



## Circular CSSF 26/914

Identification of obliged entities eligible for direct supervision by AMLA

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## Identification of obliged entities eligible for direct supervision by AMLA

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; and
- Crypto-Asset Service Providers;

incorporated under Luxembourg law, and which are considered the ultimate parent undertaking in the EU<sup>1</sup> having branches, subsidiaries and/or providing freedom to provide services, and

incorporated under Luxembourg law, which are not part of a group (solo entities).

To all Luxembourg establishments of the above-listed entities which have been assigned as the designated reporting entity in the EU for all the group's establishments within the EU where there is no parent undertaking in the EU.

Luxembourg, 25 June 2026

Ladies and Gentlemen,

The Commission de Surveillance du Secteur Financier (CSSF) would like to inform you that the European Authority for anti-money laundering and countering the financing of terrorism (AMLA) is seeking to collect data in order to identify which entities meet the eligibility criteria of Article 12(1) of Regulation (EU) 2024/1620, relevant both for the selection process which will take place in 2027 of obliged entities that will be directly supervised by AMLA, and for the determination of the obliged entities on which the fees shall be levied in accordance with Article 77(1) of Regulation (EU) 2024/1620.

For this purpose, and as already announced in the CSSF *Communiqué* of 1 June 2026, AMLA has made a data collection package available directly on their website<sup>2</sup>. The package is composed of 1) the **AMLA template** that needs to be filled out and submitted to the supervisory authority, and 2) the **Interpretative note** accompanying the template that needs to be consulted **before** filling out the template.

The completed template must be submitted to the CSSF by all addressees of this Circular **by 22 July 2026 at the very latest**.

<sup>1</sup> Alternatively, entities with a parent undertaking in another EU Member State must report to that parent undertaking, which is responsible for collecting data for the group and reporting to the relevant AML/CFT supervisor in that EU Member State.

<sup>2</sup> [https://www.amla.europa.eu/amla-takes-next-step-toward-2027-selection-entities-direct-supervision\\_en](https://www.amla.europa.eu/amla-takes-next-step-toward-2027-selection-entities-direct-supervision_en)

Please note that a dedicated **eDesk campaign** for submission will be opened by the CSSF on **20 July 2026** and the eDesk registered compliance officers of the entities will be duly notified thereof.

The answers to the questionnaire must be submitted within the CSSF eDesk platform by:

- the compliance officer in charge of the control of compliance with the professional obligations<sup>3</sup> ("*responsable du contrôle du respect des obligations professionnelles*" ("**RC**")), or
- the person responsible for compliance with the professional obligations<sup>4</sup> ("*responsable du respect des obligations professionnelles*" ("**RR**")).

The completion of the questionnaire, however, may be assigned within the CSSF eDesk platform 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". This implies that the aforementioned person and his/her potential delegate hold an eDesk account, which requires a LuxTrust authentication.

Finally, as announced in the CSSF *Communiqués* of 1 June 2026 and 8 June 2026, AMLA hosted, on 10 June 2026, a webinar offering a practical walkthrough of the template and addressing previously submitted questions to AMLA. The webinar, the slide deck, and examples and pre-filled templates are now available for consultation [on AMLA's website](#).

Please note that AMLA may request further information relevant to this exercise after the deadline.

**Pascale TOUSSING**  
Director

**Claude WAMPACH**  
Director

**Marco ZWICK**  
Director

**Jean-Pierre FABER**  
Director

**Claude MARX**  
Director General

<sup>3</sup> As per Article 1(1) of CSSF Regulation No 12-02 of 14 December 2012 on the fight against money laundering and terrorist financing, as amended

<sup>4</sup> As per Article 1(1) of CSSF Regulation No 12-02 of 14 December 2012 on the fight against money laundering and terrorist financing, as amended