

#### Introduction

This document is developed to provide more specific guidelines for the application of the ECF-Compliance Certification. It includes information related to (A) Eligibility Criteria, (B) Application Procedure, and (C) Recertification Arrangement for the application(s) of the following professional qualifications:

#### Core Level

• Associate Compliance Professional (ACOP)

#### **Professional Level**

- Certified Compliance Professional General Compliance Stream (CCOP(GC))
- Certified Compliance Professional Investment and Insurance Compliance Stream (CCOP(IIC))

### A. Eligibility Criteria

#### 1. Relevant Practitioner

The Enhanced Competency Framework (ECF) on Compliance is targeted at "Relevant Practitioners (RPs)", engaged by an **Authorized Institution (AI)**<sup>1</sup>. The ECF-Compliance is intended to apply to staff whose primary responsibilities involve performing the compliance function (other than AML/ CFT compliance).

Specifically, it is aimed at RPs located in the Hong Kong office of an AI who perform the compliance job roles as listed in the Table below.

<sup>&</sup>lt;sup>1</sup> An institution authorized under the Banking Ordinance to carry on the business of taking deposits. Hong Kong maintains a Three-tier Banking System, which comprises banks, restricted license banks and deposit-taking companies. Authorized institutions are supervised by the HKMA.



### Table – Job roles of the ECF-Compliance

	Role 1 –	Role 2 –
	General Compliance	Investment and Insurance
		Compliance
Key Tasks	Assist senior management in	Report to and advise senior
	meeting their responsibility in	management on matters
	terms of understanding,	concerning compliance with
	monitoring and managing	relevant regulatory
	compliance related matters	requirements including sales
	Establish compliance review	suitability, financial need
	programmes to ensure	analysis requirements and cross
	compliance with applicable	border selling restrictions
	legal and regulatory	Investigate suspicious activities
	requirements and codes of	and handle non-compliance
	conduct	incidents whilst monitoring the
	Handle non-compliance issues	remedial actions taken
	and monitor the remedial	<ul> <li>Provide regulatory advice and</li> </ul>
	actions taken	analysis (and raise queries
	Develop and implement	where appropriate) in relation
	transactions monitoring and	to the life cycle of investment
	surveillance infrastructure on	and insurance products
	general banking activities	Develop and implement
	Maintain communication with	transactions monitoring and
	internal stakeholders and liaise	surveillance infrastructure on
	with regulators to understand	investment and insurance
	potential risk areas and	business activities
	monitor regulatory	• Liaise with local regulators on a
	developments	regular basis to ensure open
	• Provide training and advice to	lines of communication,
	the business units on	maintain reporting obligations
	compliance related matters	and handle requests



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The definition of RPs takes into account differences among AIs in how compliance practitioners are assigned within their organisational structures. Functional roles, rather than the functional titles of staff members, are considered when assessing the qualification of RP. To facilitate the determination of whether a staff member falls under the scope of RPs, please refer to the key roles/ tasks outlined in Annex 1 as per the HKMA's circular on "Guide to Enhanced Competency Framework on Compliance".

It should be noted that the ECF-Compliance is not intended to cover staff members performing the following functions:

- (a) Staff performing solely AML/ CFT roles within an AI, as they are already subject to the ECF-AML/ CFT. Please refer to the HKMA's Guide to ECF on AML/ CFT for details on these roles. In some cases, the responsibilities of compliance and AML/ CFT roles may overlap. AIs should consider the relative weight of roles and responsibilities relevant to compliance and AML/ CFT roles performed by staff members when assessing whether they should fall under the ECF-Compliance or ECF-AML/ CFT or both;
- (b) Staff performing compliance functions within an AI that are not related to regulatory compliance (e.g. financial/ accounting risk);
- (c) Staff performing specialised functions within an AI for ensuring compliance with prudential regulations (e.g. capital and liquidity requirements) and for risk areas that are covered under other ECF modules (e.g. liquidity risk, credit risk and operational risk that are covered under the ECF on Treasury Management, ECF on Credit Risk Management, and ECF on Operational Risk Management respectively);
- (d) Staff in the compliance function within an AI who are performing solely clerical and administrative duties or other incidental functions<sup>2</sup>;
- (e) Staff in the legal or internal audit function of an AI;
- (f) Senior management or relevant compliance committee members<sup>3</sup> other than the manager or person-in-charge of the compliance department; and

<sup>2</sup> Examples of other incidental functions include arranging meetings to discuss compliance related issues and preparing minutes of meetings that involve the discussion of compliance related issues.

