

Administrative Services Providers (ASPs) under ICPAC COMPLIANCE CALENDAR 2023

January		February		March		April	
Date	Task	Date		Date		Date	
May		June		July		August	
Date	Task	Date	Task	Date	Task	Date	Task
		30	ICPAC-Final date for the Submission of the Consolidated AML Questionnaire. <i>[final submission date subject to confirmation by the Regulator]</i>				
September		October		November		December	
Date	Task	Date	Task	Date	Task	Date	Task

S/N	TASK	IMPORTANT NOTES
1	Financial Statements	No provision and obligation in the ICPAC Directive for the Financial Statements to be reviewed by the regulator.
2	Internal Audit report	Only where appropriate and proportional to the size and nature of the activities of the Firm, an independent internal audit service covering the AML/CFT system of the firm, should be established for verification of internal policies, controls and procedures.
3	Trusts	All new trust registrations/changes in trusts should be declared to ICPAC within 15 days from the trust establishment/changes or within 15 days from the date of any change. Applicable Trust should be registered with CyTBOR and any changes updated.

4	Continuing Professional Development	By no later than 1 January each year, all Members of ICPAC must submit electronically to ICPAC an annual CPD declaration in the prescribed form.
5	ICPAC Forms	<p>“Natural Persons Employed by an ASP” Form – notification to ICPAC for employees who offer services under article 4 of the ASP law.</p> <p>“Amendment of Firm’s Details” Form regarding any updates to the firm’s information/directors/shareholders/compliance officer.</p> <p>Obligation to notify for all subsidiary companies that are used for the provision of administrative services. Please note that there is no deadline for the submission of such notices</p>
6	Compliance Officer Certification	Compliance officers are required to undertake the relevant examination indicated by ICPAC as per the relevant guidelines of the Regulator

It is noted that each member firm is obliged to comply with the circulars/guidelines/announcements of the relevant authorities and regulators as this are issued from time to time. Any information contained in this notification/announcement, or any other notifications/announcements or circulars is subject to change and should be assessed on its own merits.