AML/CFT Summary Report RC - Practical and technical guidance

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Contents

Update information

Date	Version	Changes
29/02/2024	1.0	Publication of the document

1. Glossary and objectives

1.1 Glossary

Notion	Definition
RCSSF 12-02	CSSF Regulation 12-02 of 14 December 2012 on the fight against money laundering and terrorist financing
RC	« *Responsable du contrôle du respect des obligations professionnelles* »; in the RCSSF 12-02 also referred to as, the compliance officer in charge of the control of compliance with the professional obligations
Bucket	A bucket is a container for objects. S3 stores data as objects within buckets. An object is a file and any metadata that describes the file. Each entity manages its own separate buckets to be used for each report type.
IT Expert	The "IT Expert" is an eDesk specific role that is granted by the "Advanced User" of the entity to the person managing access to the S3 API. A person with this role is responsible for creating, viewing and revoking access keys.
SRRC	AML/CFT Summary Report RC
S3	S3 – or "simple storage service" – is the object storage protocol (through a web service interface) used by the CSSF for the file exchange. In this context, S3 simply refers to the protocol for managing object storage and does not rely on any services provided by commercial cloud providers.

1.2 Objectives

The general objective of this document is to provide practical and technical information on the AML/CFT Summary Report RC ("SRRC")

The first part of the document aims at providing information on the scope of the reporting obligation and outlines the CSSF expectations on the manner in which the information should be submitted to the CSSF.

The second part of the document aims at providing technical details in relation to the SRRC:

- Technical overview of the reporting system;
- Data and file format of the reports;
- Data validation and feedbacks.

2.   Scope

2.1   Who must submit the report?

This report is referred to in Articles 42 (6) and 42 (7) of the CSSF Regulation 12-02 of 14 December 2012 on the fight against money laundering and terrorist financing ("RCSSF 12-02") as amended.

This Report shall be prepared annually by the compliance officer in charge of the control of compliance with the professional obligations, also referred to as the "*Responsable du contrôle du respect des obligations professionnelles*" or the "RC".

This Report needs to be completed if you are:

- A designated Investment Fund Manager ("IFM");
- A self-managed fund;
- A fund managed by a foreign IFM.

This Report shall be submitted to the CSSF by either one of the following eDesk users (hereafter the "submitters"):

- AML/CFT Responsible;
- Conducting officer;
- Board Member.

2.2   When does an entity have to report?

The submitters are required to submit the Report every year 5 months after the closing of the financial year-end.

Please note, that within these 5 months, the submitters may submit the report and update any previously submitted instances of this report. Once the 5 months are lapsed, no further modification of the report is possible anymore.

3.   Practical guidance

Please refer to Annexes I & II.

4.   Technical guidance

The SRRC can be submitted through two different channels:

- via an online form available on the eDesk platform;
- via the S3 system by using a structured exchange file.

4.1 eDesk online form

An online form is available on the eDesk platform via the "AML/CFT Summary Report RC ("SRRC")" module (https://edesk.apps.cssf.lu/srrc/edesk-srrc/home).

4.1.1 Authentication

The submitters are required to have an eDesk account (available with a LuxTrust authentication) and must be linked to the relevant entity. Further details can be found in the User Guide ("eDesk – Authentication – User Guide") from the dedicated section of the CSSF eDesk Portal homepage: https://edesk.apps.cssf.lu/edesk-dashboard/dashboard/getstarted.

4.1.2 Dashboard

The main dashboard labelled "SRRC" or "AML/CFT Summary Report RC ("SRRC")" lists all reporting linked to the entity represented by the connected user. Those listed reporting are either in "DRAFT" status or already "SUBMITTED".

From the dashboard, it is possible for any user linked to the entity to consult the details of a reporting, either by double-clicking on the respective line or by clicking on the "magnifying glass" icon. It is also possible to delete any report in draft status, i.e. not yet submitted to the CSSF.

4.1.3 Creation and submission of a report

Through a dedicated "Create report" action on the dashboard, a user linked to the relevant entity can initiate the creation of a report.

A first step consists of specifying which year-end this report is related to, starting on 31/12/2023. Please note that if a relevant year-end is not presented for a relevant entity, contact the CSSF via edesk@cssf.lu.

Once the report is filled in, upon submission, a control will list any potential errors. If no error is detected, the report will be sent, and its status changed to "SUBMITTED".

In case a report needs to be corrected, it may be updated and resubmitted, as long as the deadline for the report's submission (five months after the year-end) is not reached, or a new report can be initiated, based on the same year-end. Please note that only the last submitted report for a specific year-end will be considered by the CSSF.

4.1.4 Export PDF

Regardless whether a report is submitted or not, a "Submission of the report" action is available to export the report in PDF format. It is accessible through a report's detailed view, under "Actions" in the navigation menu on the left side.

4.2 S3 system reporting technical specifications

The method for transmitting reports via Application Programming Interface can be found on our website following the link.

