



COMPLIANCE CIRCULAR

25/2025 [CC 25_2025]

To:

**ALL FIRMS OF THE INSTITUTE
ALL COMPLIANCE OFFICERS OF THE
INSTITUTE**

Date:

11 September 2025

Subject:

**Consolidated AML- CFT/Sanctions
Questionnaire for the year 2024 – New
Portal for submissions (ICPAC Data
Portal)**

ICPAC would like to remind you of your firm's annual obligation to complete and submit the consolidated **AML/CFT & Sanctions Questionnaire for 2024** to ICPAC. The obligation applies to ALL firms that hold a practising certificate from the Institute, irrespective of its activities (i.e. Audit, Accounting, Provision of Administration Service) up until **31 December 2024**.

The obligation for submission of the relevant Questionnaire relates to **ALL licensed firms**, irrespective of whether they were practicing in their professional capacity (self-employed, limited companies, partnerships) or they were dormant in the effective year and irrespective of whether they belong in a group of companies (for purposes of holding other companies shares), which are also required to submit the Questionnaire.

Release of the 2024 Questionnaire

Please be advised that the **2024 Consolidated AML/CFT & Sanctions Questionnaire** will be released on **Monday, 15 September 2025, and will be accessed via a new platform.**

An email from noreply@formresponse.com titled **"2024 – Consolidated AML/CFT & Sanctions Questionnaire Has Been Sent to You"** will be sent to the Compliance Officer's dedicated email address.

If you do **not receive the email by 15:00 on Monday 15 September 2025**, please contact ICPAC promptly at compliance@icpac.org.cy. ⚠ Remember to also check your spam folder.

New Submission Procedure

Please note that the submission process has changed. All firms must follow the below instructions below **before starting** the Questionnaire:

[Step-by-Step Guide](#) – This guide outlines how to access and complete the Questionnaire.

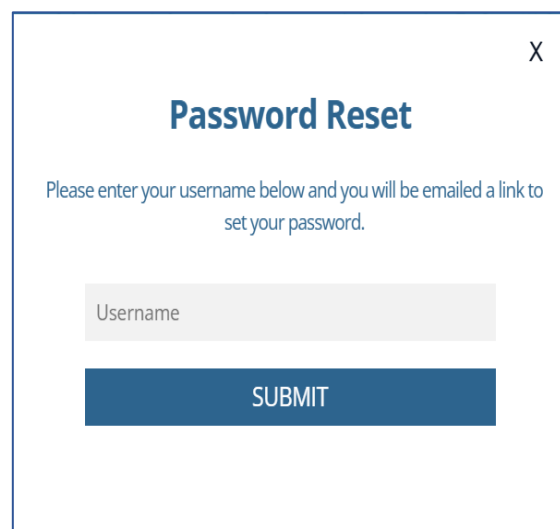
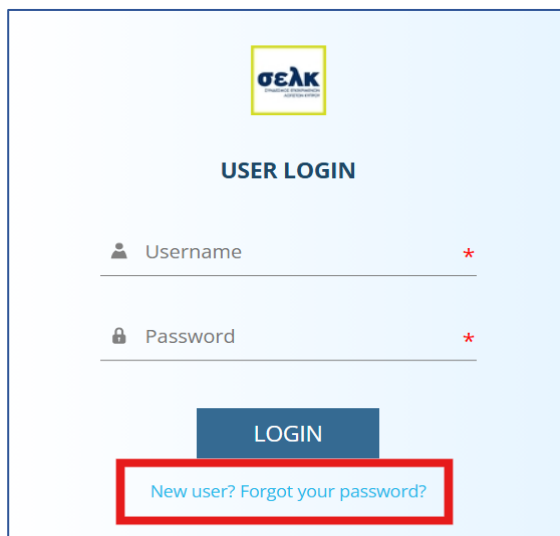
⚠ **Important:** Failure to follow these steps may result in data loss.

Mandatory Training Sessions

A training session on how to access and save the Questionnaire will be available **either through our Youtube channel [here](#) or through the VinciWorks platform**, both in Greek and English language. The Compliance Officer of each firm is responsible for completing the Questionnaire and as such is **required** to watch this session.

You can access VinciWorks [here](#). You should already have received your login credentials—please check your email for the message titled ' "[LMS] Course Enrolment Notification"' received by noreply@vinciworks.com.

If you have misplaced your credentials, you can select '**Forgot your password**' and reset it by including your username (ICPAC member number OR Compliance Officer Number COOFxxx) and select '**SUBMIT**'. An automated email will be sent to your designated email address which you can access to re-set your password.



Once logged in, start the session titled '***Training - Getting Started with the AML-CFT & Sanctions Questionnaire 2024 (ENG)***'.

Submission Deadline

All completed Questionnaires must be submitted no later than **30 October 2025**.

Supporting Materials for Completing the Questionnaire

To assist you in accurately completing the Questionnaire, please refer to the following resources:

[Step by step Guide to Access the Questionnaire and save your responses - ENG](#)

[Training - Getting Started with the AML CFT & Sanctions Questionnaire 2024 ENG](#)

[Guidance Notes AML-CFT-Sanctions 2024](#)

[ICPAC Data Portal - Section 24 - Table](#)

[ICPAC Data Portal - Print - Submit - Download - Send message](#)

[FAQ on ICPAC DATA PORTAL - ENG](#)

Questionnaire Overview

The 2024 Questionnaire contains **27 sections** that collect details concerning your firm's internal controls, policies and procedures, financial information, risk management systems, Client Due Diligence, record-keeping, training, and more.

Sections 24–26 will only be visible if the firm:

1. Holds an ASP license (as indicated in Question 2.3),
2. Reports any income in Questions 6.2.6 or 6.2.7, or
3. Reports any clients in Sections 8.7 or 8.8.

Completing the questionnaire is estimated to require *between 10 minutes (if the firm is dormant or holding) or around 2 to 3 hours, assuming the firm is active and depending on the services provided, and all the required data has been collected*. It is imperative that you allocate sufficient time and resources to accurately review the questions, thereby ensuring the provision of precise and accurate responses.

Important Note

Upon submission of the Questionnaire, a PDF report containing all submitted responses will be sent to the Compliance Officer's dedicated email address. It is important that this document is also saved in the firm's internal records.

Need Help?

If you have any questions or require assistance regarding the portal or the Questionnaire, please contact our support team **via an email** titled 'AMLQ24 Query' at:

 **compliance@icpac.org.cy**