

# The Anti-Money Laundering and Counter-Terrorist Financing Compliance Self-Assessment Form 2025 ("AML/CTF Form")

## Frequently Asked Questions ("FAQs")

### 1. Why does the Law Society require me to complete the AML/CTF Form?

As the designated regulatory body under the Anti-Money Laundering and Counter-Terrorist Financing Ordinance (Cap. 615) ("AMLO"), we have a statutory duty to oversee lawyers' compliance with AML/CTF requirements, including Client Due Diligence and record-keeping.

The AML/CTF Form is a crucial tool in our statutory obligation to deploy a risk-based approach to our AML supervision. We are proactively managing this responsibility, and this exercise is one of the measures that enable us to fulfil this duty.

### 2. What is the purpose of the AML/CF Form?

The AML/CTF Form is designed to guide firms in reviewing their own compliance and to help identify areas where additional guidance or training may be useful. It will also assist the Law Society in understanding where support is most needed, allowing us to develop practical guidance and other resources for members.

The goal is to make compliance easier and more collaborative, to establish a shared understanding of AML/CTF requirements across the sector, support firms in strengthening their compliance frameworks, and provide an opportunity to raise questions. Following completion of the AML/CTF Form, members will be provided with opportunities to attend AML/CTF training, including:

- **webinars and workshops** where firms can share experience and discuss how to meet their AML requirements in practice
- **training sessions** for individual firms.

### 3. Is the AML/CTF Form Compulsory?

Yes, all Legal Practices and Sole Practitioners are required to complete the AML/CTF Form. This requirement is based on a resolution by the Council of the Law Society. As the designated regulatory AML supervisory body, the Law Society has a statutory duty to oversee compliance with AML/CTF obligations.

Completing the AML/CTF Form is an important part of meeting your professional responsibilities, and non-compliance may be treated as professional misconduct.

### 4. What will the Law Society do with the responses to the AML/CTF Form?

Your responses will not be used for any enforcement purposes, and firms should not worry about any negative consequences. It's important that firms answer the questions honestly, without concern that doing so will result in any immediate negative consequences.

The AML/CTF Form is designed as a helpful tool for the Law Society to understand and identify areas where additional support may be beneficial. By gathering this information, we can:

- develop further guidance and educational materials for members

- share best practices across the profession
- promote greater consistency and standardisation in AML/CTF compliance

The AML/CTF Form also helps us identify firms that may benefit from AML/CTF training. You'll also have the option to indicate if you would like to receive such training by selecting "Yes" to **question D5** in the AML/CTF Form.

#### 5. Will the Law Society share my information?

All information submitted through the AML/CTF Form will be handled with confidence. The data collected will be used solely for the Law Society's internal assessment of the state of AML/CTF compliance in the sector and to identify training needs that may benefit firms. No information will be disclosed to any third party. If statistical reporting is required, it will be presented only in an aggregated and anonymised format.

#### 6. When is the deadline for submitting the AML/CTF Form?

The AML/CTF Form submission period is open from **5 January 2026** to **2 March 2026**. The deadline for submission is **02 March 2026**, after which the online form will no longer be accessible.

#### 7. Where and how do I complete the AML/CTF Form?

The link to the AML/CTF Form can be accessed at the Law Society's AML website under the "[\*AML/CTF Compliance Self-Assessment Form\*](#)" tab. The link to the AML/CTF Form is at the bottom of that page.

Please click on the link to open the online form and complete all required fields. Once you have entered your information, ensure accuracy and then click the "Submit" button. The Law Society will receive your submission automatically.

#### 8. Can I submit the AML/CTF Form via e-mail or post?

No. All submissions must be completed using the online form available on the Law Society's AML website under the "[\*AML/CTF Compliance Self-Assessment Form\*](#)" tab.

Submissions via e-mail or post will not be accepted. The online process is simple and ensures efficient resource management as well as accurate handling of your information.

#### 9. What is the "reporting period" under the AML/CTF Form?

The reporting period of the self-assessment covers the period from **01 January 2025 to 31 December 2025**.

#### 10. Who should complete this AML/CTF Self-Assessment Form?

The AML/CTF Form should be completed either by the:

- (a) Money Laundering Reporting Officer ("MLRO")
- (b) Compliance Officer
- (c) Partner or employee of the Legal Practice responsible for AML/CTF oversight and reporting of suspicious transactions within the firm.

#### 11. If I don't provide legal services that trigger AML/CTF obligations, do I still need to complete the AML/CTF Form?

Yes, all Legal Practices and Sole Practitioners are required to complete the AML/CTF Form.

If your practice does not engage in any legal services as defined in Section B (Legal Services Information) of the AML/CTF Form, you only need to complete **Section A** (Legal Practice Information) and **Section B** of the AML/CTF Form. The final question in Section B will ask you to provide an overview of the work that your practice is currently engaged in.

## 12. What if I am a new practice?

We require all Legal Practices to complete the AML/CTF Form for the period of operation from **1 January 2025 to 31 December 2025**.

If your practice has not provided any legal services as defined in **Section B** (Legal Services Information) of the AML/CTF Form, you only need to complete **Section A** (Legal Practice Information) and **Section B** of the AML/CTF Form. The final question in Section B will ask you to provide an overview of the work that your practice is currently engaged in, and state that you are a newly established practice.

If you have recently started providing such services and have not yet implemented some AML/CTF requirements, please select “No” for the relevant questions or use the comment box to state that you are a new practice and are in the process of implementing these measures (if required). Additionally, in **Section D** of the AML/CTF Form, you may indicate whether you would like assistance that the Law Society can provide.

## 13. What should I expect after submission of the AML/CTF Form?

After receiving information from the firms, the Law Society will start delivering AML/CTF training sessions to law firms, either on-site or via Zoom. These sessions are collaborative in nature and will cover the following key areas:

- Use of the Law Society’s UN Sanctions Screening Tool – guidance for firms without existing name-screening solutions on how to effectively use the tool.
- Scope of Compliance – clarification on which legal services fall under CDD and record-keeping requirements.
- CDD Requirements – practical steps for conducting due diligence in accordance with the AMLO and the PDP requirements.
- Red Flags and Key Risk Indicators – identifying warning signs and risk factors associated with money laundering and terrorist financing.
- Suspicious Transaction Reporting – filing and reporting requirements, including best practices for timely and accurate submissions.
- Law Society Compliance Tools – a walkthrough of resources and tools developed by the Law Society to support firms in meeting AML/CTF obligations.

## 14. How will the Law Society choose which firms will receive the AML/CTF training?

The Law Society plans to deliver a blended training program through various formats, including webinars, interactive workshops, and one-to-one training offered to individual firms.

For in-person training, priority will be given to firms that have expressed interest in one-to-one AML training in their AML/CTF Form responses. We will also reach out to firms that may benefit most from tailored support based on their responses, including newly established practices and a random selection, to ensure broad engagement. Firms are also encouraged to write to us if they would like to arrange such training in advance of our engagement.

## 15. Who should I contact with queries?

For any inquiries or assistance, please contact the Law Society’s AML Team at **+852 3958 2394** or email [aml@hklawsoc.org.hk](mailto:aml@hklawsoc.org.hk).