In the eDesk IT management console, the "IT Expert" must create a bucket "**Summary report on compliance with AML/CFT obligations**".

4.2.1 Reporting file

4.2.1.1 Reporting format

The data concerning the Summary report on compliance with AML/CFT obligations shall be reported in the JSON (JavaScript Object Notation) format.

The JSON report must be compressed in a ZIP format.

Summary report on compliance with AML/CFT obligations document JSON schema

The schema concerning the reporting is available at:

Publication date	Version	Link	Release note
31/12/2023	1.0.0	schema	Initial version

4.2.1.2 Submission process

The ZIP file MUST be uploaded to the "submission" folder in S3. No upload is allowed into other folders (e.g. "feedback" folder is only dedicated to CSSF feedbacks).

4.2.1.3 ZIP technical specifications

The reporting file must be transmitted via a compressed .zip format containing one single .json file and an optional .pdf file.

Here are the specifications for ZIP archive:

Compression algorithm	RFC 1951 (DEFLATE Compressed Data Format Specification version 1.3)
Multi-volume archives (multi-part zipfile)	No
Maximum size of a file in the archive	2 Gigabytes
Codepage	UTF-8

4.2.1.4   Naming conventions

i.   ZIP file

The mandatory file naming convention for .zip files is specified below.

Format: SRRC-ENNNNNNNN-YYYY-MM-DD-UUID.ext

Code	Meaning	Structure	Authorised value
SRRC	Reporting type	Char(4)	'SRRC' (constant)
-	Separator	Char(1)	'-' (constant)
E	Reporting entity	Char(1)	Entity type : 'A', 'K', 'O' or 'S'
NNNNNNNN	Identification number	Number(8)	00000001…99999999 (CSSF code of the entity)
-	Separator	Char(1)	'-' (constant)
YYYY	Financial Year-end – Year	Char(4)	Year of this reporting's related financial year-end
-	Separator	Char(1)	'-' (constant)
MM	Financial Year-end – Month	Char(2)	Month of this reporting's related financial year-end
-	Separator	Char(1)	'-' (constant)
DD	Financial Year-end – Day	Char(2)	Day of this reporting's related financial year-end
UUID	Unique identifier (ReportUid)	UUID format	Unique identifier following the rfc 4122 norm
.ext	Extension	Char(5)	.zip (constant)

UUID specifications

The **UUID** is necessary to uniquely identify a report. It is also used to prevent a file to be processed several times.

A ZIP file with the same UUID of another ZIP file concerning the same entity will be rejected with the error SRRC007 (cf. chapter 4.2.2.2.3).

The expected format of an UUID is:

XXXXXXXX-XXXX-XXXX-XXXX-XXXXXXXXXXXX

where each X data can have a value from 0 to 9 or from a to f (hexadecimal authorised characters).

You can find more information about the UUID on Universally Unique Identifier (UUID).

ii.   JSON report

No specific naming convention will apply for the JSON report included in the zip file, but it is recommended to use report.json.

4.2.2   CSSF feedback file

It is up to the submitter to monitor transmission correctness.

A feedback file in JSON format is systematically generated for each file transmitted and made available in the "feedback" folder.

The schema concerning the data of the generated feedback is available in the CSSF feedback file.

Please ensure that you have received a feedback file for the last file sent before submitting a new file concerning a same entity. Feedback generation could take some time. If you do not receive a response within one working day, please contact our dedicated support team at edesk@cssf.lu.

4.2.2.1   Naming convention

Feedbacks from the CSSF are received in the "feedback" folder of the S3 transfer client.

Format: SourceFileName_FEEDBACK_TrackingCode.json

Code	Meaning	Structure	Authorised value
SourceFileName	Reporting entity	Char(N)	Submitted file name - Refer to the ZIP File name structure in section 4.2.1
_	Separator	Char(1)	'_' (constant)
FEEDBACK	File type	Char(8)	FEEDBACK (constant)

TrackingCode	Unique identifier	Char(16)	Unique identifier created by the CSSF system after file submission SRRCYYYYMMDDXXXXXX where: YYYYMMDD: year, month and day of submission XXXXXX: daily increment
_	Separator	Char(1)	'_' (constant)
.ext	Extension	Char(5)	.json (constant)

4.2.2.2 File content

A feedback file contains several information:

- A status at the report level;

- ReportUids previously processed;

- Feedback messages at the report level.

4.2.2.2.1 Report status

The report status can have two different values:

- REJECTED when the report is entirely rejected. That is the case when the archive is not technically compliant.

- ACCEPTED when the archive is technically compliant and all the relevant data to be included in the report have been correctly reported.

4.2.2.2.2 ReportUids previously processed

The feedback file lists the unique identifiers (ReportUid) of the last reports concerning the entity in the CSSF processing order (most recent report at the top of the list).

4.2.2.2.3 Feedback message at report level

If a report has the ACCEPTED status, a feedback message with the "SRRC000" code is sent.

