Educational Seminar

CYPRUS INVESTMENT PROGRAMME AND CODE OF CONDUCT

9 OCTOBER 2019
Cyprus Investment Programme

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Director
Directorate of Administration and Finance
Ministry of Finance
Purpose

Encourage Foreign Direct Investment.

Attract high net worth individuals to settle and do business in Cyprus.
Objectives

Increase in economic activity.

Incentives for investment in Research and Innovation and in the Primary and Secondary Sector of the Economy.

Stimulation of demand in key areas of the economy.

Creation of new jobs.

De-escalation of non-performing loans.
Legal Basis

• Grant of the Cypriot Citizenship through naturalization by exception to non-Cypriot investors/businessmen on the basis of subsection (2) of section 111A of the Civil Registry Law 141(I)2002.

• Council of Ministers decisions dated:
  • 13 September 2016
  • 09 January 2018
  • 21 May 2018
  • 13 February 2019
  • 25 July 2019
Areas of Investment

One of the following:

- Real estate, land development and infrastructure projects
- Purchase or establishment or participation in Cypriot companies and businesses
- Investment in alternative investment funds

Or combination of the aforementioned investments.
Beneficiaries

A non-Cypriot citizen, who meets one of the following economic criteria and other terms and conditions:

- either personally.
- or through a company/companies in which he/she participates as a shareholder.
- or through investments done by his/her spouse or jointly with the spouse.
- or even as a high-ranking senior manager of a company/companies that meets one of the economic criteria.
Submission of Application (Form M127)

The application for a Certificate of Naturalization is submitted to the Ministry of Interior with all required accompanying documents that provide evidence of the economic criteria, terms and conditions.
GENERAL TERMS AND CONDITIONS

• The applicant should have made the necessary investments during the three years preceding the date of the application and must retain the said investments for a period of at least three years as from the date the naturalization.

• The required period of three years that the applicant must retain the investment will commence on the date that the town-planning permit is issued, in case the investment(s) refers to the development of property(ies) under construction.

• A high-ranking senior manager may apply, provided that he/she receives such a remuneration that generates for the Republic tax revenues of at least €100,000 over a three-year period and provided that this tax has already been paid or prepaid.

• The Ministry of Interior and/or the Ministry of Finance reserve the right to request any additional documentation during the assessment of the application.

• The final decision is at the absolute discretion of the Council of Ministers.

• In case, following periodic inspection, it has been established that a criterion, term or condition of the Programme has been breached, the granted naturalization may be revoked.
A1. DONATION TO THE RESEARCH AND INNOVATION FOUNDATION AND THE CYPRUS LAND DEVELOPMENT CORPORATION

Donation of the amount of €75,000 to the Research and Innovation Foundation

- The obligation is lifted if the applicant has invested at least €75,000 in a certified innovative enterprise (i.e. an enterprise that had acquired the relevant certificate by the Ministry of Finance) or a certified social enterprise.

- The obligation is lifted if the applicant has made an investment under the criterion A3 of a total amount equal to the 20% of the required investment amount (i.e. €400,000) of the abovementioned criterion A3 in a company whose operations fall within the primary sector of the economy, or the secondary sector of the economy (excluding constructions), or in the sectors of research and development, education, health and renewable energy sources.

- It is noted that if the applicant wishes to donate an amount higher than the minimum of €75,000, this additional amount can be used for purposes of supplementing the total amount of the investment made on the basis of the criteria A2-A5.

- It is clarified that donations to the Research and Innovation Foundation may be made after the Council of Ministers approves the application for naturalization.
A1. DONATION TO THE RESEARCH AND INNOVATION FOUNDATION AND THE CYPRUS LAND DEVELOPMENT CORPORATION

Donation of the amount of €75,000 to the Cyprus Land Development Corporation

- Promotion of housing schemes for affordable housing as well as the materialization of other housing schemes/measures.
- It is noted that if the applicant wishes to donate an amount higher than the minimum of €75,000, this additional amount can be used for purposes of supplementing the total amount of the investment made on the basis of the criteria A2-A5.
- It is clarified that donations to the Cyprus Land Development Corporation may be made after the Council of Ministers approves the application for naturalization.
A1. DONATION TO THE RESEARCH AND INNOVATION FOUNDATION AND THE CYPRUS LAND DEVELOPMENT CORPORATION

