



FAQ on the  
AML/CFT Summary  
Report RC  
("SRRC") on  
compliance with  
AML/CFT  
obligations in  
accordance with  
Circular CSSF  
24/854

AS OF FEBRUARY 2024



Commission de Surveillance  
du Secteur Financier

## FAQ on the AML/CFT Summary Report RC ("SRRC") on compliance with AML/CFT obligations in accordance with Circular CSSF 24/854

### TABLE OF CONTENTS

CONTEXT	3
Q1. A Luxembourg investment fund supervised by the CSSF for AML/CFT purposes has not designated an investment fund manager. Does this entity fall within the scope of Circular CSSF 24/854?	4
Q2. A Luxembourg investment fund supervised by the CSSF for AML/CFT purposes has designated a foreign investment fund manager. Does this entity fall within the scope of Circular CSSF 24/854?	4
Q3. For an entity which does not fall within the scope of Circular CSSF 24/854, can the RC have access and use the SRRC template?	4
Q4. What is the submission deadline for the SRRC in eDesk?	5
Q5. How and by whom should the SRRC be transmitted to the CSSF?	5
Q6. Which findings must be reported in the dedicated section of the SRRC?	6



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## FAQ on the AML/CFT Summary Report RC ("SRRC") on compliance with AML/CFT obligations in accordance with Circular CSSF 24/854

### CONTEXT

This document is of interest to Luxembourg investment funds and Luxembourg investment fund managers that are supervised by the CSSF for AML/CFT purposes.

The present document refers to a list of questions & answers in relation to Circular CSSF 24/854 – Guidelines for the collective investment sector on the AML/CFT Summary Report RC ("SRRC") to be prepared by the "Responsible du Contrôle" ("RC") and submitted to the CSSF by the "Responsible du Respect" ("RR") in accordance with Article 42(7) of [CSSF Regulation No 12-02](#) of 14 December 2012 on the fight against money laundering and terrorist financing, as amended ("RCSSF 12-02").

*This document will be updated when necessary and the CSSF reserves the right to adapt its approach to any matter covered by the questions & answers at any time.  
You should regularly check the website of the CSSF in relation to any matter of importance to you to see if questions have been added and/or positions have been adapted.*

### Update information

<b>29/02/2024</b>	First publication



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## **FAQ on the AML/CFT Summary Report RC ("SRRC") on compliance with AML/CFT obligations in accordance with Circular CSSF 24/854**

**Q1. A Luxembourg investment fund supervised by the CSSF for AML/CFT purposes has not designated an investment fund manager. Does this entity fall within the scope of Circular CSSF 24/854?**

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Yes, this entity falls within the scope of Circular CSSF 24/854 and must therefore comply with it.

**Q2. A Luxembourg investment fund supervised by the CSSF for AML/CFT purposes has designated a foreign investment fund manager. Does this entity fall within the scope of Circular CSSF 24/854?**

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Yes, this entity falls within the scope of Circular CSSF 24/854 and must therefore comply with it.

**Q3. For an entity which does not fall within the scope of Circular CSSF 24/854, can the RC have access and use the SRRC template?**

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Not at present.

## Q4. What is the submission deadline for the SRRC in eDesk?

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The SRRC shall be submitted on an annual basis, within five months after the closing of the annual accounts of the supervised entity in scope.

Only for the closing ending on 31 December 2023, an extension of two extra months is granted for the submission.

## Q5. How and by whom should the SRRC be transmitted to the CSSF?

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The SRRC must be exclusively submitted via eDesk by the supervised entity. No other means of submission will be accepted.

The requirements to access to the eDesk platform are detailed in [Circular CSSF 19/721](#).

A user guide for the SRRC is available to the supervised entity on the eDesk platform.

The SRRC shall be submitted by the “*Responsable du Respect*” (“RR”, i.e. the person responsible for compliance with the AML/CFT professional obligations at the level of the authorised management or Board of Directors)<sup>1</sup>.

The RR can delegate the technical submission of the SRRC to another person; however, the RR shall remain ultimately responsible for the submission.

<sup>1</sup> A technical delegation to an eDesk user linked to the entity and having been assigned with the role of “AML/CFT responsible” in the eDesk platform, is permissible to the extent that such delegation is documented in writing and made available to the CSSF upon demand.

## Q6. Which findings must be reported in the dedicated section of the SRRC?

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All the AML/CFT-related findings (open or closed) which have been identified during the exercise covered by the SRRC must be reported in the "Findings" section of the SRRC.

This includes:

- the AML/CFT findings identified by the "*Responsable du Contrôle*";
- (when applicable) the AML/CFT findings identified by the Internal Audit in the report presented to the Board (or equivalent) during the exercise covered by the SRRC, and;
- the AML/CFT findings of the Approved Statutory Auditor as reported in the Management Letter presented to the Board (or equivalent) during the exercise covered by the SRRC;
- the AML/CFT findings reported by the CSSF in a letter to the entity during the exercise covered by the SRRC.



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