



## Trinidad and Tobago Securities and Exchange Commission

### Virtual Assets and Virtual Assets Service Provider Act, 2025

#### Fact Sheet

#### What is the VA/VASP Act?

The **VA/VASP Act** was assented to on December 23, 2025, and is now in effect. The conduct of virtual asset activities as a business in or from within Trinidad and Tobago is temporarily prohibited **until December 31, 2026**.

During the prohibition period, a Regulatory Sandbox has been established and is being administered by the Trinidad and Tobago Securities and Exchange Commission (“the Commission”) into which VASPs operating prior to commencement of the VA/VASP Act, may be authorised to conduct certain virtual asset activities under conditions authorised by the Commission.

#### What are Virtual Asset Activities?

**Virtual Asset Activities** include the conduct of one or more of the following activities, for or on behalf of another person:

- (a) the exchange between virtual assets and fiat currencies;
- (b) the exchange between one or more forms of virtual assets;
- (c) the transfer of virtual assets;
- (d) the safekeeping or administration of virtual assets or instruments enabling control over virtual assets;
- (e) the participation in and provision of financial services related to an offer of an issuer or sale of a virtual asset; and
- (f) such other activity as may be prescribed

Note however, that the Act does not permit the holding/custody/retention of virtual assets on behalf of another person as a virtual asset activity.

### Why does the VA/VASP Act prohibit the operations of VASPs?

This temporary prohibition seeks to prevent the operation of illegal scams, money-laundering and terrorist-financing involving virtual asset activities, and aids the development of a safe environment for use of virtual assets.

### Who will be affected by the temporary prohibition?

The temporary prohibition will affect persons currently engaged in virtual asset activities as a business or on behalf of other persons. The temporary prohibition **does not** apply to use of virtual assets by individuals in their purchase of goods and services but only to the conduct of virtual asset activities on behalf of another person or as a business.

### What is the Regulatory Sandbox, and why is it being introduced?

The Regulatory Sandbox presents an opportunity to allow existing local virtual asset service providers to operate in an environment that includes safeguards for citizens of Trinidad and Tobago.

It will:

- create new business opportunities;
- improve citizens' access to innovative financial products and services;
- allow these benefits to unfold within a safe environment for Trinidad and Tobago's financial system and consumers by assisting the Commission to develop an effective and appropriate supervisory framework for the sector; and
- provide Trinidad and Tobago with the best opportunity to meet its international obligations as outlined by the FATF Recommendations and Immediate Outcomes.

VASPs operating at the time of enactment of the VA/VASP Act will have thirty (30) days within which to apply to participate in the Regulatory Sandbox. Should they be unable to meet the criteria for participation, a VASP will have until the end of the three (3) month moratorium period to cease operations and notify the Commission that they have so ceased.

### What are the criteria for participation in the Regulatory Sandbox?

The main criteria for participation in the Regulatory Sandbox requires that a VASP:

- be a locally **registered corporate entity** with a physical presence and data server in Trinidad and Tobago operating before enactment of the VA/VASP Act;
- submit notification to the Commission within thirty days of commencement of the VA/VASP Act, advising of its operation, and complete and submit an application for entry into the Regulatory Sandbox with requisite attachments.

- not be currently subject to any regulatory or criminal enforcement proceedings for fraud, dishonesty or other financial impropriety, cybercrime and laws pertaining to AML/CFT/CPF in Trinidad and Tobago or a foreign jurisdiction; and
- meet such additional requirements as may be prescribed by the Commission in issued Regulations.

#### **When will application forms for entry be available?**

Application forms with instructions for entry into the Regulatory Sandbox are available on the Commission's website ([place link here](#)). Only complete applications accompanied by payment of the relevant fee will be considered for processing. For more information, please email [VASPSandbox@ttsec.org.tt](mailto:VASPSandbox@ttsec.org.tt).

#### **What if a person continues to operate a VASP business without applying for entry?**

A person who continues to operate as a VASP after the end of the moratorium period, without authorisation by the Commission, will be liable on summary conviction to a fine of five million dollars and to imprisonment for five years, and in the case of a continuing offence, to a fine of five hundred thousand dollars for every day on which the offence continues. A senior officer of a company convicted of the offence is liable to similar penalties.

The Commission may also apply additional legal remedies stipulated in the Act to give effect to the prohibition.