If a report has the REJECTED status, the possible errors at report level, are listed in the table below with the severity "ERROR".

Feedback messages

Code	Message	Severity
SRRC000	The summary report on compliance with AML/CFT obligations has been accepted by the CSSF	INFO
SRRC001	The archive is corrupted	ERROR
SRRC002	The archive filename is invalid. The expected naming convention must follow the regex: SRRC-(?<entityCssfCode>[ASOK]\\d{8})-(?<exerciseEndDate>[1-9][0-9][0-9]{2}-([0][1-9]|[1][0-2])-([1-2][0-9]|[0][1-9]|[3][0-1]))-(?<reportUid>[0-9a-f]{8}-[0-9a-f]{4}-[0-9a-f]{4}-[0-9a-f]{4}-[0-9a-f]{12}).zip	ERROR
SRRC003	The archive must contain a single JSON file	ERROR
SRRC004	The archive file cannot exceed 20 MB	ERROR
SRRC005	The submitter is not authorized to transmit a report for this entity	ERROR
SRRC006	The entity defined in the archive filename is not in scope for the reported period	ERROR
SRRC007	The archive with ReportUid "ReportUid" has already been received for this entity	ERROR
SRRC008	JSON file does not respect JSON Schema	ERROR
SRRC009	The unique identifier "ReportUid" in the JSON file is different from the unique identifier used in the archive name	ERROR
SRRC010	The CSSF code of the entity in the JSON file is different from the CSSF code of the entity used in the archive name	ERROR
SRRC011	The year end date of the entity in the JSON file is different from the year end date used in the archive name	ERROR
SRRC012	Due to the condition <fieldname1:value>, the field <fieldname2> value must not be provided	ERROR

SRRC013	The finding \<findingsPrevId\> you are trying to update cannot be retrieved from the list of AML/CFT findings opened from previous periods	ERROR

4.2.3   Data quality

Entities are required to review and validate the reporting files (ZIP and JSON files) before any submission.

Files must be validated against the JSON schema provided by the CSSF.

4.2.4   Review the feedback files and correct the rejected reports

Entities must ensure that all feedback files are properly analysed and that any rejected data are corrected and resubmitted.

5. Contact information

If you have any questions, please contact edesk@cssf.lu.

To facilitate the processing of your request, please provide the entity's CSSF code and name.

Annex I – Synopsis on information to be collected

For general guidance on filling in the AML/CFT Summary Report RC ("SRRC"), please refer to the JSON schema linked in section 4.2.2.2.1 of the present document.

Below is guidance for each field:

- Which requires a specific answer (closed questions may refer to codes, listed in annex II);
- Which triggers another section / question that becomes required to fill; and
- For which a specific guidance has been provided by the CSSF.

"General Information" section

Information to be provided	JSON ID	Required only if …	Codes required for closed questions (see Annex II)	CSSF guidance
Type of entity				
Please select your type of entity:	infoIfmNonLu	-	TypeOfEntity	-

Have you performed AML/CFT due diligence on your IFM?	infoIfmDueDil	[infoIfmNonLu] has value [FundForeignIFM]	YesNoList	-
Funds				
Have you, or the Group to which you belong, initiated ALL the funds you provide services to?	infoFundsInitiatedAll	-	YesNoList	The notion "Group" is explained in Article 1 (3b) of the AML/CFT Law of 12 November 2004.
How many funds do you service?	infoFundsNbr	-	-	If you are a fund, type in 0.
Have you outsourced the AML/CFT due diligence on the funds you service?	infoFundsDueDilOutsourced	[infoFundsNbr] has value [>0]	YesNoPartiallyList	-
Have you performed the AML/CFT due diligence on the funds you service?	infoFundsDueDil	[infoFundsDueDilOutsourced] has value [N] or [P]	YesNoList	-

Have you performed AML/CFT oversight on the outsourced control(s) performed on the funds you service?	infoFundsAmlOversightOnOutsourced	[infoFundsDueDilOutsourced] has value [Y] or [P]	YesNoList	-
Investors		-	-	-
Are you, by license or by contractual obligation, responsible for the AML/CFT Due Diligence on investors of the funds you service?	infoInvestorsCentralAdminServices	-	YesNoList	If you are an AIFM, such responsibilities are derived from the provision of other functions that you may additionally perform as referred to in Annex I point 2. of the AIFM Law (e.g. administration, …). If you are a UCITs Manco, you are de facto, by license responsible for the AML/CFT Due Diligence on investors.