Required documents and evidence:

- Copy of the wire transfer of the donation to the Research and Innovation Foundation to an account in a Cypriot commercial banking institution in the name of the Foundation.
- Copy of the wire transfer of the donation to the Cyprus Land Development Corporation to an account in a Cypriot commercial banking institution in the name of the Foundation.
- Innovative enterprise certificate.
- Investment Agreement in Cypriot company or companies.
- Proof of payment of the agreed amount.
- Certificate of shareholders by the Registrar of Companies.
- Copy of the wire transfer to a Cypriot commercial banking institution in the name of the company or the organization.
- Specific investment plan.
- Copies of the employment contracts of the Cypriot or European Union citizens employed by the company in which the applicant has invested.
- Confirmation from the Social Insurance Department as to the insurable income of the Cypriot or European Union citizens employed in the company.
- Copy of the Social Insurance Contributions for every Cypriot or EU citizen employee.
- Registration Certificate (MEU1) or Permanent Registration Certificate of Union Citizen (MEU3) for employees that are European Union citizens.
- Audited company financial statements for the last three years preceding the year of application.
Investment of at least €2m.

- Purchase or construction of real estate.
- Construction of other land development (residential or commercial developments or developments in the tourism sector) or other infrastructure projects.
- Investment in land under development provided that the application includes an investment plan of the project.
- If the investment includes the purchase of housing units already used for the Programme, the total investment, including the permanent privately owned housing, will amount to at least €2.5m.
A2. INVESTMENT IN REAL ESTATE, LAND DEVELOPMENT AND INFRASTRUCTURE PROJECTS (cont.)

Required documents and evidence:
• Contract of sale.
• Certificate of registration (Title Deed) or proof of registration of the contract with the Department of Lands and Surveys.
• Proof of payment of the agreed purchase price.
• Copy of the wire transfer to a Cypriot commercial bank in the name of the seller or the company of the seller.
• Valuation certificate from an independent registered land surveyor following a request by the Ministry of Interior or the Ministry of Finance.
• Land development plan in case of investment in land located in building zone.
• Planning Permit, in cases it is required by the Planning Department Law.
• Bank Waiver from the mortgage lender for the benefit of which the property in question may be mortgaged to undertake the complete foreclosure of the mortgage as long as the investor or the seller will pay to the lender the amount stated in that Bank Waiver.
• Completion Certificate signed by the Architect of the project. In case of a property being built, it is necessary to maintain an amount equal to 5% of the value in a special account or to issue a performance bank guarantee from the seller of the property to the buyer.
A3. PURCHASE OR ESTABLISHMENT OR PARTICIPATION IN CYPRIOT COMPANIES AND BUSINESSES

Investment of at least €2m.

- Purchase, establishment or participation in businesses or companies registered and operating in the Republic of Cyprus.
- Capital invested exclusively in Cyprus according to a specific investment plan.
- Employment of at least 5 Cypriot or European Union citizens with legal and continuous residency in Cyprus for the last five years before the submission of the application for naturalization.
- Investments in the Shipping sector are accepted on the basis of measurable criteria to be jointly established by the Ministry of Finance and the Deputy Ministry of Shipping.
A3. PURCHASE OR ESTABLISHMENT OR PARTICIPATION IN CYPRIOT COMPANIES AND BUSINESSES (cont.)

Required documents and evidence:
• Contract of sale.
• Proof of payment of the agreed purchase price.
• Company registration certificate by the Registrar of Companies.
• Certificate of shareholders by the Registrar of Companies.
• Copy of the wire transfer from abroad to a Cypriot commercial bank in the name of the seller or the company of the seller.
• Specific investment plan.
• Copies of the employment contracts of Cypriots and/or EU citizens employed by the company in which the applicant has invested.
• Confirmation from the Social insurance Department as to the insurable income of the Cypriot or EU citizens employed in the company.
• Copy of the Social Insurance Contributions for every Cypriot or EU citizen employee.
• Registration certificate (MEU1) or Permanent Registration Certificate of EU citizens (MEU3) for employees that are citizens of EU member states.
• Audited company financial statements for the last three years preceding the year of application.
**A4. INVESTMENT IN ALTERNATIVE INVESTMENT FUNDS OR REGISTERED ALTERNATIVE INVESTMENT ORGANISATIONS OR FINANCIAL ASSETS OF CYPRIOT COMPANIES OR CYPRIOT ORGANISATIONS LICENCED BY THE CYPRUS SECURITIES AND EXCHANGE COMMISSION**

