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

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General - Qualitative questionnaire on the Fight Against Money Laundering and the Financing of Terrorism (AML/CFT)

* Some questions do not apply to all types of professionals. The "CodeAnswers" requiring a response are highlighted in red.
* 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 in the updated version of the questionnaire.
* The new "CodeAnswers" are highlighted in blue.

SECTION 1. Overall ML/TF risk assessment and ML/TF risk appetite at professional level

		CodeAnswer	Options	Comments
1.1	Has the professional carried out an overall risk assessment during which it has identified and evaluated the ML/TF risks to which it is exposed ?	R0001	Yes No	This question, along with the associated sub-questions, pertains to the overall assessment of money laundering and terrorist financing (ML/TF) risks that professionals are required to conduct under Article 2-2 of the AML/CFT Law. The purpose is to identify, assess, and understand the ML/TF risks to which they are exposed. Specifically, this assessment involves quantifying and analyzing the ML/TF risks associated with their activities by considering all relevant risk factors related to customers, countries or geographic areas, products, services, transactions, and distribution channels. The objective is to determine the overall risk level to which the professional is exposed. This assessment must also incorporate the level and type of appropriate measures (AML/CFT policies and procedures, controls, etc.) implemented by the professional to manage and mitigate the identified risks. This approach enables the professional to: - Evaluate the inherent risk associated with their activities, i.e., the risk before considering mitigating measures; - Describe the mitigating measures in place to reduce the inherent risk and assess their effectiveness; - Evaluate the residual risk, i.e., the level of risk remaining after applying mitigating measures, to determine whether this risk is acceptable or if additional mitigating measures are necessary. The nature and extent of this overall ML/TF risk assessment must be adapted to the nature and volume of the professional's activities.
1.1.1	If "No" to 1.1, specify the reasons and remedial actions in place:	R0041	*Free text*	
	If "Yes" to 1.1, please answer questions 1.2 to 1.10:			
1.2	Date of last update (yyyy-mm-dd):	R0002	*Date*	
1.3	According to this assessment, what is the professional's exposure to ML/TF risks in relation to the following criteria:			It refers to the residual risk level, i.e., the level of risk that remains after applying mitigation measures.
1.3.1	- Type of customers	R0003	Low Medium High Not assessed	
1.3.2	- Countries or geographical areas	R0004	Low Medium High Not assessed	
1.3.3	- Type of transactions, operations	R0005	Low Medium High Not assessed	
1.3.4	- Type of products, services	R0006	Low Medium High Not assessed	
1.3.5	- Distribution channel (e.g. direct selling, distance selling, type of intermediaries, etc.)	R0007	Low Medium High Not assessed	
1.4	Has this overall risk assessment been drawn up and documented in writing ?	R0008	Yes No	
1.4.1	If "Yes" to 1.4, is it formalised in a separate document ?	R0009	Yes No	
1.5	Have the results of the overall risk assessment been communicated to:			Reference is made to refers to CL 23/13 on the revised European Banking Authority's Guidelines on money laundering and terrorist financing risk factors.
1.5.1	- The Board of Directors / Board of Managers ?	R0010	Yes No	
1.5.2	- The Executive Committee ?	R0011	Yes No	
1.5.3	- Another effective management body (not listed above) ?	R0012	Yes No Not applicable	For example, audit committee, risk management committee, etc.
1.5.7	- All employees ?	R0016	Yes No	
1.6	Has this overall risk assessment been formally approved by the professional ?	R0017	Yes No	
1.6.1	If "Yes" to 1.6, who approved this assessment ?	R0018	Board of Directors/ Board of Managers Executive Committee Board of Directors/ Board of Managers and Executive Committee Other	
1.6.2	If "Other" in 1.6.1, specify which body:	R0019	*Free text*	
1.7	Do the professional's internal procedures include a description of the methodology used to carry out this assessment ?	R0020	Yes No	