<sup>3</sup> Given that the main responsibilities of senior management or relevant compliance committee members (other than the manager or person-in-charge of the compliance department) may not be limited to managing the compliance risk of an AI, they are not captured within the scope of the ECF-Compliance. However, such persons may choose to acquire the ECF certification(s) which is(are) of interest and relevance to them



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(g) Staff employed by an AI in Hong Kong whose primary function does not involve serving the AI in Hong Kong (e.g. regional office staff who are based in Hong Kong serving the compliance function for an overseas office) and staff based in the subsidiaries of AIs or overseas branches of AIs who are serving the compliance function for Hong Kong and/ or overseas offices. That said, it should be noted that AIs have a responsibility to ensure that the relevant staff based in the subsidiaries and overseas branches receive adequate compliance training, including those applicable in overseas jurisdictions.

For the avoidance of doubt, a staff member is not required to work full time in the compliance function or perform all of the roles specified in the job description in order to be classified as a RP. Als are expected to adopt a principles-based approach when determining whether a staff member with multiple job roles falls within the definition of RPs. If a staff member's job responsibility covers a majority of the key tasks detailed in ECF-Compliance's role description, the staff member will be considered in scope. Als should refer to the key tasks listed in Annex 1 to assess the significance of the compliance role performed by the staff member. Als are expected to justify their decisions made in this regard. The following is a non-exhaustive list of criteria that can be taken into consideration when assessing whether a staff member should be classified as an RP:

- Proportion of time spent on compliance related matters;
- Extent to which the staff member reports to senior management and/ or governance committees on compliance related matters;
- Level of authority/ seniority of the staff member in making decisions on compliance related matters; and
- Organisational structure of the AI. For example, a staff member with roles and tasks dedicated to compliance may be working in other functions such as Legal or Risk Management.

Please refer to the HKMA's circular on "<u>Guide to Enhanced Competency Framework on</u> <u>Compliance</u>" dated 27 September 2022 for more details.



#### 2. Other Certification Requirements

Upon attaining the below qualifications and fulfilling the minimum relevant work experience requirement, RPs may apply to the HKIB, for certification as an Associate Compliance Professional (ACOP) or a Certified Compliance Professional – General Compliance Stream (CCOP(GC)) or a Certified Compliance Professional – Investment and Insurance Compliance Stream (CCOP(IIC)).

#### (a) Core Level

#### Associate Compliance Professional (ACOP)

- Successful completion of Module 1 to Module 3 of the Core Level training programme; or
- Grandfathered for ECF-Compliance (Core Level)

#### (b) Professional Level

#### Certified Compliance Professional – General Compliance Stream (CCOP(GC))

- On top of the Core Level certification, successful completion of Module 4 of the Professional Level training programme plus <u>5 years of relevant work experience</u>\* in the general compliance function as specified in Annex 1; or
- Grandfathered for ECF-Compliance (Professional Level) in CCOP(GC)

#### Certified Compliance Professional – Investment and Insurance Compliance Stream (CCOP(IIC))

- On top of the Core Level certification, successful completion of Module 4 and Module 5 of the Professional Level training programme plus <u>5 years of relevant work experience</u>\* in the investment and/or insurance compliance function as specified in Annex 1; or
- Grandfathered for ECF-Compliance (Professional Level) in CCOP(IIC)

The <u>5 years of relevant work experience</u>\* required for CCOP(GC) and CCOP(IIC) certification should be accumulated within the 10 years immediately prior to the date of application for certification, but it does not need to be continuous.

