



Commission de Surveillance
du Secteur Financier

Circular-letter CSSF

2021 SURVEY RELATED TO THE
FIGHT AGAINST MONEY
LAUNDERING AND TERRORISM
FINANCING

Circular-letter CSSF

Re: 2021 Survey related to the fight against money laundering and terrorism financing

Luxembourg, 27 January 2022

**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 14 December 2021](#)), the annual online survey for the year 2021 collecting standardised key information concerning money laundering and terrorism 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 2022**.

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.

The data provided by professionals in the context of this survey needs to be accurate under penalty of application of administrative measures or sanctions by CSSF pursuant to Articles 8-2 or 8-4 of the Law of 12 November 2004, as amended, relating to AML/CFT.

In substance, the 2021 survey remains mostly unchanged compared to the previous year. However, some questions have been removed, added or amended. The new questions have been highlighted in the survey.

Answers to the survey questions will have to be submitted through the CSSF eDesk portal **by 15 April 2022 (at the latest)**.

The 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 the “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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