1.8	As part of the inherent risk assessment, does the professional use the CAA quantitative questionnaire as a basis for inventorying/identifying the relevant ML/TF risk factors ?	R0021	Yes No Partially	The identification of relevant ML/TF risk factors at the professional level is a key step in assessing the inherent risk level — that is, the risk that exists before taking into account the mitigation measures implemented by the professional. In order to measure the impact and scope of these risk factors, and to justify the associated inherent risk assessment, professionals are expected to rely in particular on quantitative data, such as scores derived from the quantitative questionnaires, the volume (in value and/or number) or percentage of affected contracts, the amount of relevant operations/transactions, etc. For life insurance undertakings, reference is made to the quantitative questionnaire of the CL 18/9. For insurance brokers and insurance brokerage firms, reference is made to the quantitative questionnaire of the CL 23/3.
1.8.1	If "Yes" or "Partially" to 1.8, does the professional take into account additional ML/TF risk factors resulting from the nature and size of its activity ?	R0022	Yes No	
1.9	Indicate whether the overall risk assessment includes/considers the following elements:			
1.9.3	A description of the measures in place to mitigate and manage the identified ML/TF risks	R0025	Yes No	When carrying out its overall assessment of the ML/TF risks to which it is exposed, the professional considers the quality of the controls and other measures in place to mitigate and manage ML/TF risks. This notably refers to CL 23/13 on the revised European Banking Authority's Guidelines on money laundering and terrorist financing risk factors.
1.9.3.1	If "No" to 1.9.3, specify the reasons:	R0042	*Free text*	
1.9.5	Information on risks contained in the NRAs	R0027	Yes No	This notably refers to Luxembourg's NRAs. For more information, including links to the relevant documentation, please consult the dedicated CAA's webpage (https://www.caa.lu/en/financial-crime/fight-against-money-laundering-and-terrorist-financing/supporting-documentation).
1.9.5.1	If "No" to 1.9.5, specify the reasons:	R0044	*Free text*	
1.9.6	Information on risks contained in the supranational report from the European Commission on the ML/TF risks	R0028	Yes No	This notably refers to the European Commission's 2022 supranational report on the assessment of ML/TF risks. For more information, including links to the relevant documentation, please consult the dedicated CAA's webpage (https://www.caa.lu/en/financial-crime/fight-against-money-laundering-and-terrorist-financing/supporting-documentation).
1.9.6.1	If "No" to 1.9.6, specify the reasons:	R0045	*Free text*	
1.9.7	Information on risks contained in guidances issued by the European Supervisory Authorities	R0029	Yes No	This notably refers to the guidelines issued by the European Banking Authority. For more information, including links to the relevant documentation, please consult the dedicated CAA's webpage (https://www.caa.lu/en/financial-crime/fight-against-money-laundering-and-terrorist-financing/supporting-documentation).
1.9.7.1	If "No" to 1.9.7, specify the reasons:	R0046	*Free text*	
1.9.8	An assessment of the risks related to <u>restrictive measures in financial matters</u> (whether integrated into the overall risk assessment or carried out separately):	R0047	Yes No	Restrictive measures in financial matters as referred to in the amended Law of 19 December 2020 on the implementation of restrictive measures in financial matters. For the purposes of this questionnaire, the terms "financial sanctions" and "restrictive measures in financial matters" have the same meaning. Upon detecting persons, entities, or groups targeted by restrictive measures in financial matters, professionals must apply the required measures without delay (i.e., within a few hours) and notify the competent authorities in terms of financial sanctions. For more information, please consult: - The dedicated webpage of the Ministry of Finance on international financial sanctions, particularly the "For more information" section listing best practice guides: https://mfin.gouvernement.lu/en/dossiers/2018/sanctions-financiaires-internationales.html, - The "Typology Report" on the circumvention of financial restrictive measures, published in July 2023 by the FIU via GoAML platform.
1.9.8.1	If "No" to 1.9.8, specify the reasons why the professional has not assessed the risks related to restrictive measures in	R0048	*Free text*	
1.9.8.2	If "Yes" to 1.9.8, specify the main risk factors identified:	R0049	*Free text*	
1.9.8.3	If "Yes" to 1.9.8, specify the associated inherent risk level:	R0050	Low Medium High	This refers to the inherent risk level, i.e., the risk existing before the application of mitigation measures.
1.9.8.4	If "Yes" to 1.9.8, specify the associated residual risk level:	R0051	Low Medium High	This refers to the residual risk level, i.e., the level of risk that remains after applying mitigation measures.