**Investment of at least €2m.**

- Purchase of units from Alternative Investments Funds (AIF) established in the Republic of Cyprus, licensed and supervised by the Cyprus Securities and Exchange Commission, and whose investments are made exclusively in the Republic of Cyprus, in investments that meet the criteria of the Programme or in areas approved by the Minister of Finance.

- Retain the investment for at least 5 years, provided that there is an annual confirmation in writing with reference to the value of the initial investment, from the auditor of the Fund to the Ministries of Finance and Interior.

- AIF will also have the opportunity to invest up to €200,000 in securities in the secondary market of the Cyprus Stock Exchange.
Investment of at least €2m.

Purchase of financial assets of Cypriot companies such as bonds, bills and securities, issued with the approval of Securities and Exchange Commission.
A4. INVESTMENT IN ALTERNATIVE INVESTMENT FUNDS OR REGISTERED ALTERNATIVE INVESTMENT ORGANISATIONS OR FINANCIAL ASSETS OF CYPRIOT COMPANIES OR CYPRIOT ORGANISATIONS LICENCED BY THE CYPRUS SECURITIES AND EXCHANGE COMMISSION (cont.)

Required documents and evidence:

• Title / Titles and other relevant documents of financial assets/ units purchased.
• Copy of wire transfer to a Cypriot commercial bank in the name of the company or the organisation.
• Specific investment plan.
• Confirmation by the Cyprus Securities and Exchange Commission.
A5. COMBINATION OF INVESTMENTS – INVESTMENT IN GOVERNMENT BONDS

Investment of at least €2m. and permanent residence of €500,000.

• The applicant may make a combination of the above investments provided that the total investment amounts to €2m. at least.

• The applicant may purchase securities up to €200,000 on the secondary market of the Cyprus Stock Exchange.
Financial Criteria

Required documents and evidence for all financial criteria:

• Certificate of Registration of the company from the Registrar of Companies.
• Certificate of Shareholders from the Registrar of Companies or other certificates that prove that the investor is the final beneficiary of the company.
• Audited financial statements of the company for the three years preceding the year that the application is submitted.
• In case of an application by a Senior Manager, the employment contract and a receipt from the Tax Department are also required.
TERMS AND CONDITIONS

- Clear Criminal Record
- Permanent privately-owned residence in Cyprus
- Residency in Cyprus

Required documents and evidence with regards to financial criteria:

- Contract of sale for a permanent residence in Cyprus.
- Certificate of registration (Title Deed) or proof of registration of the contract with the Department of Lands and Surveys.
- Proof of payment of the agreed purchase price.
- Copy of wire transfer to a Cypriot commercial bank in the name of the seller or the company of the seller.
- Valuation certificate from an independent registered land surveyor following a request by the Ministry of Interior or the Ministry of Finance.
Thank you for your attention.
Cyprus Investment Programme

- TERMS AND CONDITIONS
- FAMILY MEMBERS OF THE INVESTOR
- APPLICATION/EVALUATION PROCEDURE
Terms and Conditions

1. Clean Criminal Record

2. Schengen Visa

3. Permanent privately-owned residence in the Republic of Cyprus

4. Residency in Cyprus
Clean Criminal Record

The applicant must have a clean criminal record. Furthermore, his name must not be included in the list of persons whose assets, within the boundaries of the European Union, have been frozen as the result of sanctions.

It is noted that an applicant that has applied for the acquisition of citizenship in any other Member State that has been rejected, will not be entitled to acquire Cypriot citizenship under the Cyprus Investment Programme.

Required Documents:

Certificate of Clean Criminal Record from the country of origin and the country of residence (if different). Certificate of Clean Criminal Record is valid for a period of three months.

Declaration of the applicant regarding citizenship applications submitted in any other Member State of the EU signed in the presence of the Cyprus Court Registrar or a consular officer.

