



Commission de Surveillance
du Secteur Financier

Circular-letter

**2020 SURVEY RELATED TO THE
FIGHT AGAINST MONEY
LAUNDERING AND TERRORIST
FINANCING**

Circular-letter

Re: 2020 Survey related to the fight against money laundering and terrorist financing

Luxembourg, 27 January 2021

**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;
- specialised professionals of the financial sector (PFS); and
- central securities depositories.

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.

Madam, Sir,

As previously announced (please refer to the [Communiqué of 24 December 2020](#)), the annual online survey for the year 2020 collecting standardised key information concerning money laundering and terrorist financing (ML/TF) 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 **15 February 2021**.

This cross-sector survey contributes to the CSSF's ongoing assessment of ML/TF risks present in the financial sectors under its Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) supervision, and forms part of the AML/CFT risk-based supervision approach put in place by the CSSF over the last years.

In substance, the 2020 survey remains generally unchanged compared to the previous year. However, a limited number of questions have been added or amended due to the legislative and regulatory changes that occurred in 2020 (notably the amendment to the 2004 AML/CFT Law in March 2020 or the new law of 19 December 2020 regarding financial restrictive measures).

Answers to the survey questions will have to be submitted through the CSSF eDesk portal by 15 March 2021.

The self-assessment ML/TF risk survey must be initiated and submitted via the CSSF eDesk portal by:

- the compliance officer in charge of the control of compliance with the professional obligations¹ ("*responsable du contrôle du respect des obligations professionnelles*" ("RC")), or
- the person responsible for compliance with the professional obligations² ("*responsable du respect des obligations professionnelles*" ("RR")).

¹ As per Article 1(1) of the CSSF Regulation N° 12-02 of 14 December 2012 on the fight against money laundering and terrorist financing as amended by CSSF Regulation N° 20-05 of 14 August 2020

² As per Article 1(1) of the CSSF Regulation N° 12-02 of 14 December 2012 on the fight against money laundering and terrorist financing as amended by CSSF Regulation N° 20-05 of 14 August 2020



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The completion of the survey, however, may be assigned within the CSSF eDesk portal to another employee of the entity or third party, while bearing in mind that the **ultimate responsibility** for the adequate completion of the survey shall remain with the “RC” or “RR”.

In terms of logistics, this implies that the aforementioned person and their potential delegates must have an eDesk account, which requires a LuxTrust authentication.

In order to avoid delays and connection problems once the survey will be launched, the CSSF invites all entities it supervises for AML/CFT purposes to ensure they have created respective account(s) in advance. Reference is made to the “Authentication and user account management” user guide in the dedicated section of the CSSF [eDesk portal homepage](#) for further details.

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