



Index Reference:

Regulations: Practice Direction P, The Anti-Money Laundering and Counter-Terrorist Financing Ordinance (Cap. 615)

CIRCULAR 26-1 (SD)

2 January 2026

26-1 (SD) LAUNCH OF THE ANTI-MONEY LAUNDERING/COUNTER TERRORIST FINANCING COMPLIANCE SELF-ASSESSMENT FORM

1. As the designated regulatory body under the Anti-Money Laundering and Counter-Terrorist Financing Ordinance (Cap. 615), the Law Society is committed to supporting its members in managing money laundering and terrorist-financing risks effectively. Alongside this commitment, the Law Society has a statutory duty to oversee members' compliance with the statutory Client Due Diligence ("CDD") and record-keeping requirements. To fulfil these responsibilities, the Law Society is enhancing its supervisory framework through a proportionate, risk-based approach.
2. This work is also being undertaken to address the recommendations set out by the Financial Action Task Force ("FATF") in the [Mutual Evaluation Report of Hong Kong \(2019\)](#) PDF, which called on the Law Society to establish a robust, risk-based AML supervision of legal professionals.

Mandatory Anti-Money Laundering/Counter-Terrorist Financing Compliance Self-Assessment Form ("AML/CTF Form")

3. As part of ongoing efforts to meet FATF recommendations and enhance sector-wide compliance, the Law Society is rolling out the AML/CTF Form. Completion and online submission of this form is mandatory for all law firms in Hong Kong. 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 members' compliance with the AML/CTF obligations.
4. Completion of the AML/CTF Form is an important part of meeting the Law Society's professional responsibilities, and non-compliance may be treated as professional misconduct.
5. The AML/CTF Form is designed to guide firms in reviewing their own compliance with the AML/CTF requirements 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 and in developing practical guidance and other resources for members.
6. 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.

How to Complete the AML/CTF Form?

1. **Online access to the Form:** The link for online submission of the AML/CTF Form is available on the Law Society's AML website under the "[AML/CTF Compliance Self-Assessment Form](#)" tab. Please click [here](#) to access the link to the AML/CTF Form. On the AML website, members will also find a comprehensive [Frequently Asked Questions](#) PDF document to assist with completing the form, as well as a sample AML/CTF Form for reference purposes only. **Please note that all responses to the AML/CTF Form must be submitted online using the link provided on the AML website; submissions by email or post will not be accepted.**

2. Submission Period: 5 January 2026 – 2 March 2026

3. Submission Method: Online only (no email or postal submissions)

4. Relevant Period of Self-Assessment: 1 January 2025 – 31 December 2025

5. Complete All Required Fields: Enter your information accurately.

6. Submission of the AML/CTF Form: Click the “Submit” button at the end of the form. The Law Society will receive your submission automatically, and you will receive a confirmation email.

7. Record Keeping: Refer to the front page of the AML/CTF Form for instructions on saving your submission and making amendments if needed.

Training and Engagement Opportunities:

7. To support firms in meeting their AML/CTF obligations, the Law Society will deliver targeted training sessions starting in 2026, both on-site and through webinars or workshops. These sessions will focus on the following areas:

1. Scope of compliance and CDD requirements

2. Red flags and risk indicators

3. Suspicious transaction reporting

4. Law Society's compliance tools.

8. As part of this process, the Law Society will contact firms to arrange an AML/CTF training session. Firms are also encouraged to write to us if they would like to arrange such training or discuss a particular area in advance of our engagement.

9. The Law Society will host two information sessions for members to provide guidance on the AML/CTF Form and the submission process. These sessions are scheduled for 14 January 2026 and 6 February 2026. Members are encouraged to register for any of these sessions through the Law Society App or the Hong Kong Academy of Law website.

10. For a detailed overview of the AML supervisory background, requirements, and progress, as well as the link to the AML/CTF Form and submission guidance, please refer to the AML webpage [AML/CTF Compliance Self-Assessment Form](#).

11. If you have any enquiries regarding this Circular, please contact the Law Society on +852 2846 8804 or by email to aml@hklawsoc.org.hk.