HANDBOOK
for the questionnaire in regards to Anti-Money Laundering (AML) and Terrorist Financing (TF)

A. General Questions:

Question 1: In which language can the questionnaire process be completed?

The whole procedure, including the questionnaire, is available in Greek and English and the selected language can be changed at any time choosing the respective choice.

Question 2: Which are the mandatory fields that the supervised persons must fill out on the homepage of the process (https://www.cyprusbar.org/LogInPageFill.aspx)?

Supervisee Type:
1. Lawyer (Natural Person): mandatory fields are the “Lawyer Registration Number” and the “Identification Number”.
2. LLCs: mandatory fields are the “Lawyer Registration Number” and the “LLC number”.
3. ASPs: mandatory fields are the “Lawyer Registration Number”, “ASP Number” and the “LLC number”.

Notes:
- At points 2 and 3 the “Lawyer Registration Number” is the registration number of the lawyer running the procedure for the ASP or the LLC.
- At point 3 “LLC number” is the number of the LLC to which the ASP belongs.

When proceeding to the next step of the procedure the supervised person should declare the services provided. Depending on the declaration of the services provided, the supervised person will need to or not complete the questionnaire (see question 2 and 3).
Question 3: Who is excluded from completing the questionnaire?

The supervised persons (natural or legal) that are excluded from completing the questionnaire are the following:

1. **Natural Person:**
   - LLC/Partnership/ASP employee who is not independently provides administrative services
   - Sole practitioner who provides litigation services only

2. **Legal Person:**
   - Legal entity which provides litigation services only

After the declaration of the provided services from the supervised persons that are excluded from completing the questionnaire, the procedure is finalised.

Question 4: Who should complete the questionnaire?

The questionnaire should be completed by the person (legal or natural) providing Administrative Services (as defined in section 4 of Law 196 (I) / 2012 as applicable):

1. **Natural Person:**
   - Self-employed lawyer who provides administrative services and does not own an Administrative Service Provider (i.e. ASP) company under his control, then the questionnaire must be filled by the lawyer himself;
   - In the case where a lawyer is employed by LLC or Partnership or Legal Office that provides services and that lawyer provides also independently administrative services, then the lawyer should fill a separate questionnaire.

2. **Legal Person:**
   - Self-employed lawyer, who owns an ASP and provides his administrative services through this company, then the questionnaire has to be filled by the ASP;
   - In the event that the administrative services are provided by a LLC, Partnership or a Legal Office (with more than one lawyer), then the questionnaire must be filled by one of the above-mentioned entities.
     - If an ASP, which is owed by a LLC, Partnership or Legal Office, have the same clientele with the above-mentioned entities, then the questionnaire should be filled by the LLC, Partnership or the Legal Office.
In the case where administrative services are provided both by LLC or Partnership or Legal Office and ASPs but the ASPs have different clientele and invoices separately from the above-mentioned entities, then separate questionnaires must be filled by each entity.

**Question 5: Which is referred as reporting period?**

The reporting period is the calendar year from 1 January to 31 December. (i.e. 01/01/20XX-31/12/20XX)

**Question 6: Who is considered as “Client”?**

The legal entities only are considered as a Client. In the case where a natural person owns multiple companies, then the companies are considered as separated Clients.

Exceptionally, for the purposes of the questionnaire, the Client is considered a natural person to whom the “property purchase and sale service” is provided.

**Question 7: Who is considered as “Active Client”?**

Active Client, for the purpose of the questionnaire, are those who were invoiced by the firm during the year under review (reporting period).

**B. Points explanation:**

1. **MANAGEMENT**

**Point 1.3.1: Total Number of offices/branches**

- The total number of offices/branches which referred to the point 1.3.1 should be consistent with the numbers given to the points 1.3.1.1 – 1.3.1.6.

**Point 1.3.1.4:** Updated EU high-risk third countries (available [here](#)).

**Point 1.3.1.5:** Updated Financial Action Task Force (FATF) list with High risk and non-cooperative jurisdictions (available [here](#) and [here](#))

**Point 1.3.1.6:** Updated list of EU tax list countries (available [here](#))
2. COMPLIANCE DEPARTMENT

Point 2.6: Knowledge and expertise of the Compliance Officer in relation to compliance
- General description regarding the expertise and experience of the Compliance Officer.

3. OTHER INFORMATION

Point 3.1: Total number of staff in the firm
- The total number of staff referred to the point 3.1 should be consistent with the numbers given to the points 3.2 – 3.4.

Points 3.3 and 3.4: Total number of Lawyers and Total Number of employees (except lawyers)
- Self-employed lawyers are not required to completed the specific sections.
- LLC is required to complete only the field related to it
- ASP is required to complete only the field related to it
- Legal Offices/Partnerships are required to complete only the field related to them

4. CLIENT INFORMATION

Point 4.1: Total number of all active Clients as of 31st of December of the reporting period
- The Supervised Entity should declare the total number of all active Clients as was calculated on the last day of the reporting period (31/12/XX).
- The number of active Clients referred to the point 4.1 should be consistent with the numbers given in the following points: 4.2 (4.2.1 – 4.2.3), 4.3 (4.3.1 – 4.3.7), 5 (5.1 – 5.3 και 5.4.1 – 5.4.6)

Point 4.1.1: Total number of Transferred out/Resigned/Strike off/Dissolved Clients during the reporting period
- The number of Clients referred to the point 4.1.1 is not included in the number of active Clients of the point 4.1
- This point is referred specific to the Clients who were Transferred out/Resigned/Strike off/Dissolved from the 1st of January until the 31st of December of the reporting year.

Point 4.1.2: Total number of potential Clients who had been rejected before the establishment of the business relationship during the reporting period
- The number of Clients referred to the point 4.1.2 should be consistent with the numbers given in the points 4.1.2.1 - 4.1.2.3.
Point 4.3: Provided Services

- In the case where the Supervised Entity provides all the administrative services, then the number of Clients which will be included in the point 4.3.1, will **not** be inserted again in the following points 4.3.2-4.3.7.
- All the natural persons to whom the “property purchase and sale service” is provided, will be included in the points 4.3.3 και 4.3.4

5. CLIENT CATEGORISATION

Point 5.1: Number of Low Risk Clients

- As Low Risk Clients can be considered the categories included in the ANNEX II of the Law 188(I)/2007.

http://www.cylaw.org/nomoi/enop/ind/2007_1_188/appendix-ap8b5756d4-b257-a1c6-8124-e4a85e72af82.html

Point 5.3: Total Number of High-Risk Clients

- As High-Risk Clients can be considered the categories included in the ANNEX III of the Law 188(I)/2007.

http://www.cylaw.org/nomoi/enop/ind/2007_1_188/appendix-ap9da1ba3c-901c-3c7d-19d2-e45793426722.html

- The number of Clients referred to the point 5.3 should be consistent with the numbers given in the “Sub-categories of High-Risk Clients”

Point Σημείο 5.5: Number of new clients during the reporting period

- The number of all new clients during the reporting period (01/01/20XX-31/12/20XX), even though the business relationship was terminated before the end of the said year.

8. FINANCIAL INFORMATION

Point 8.2: Total turnover during the reporting period

- It refers to the gross income, before the deduction of any costs, expenses or taxes of the supervised entity, as this is presented in its Financial Statements (Income statement audited or management, whichever is available) as of the reporting period.

**Note:** When submitting the questionnaire, if the stated numbers do not match as provided, then the submission procedure will not be possible by the system.