\*In general, HKIB will consider whether the nature of work experience is substantially the same as that described in the Compliance Role 1 and Role 2 in Annex 1 of the "<u>Guide to Enhanced Competency</u> <u>Framework on Compliance</u>". Relevant work experience may be obtained from AIs and/or non-bank financial institutions. As for work experiences related to Compliance gained from other non-banking industries, they will be considered on a case-by-case basis.



### **B.** Application Procedure

#### 1. Please follow the application procedure below :

- (a) Complete all the necessary fields in the relevant Grandfathering and/or Certification Application Form for ECF-Compliance including applicant's signature and HR endorsement in relevant sections.
  - For Core Level: COM-G-009
  - For Professional Level: COM-G-010

Note: Applicants are encouraged to apply for both Grandfathering and Certification at the same time by using the above application form. Please also read the Guidelines of Grandfathering Application for ECF-Compliance (COM-G-007) if Grandfathering and Certification are applied at the same time.

- (b) Obtain endorsement from the Human Resources Department (HR) of the concerned Authorized Institution(s) with signature of Head of HR or equivalent and company chop on the Annex of the Grandfathering and/ or Certification Application Form – HR Department Verification Form on Key Roles/ Responsibilities for Compliance Practitioners. Applications can only be accepted with HR endorsement included.
- (c) Applicants are required to fill in **ONE** completed HR Verification Annex form for **EACH** relevant position/ functional title in the application.

Als are expected to support their staff's application for grandfathering and certification. Regarding information related to a Relevant Practitioner's previous employment(s), current employer should provide necessary assistance to Relevant Practitioners in the latter's applications for grandfathering or ECF certification (e.g. by confirming whether such information is consistent with curriculum vitae provided by the Relevant Practitioner at the time of job application).

(d) Read the <u>Privacy Policy Statement</u> set out on the HKIB's website before submitting the application.



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(e) Send the completed Application Form with HR department's endorsement, relevant supporting documents and payment evidence to the HKIB within the required time frame.

#### 2. Fee Payable

A Non-refundable fee is required for **ACOP/CCOP(GC)/CCOP(IIC)** certification application:

#### 1st Year certification:

- Not currently a HKIB member: HKD1,730
- Current HKIB Student member: HKD1,530
- Current HKIB Ordinary member: HKD600
- Current HKIB Professional member: Waived
- Current HKIB Senior member: HKD1,530

#### Annual Renewal:

- Certification: HKD1,730 and subject to change
- Reinstatement fee of default member: HKD2,000

#### 3. Payment Method

- (a) Paid by Employer
- (b) A crossed cheque or e-cheque made payable to "**The Hong Kong Institute of Bankers**". Post dated cheques will not be accepted.
- (c) Credit card (Visa or Mastercard)

#### 4. Submission of Application

Please complete and submit the **SIGNED** Application Form together with the required documents via email to <u>cert.gf@hkib.org</u> or by post/in-person to The Hong Kong Institute of Bankers (HKIB) at the following address:

<u>"Application for ECF-Compliance Grandfathering & Certification</u>"
Department of Professional Assessment and Certification
The Hong Kong Institute of Bankers
3/F Guangdong Investment Tower
148 Connaught Road Central, Hong Kong

Note: Please ensure sufficient postage is provided when sending out the required documents.



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#### 5. Approval and Election

- (a) The certification processing time, including the election process done by the HKIB committee members, will require approximately 2 months. If grandfathering is also applied together with certification by using the combined application form, the processing time will be approximately 3 months.
- (b) Upon successful completion of the certification process, ACOP/CCOP(GC)/CCOP(IIC) holders will be registered as Certified Individuals (CI) and be included in a public register on the HKIB's website. The HKIB will also grant the holder a professional membership. ACOP/CCOP(GC)/CCOP(IIC) professional qualification holders are then entitled to print the professional qualification on their business cards and curriculum vitae to signify their professional excellence.
- (c) Besides, the professional qualification holders' names will also be presented on the HKIB website and published in the Institute's journal "Banking Today" and Annual Report.



