

14 November 2023

## Circular to Licensed Corporations, SFC-licensed Virtual Asset Service

### Providers and Associated Entities

### Anti-Money Laundering / Counter-Financing of Terrorism

### Updated AML/CFT Self-Assessment Checklist

The Securities and Futures Commission (SFC) today posted an updated AML/CFT Self-Assessment Checklist, which reflects the latest Guideline on Anti-Money Laundering and Counter-Financing of Terrorism (For Licensed Corporations and SFC-licensed Virtual Asset Service Providers) (AML/CFT Guideline)<sup>1</sup>. A copy of the updated checklist can be downloaded from the SFC website at ([https://www.sfc.hk/-/media/EN/files/IS/AML/AML\\_Self-Assessment\\_Checklist\\_EN\\_2023](https://www.sfc.hk/-/media/EN/files/IS/AML/AML_Self-Assessment_Checklist_EN_2023)).

The AML/CFT Self-Assessment Checklist aims to provide a structured and comprehensive framework for licensed corporations, SFC-licensed virtual asset service providers and associated entities to assess their compliance with the key AML/CFT requirements<sup>2</sup>. Licensed corporations, SFC-licensed virtual asset service providers and associated entities are advised to use the self-assessment checklist as part of their regular review to monitor their AML/CFT compliance.

Senior management of licensed corporations, SFC-licensed virtual asset service providers and associated entities should ensure that any compliance deficiencies identified during the regular reviews are rectified in a timely manner. As part of our supervision, we may request licensed corporations, SFC-licensed virtual asset service providers and associated entities to provide documentary evidence of the performance of such review and its results.

Should you have any queries regarding the contents of this circular, please contact Ms Kiki Wong at 2231 1569 who will assist in referring your queries to the relevant officer.

Intermediaries Supervision Department  
Intermediaries Division  
Securities and Futures Commission

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<sup>1</sup> The latest AML/CFT Guideline became effective on 1 June 2023, except for the requirements for submitting the required information to beneficiary institution immediately (as set out in paragraphs 12.11.10 and 12.11.13 of the latest AML/CFT Guideline) which will take effect on 1 January 2024. For details, please refer to the SFC's 24 May 2023 circular in relation to the Amendments to Anti-Money Laundering and Counter-Financing of Terrorism Guidelines (<https://apps.sfc.hk/edistributionWeb/api/circular/openFile?lang=EN&refNo=23EC21>).

<sup>2</sup> The SFC has also taken the opportunity to refine the existing questions in the checklist to enhance their clarity so as to assist the assessment of compliance with the AML/CFT requirements.