



Commission de Surveillance  
du Secteur Financier

# Circular letter

2022 QUESTIONNAIRE ON  
FINANCIAL CRIME

## Circular letter

Re: 2022 Questionnaire on financial crime

Luxembourg, 7 February 2023

**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;**
- **Virtual Asset Service Providers (VASP)**
- **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 7 December 2022](#)), the annual online questionnaire for the year 2022 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 2023**.

This cross-sector questionnaire 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 questionnaire 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 2022 questionnaire 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 questionnaire.

Answers to the questions will have to be submitted through the CSSF eDesk Portal **by 31 March 2023 (at the latest)**.

The questionnaire must be initiated and submitted via the CSSF eDesk Portal by:

- the compliance officer in charge of the control of compliance with the professional obligations<sup>1</sup> ("*responsable du contrôle du respect des obligations professionnelles*" ("RC")), or
- the person responsible for compliance with the professional obligations<sup>2</sup> ("*responsable du respect des obligations professionnelles*" ("RR")).

<sup>1</sup> 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.

<sup>2</sup> 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 questionnaire, 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 questionnaire 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 questionnaire 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.

**Claude WAMPACH**  
Director

**Marco ZWICK**  
Director

**Jean-Pierre FABER**  
Director

**Françoise KAUTHEN**  
Director

**Claude MARX**  
Director General



**Commission de Surveillance du Secteur Financier**

283, route d'Arlon

L-2991 Luxembourg (+352) 26 25 1-1

[direction@cssf.lu](mailto:direction@cssf.lu)

[www.cssf.lu](http://www.cssf.lu)