### C. Recertification Arrangement

- Subject to the HKIB membership governance, if the applicant wants to apply for or maintain his/her ACOP/CCOP(GC)/CCOP(IIC) professional qualification, he/she is required to maintain valid membership status with the HKIB. The applicant must also be a Relevant Practitioner who has met the annual Continuing Professional Development (CPD) requirements and pay the annual renewal of certification fee.
- 2. ACOP/CCOP(GC)/CCOP(IIC) holders are bound by the prevailing rules and regulations of the HKIB. They must abide by the HKIB's rules and regulations as per the HKIB Members' Handbook. ACOP/CCOP(GC)/CCOP(IIC) holders are required to notify the HKIB of any material changes in their applications for certification, including their contact details. The HKIB may investigate the statements ACOP/CCOP(GC)/CCOP(IIC) holders have made with respect to their applications, and that they may be subject to disciplinary actions for any misrepresentation (whether fraudulent and otherwise) in their applications.
- **3.** (a) For the Core Level qualification, a minimum of 10 CPD hours is required for each calendar year (ending 31 December), of which at least 5 hours should be on topics related to compliance, legal and regulatory requirements, risk management and ethics.

(b) For the Professional Level qualifications, a minimum of 12 CPD hours is required for each calendar year (ending 31 December), of which at least 6 hours should be on topics related to compliance, legal and regulatory requirements, risk management and ethics.

- **4.** Any excess CPD hours accumulated within a particular year cannot be carried forward to the following year.
- 5. Activities that qualify for CPD include:
  - Attending seminars or courses (both online and in-person) provided by AIs, financial services regulators, professional bodies, academic and training institutions, and the HKIB;
  - Taking professional examinations; and
  - Delivering training and speeches.



**6.** CPD training topics should be related to banking and finance or the job function. Examples of appropriate training topics include:

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- Compliance, code of conduct, professional ethics or risk management (including AML/ CFT and other regulatory related topics);
- Banking and financial knowledge;
- Economics;
- Accounting;
- Legal principles;
- Business and people management;
- Language and information technology; and
- Subject areas covered in the HKIB's professional examinations.
- **7.** The annual CPD requirements are also applicable to RPs meeting the ECF-Compliance benchmark through the grandfathering route.
- **8.** The CPD requirements will be waived for the first calendar year (ending 31 December) of certification and grandfathering.
- 9. RPs are required to self-declare their CPD compliance to the HKIB at the time of certification renewal. Documentary evidence should be kept for random audit by the HKIB. The minimum 16 CPD requirements will be subject to periodic review in light of the latest developments in the banking sector. For details, please refer to the HKIB's website (https://www.hkib.org).
- **10.** For the avoidance of doubt, RPs who are captured under multiple ECFs are only required to fulfil the CPD hours for one of their certifications per year (whichever is greater).
- **11.** The renewal of ACOP/CCOP(GC)/CCOP(IIC) certification is subject to fulfillment of the annual CPD requirements starting from the calendar year (from 1 January to 31 December) following the year of certification.
- **12.** The annual CPD requirements are also applicable to Relevant Practitioners who have been grandfathered.
- **13.** The CPD requirements are waived in the first calendar year (ending 31 December) of certification and grandfathering.

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### Annex 1: ECF-Compliance: Key Roles and Tasks for Relevant Practitioners

(Quoted from the Annex 1 "Guide to Enhanced Competency Framework on Compliance")