How many investors are in your fund(s) or in the funds for which you are responsible for the AML/CFT Due diligence on investors?	infoInvestorsNbr	[infoInvestorsCentralAdminServices] has value [Y]	-	By investor, it is meant "account holder". As such, if Mr X has 7 positions in a fund, you only count him once. If Mr X has multiple positions across multiple funds, you only count him once as well. What matters is to count the number of KYC files.
Have you outsourced the AML/CFT due diligence on investors?	infoInvestorsDueDilOutsourced	[infoInvestorsNbr] has value [>0]	YesNoPartiallyList	-
Have you performed AML/CFT due diligence on investors?	infoInvestorsDueDil	[infoInvestorsDueDilOutsourced] has value [N] or [P]	YesNoList	-
Have you performed AML/CFT oversight on the outsourced control(s) performed on investors?	infoInvestorsAmlOversightOnOutsourced	[infoInvestorsDueDilOutsourced] has value [Y] or [P]	YesNoList	For instance, if you have outsourced the identification and verification of investors to another company, have you checked the work

				they have performed during the reference period covered by the report?
Third-party distributors				
Are you, by license or by contractual obligation, responsible for the AML/CFT Due Diligence on distributors of the funds you service?	infoTpDistriCentralAdminServices	-	YesNoList	If you are an AIFM, such responsibilities are derived from the provision of other functions that you may additionally perform as referred to in Annex I point 2. of the AIFM Law (e.g. administration, ...).
How many third-party distributors do you have a contractual relationship with?	infoTpDistriNbr	[infoTpDistriCentralAdminServices] has value [Y]	-	"third-party" means, that they are not part of the Group to which you belong.
Have you outsourced the AML/CFT due diligence on third-party distributors?	infoTpDistriDueDilOutsourced	[infoTpDistriNbr] has value [>0]	YesNoPartiallyList	"Due diligence" in this question is to be understood as KYC on the entity (i.e. identification, verification, monitoring).

Have you performed AML/CFT due diligence on third-party distributors?	infoTpDistriDueDil	[infoTpDistriDueDilOutsourced] has value [N] or [P]	YesNoList	-
Have you performed AML/CFT oversight on the outsourced control(s) performed on third-party distributors?	infoTpDistriAmlOversightOnOutsourced	[infoTpDistriDueDilOutsourced] has value [Y] or [P]	YesNoList	-
Third-party initiators				
How many third-party initiators of funds do you have?	infoTpInitNbr	-	-	"third-party" means, that they are not part of the Group to which you belong.
Have you outsourced the AML/CFT due diligence on third-party initiators of funds?	infoTpInitDueDilOutsourced	[infoTpInitNbr] has value [>0]	YesNoPartiallyList	"Due diligence" in this question is to be understood as KYC on the entity (i.e. identification, verification, monitoring).
Have you performed AML/CFT due diligence on	infoTpInitDueDil	[infoTpInitDueDilOutsourced] has value [N] or [P]	YesNoList	-

third-party initiators of funds?				
Have you performedAML/CFT oversight on the outsourced control(s) performed on third-party initiators of funds?	infoTpInitAmlOversightOnOutsourced	[infoTpInitDueDilOutsourced] has value [Y] or [P]	YesNoList	-
External portfolio managers				
How many external portfolio managers do you have a contractual relationship with?	infoExtPtfMgNbr	-	-	For the purpose of this question, external porftolio manager includes entities from your Group (if applicable).
Have you performed AML/CFT due diligence on external portfolio managers?	infoExtPtfMgDueDil	[infoExtPtfMgNbr] has value [>0]	YesNoList	Due diligence is to be understood as : reviewof KYC documents of the entity, screening ...

Third-party investment advisors				
How many third-party investment advisors do you have a contractual relationship with?	infoTpInvAdvNbr	-	-	"third-party" means, that they are not part of the Group to which you belong.
Have you performed AML/CFT due diligence on third-party investment advisors?	infoTpInvAdvDueDil	[infoTpInvAdvNbr] has value [>0]	YesNoList	"Due diligence" in this question is to be understood as KYC on the entity (i.e. identification, verification, monitoring).
Intermediaries				
How many intermediaries ("nominees") are in the funds you service at your closing date?	infoIntermediariesNbr	[infoInvestorsCentralAdminServices] has value [Y]	-	"Intermediary" means "nominee" in the shareholders registers of the funds, which are acting on behalf of their customers.
Have you outsourced the AML/CFT due diligence on	infoIntermediariesDueDilOutsourced	[infoIntermediariesNbr] has value [>0]	YesNoPartiallyList	-

intermediaries ("nominees") present in the shareholders registers of the funds?				
Have you performed AML/CFT due diligence on intermediaries ("nominees") present in the shareholders registers of the funds?	infoIntermediariesDueDil	[infoIntermediariesDueDilOutsourced] has value [N] or [P]	YesNoList	-
Have you performed AML/CFT oversight on the outsourced control(s) performed on intermediaries ("nominees") present in the shareholders registers of the funds?	infoIntermediariesAmlOversightOnOutsourced	[infoIntermediariesDueDilOutsourced] has value [Y] or [P]	YesNoList	-

