Luxembourg, 31 January 2020

To the Management Board and the Board of Directors of all:
- credit institutions;
- 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.
- payment institutions and electronic money institutions; 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

CIRCULAR-LETTER

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

Madam, Sir,

As previously announced (please refer to Press release 19/57), the annual online survey for the year 2019 collecting standardised key information concerning money laundering and terrorist financing (ML/FT) risks to which the professionals under supervision are exposed and the implementation of related risk mitigation and targeted financial sanctions measures will be launched on 3rd of February 2020. This cross-sector survey contributes to the CSSF’s ongoing assessment of ML/FT risks present in the financial sectors under its Anti-Money Laundering and Counter Terrorist Financing (AML/CTF) supervision,
and forms part of the AML/CTF risk-based supervision approach put in place by the CSSF over the last years.

In substance the 2019 survey remains generally unchanged compared to the previous year.

Answers to the survey questions will have to be submitted through the CSSF eDesk portal by 15 March 2020, except for the banking sector where answers have to be submitted by 2 March 2020.

The self-assessment ML/FT risk survey must be initiated and submitted via the CSSF eDesk portal by a member of the Authorised Management of the entity or, preferably, the AML/CTF Compliance Officer who is responsible for AML/CTF compliance.

The completion of the survey, however, may be assigned by the person responsible for AML/CTF compliance within the CSSF eDesk portal to another employee of the entity. The ultimate responsibility for the adequate completion of the survey shall remain with the Authorised Management.

The aforementioned persons and their potential delegates are required to have an eDesk account with a LuxTrust authentication. Reference is made to the “Authentication and user account management” (User guide) in the dedicated section of the CSSF eDesk portal homepage (https://edesk.apps.cssf.lu/edesk-dashboard/dashboard/getstarted) for further details. An eDesk Survey AML/CTF questionnaire User guide has been released to provide any needed assistance to complete the questionnaire.

COMMISSION de SURVEILLANCE du SECTEUR FINANCIER

Claude WAMPACH
Director

Marco ZWICK
Director

Jean-Pierre FABER
Director

Claude MARX
Director General