Job Roles	Role 1 -	Role 2 -
	(General Compliance)	(Investment and Insurance Compliance)
	Core Level	
	(For entry to junior level staff with	less than 5 years of work experience)
Examples of	Compliance Officer,	Compliance specialist,
functional title	Associate/Assistant	Compliance Manager
(for reference		
only)		
Key Tasks	<ul> <li>guidelines and compliance related docu and regulatory obligations and the Al's</li> <li>Assist in performing compliance testing compliance monitoring programmes to applicable legal and regulatory requirer</li> <li>Assist in performing compliance assess as mandated by the compliance function compliance risk and mitigate any condut</li> <li>Assist in compiling reports on compliant monitoring to senior management</li> <li>Conduct initial analysis and facilitate the report any possible breaches of laws and</li> <li>Conduct initial investigation of non-com- remedial actions taken</li> <li>Assist in providing general advice on law units and senior management</li> <li>Assist in drafting, revising and updating for identifying and reporting potential action Maintain regular communication and in- risk and credit risk colleagues to underse</li> </ul>	g and other reviews according to the ensure the Al's compliance with ments, and codes of conduct ments and reviews on business activities on to identify, assess and monitor act and reputational risk issues ace related matters and/or transactions the investigation of suspicious activities and ad regulations in business activities mpliance issues and monitor the status of ws, rules and standards to the business and actual non-compliance issues interaction with operational risk, market stand current areas of heightened risk. Assist line managers in maintaining





Job Roles	Role 1 -	Role 2 -	
	(General Compliance)	(Investment and Insurance Compliance)	
	Core	Level	
	(For entry to junior level staff with less than 5 years of work experience)		
(Continued)	• Assist in liaising with local regulators on a regular basis to ensure open lines of		
Key Tasks	communication, maintain reporting obligations and handle requests		
	Handle information requests from local regulators and coordinate with respective		
	business units in responding to regulatory enquiries		
	• Perform research and gap analysis on key legal and regulatory changes both in		
	Hong Kong and relevant overseas jurisdictions		
	• Prepare training materials on complian	ce related matters and assist in providing	
	training to business departments/opera	ation units in Hong Kong	

Job Roles	Role 1 -	Role 2 -
	(General Compliance)	(Investment and Insurance
		Compliance)
	Professio	nal Level
	(For staff taking up middle to senior lev	el positions in the compliance function
	with 5+ years of v	work experience)
Examples of	General Compliance Manager,	Investment and Insurance
functional title	Regulatory Compliance Manager	Compliance Manager
(for reference		
only)		
Key Tasks	<ul> <li>Develop, review, evaluate and update</li> </ul>	<ul> <li>Develop, review, evaluate and</li> </ul>
	the Al's compliance policies,	update the Al's compliance policies,
	procedures, guidelines and compliance	procedures, guidelines and
	related documents to ensure	compliance related documents to
	congruence with its legal and regulatory	ensure congruence with its legal and
	obligations and the Al's internal	regulatory obligations and the Al's
	requirements	internal requirements
	<ul> <li>Establish and review compliance</li> </ul>	
	monitoring programmes to ensure the	
	Al's compliance with applicable legal	
	and regulatory requirements, and codes	
	of conduct	



Job Roles	Role 1 - (General Compliance)	Role 2 - (Investment and Insurance Compliance)
	Profession	
	(For staff taking up middle to senior leve	
	with 5+ years of w	
(Continued) Key Tasks	<ul> <li>Conduct independent compliance assessments and reviews as mandated by the compliance function to identify, assess and monitor compliance risk and mitigate any conduct and reputational risk issues</li> <li>Report to and advise senior management on compliance related matters</li> <li>Investigate suspicious activities and report any possible breaches of laws and regulations in business activities</li> <li>Analyse areas of non-compliance and identify actions for improvement</li> <li>Monitor the effectiveness of any remedial actions taken</li> <li>Provide advice and recommendations on laws, rules and standards to the business units</li> <li>Maintain a strong understanding of new and emerging products and services and the compliance implications on the AI of such products and services</li> </ul>	<ul> <li>Establish and review compliance monitoring programmes to ensure the Al's compliance with applicable legal and regulatory requirements, and codes of conduct covering the selling process</li> <li>Report to and advise senior management on compliance related matters including sales suitability, financial need analysis and cross border selling restrictions</li> <li>Investigate suspicious activities and report any possible non-compliance incidents related to Al's investment and insurance business activities</li> <li>Identify and handle non-compliance issues and monitor the effectiveness of any remedial actions taken</li> <li>Provide advice on business initiatives, product development, and review and approve marketing materials for dissemination</li> <li>Provide advice and guidance on compliance related matters to relationship managers and investment and insurance product managers</li> </ul>