PEPs				
How many investors qualifying as PEPs are in the funds to which you provide services?	infoPepNbr	[infoInvestorsCentralAdminServices] has value [Y]	-	Please provide the number as at the end of the reference period for your entity. The number shall be provided at account holder level (i.e. The investor is PEP or the BO / representative of the investor is PEP).
Have you outsourced the AML/CFT due diligence on PEPs?	infoPepDueDilOutsourced	[infoPepNbr] has value [>0]	YesNoPartiallyList	-
Have you performed AML/CFT due diligence on PEPs?	infoPepDueDil	[infoPepDueDilOutsourced] has value [N] or [P]	YesNoList	-
Have you performed AML/CFT oversight on the outsourced control(s)	infoPepAmlOversightOnOutsourced	[infoPepDueDilOutsourced] has value [Y] or [P]	YesNoList	-

performed on PEPs?				
Assets				
Have you outsourced / delegated AML/CFT due diligence on assets?	infoAssetsDueDilOutsourced	-	YesNoPartiallyList	-
Have you performed AML/CFT due diligence on assets?	infoAssetsDueDil	[infoAssetsDueDilOutsourced] has value [N] or [P]	YesNoList	-
Have you performed AML/CFT oversight on the outsourced control(s) performed on assets?	infoAssetsAmlOversightOnOutsourced	[infoAssetsDueDilOutsourced] has value [Y] or [P]	YesNoList	-
Branches / subsidiaries				
Do you have any branches / subsidiaries?	infoBranch	[infoIfmNonLu] has value [IFM] or [SelfManFund]	YesNoNAList	-

Do the branches / subsidiaries perform AML/CFT controls?	infoBranchAmlControls	[infoBranch] has value [Y]	YesNoList	-
Have you performed AML/CFT oversight on your branches / subsidiaries?	infoBranchAmlOversight	[infoBranchAmlControls] has value [Y]	YesNoList	-
Assessment				
Please confirm that the findings contained in this report have been presented and acknowledged by the Board of Directors / Managers or equivalent.	infoFindingsAck	-	YesNoList	-

"Risk assessment" section

Information to be provided	JSON ID	Required only if …	Codes required for closed questions (see Annex II)	CSSF guidance
What is your ML/TF risk appetite?	riskAppetite	-	MLTFRiskCombo	The CSSF uses a 4-leveled risk rating scale, like "Low", "Medium-Low", "Medium-High" and "High". If you use a 3-leveled risk rating scale (like Low, Medium and High), you will select "Low" for your Low risk, "High" for your High risk and "Medium-High" for your Medium risk.

What is your overall assessment of the inherent ML/TF risk of the funds you service?	riskInherentRiskSelfAssess	-	MLTFRiskCombo	If you are an IFM, please provide an overall inherent ML/TF risk assessment for all the funds you service. If you are a fund, then please provide your inherent ML/TF risk.
What is your overall assessment of the residual ML/TF risk of the funds you service?	riskResidualRiskSelfAssess	-	MLTFRiskCombo	If you are an IFM, please provide an overall residual ML/TF risk assessment for all the funds you service. If you are a fund, then please provide your residual ML/TF risk.
Have you identified, during the reference period, triggers which	riskInherentRiskHasTrigger	-	YesNoList	"Trigger(s)" means an event from one

led to a modification of the inherent risk?				or more sources which may lead to an increase or a decrease of the inherent risk.
The triggers are related to:	riskInherentRiskTriggers	[riskInherentRiskHasTrigger] has value [Y]	InherentRiskTriggersCombo	-
In case of "Others", please specify:	riskInherentRiskTriggersOthers	[riskInherentRiskTriggers] has value [Others]	-	-

"Investment fund managers ("IFM")" section

Information to be provided	JSON ID	Required only if ...	Codes required for closed questions (see Annex II)	CSSF guidance
"Investment fund managers ("IFM")" section	ifm	[infoIfmDueDil] has value [Y]	-	

Did you perform sample testing as part of your AML/CFT due diligence performed during the reference period?	ifmDueDilHasSample	-	YesNoList	"Sample testing" is to be understood as document-based review (i.e. KYC documents, proof of screening …).
How long ago did you perform a sample testing?	ifmLastSample	-	SampleCombo	-
Size of sample for the reference period	ifmDueDilSampleSize	[ifmDueDilHasSample] has value [Y]	-	-
Did you identify any AML/CFT findings as a result of your AML/CFT work?	ifmDueDilHasFindings	-	YesNoList	-

"Funds" section

Information to be provided	JSON ID	Required only if …	Codes required for closed questions (see Annex II)	CSSF guidance
"Funds" section	funds	[infoFundsDueDil] has value [Y] Or [infoFundsAmlOversightOnOutsourced] has value [Y]	-	-
Did you perform sample testing as part of your AML/CFT due diligence or as part of your AML/CFT oversight on the outsourced control(s) performed during the reference period?	fundsDueDilHasSample	-	YesNoList	"Sample testing" is to be understood as document-based review (i.e. KYC documents, proof of screening …).
How long ago did you perform a sample testing?	fundsLastSample	[fundsDueDilHasSample] has value [N]	SampleCombo	-