Due diligence report issued through an internationally accepted database ensured though a subscription (e.g. World Check, LexisNexis Diligence, Regulatory DataCorp Inc. etc). The report must be no later than thirty days from the date of its submission.
Schengen Visa

The applicant must be a holder of Schengen Visa which must be in force. Third-country nationals who do not require a visa to enter the Member States of the European Union as well as applicants who are nationals of Member States of the European Union, are excluded.

**Required Documents:**

Copy of the Schengen visa, which must be valid at the time of application.
Applications of high risk persons

Publication of the Council of Ministers’ rationale and guidelines: these guidelines exclude persons belonging to the following categories of high-risk persons.

- Politically Exposed Persons holding a government position at present or for the last 5 years
- Persons subject to criminal investigation without being charged
- Persons who are subject to criminal investigation and to criminal proceedings
- Persons sentenced to prison for serious offenses (e.g. bribery by a public official, tax evasion, etc.) and the sentence is time-barred
- Persons related to legal entities subject to restrictive measures imposed by the European Union e.g. shareholders, senior executives of companies included in a list of sanctions
- Persons affiliated with legal entities which have been restricted by the European Union but are no longer affiliated e.g. shareholders, senior executives of companies that are included in the list of sanctions, which were associated with those companies when the sanctions regime was imposed
- Persons who have been sanctioned by third countries (e.g. USA, Ukraine, Russia)
- Persons associated with legal entities subject to sanctions by third countries
- Persons who are being investigated / charged with criminal offenses and are being sought across Europe by EUROPOL or internationally by INTERPOL
- Persons who have been investigated / charged for criminal offenses and are being sought across Europe by EUROPOL or internationally by INTERPOL and are no longer wanted
- Persons subject to sanctions by the UN Security Council
Self-Declaration

The Decision of the Council of Ministers dated 21.5.2018 provides that the application must be accompanied by the signed Self-Declaration form by both the Applicant and the Service Provider.

The following documents should be submitted:

- “Self-Declaration by the Applicant who has received services for the purposes of the Cyprus Investment Programme” duly completed and signed by the investor. By submitting it, the applicant certifies that he/she was fully informed by the Service Provider for his/her obligations and rights under the Cyprus Investment Program.

- “Self-Declaration by the Service Provider for the purposes of the Cyprus Investment Programme” duly completed and signed by the investor’s representative. By submitting it the service provider confirms that he has complied with the Code of Conduct and has fully implemented the provisions of the Cyprus Investment Program.
Permanent, privately-owned residence in Cyprus

• Possession of a permanent privately-owned residence in the Republic of Cyprus, the purchase price of which must be at least €500,000, plus V.A.T.

• Members of the same family, who apply separately as investors, can collectively acquire a residence, provided that the total value of this home-property covers the amount of €500,000, per each applicant.

• In case that the purchase value of the permanent privately owned residence in Cyprus exceeds the amount of €500,000, part of this additional amount can be used for purposes of supplementing the total amount of the investment made on the basis of the economic criteria.

• If the applicant has invested in housing unit/units on the basis of the aforementioned criterion A.1, the purchase of another permanent residence in Cyprus will not be required, if at least one of the housing units is worth at least €500,000, plus V.A.T., provided that the applicant retains the possession of the residence for life.

• If the investment relates to the purchase of housing units already used for the Program, this provision shall apply provided that the total investment, including permanent ownership, amounts to at least 2.5 million.
Residence Permit in Cyprus

• The applicant, prior to his/her naturalization as a Cypriot citizen must hold a residence permit in Cyprus for a period of at least 6 (six) months.

• If the applicant does not already hold a residence permit, he/she may apply for an immigration permit on the basis of Regulation 6 (2) of the Aliens and Immigration Law, at the same time as submitting the application for Naturalization, without requiring any conditions other than those provided by the Program.

• When the naturalization process is complete the residence permit, will be cancelled immediately. In case, for any reason the application for naturalization is rejected, the Immigration Permit obtained in accordance with the provisions of the Program will be immediately cancelled.
Investor’s Family Members

- Spouse/ Partner
- Investor’s Parents
- Adult Children
- Minor Children
Spouse/ Partner

- May acquire Cypriot citizenship without requiring additional investment. In order to facilitate the procedure of the acquisition of the Cypriot citizenship by the investor’s partner or spouse, the Council of Ministers decided to allow the submission of the spouse’s or partner’s application along with the application of the investor, so that both spouses / partners will be able to acquire the Cypriot citizenship simultaneously.