Job Roles	Role 1 - (General Compliance)	Role 2 - (Investment and Insurance	
		Compliance)	
	Professio		
	(For staff taking up middle to senior lev		
	with 5+ years of work experience)		
(Continued)	• Develop, review, evaluate and update	• Liaise with local regulators on a	
Key Tasks	escalation and whistleblowing policies	regular basis to ensure open lines of	
	and procedures for identifying and	communication, maintain reporting	
	reporting potential and actual	obligations and handle requests	
	noncompliance issues	Develop and implement transactions	
	Maintain regular communication and	monitoring and surveillance	
	interaction with operational risk,	infrastructure on investment and	
	market risk and credit risk colleagues to	insurance business activities	
	understand current areas of heightened	• Track and capture key local and	
	operational risk, market risk and credit	regulatory changes both in Hong	
	risk	Kong and relevant overseas	
	• Liaise with local regulators on a regular	jurisdictions and notify relevant	
	basis to ensure open lines of	stakeholders to ensure the business	
	communication, maintain reporting	operations of the AI could meet the	
	obligations and handle requests	relevant requirements	
	<ul> <li>Develop and implement transactions</li> </ul>	• Provide advice and training on	
	monitoring and surveillance	investment and insurance compliance	
	infrastructure on general banking	to business units in Hong Kong	
	activities		
	<ul> <li>Track and capture key legal and</li> </ul>		
	regulatory changes both in Hong Kong		
	and relevant overseas jurisdictions and		
	notify relevant stakeholders to ensure		
	the business operations of the AI could		
	meet the relevant requirements		
	Provide advice and compliance related		
	training to business units in Hong Kong		



### Annex 2: ECF-Compliance: Competency Framework

(Quoted from the Annex 2 "Guide to Enhanced Competency Framework on Compliance")

and Experience1Certification•title•ExemptionRP vfor eprog•(	Completion of Module 1 to Mo training programme <sup>4</sup> Associate Compliance Profession who has passed the following t exemption on Module 1 of the gramme:	Investment and Insurance Compliance ore Level odule 3 of the ECF-Compliance Core Level onal (ACOP) raining programme(s) is eligible to apply ECF-Compliance Core Level training
and Experience1Certification title•ExemptionRP v for e prog •	Completion of Module 1 to Mo training programme <sup>4</sup> Associate Compliance Profession who has passed the following t exemption on Module 1 of the gramme:	odule 3 of the ECF-Compliance Core Level onal (ACOP) raining programme(s) is eligible to apply
and Experience1Certification title•ExemptionRP v for e prog •	training programme <sup>4</sup> Associate Compliance Profession who has passed the following t exemption on Module 1 of the gramme:	onal (ACOP) raining programme(s) is eligible to apply
Certification title•ExemptionRP vfor e prog•0	Associate Compliance Profession who has passed the following t exemption on Module 1 of the gramme:	raining programme(s) is eligible to apply
title RP v Exemption RP v for e prog • (	who has passed the following t exemption on Module 1 of the gramme:	raining programme(s) is eligible to apply
Exemption RP v for e prog • (	exemption on Module 1 of the gramme:	
for e prog • (	exemption on Module 1 of the gramme:	
	Institute (ARIMI); or Certification in Risk Managem Auditors (IIA); or International Diploma in Go International Compliance Asso Professional Ethics and Complia for Certified Banker (Stage I) of Bachelor's or higher degree in Certified Public Accountant of Accountants (HKICPA); or Full member of Association of or Members of overseas accour exemption from the qualificati	ance module under the Advanced Diploma f the HKIB; or law; or the Hong Kong Institute of Certified Public <sup>E</sup> Chartered Certified Accountants (ACCA); ntancy bodies which are eligible for full on programme for membership admission CPA's reciprocal membership and mutual

<sup>&</sup>lt;sup>4</sup> Module 1 and Module 2 are identical for both ECF-Operational Risk Management and ECF-Compliance. Hence, an RP who has completed Module 1 and/or Module 2 under either of these ECF streams will not be required to complete the same module(s) when he/she undertakes the training programme under the other ECF stream.