Size of sample for the reference period	fundsDueDilSampleSize	[fundsDueDilHasSample] has value [Y]	-	You may count all the AML/CFT due diligence files which were reviewed during the reference period covered by the report.
Please select the review frequency of due diligence files for funds with high residual risk	fundsDueDilReviewFreqHigh	-	YearReview	-
Did you identify any AML/CFT findings as a result of your AML/CFT work?	fundsDueDilHasFindings	-	YesNoList	-

"Investors" section

Information to be provided	JSON ID	Required only if …	Codes required for closed questions (see Annex II)	CSSF guidance

"Investors" section	investors	[infoInvestorsDueDil] has value [Y] Or [infoInvestorsAmlOversightOnOutsourced] has value [Y]	-	-
Number of investors with residual high risk	investorsHR	-	-	By investor, it is meant "account holder". As such, if Mr X has 7 positions in a fund, you only count him once. If Mr X has multiple positions across multiple funds, you only count him once as well. What matters is to count the number of KYC files.
Did you perform sample testing as part of your AML/CFT due diligence or as part of	investorsDueDilHasSample	-	YesNoList	"Sample testing" is to be understood as document-

your AML/CFT oversight on the outsourced control(s) performed during the reference period?				based review (i.e. KYC documents, proof of screening …).
How long ago did you perform a sample testing?	investorsLastSample	[investorsDueDilHasSample] has value [N]	SampleCombo	-
Size of sample for the reference period	investorsDueDilSampleSize	[investorsDueDilHasSample] has value [Y]	-	You may count all the AML/CFT due diligence files which were reviewed during the reference period covered by the report.
Please select the review frequency of due diligence files for investors with high residual risk	investorsDueDilReviewFreqHigh	-	YearReview	-
Did you identify any AML/CFT findings as a result of your AML/CFT work?	investorsDueDilHasFindings	-	YesNoList	-

"AML/CFT blocked investors" section

Information to be provided	JSON ID	Required only if ...	Codes required for closed questions (see Annex II)	CSSF guidance
"AML/CFT blocked investors" section	blockedInv	[infoInvestorsNbr] has value [>0]	-	
Percentage of blocked investors compared to all investors in your fund or in the funds you service	blockedInvDueDilSampleSize	-	-	You may use the same statistics that you computed in the past for paragraph f) of point 318 of Circular CSSF 18/698
Have you identified shortcomings regarding the remediation plans of the blocked investors?	blockedInvDueDilHasFindings	-	YesNoList	You may explain in the comments why you believe that a remediation plan is not

				possible (e.g. The blocked investors are all deceased)

"Third-party distributors" section

Information to be provided	JSON ID	Required only if …	Codes required for closed questions (see Annex II)	CSSF guidance
"Third-party distributors" section	distributors	[infoTpDistriDueDil] has value [Y] Or [infoTpDistriAmlOversightOnOutsourced] has value [Y]	-	-
Did you perform sample testing as part of your AML/CFT due diligence or as part of your AML/CFT oversight on the	distributorsDueDilHasSample	-	YesNoList	"Sample testing" is to be understood as document-based review (i.e. KYC

outsourced control(s) performed during the reference period?				documents, proof of screening …).
How long ago did you perform a sample testing?	distributorsLastSample	[distributorsDueDilHasSample] has value [N]	SampleCombo	-
Size of sample for the reference period	distributorsDueDilSampleSize	[distributorsDueDilHasSample] has value [Y]	-	You may count all the AML/CFT due diligence files which were reviewed during the reference period covered by the report.
Please select the review frequency of due diligence files for third-party distributors with high residual risk	distributorsDueDilReviewFreqHigh	-	YearReview	-
Did you identify any AML/CFT findings as a	distributorsDueDilHasFindings	-	YesNoList	-

result of your AML/CFT work?			

"Third-party initiators" section

Information to be provided	JSON ID	Required only if …	Codes required for closed questions (see Annex II)	CSSF guidance
"Third-party initiators" section	initiators	[infoTpInitDueDil] has value [Y] Or [infoTpInitAmlOversightOnOutsourced] has value [Y]	-	-
Did you perform sample testing as part of your AML/CFT due diligence or as part of your AML/CFT oversight on the outsourced control(s)	initiatorsDueDilHasSample	-	YesNoList	"Sample testing" is to be understood as document-based review (i.e. KYC documents,

performed during the reference period?				proof of screening …).
How long ago did you perform a sample testing?	initiatorsLastSample	[initiatorsDueDilHasSample] has value [N]	SampleCombo	-
Size of sample for the reference period	initiatorsDueDilSampleSize	[initiatorsDueDilHasSample] has value [Y]	-	You may count all the AML/CFT due diligence files which were reviewed during the reference period covered by the report.
Please select the review frequency of due diligence files for third-party initiators with high residual risk	initiatorsDueDilReviewFreqHigh	-	YearReview	-
Did you identify any AML/CFT findings as a result of your AML/CFT work?	initiatorsDueDilHasFindings	-	YesNoList	-