- The Decision of the Council of Ministers dated 13.9.2016 clarifies that for the purposes of the Programme the term partner is interpreted in accordance with the provisions of the Civil Partnership Law 184(I)/2015. According to this law the State recognizes any civil partnership that had been concluded in the Republic of Cyprus, or any other state in accordance with the legislation of that state and is still in power.
Investor’s Parents

- Can apply for citizenship after the investor acquires the Cypriot citizenship. These applications (Form M127) are filed at the Ministry of Interior.

- In order for the investor’s parents to be able to apply for citizenship they need to hold a permanent privately-owned residence in the Republic of Cyprus, the purchase price of which must be at least €500,000, plus V.A.T.

- The investor and his/her parents, may collectively acquire a residence, provided that the value of this home-property is at least €1,000,000, plus V.A.T.
Adult Children

The right to apply for Citizenship is granted only to the financially dependent adult children of the investor. The decision of the Council of Ministers dated 13.9.2016 determined that financially depended adult children individuals should belong to one of the below category:

(a) students up to the age of 28 that are attending an institution of higher education aiming to obtain a diploma or an undergraduate or a master's degree. The Decision excludes individuals who are studying for the acquisition of a professional qualification (e.g. chartered accountants or barrister).

(b) children with severe physical or mental disability that renders them unable to work.
Minor Children

- The application is submitted after the investor acquires the Cypriot citizenship.

- It is necessary that the other parent consents to the grant of the citizenship.

- Unlike all other applications submitted to the Ministry of Interior, the specific applications (Form M126) are submitted to the Civil Registry and Migration Department, where they are processed.
Submission of the Application I

- The application of both the investor and adult members of the family needs to be submitted to the Ministry of the Interior and the amount of €2,000 as fees must be paid.

- For the submission of the application, an appointment needs to be arranged beforehand via the email address: eskordelli@papd.mof.gov.cy. A period of 25-30 days is needed to arrange a meeting so the appointment should be settled in time. No application will be accepted for submission, if an appointment has not been arranged beforehand.

- Prior to the submission of the application and all the necessary documents, please see the relevant Guidelines documents that can be found on the website of the Ministry of Interior.
Submission of the Application II

The **necessary** documents that need to be filed are as follows:

<table>
<thead>
<tr>
<th>Investor</th>
<th>Spouse/ Partner</th>
<th>Adult Child</th>
<th>Parents</th>
</tr>
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</table>
| • Check List of Investors Application Documents*  
• Letter by the applicant or by the representative of the applicant  
• "Self-Declaration by the Applicant"  
• "Self-Declaration by the Service Provider"  
• Form M127  
• Birth certificate  
• True Copy of passport  
• Certificate of Clear Criminal Record  
• Due Diligence Report  
• Declaration of citizenship applications in other EU Member States  
• Copy of Schengen visa  
• Marriage or Civil Partnership Certificate  
• Copies of advertisements in a daily newspaper  
• Two passport size photographs  
• Curriculum Vitae  
• Copy of residence permit  
• Proof of investment plan  | • "Check List of Family Members Application Documents"  
• "Self-Declaration by the Applicant"  
• "Self-Declaration by the Service Provider"  
• Form M127  
• Birth certificate  
• True Copy of passport  
• Certificate of Clear Criminal Record  
• Due Diligence Report  
• Declaration of citizenship applications in other EU Member States  
• Copy of Schengen visa  
• Marriage or Civil Partnership Certificate  
• Copies of advertisements in a daily newspaper  
• Two passport size photographs  
• Curriculum Vitae  
• Copy of residence permit  
• Copy of the investor's Certificate of Naturalization  | • Check List of Family Members Application Documents"  
• "Self-Declaration by the Applicant"  
• "Self-Declaration by the Service Provider"  
• Form M127  
• Copy of the investor’s Certificate of Naturalization  
• Copy of the investor’s Cypriot passport  
• Birth certificate  
• True Copy of passport  
• Certificate of Clear Criminal Record  
• Due Diligence Report  
• Declaration of citizenship applications in other EU Member States  
• Copy of Schengen visa  
• Marriage or Civil Partnership Certificate  
• Copies of advertisements in a daily newspaper  
• Two passport size photographs  
• Curriculum Vitae  
• Copy of residence permit  
• Certificate of school attendance  
• Medical certificate  | • Check List of Family Members Application Documents"  
• "Self-Declaration by the Applicant"  
• "Self-Declaration by the Service Provider"  
• Form M127  
• Copy of the investor’s Certificate of Naturalization  
• Copy of the investor’s Cypriot passport  
• Birth Certificate  
• True Copy of passport  
• Certificate of Clear Criminal Record  
• Due Diligence Report  
• Declaration of citizenship applications in other EU Member States  
• Copy of Schengen visa  
• Marriage or Civil Partnership Certificate  
• Copies of advertisements in a daily newspaper  
• Two passport size photographs  
• Curriculum Vitae  
• Copy of residence permit  
• Documents of permanent, privately-owned residence |
Submission of Application III