	<ul> <li><u>Remarks</u>: Other equivalent academic/professional qualifications in compliance may be considered for exemption on Module 1 on a case-by-case basis. RPs will need to provide detailed information on such qualifications (e.g. training course syllabus, examination syllabus) to the HKIB to facilitate their assessment. The assessment to determine if the RPs are qualified for exemption will be focused on:</li> <li>The content of the syllabus to ensure there is adequate coverage of the ECF Compliance syllabus; and</li> <li>The level of the examination (e.g. QF Level or academic level) of the compliance related training programmes/qualifications.</li> </ul>
Grandfathering (on a one-off basis)	<ul> <li>Possessing at least 3 years of relevant work experience<sup>5</sup> in a general compliance function (for Role 1) or in an investment and/or insurance compliance function (for Role 2), which is related to the key tasks in Annex 1; and</li> <li>Employed by an AI at the time of application.</li> </ul>
CPD requirements	<ul> <li>A minimum of 10 CPD hours is required for each calendar year, of which at least 5 hours should be on topics related to compliance, legal and regulatory requirements, risk management and ethics</li> <li>Qualified CPD activities include:         <ul> <li>(a) attending seminars or courses (both on-line and in-person) provided by Als, financial services regulators, professional bodies and academic and training institutions and the HKIB;</li> <li>(b) taking professional examinations; and</li> <li>(c) delivering training and speeches</li> </ul> </li> </ul>

<sup>&</sup>lt;sup>5</sup> In general, HKIB will consider whether the nature of work experience is substantially the same as that described in the compliance roles 1 and 2 in Annex 1. Relevant work experience is expected to be obtained from Als. As for work experience related to compliance gained from non-bank financial institutions and/or regulators, they will be considered on a case-by-case basis taking into account the level of involvement in performing compliance related key tasks. The work experience acquired from frontline business processes and operations, internal audit and risk management functions will also be considered on a case-by-case basis.



	Role 1 –	Role 2 –
	General Compliance	Investment and Insurance Compliance
	•	onal Level
Qualification	Completion of Module 4 of the	Completion of Module 4 and
and Experience	ECF Compliance Professional	Module 5 of the ECF-Compliance
	Level training programme on top	Professional Level training
	of the Core Level certification;	programme on top of the Core
	and	Level certification; and
	<ul> <li>Having at least 5 years of relevant</li> </ul>	<ul> <li>Having at least 5 years of relevant</li> </ul>
	work experience which in the	work experience which is
	general compliance function.	accumulated within the 10 years
		immediately prior to the date of
		certication application in the
		investment and/or insurance
		compliance function.
Certification	Certified Compliance Professional	Certified Compliance Professional –
title	– General Compliance Stream	Investment and Insurance
	(CCOP(GC))	Compliance Stream (CCOP(IIC))
Grandfathering	• Possessing at least 8 years of	<ul> <li>Possessing at least 8 years of</li> </ul>
(on a one-off	relevant work experience <sup>6</sup> in the	relevant work experience <sup>7</sup> in the
basis)	general compliance function	compliance function for investment
	which is related to the key tasks	and/or insurance business activities
	in Annex 1, of which at least 3	which is related to the key tasks in
	years are gained from respective	Annex 1, of which at least 3 years
	Professional Level job roles; and	are gained from respective
	• Employed by an AI at the time of	Professional Level job roles; and
	application	<ul> <li>Employed by an AI at the time of</li> </ul>
		application

<sup>&</sup>lt;sup>6</sup> Please see footnote 5.

<sup>&</sup>lt;sup>7</sup> Please see footnote 5.





CPD	• A minimum of 12 CPD hours is required for each calendar year, of which
requirements	at least 6 hours should be on topics related to compliance, legal and
	regulatory requirements, risk management and ethics
	Qualified CPD activities include:
	(d) attending seminars or courses (both on-line and in-person) provided
	by Als, financial services regulators, professional bodies and academic
	and training institutions and the HKIB;
	(b) taking professional examinations; and
	(c) delivering training and speeches