
TO : Regulated Entities

- i. Cyprus Investment Firms
- ii. UCITS¹ and, where relevant, their Management Companies
- iii. Alternative Investment Funds ('AIFs')² established or managed in Cyprus and where relevant, their Alternative Investment Fund Managers ('AIFMs')
- iv. Non-Financial Counterparties

FROM : Cyprus Securities and Exchange Commission

DATE : December 23, 2025

CIRCULAR NO. : C747

SUBJECT : Clarification to the data collection for onboarding of financial and non-financial counterparties subject to the obligation to apply for authorisation and validation for their initial margin models in accordance with Article 11(3) of Regulation (EU) No 648/2012 on OTC derivatives, central counterparties and trade repositories ('EMIR')

The Cyprus Securities and Exchange Commission ("CySEC") wishes with this circular to clarify the following, in relation to CySEC Circular C740 ("C740"):

The example provided in paragraph B5 of C740 regarding activities exceeding clearing thresholds captures the non-financial counterparties.

Yours sincerely,

Panikkos Vakkou
Vice Chairman
Cyprus Securities and Exchange Commission

cc. Central Bank of Cyprus
Cyprus Stock Exchange

¹ UCITS set up exclusively for the purpose of service one or more employee share purchase plans are out of scope.

² AIFs set up exclusively for the purpose of serving one or more employee share purchase plans, or AIFs which are securitization special purpose entities as defined by Article 2(1) of the Alternative Investment Fund Managers Law of 2013 (Law 56(I)/2013 as amended) are out of scope.