- The original application and the required documents in their original form, together with an additional photocopy of the application and all the documents are submitted at the Ministry of Interior. Please ensure that all copies are clear and easy to read.

- The original documents and the copies need to be submitted in two separate and distinguished bundles. Moreover, the documents need to be placed in the bundles in the order that they appear on the 'Investor's Application Check List'. In addition, on the upper left side of each document the number of the relevant document on the 'Investor's Application Check List' needs to be written in pencil.

- All documents submitted with the application shall be officially translated in Greek or English and they must be duly authenticated. Specifically, they should bear the stamp 'APOSTILE', if they are issued by countries that have ratified the Convention of Hague or bear diplomatic ratification by the Embassy of the Republic of Cyprus in the country of issue as well as the Ministry of Foreign Affairs of the Republic of Cyprus.

Applications that are not complete (i.e. that do not include all the necessary documents) and that are not submitted in the way that is described above (distinct originals and copies) will not be accepted for submission.
Submission of application – Immigration Permit

I. Submission of the Citizenship application at the Ministry of Interior
   Provided that the application is complete and accompanied by all the necessary documents the “Confirmation of Submission of Application for Naturalization by Exception” (not the same thing as the fees payment receipt) will be handed over to the applicant or his/her representative.

II. Submission of the Immigration Permit application at the Civil Registry and Migration Department

III. Collection of applicant’s biometric data

IV. Issuance of the Immigration Permit

It is noted that the applicant cannot be considered as a holder of a residence permit, unless the aforementioned procedure is completed and the Immigration Permit (card) issued.
Examination procedure of the application

I. The documents relating to the business activities and investments of the applicant in Cyprus are sent to the Ministry of Finance for evaluation and comments on whether the applicant meets any of the criteria established by the Council of Ministers.

II. The Ministry of Interior, in collaboration with the Safety authorities, investigates whether the applicant meets the other conditions of the abovementioned Decision of the Council of Ministers.

III. Ministry of Finance and Safety authorities of the Republic submit their views.

IV. If the applicant meets the Criteria and Conditions of the Decision, the Minister of Interior presents the case to the Council of Ministers for final decision.

V. Expected time of examination of the application is 6 (six) months.

VI. The Council of Ministers decision dated 21.5.2018 states that the maximum number of applications will be 700 (seven hundred) per year.
Acquisition of the Cypriot citizenship

I. Council of Ministers approval.

II. Issuance of the Certificate of Naturalization from the Civil Registry and Migration Department, provided the fees of €5,000 have been paid for.

III. ‘Oath of faith’ to the Republic of Cyprus before a Registrar of a Cypriot Court or a Consular Officer of the Republic of Cyprus.

I. Acquisition of the Cypriot passport and identity card.
For further information:

www.moi.gov.cy

Thank you for your attention!
Registration at the Registry of Service Providers and Code of Conduct

Lucy Herodotou-Mouskou
Chairperson of the Committee of Supervision and Control
Committee of Supervision and Control

• The Committee of Supervision and Control was established on the basis of the Council of Ministers decision.

• The main role of the Committee is:
  • The licensing of applicants/service providers
  • the creation and maintenance of a Service Providers Registry for the Cyprus Investment Program and
  • The supervision for the proper implementation of the provisions of the Code of Conduct by the service providers.

