Luxembourg, 17th March 2020

To the Management Board and the Board of directors of all:
- investment firms;
- investment fund managers including registered AIFMs, Luxembourg branches of investment fund managers, SIAG, FIAAG and investment funds which did not designate an investment fund manager incorporated under Luxembourg law; and
- specialised professionals of the financial sector (PSF) incorporated under Luxembourg Law.

To all Luxembourg branches of the above-listed entities having their registered office in an EU country or a third country

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**CIRCULAR LETTER**

**Re: 2019 Survey related to the fight against money laundering and terrorist financing: extended deadline**

Madam, Sir,

We refer to the Circular Letter of 31 January 2020 announcing the annual online survey ("Survey") for the year 2019 collecting standardised key information concerning money laundering and terrorist financing (ML/FT) risks to which the professionals under the AML/CFT supervision of the CSSF are exposed to and the implementation of related risk mitigation and targeted financial sanctions measures. The Survey was launched on 3rd of February 2020 and answers had to mandatorily be submitted through the CSSF eDesk portal by 15 March 2020.

The CSSF acknowledges that potential delays regarding the timely submission by professionals of the Survey may have occurred due to the Survey being hosted on the new eDesk platform and the implementation of the relevant registration process.
On these grounds, and on an exceptional basis due to the COVID-19 pandemic, the CSSF is granting an extension of four additional weeks for the submission of the Survey. Consequently, the new deadline for the submission of the Survey will be close of business on 10th of April 2020.

The CSSF draws your attention to article 5(1) of the Law of 12 November 2004 on the fight against money laundering and terrorist financing (the AML/CFT Law), which provides that “The professionals, their directors and employees are obliged to cooperate fully with the Luxembourg authorities responsible for combating money laundering and terrorist financing”. The CSSF reminds in this context that article 8-4 (1) of the AML/CFT Law provides that “The supervisory authorities have the power to impose administrative sanctions and to take other administrative measures laid down in paragraph 2 with respect to professionals subject to their respective supervisory powers with article 2-1 which do not comply with the professional obligations laid down in Articles (...) and 5 (...)

Therefore, in case of failure to submit the Survey by close of business on 10th of April 2020, the CSSF will consider that the professional is in breach of the above-mentioned legal provision. CSSF will be in a position to apply the sanctions foreseen in Article 8-4 of the AML/CFT Law and also take into account previous breaches of the aforementioned obligation by the professional when determining the sanction.

COMMISSION de SURVEILLANCE du SECTEUR FINANCIER

Marco ZWICK      Jean-Pierre FABER      Françoise KAUTHEN      Claude MARX
Director                    Director                          Director                Director General