
TO : **Cyprus Investment Firms**
FROM : **Cyprus Securities and Exchange Commission**
DATE : **April 2, 2012**
CIRCULAR No : **CI144-2012-09**
FILE No : **E.K. 6.1.14**
SUBJECT : **Transfers of money between client's accounts**

The Cyprus Securities and Exchange Commission ('the Commission') wishes with the current circular, to inform the Cyprus Investment Firms ('the CIFs') of their obligation, when making transfers of money between clients' accounts, to apply the following procedures:

1. To ask, from both clients directly involved (originator of the transfer and recipient of the transfer), to complete a form of order and acceptance of the money transfer between the clients' accounts ('the Form').
2. Before performing the money transfer, the responsible, for this purpose, person (e.g. accountant) to confirm the order and acceptance of the money transfer by telephone or by other equivalent method. If the confirmation is made by telephone, the telephone communication to be recorded.
3. The Compliance Officer for the prevention of money laundering and terrorist financing of the CIF:
 - (a) to verify the authenticity of the signatures on the Form and
 - (b) to record (e.g. on the Form) the reasons and to confirm the legality of the purpose for which the transfer of money is made.
4. All records and information related to this purpose are filed in the involved customers' folders.

Sincerely

Demetra Kalogerou
Chairman, Cyprus Securities and Exchange Commission