• The objective is to exercise quality control on the services provided by the service providers to interested investors, within the framework of the Programme.

• The ultimate goal is to enhance the Programme and thus, protect the reputation of the country.
Application of Service Providers

The application must be accompanied by the following documents:

**Physical persons:**

i. Clean criminal record for the applicant and any of his key partners (the date of issue shall not exceed six months from the date of submission of the application).

ii. Signed Code of Conduct.

iii. Certificate of Attendance at a relevant educational seminar on the Cyprus Investment Programme.

iv. A declaration that they do not work as employees or are Directors or shareholders in a company accompanied by a self-employed status issued by the social security service.

v. Where the natural person is a resident of another Member State of the European Union, the documents must be provided by the respective competent authorities and must be translated into Greek or English and duly certified.
Application of Service Providers (con.)

**Legal persons:**

i. Clean criminal record for the applicant, all physical persons acting on its behalf and any of its key partners (the date of issue shall not exceed six months from the date of submission of the application).

ii. For the purpose of the Programme, the Director / Partner of the company, all natural persons, including the contact person, as well as legal entity partners, must provide a photocopy of their ID or passport.

iii. Code of Conduct duly signed by the Director/Partner.

iv. Certificate of Attendance at a relevant educational seminar on the Cyprus Investment Programme.

v. The documents related to the legal person (company’s memorandum and articles of association, certificate of incorporation, certificate of registered office address, certificate of directors and secretary, certificate of shareholders) for companies based in the Republic of Cyprus, will be directly obtained by the Committee.

vi. In case of a company registered in another Member State of the European Union, the above documents must be provided by the respective competent authorities and must be translated into Greek or English and duly certified.
Application of Service Providers (con.)

• Completion of all fields in the application is mandatory.

• In certain fields, English language must be used for technical reasons.

• For any changes on the registration application, the Committee must be informed in writing about the applicant, any natural persons acting on his behalf as well as his associates for the purposes of the Programme, and/or on any other document or evidence that may be required.

• The Commission reserves the right to request additional documents.

• Clear instructions on the registration process can be found on the Commission's Web site (in Greek and English), http://cipregistry.mof.gov.cy/gr/
Application evaluation process

• The Committee, following the appraisal of each application, has the right to approve or reject it.

• The Committee must be convinced that the applicant has sufficient knowledge with regards to the Programme.

• The Committee, upon its judgement may invite for an interview any applicant, either physical or legal person.

• In case of rejection of an application, the applicant has the right to appeal in writing with justification of its appeal to the Minister of Interior.

• Under all circumstances the applicant will be informed in writing.
Registry of Service Providers

• The Registry of Service Providers of the Cyprus Investment Programme has been posted on the websites of the Ministry of Finance, the Ministry of Interior and Invest Cyprus, on 31st July 2018.

• The Committee updates the Registry at regular intervals.

• As of 1st August 2018 all applications within the framework of the Cyprus Investment Programme must be submitted by approved Service Providers, registered at the Registry of Service Providers.

• Registration in the Registry is valid for one year. Members may, if they wish, renew their registration in accordance with the Registration Renewal Instructions.
CODE OF CONDUCT

• The Code of Conduct and its implementation is a basic requirement in order to register and remain registered at the Registry of Service Providers.

• The Code of Conduct is signed by the legal representative of the company (in case of a legal person).

• It comprises the obligations that the Service Providers must comply with, protecting themselves and the applicants of the Programme from any unprofessional and dishonest behaviour.

• The provisions of the Code of Conduct totally bind the applicant/service provider as well as each of its partners within the framework of the Programme.

• The Service Provider has the obligation to inform its partners that they must comply with the provisions of the Code of Conduct.
Basic principles of the Code of Conduct

Members of the Registry, individually and collectively, undertake to fully adhere to the following basic principles:

• Demonstrate zero tolerance and/or engagement in any unprofessional or unethical forms of practice.

• Maintain a high level of transparency in all transactions.

• Comply fully with applicable laws, regulations and the provisions of the Programme, in relation to eligible investments and the minimum requirements, as well as with the other terms and conditions of the Programme.

• Encourage all stakeholders in the Programme to adhere to the same ethical standards.

