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**TO** : **Regulated Entities**

- i. Crypto Asset Service Providers ('CASPs')**
- ii. Cyprus Investment Firms ('CIFs')**
- iii. Administrative Service Providers ('ASPs')**
- iv. UCITS Management Companies ('UCITS MC')**
- v. Self-Managed UCITS ('SM UCITS')**
- vi. Alternative Investment Fund Managers ('AIFMs')**
- vii. Self-Managed Alternative Investment Funds ('SM AIFs')**
- viii. Self-Managed Alternative Investment Funds with Limited Number of Persons ('SM AIFLNP')**
- ix. Companies with sole purpose the management of AIFLNPs**
- x. Small Alternative Investment Fund Managers ('Small AIFMs')**

**FROM** : **Cyprus Securities and Exchange Commission**

**DATE** : **23 January 2025**

**CIRCULAR NO.** : **C679**

**SUBJECT** : **European Banking Authority's ('EBA') public Consultation Paper on Draft Regulatory Technical Standards amending Commission Delegated Regulation (EU) 2018/1108, on the criteria for the appointment of central contact points for crypto-asset service providers to strengthen the fight against money-laundering and terrorism financing in host Member States**

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The Cyprus Securities and Exchange Commission ('CySEC') wishes with this Circular to inform the Regulated Entities of the following:

The EBA has launched a [public consultation](#) on draft Regulatory Technical Standards ('RTS') specifying the criteria according to which crypto-asset service providers ('CASPs') should appoint a central contact point to ensure compliance with local anti-money laundering and countering the financing of terrorism (AML/CFT) obligations of the host Member State.

A first version of such regulatory standards was published in the Official Journal of the EU in 2018. Since their scope was limited to PSPs and EMIs, the co-legislator amended Article 45(9)

of Directive (EU) 2015/849 on 9/6/2023, to extend it to CASPs. The EBA decided to update and amend the Commission Delegated Regulation (EU) 2018/1108 in this regard.

CASPs can provide services in other Member States through establishments other than branches. Once established, CASPs have to comply with local AML/CFT obligations, even if their establishments are not 'obliged entities' themselves. The draft RTS sets out the criteria for determining the circumstances in which the appointment of a central contact point is appropriate, as well as the functions of those central contact points.

Comments to the consultation paper can be sent by clicking on the 'Submit response' button on the [EBA's consultation page](#). The deadline for the submission of comments is 4<sup>th</sup> February 2025.

All contributions received will be published by the EBA following the end of the consultation, unless requested otherwise.

The CySEC encourages the Regulated Entities to respond to the said consultation paper.

Sincerely,

Dr George Theocharides  
Chairman, Cyprus Securities and Exchange Commission