic regulatory focus. The Commission will also work on enhancing memoranda of understanding and cooperation agreements with regional and international partners to strengthen supervisory collaboration and institutional capacity.

5. Technology and Information Security

The Commission's 2026 technology programme serves two of its priority objectives: improving internal processes through technology and strengthening information security. The objective is to make the Commission a more effective supervisor by improving the quality, security, and accessibility of its data, automating manual processes, and equipping staff with modern tools.

Information Security. The Commission will implement a structured information security management programme aligned with the ISO 27001 standard, progressing from policy and scope definition early in the year, through risk assessments and treatment plans, to internal audits and continuous-improvement processes. The objective is to protect the sensitive supervisory and licensing data the Commission holds and to build a security posture that meets international expectations.

Artificial Intelligence. The Commission will take a phased, governance-first approach to artificial intelligence. Early in the year, the Commission will establish governance structures and ethical-use standards. Proofs of concept and skills development will follow, with successful pilots transitioning to monitored production by late in the year. The objective is to ensure the Commission can responsibly leverage AI to improve regulatory effectiveness without introducing unmanaged risk.

Data and Supervisory Intelligence. High-quality and timely supervisory data is essential to effective risk-based supervision. The Commission will deploy an interim data tool to centralize regulatory and supervisory datasets needed for national and international evaluations, creating a single source of truth while the broader management information system is developed. Late in the year, dedicated compliance and enforcement modules will be deployed within the LicenSys platform, enabling end-to-end data management and evidence-based decision-making across licensing, supervision, and market surveillance.

IT Service Delivery and Collaboration. The Commission will modernize its internal technology operations by adopting an integrated service management platform that standardizes how technology incidents, requests, and changes are handled. A published service catalogue and formalized operating practices will improve accountability and response times. The Commission will also roll out structured use of the digital collaboration platforms to improve information-sharing and decision-making across departments.

6. Stakeholder Cooperation and External Relations

The Commission's effectiveness as a regulator depends in part on the public's understanding of its role and of the financial services market it oversees. In 2026, the Commission will advance its stakeholder engagement and international relations capabilities.

Investor Education. The Commission will develop a three-year Investor Education Strategy to provide a structured, multi-year approach to improving financial literacy among Belizean citizens. In 2026, eleven outreach initiatives will be implemented, quarterly webinars will be expanded, and a Sustainable Finance and Green Investment Education Initiative will be launched in collaboration with key stakeholders.

Stakeholder Engagement. The Commission will develop and implement a Stakeholder Engagement Framework to embed structured input from market participants and the public into policy development and regulatory reform. The objective is to ensure the Commission's regulatory decisions are informed by the experience of market participants and stakeholders they affect.

International Relations. As the regulatory environment becomes increasingly interconnected, coordinated international engagement is essential. In 2026, the Commission will formalize its External and International Relations function, ensuring compliance with international commitments, strengthening institutional positioning, and improving coordination between technical departments and external stakeholders.

Regulatory Reform Coordination. The Commission will support the development and implementation of the national insolvency framework, including the operationalization of the Office of the Official Receiver and related cross-cutting regulatory reform initiatives.

Digital Channels. The Commission will enhance its website and Investor Centre, automate key internal workflows, and migrate administrative processes to a modern service-desk platform.

7. Capacity Building and Professional Development

Effective regulation depends on a skilled and knowledgeable workforce. The Commission recognizes that investments in its people are investments in the quality of its regulatory outcomes.

A twelve-month training programme will build technical depth in priority areas including digital assets, trust administration, anti-money laundering, and core supervisory skills. Staff will participate in international programmes, including the SEC Institute and STEP LATAM, to ensure exposure to international regulatory practices.

A quarterly knowledge-sharing series will strengthen cross-departmental understanding of regulatory and enforcement issues, building institutional expertise and fostering a culture of continuous learning. Targeted training in cybersecurity awareness, digital tools, and artificial intelligence competencies will support the Commission's technology objectives.

Continued investment in staff expertise is essential to the Commission's ability to deliver on the priorities set out in this Annual Work Programme and to maintain a regulatory institution aligned with international standards.

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