• Refrain from practices that damage the integrity, reputation and image of the service providers, the government sector and the country itself.

• Refrain to adopt practices which circumvent the financial goals of the Programme, either through reducing the real economic benefit for the country from investments pursuant to the Programme or otherwise.

• The Code includes guidelines on how to provide services to clients and how they are managed.
Provision of Services

• The members of the Registry who act as service providers must ensure their clients are informed in writing of the exact nature of their services and all relevant commitments which relate to them, including their commitments pursuant to the Code of Conduct.

• Within this context, the following must be abided by:
  ➢ Professional relationships between a member and a client must be described in a service agreement
  ➢ Members must not make statements or provide or publish any false or misleading information related to the Programme.
  ➢ Members who provide advice in relation to the process of the Programme must act in an efficient and professional manner and only within their area of competence.
  ➢ Members must submit, on behalf of the applicant, any activity reports, which are required or may be required pursuant to the terms and conditions of the Programme.
Client Management

Members of the Registry shall apply the following due diligence practices in relation to client acceptance, when examining the possibility of collaboration:

• Recording and verifying information that fully and accurately identifies the potential client.

• Undertaking, within the framework of the law, checks on the client, of its professional activities as well as its background (including possible publications in the press or online).

• Verifying the origin and legality of the investment funds of the client.

• Providing a report of the findings of the due diligence review (due diligence report) from internationally recognised electronic databases, for the use of which a fee is payable (e.g. World Check, LexisNexis Diligence, Regulatory DataCorp Inc, etc). The report must be dated no later than thirty days from the date of its submission.
Promotion and public relations

In order to protect the principles and parameters of the Programme, the members of the Registry and their associates must comply with the guidelines regarding the promotion of the Programme, as stated in the Appendix of the Code of Conduct:

• The guidelines provided codify the acceptable and non-acceptable methods of promotion of the Programme.

• Adherence to the guidelines is compulsory and in case the Committee notices deviation and non-compliance by a member and any other person acting on his/her behalf or collaborating with him/her, this will lead to exclusion from the Registry.

• The material used by the providers for the purpose of promotion must comply with the promotion guidelines.

• All members of the Registry are required to maintain a website containing at least their basic contact details.

• Any existing promotional material should be modified in accordance with the guidelines.
Guidelines in relation to promotion/advertising of the Programme

The following Guidelines should be mentioned:

• Any reference to details of the Programme must be in line with the information provided in the websites of the Ministries of Interior, Finance and Invest Cyprus.

• Any reference to the name of the Programme should be in its proper name, namely the 'Cyprus Investment Programme'.

• It is expressly prohibited, for members of the Registry as well as for the natural persons acting on their behalf and for all their associates:
  
  ➢ To show, in all forms of advertising, including the internet and social media, the Cyprus passport or other similar images or details which do not comply with the law and/or misleading advertising with false details and representations.

  ➢ To use, in any way whatsoever, the symbols of the Republic of Cyprus and the European Union.
Guidelines in relation to promotion/advertising of the Programme (cont.)

• Any reference that the process of examination of the application for the Programme can be accelerated in any way (fast track procedure) is prohibited.
• Any reference which refers to ‘sale of passports’ is prohibited.
• The acquisition of European citizenship cannot be included in the benefits of the Programme.
Non-compliance consequences

Non-compliance with the Code of Conduct, may lead to deletion of the Service Provider from the Registry.

• In the event of deletion from the Registry (voluntarily or after a decision of the Committee), the deletion will be announced by posting it in the websites of the Ministries of Interior and Finance and Invest Cyprus.

• The Committee, when deemed necessary, maintains the right, at any given time, to invite the applicants/service providers for an interview for further clarifications.

• The Committee may also receive complaints. Upon investigation of the said complaints, the Committee will decide to take any further actions or refer the issue to the relevant Ministries.

• The Committee shall maintain the right not to register service providers in relation to the Programme who collaborate with companies which do not apply the relevant provisions of the Code of Conduct.

• The members of the Registry, who shall be accountable to the Committee, are obliged to renew their commitment every year through the re-submission of the Code of Conduct.
For further information:

http://cipregistry.mof.gov.cy/gr/
and
Marianna Georgoulia (tel. 22601166)

Thank you for your attention.