"External portfolio managers" section

Information to be provided	JSON ID	Required only if …	Codes required for closed questions (see Annex II)	CSSF guidance
"External portfolio managers" section	extPtfMg	[infoExtPtfMgDueDil] has value [Y]	-	-
Did you perform sample testing as part of your AML/CFT due diligence performed during the reference period?	extPtfMgDueDilHasSample	-	YesNoList	"Sample testing" is to be understood as document-based review (i.e. KYC documents, proof of screening …).
How long ago did you perform a sample testing?	extPtfMgLastSample	[extPtfMgDueDilHasSample] has value [N]	SampleCombo	-
Size of sample for the reference period	extPtfMgDueDilSampleSize	[extPtfMgDueDilHasSample] has value [Y]	-	You may count all the AML/CFT due diligence files

				which were reviewed during the reference period covered by the report.
Please select the review frequency of due diligence files for external portfolio managers with high residual risk	extPtfMgDueDilReviewFreqHigh	-	YearReview	-
Did you identify any AML/CFT findings as a result of your AML/CFT work?	extPtfMgDueDilHasFindings	-	YesNoList	-

"Intermediaries" section

Information to be provided	JSON ID	Required only if …	Codes required for closed questions (see Annex II)	CSSF guidance

"Intermediaries" section	intermediaries	[infoIntermediariesDueDil] has value [Y] Or [infoIntermediariesAmlOversightOnOutsourced] has value [Y]	-	
Did you perform sample testing as part of your AML/CFT due diligence or as part of your AML/CFT oversight on the outsourced control(s) performed during the reference period?	intermediariesDueDilHasSample	-	YesNoList	"Sample testing" is to be understood as document-based review (i.e. KYC documents, proof of screening …).
How long ago did you perform a sample testing?	intermediariesLastSample	[intermediariesDueDilHasSample] has value [N]	SampleCombo	-
Size of sample for the reference period	intermediariesDueDilSampleSize	[intermediariesDueDilHasSample] has value [Y]	-	You may count all the AML/CFT due diligence files which were reviewed during the reference period covered by the report.

Please select the review frequency of due diligence files for intermediaries with high residual risk	intermediariesDueDilReviewFreqHigh	-	YearReview	-
Did you identify any AML/CFT findings as a result of your AML/CFT work?	intermediariesDueDilHasFindings	-	YesNoList	-

"Third-party investment advisors" section

Information to be provided	JSON ID	Required only if ...	Codes required for closed questions (see Annex II)	CSSF guidance
"Third-party investment advisors" section	invAdv	[infoTpInvAdvDueDil] has value [Y]	-	-

Did you perform sample testing as part of your AML/CFT due diligence performed during the reference period?	invAdvDueDilHasSample	-	YesNoList	"Sample testing" is to be understood as document-based review (i.e. KYC documents, proof of screening …).
How long ago did you perform a sample testing?	invAdvLastSample	[invAdvDueDilHasSample] has value [N]	SampleCombo	-
Size of sample for the reference period	invAdvDueDilSampleSize	[invAdvDueDilHasSample] has value [Y]	-	You may count all the AML/CFT due diligence files which were reviewed during the reference period covered by the report.
Please select the review frequency of due diligence files for third-party investment advisors with high residual risk	invAdvDueDilReviewFreqHigh	-	YearReview	-

Did you identify any AML/CFT findings as a result of your AML/CFT work?	invAdvDueDilHasFindings	-	YesNoList	-

"PEPs" section

Information to be provided	JSON ID	Required only if …	Codes required for closed questions (see Annex II)	CSSF guidance
"PEPs" section	pep	[infoPepDueDil] has value [Y] Or [infoPepAmlOversightOnOutsourced] has value [Y]	-	-
Did you perform sample testing as part of your AML/CFT due diligence or as part of your AML/CFT oversight on the outsourced control(s)	pepDueDilHasSample	-	YesNoList	"Sample testing" is to be understood as document-based review (i.e. KYC documents,

performed during the reference period?				proof of screening …).
How long ago did you perform a sample testing?	pepLastSample	[pepDueDilHasSample] has value [N]	SampleCombo	-
Size of sample for the reference period	pepDueDilSampleSize	[pepDueDilHasSample] has value [Y]	-	You may count all the AML/CFT due diligence files which were reviewed during the reference period covered by the report.
Did you identify any AML/CFT findings as a result of your AML/CFT work?	pepDueDilHasFindings	-	YesNoList	-

"Assets" section

Information to be provided	JSON ID	Required only if …	Codes required for closed questions (see Annex II)	CSSF guidance
"Assets" section	assets	[infoAssetsDueDil] has value [Y] Or [infoAssetsAmlOversightOnOutsourced] has value [Y]	-	-
Have you, or the funds you service, invested in high risk assets?	assetsHR	-	YesNoList	As per your self assessment.
Did you perform sample testing as part of your AML/CFT due diligence or as part of your AML/CFT oversight on the outsourced control(s) performed during the reference period?	assetsDueDilHasSample	-	YesNoList	"Sample testing" is to be understood as document-based review (i.e. KYC documents, proof of screening …).

