Luxembourg, 10 June 2025

The following text has been elaborated by the Commissariat aux Assurances for information purposes. The French version of this Circular letter is the only authentic version.

Circular letter 25/7 of the Commissariat aux Assurances concerning the qualitative questionnaire on the fight against money laundering and terrorist financing ("AML/CFT")

Ladies and gentlemen,

As part of the ongoing development of a risk-based supervisory approach, the Commissariat aux Assurances, by means of this circular letter, is introducing a new version of the qualitative AML/CFT questionnaire. The purpose is to gather systematic, standardised and up-to-date information on the money laundering and terrorist financing (ML/TF) risks to which professionals (as defined below) are exposed, and the ML/TF risk mitigation measures they have put in place.

Analysis of all the information collected will enable the Commissariat aux Assurances to assess the compliance and effectiveness of the AML/CFT framework of the professionals under its supervision.

Scope of application

This circular letter is addressed to:
- Life insurance undertakings;
- Brokers having distributed[1] or distributing insurance contracts relating to the life insurance classes under Annex II of the amended law of 7 December 2015 on the insurance sector;
- Luxembourg branches of life insurance undertakings from the European Economic Area ("EEA") or third countries;

(hereinafter, collectively, the "**Professionals**").

In accordance with Article 279 of the amended law of 7 December 2015 on the insurance sector, the term "brokers" used in the context of this circular letter refers to insurance brokers and insurance brokerage firms.

Instructions relating to the questionnaire

Although its general structure remains unchanged from the version of the questionnaire attached to Circular Letter 22/3 of 3 March 2022, questions have been removed, added or amended. The new questions have been highlighted in the questionnaire to make them easier to identify. To ensure consistency and facilitate comparison with the answers to the questions in the previous version of the questionnaire, the original numbering has been retained. As a result, some numbers may appear to be missing from the version of the questionnaire introduced by this circular letter.

[1] It should be noted that this circular letter does not apply to brokers having distributed insurance contracts relating to the life insurance classes under Annex II of the amended law of 7 December 2015 on the insurance sector, but no longer hold this type of insurance contract in their portfolio as at 31 December 2024.

In the interests of clarity and comprehension of the questionnaire, comments have been added to some questions.

The questionnaire must be completed under the responsibility of the Responsible for Compliance and the Compliance Officer (AML/CFT) as defined in Article 1, points t) and c) respectively, of the Commissariat aux Assurances Regulation No. 20/03 of 30 July 2020 on AML/CFT.

Practical details

Concerning transmission channels:

- Life insurance undertakings are invited to send the completed questionnaire (Excel format) via **E-File/SOFiE**;
- Brokers and Luxembourg branches of life insurance undertakings from the EEA or third countries are invited to send the completed questionnaire (Excel format) via the secure file exchange platform called **CAA FileShare**. The identifiers required to access this platform will be sent in due time by the Commissariat aux Assurances to each Professional.

Through the above-mentioned channels, the Commissariat aux Assurances will send personalised Excel files to the Professionals. As some questions do not apply to all types of Professionals, the fields requiring an answer are highlighted in red.

Answers to the questionnaire must be received by the Commissariat aux Assurances **by 4 July 2025 at the latest** and must reflect the situation at 31 December 2024, unless otherwise specified in certain questions.

The Commissariat aux Assurances may verify the accuracy and completeness of the answers provided, in particular during on-site inspections.

The Executive Committee