



**Majlis Peguam  
Bar Council**

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**Circular No 018/2025  
Dated 9 Jan 2025**

To Members of the Malaysian Bar

**ATTENTION TO ALL LAW FIRMS  
Mandatory Submission of Data Compliance Report (“DCR”) 2024 or  
Declaration of Non-Applicability (Deadline to Submit: 15 Jan 2025)**

We refer to [Circular No 324/2024](#) dated 10 Oct 2024, entitled “Submission of Data and Compliance Report 2024” and [Circular No 374/2024](#) dated 13 Nov 2024, entitled “Data Compliance Report 2024 (“DCR 2024”)”.

We wish to remind all Members of the mandatory requirement to submit the DCR 2024 or, where applicable, a declaration of non-applicability for DCR 2024, via the [DCR Submission Portal](#). This submission requirement is in accordance with the directive issued by Bank Negara Malaysia (“BNM”) under its Policy Document, and **all submissions must be made on or before 15 Jan 2025 (Wednesday)**. The DCR reporting period is for 2022 and 2023.

**Who Needs to Submit the DCR?**

Firms that provide Gazetted Activities (“GAs”) are required to submit the DCR.

Paragraph 3.3(a) of the [Anti-Money Laundering, Countering Financing of Terrorism, Countering Proliferation Financing and Targeted Financial Sanctions for Designated Non-Financial Businesses and Professions \(DNFBPs\) and Non-Bank Financial Institutions \(NBFIs\)](#) (“Policy Document”) provides that the Policy Document is applicable where an advocate and solicitor carries out the following GAs for their clients:

- (1) Buying and selling of immovable property;
- (2) Managing client’s money, securities, or other property;
- (3) Managing of accounts including savings and securities accounts;
- (4) Organising of contributions for the creation, operation or management of companies;  
or
- (5) Creating, operating or managing of legal entities or arrangements and buying and selling of business entities.

If your firm carries out any of the above GAs, it is **MANDATORY** for you to submit the DCR.

## Who Can Submit a Declaration of Non-Applicability?

If your firm meets **ANY** of the following criteria, you are only required to submit a declaration of non-applicability:

- (1) Your firm had **no new and existing transactions or clients** for the years 2022 and 2023;
- (2) Your firm was **newly incorporated in 2024**;
- (3) Your firm did not provide any GAs in 2022 and 2023; and
- (4) Your firm is **dormant**.

Please refer to [Circular No 397/2024](#) dated 26 Nov 2024 entitled “Declaration and Step-by-Step Guide on Non-Applicability of Data and Compliance Report (“DCR”) 2024”.

## Compliance Status as at 30 Dec 2024

We have been informed by BNM that as at 30 Dec 2024, approximately **8,153 firms** have yet to submit either the DCR or the declaration of non-applicability. This is an alarming figure of non-compliance within the legal profession.

To avoid potential action from the authorities for non-compliance, we strongly urge all firms to complete their DCR submissions expeditiously.

## Need Help?

BNM has prepared a DCR Information Kit, which provides clarification regarding questions pertaining to DCR. The kit can be accessed [here](#).

If you have further queries relating to DCR, please submit your query through the [DCR Query Form](#), available on the DCR submission portal.

Should you have any enquiries, please contact Malathi Mohan, Assistant Director, by telephone at 03-2050 2150 or by email at [amla@malaysianbar.org.my](mailto:amla@malaysianbar.org.my).

Thank you.

**Karen Cheah Yee Lynn**  
Chairperson  
Committee on AMLA

**Babu Raj Raja Gopal**  
Chairperson  
AMLA Training Committee