How long ago did you perform a sample testing?	assetsLastSample	[assetsDueDilHasSample] has value [N]	SampleCombo	-
Size of sample for the reference period	assetsDueDilSampleSize	[assetsDueDilHasSample] has value [Y]	-	You may count all the AML/CFT due diligence files which were reviewed during the reference period covered by the report.
Please select the frequency of due diligence files for high risk assets	assetsDueDilReviewFreqHigh	-	YearReview	-
Did you identify any AML/CFT findings as a result of your AML/CFT work?	assetsDueDilHasFindings	-	YesNoList	-

"Branches/subsidiaries" section

Information to be provided	JSON ID	Required only if …	Codes required for closed questions (see Annex II)	CSSF guidance
"Branches/subsidiaries" section	branchSection	[infoBranchAmlControls] has value [Y] Or [infoBranchAmlOversight] has value [Y]	-	-
Did you perform sample testing as part of your AML/CFT oversight performed on branches/subsidiaries during the reference period?	branchOversightHasSample	-	YesNoList	"Sample testing" is to be understood as document-based review (i.e. KYC documents, proof of screening …).
How long ago did you perform a sample testing?	branchLastSample	[branchOversightHasSample] has value [N]	SampleCombo	-
Size of sample for the reference period	branchOversightSampleSize	[branchOversightHasSample] has value [Y]	-	You may count all the AML/CFT due

				diligence files which were reviewed during the reference period covered by the report.
Did you identify any AML/CFT findings as a result of your AML/CFT work?	branchOversightHasFindings	-	YesNoList	-

"AML/CFT findings" section

Information to be provided	JSON ID	Required only if ...	Codes required for closed questions (see Annex II)	CSSF guidance
Identifier of a finding	trackingCode	Prior AML/CFT finding relating to previous reference periods must be updated	-	The [trackingcode] field should not be provided if the finding is newly added to the current

				reference period.
Detected by	detectedBy	-	FindingsDetectedByCombo	-
Severity	severity	-	FindingsSeverityCombo	-
Related section of the report	relatedSection	-	FindingsSections	-

Action(s) taken to remediate the finding	remedialAction	-	-	If none, mark "None"
Status	status	-	FindingsStatusCombo	-

Annex II – Codes required in the report for closed questions

Reference (if applicable)	Label	Code for JSON file
Questions requiring a "Y" or "N" answer ("YesNoList")	Yes	Y
	No	N
Questions requiring a "Y", "N" or "N/A" answer ("YesNoNaList")	Yes	Y
	No	N
	Not applicable	NA
Questions requiring a "Y", "N" or "Partially" answer ("YesNoPartiallyList")	Yes	Y
	No	N
	Partially	P
TypeOfEntity	a designated Investment Fund Manager	IFM
	a self-managed fund	SelfManFund

Reference (if applicable)	Label	Code for JSON file
	a fund managed by a foreign IFM	FundForeignIFM
MLTFRiskCombo	High	H
	Medium High	MH
	Medium Low	ML
	Low	L
SampleCombo	Never	Never
	1 year ago	One
	2 years ago	Two
	3 years ago	Three
	More than 3 years ago	ThreeOrMore
InherentRiskTriggersCombo	Fund service	Fund_service
	Geography	Geography

Reference (if applicable)	Label	Code for JSON file
	License	License
	Investors	Investors
	Assets	Assets
	Type of funds	Type_of_funds
	Volume of assets	Volume_of_assets
	Business model	Business_model
	Others	Others
FindingsDetectedByCombo	Responsable du Contrôle (RC)	rc
	Responsable du Respect (RR)	rr
	CSSF	cssf
	Statutory Auditor	statutory_auditor
	Internal Audit	internal_auditor
	Other	other

Reference (if applicable)	Label	Code for JSON file
FindingsSeverityCombo	Less significant	Less_significant
	Moderately significant	Moderately_significant
	Significant	Significant
	Very significant	Very_significant
FindingsStatusCombo	Open	Open
	Closed	Closed
YearReview	every year or less	Every1y
	every two years	Every2y
	every three years or more	Every3ym
FindingsSections	IFM	ifm
	Funds	funds
	Investors	investors
	Blocked investors	blockedInv

Reference (if applicable)	Label	Code for JSON file
	Distributors	distributors
	Initiators	initiators
	External Portfolio Management	extPtfMg
	Investment Advisors	invAdv
	Intermediaries	intermediaries
	PEPs	pep
	Assets	assets
	Branches / subsidiaries	branch
	Other	other