1.9.9	An assessment of the risks related to <u>tax offences</u> (whether integrated into the overall risk assessment or carried out separately):	R0052	Yes No	This notably refers to Luxembourg's NRAs considering criminal tax offenses as one of the most likely external threats for Luxembourg. It should also be noted that, on April 2, 2020, the Association des Compagnies d'assurances du Grand-Duché du Luxembourg (ACA) published a list of indicators concerning the professional obligation to report suspicions under the primary offense of aggravated tax money laundering or tax fraud (https://www.aca.lu/wp-content/uploads/2022/11/gt_aml_div_annexe-2-liste-d-indicateurs-concernant-aml-ou-escroquerie-fiscale.pdf).
1.9.9.1	If "No" to 1.9.9, specify the reasons why the professional has not assessed the risks related to tax offences:	R0053	*Free text*	
1.9.9.2	If "Yes" to 1.9.9, specify the main risk factors identified:	R0054	*Free text*	
1.9.9.3	If "Yes" to 1.9.9, specify the associated inherent risk level:	R0055	Low Medium High	This refers to the inherent risk level, i.e., the risk existing before the application of mitigation measures.
1.9.9.4	If "Yes" to 1.9.9, specify the associated residual risk level:	R0056	Low Medium High	This refers to the residual risk level, i.e., the level of risk that remains after applying mitigation measures.
1.9.10	An assessment of the risks related to <u>terrorist financing</u> (whether integrated into the overall risk assessment or carried out separately):	R0057	Yes No	Note that the CAA does not necessarily expect the TF risk assessment to be materialised in a separate document. However, dedicated TF risk assessment has to be, at minimum, conducted and materialised in the professional's existing documentation. Reference is made to various external sources, notably Luxembourg's vertical risk assessments published by the Ministry of Justice in 2022 (one concerning TF, and another concerning legal persons and legal arrangements). For further information, please consult: - the CAA's webpage with links to the relevant documentation (https://www.caa.lu/en/financial-crime/fight-against-money-laundering-and-terrorist-financing/supporting-documentation), - the list of financing of terrorist organizations indicators (December 2023, version 1.0) issued by the FIU via GoAML platform, - CAA CL 23/13 on the revised EBA Guidelines on ML/TF risk factors.
1.9.10.1	If "No" to 1.9.10, specify the reasons why the professional has not assessed the risks related to terrorist financing:	R0058	*Free text*	
1.9.10.2	If "Yes" to 1.9.10, specify the main risk factors identified:	R0059	*Free text*	
1.9.10.3	If "Yes" to 1.9.10, specify the associated inherent risk level:	R0060	Low Medium High	This refers to the inherent risk level, i.e., the risk existing before the application of mitigation measures.
1.9.10.4	If "Yes" to 1.9.10, specify the associated residual risk level:	R0061	Low Medium High	This refers to the residual risk level, i.e., the level of risk that remains after applying mitigation measures.
1.9.11	An assessment of the risks related to <u>corruption</u> (whether integrated into the overall risk assessment or carried out separately):	R0067	Yes No	This notably refers to Luxembourg's NRAs, which identify corruption and bribery as one of the most likely external threats for Luxembourg. Foreign corruption should also be considered, particularly when committed by a foreign public official in the context of international business transactions. This may involve "passive" corruption (e.g., a foreign public official receiving bribes) or "active" corruption (e.g., Luxembourg-based economic actors paying bribes in their cross-border business transactions). For further information, please consult: - the FIU's webpage on corruption (https://justice.public.lu/fr/organisation-justice/crf/typologies/corruption.html), - the Ministry of Justice's webpage on corruption (https://mj.gouvernement.lu/fr/dossiers/2020/lutte-corruption.html).
1.9.11.1	If "Yes" to 1.9.11, specify the main risk factors identified:	R0069	*Free text*	
1.9.11.2	If "Yes" to 1.9.11, specify the associated inherent risk level:	R0070	Low Medium High	This refers to the inherent risk level, i.e., the risk existing before the application of mitigation measures.
1.9.11.3	If "Yes" to 1.9.11, specify the associated residual risk level:	R0071	Low Medium High	This refers to the residual risk level, i.e., the level of risk that remains after applying mitigation measures.
1.9.12	An assessment of the risks related to <u>proliferation financing</u> (whether integrated into the overall risk assessment or carried out separately):	R0062	Yes No	Proliferation financing refers to the regime of sanctions related to the Democratic People's Republic of Korea (North Korea). In the FATF context, "proliferation financing risk" refers strictly and only as the potential breach, non-implementation, or evasion of targeted financial sanctions obligations referred to in FATF Recommendation 7. Proliferation Financing (PF) refers to the risk of raising, moving, or making available funds, other assets, or economic resources, or financing, in whole or in part, to persons or entities for purposes of "Weapons of Mass Destruction" (WMD) proliferation, including the proliferation of their means of delivery or related materials (which includes both dual-use technologies and dual-use goods used for non-legitimate purposes). The WMD proliferation refers to the manufacture, acquisition, possession, development, export, trans-shipment, brokering, transport, transfer, stockpiling, or use of nuclear, chemical, or biological weapons, and their means of delivery and related materials (which includes both dual-use technologies and dual-use goods used for non-legitimate purposes). It is important to note that a risk assessment aimed at understanding the risk of potential cases of breach, non-implementation, or circumvention of targeted financial sanctions related to proliferation financing may not necessarily require an entirely distinct or new methodological process compared to how the professionals have undertaken ML or TF risk assessments. For more information, please refer to: - The dedicated webpage of the Ministry of Justice on proliferation: https://justice.public.lu/fr/organisation-justice/crf/typologies/proliferation.html - The dedicated webpage of the Ministry of Finance on international financial sanctions, particularly the "For more information" section listing best practice guides: https://mfin.gouvernement.lu/en/dossiers/2018/sanctions-financiaires-internationales.html - The FATF's guidelines on the assessment and mitigation of proliferation financing risks: https://www.fatf-gafi.org/content/dam/fatf-gafi/guidance/Guidance-Proliferation-Financing-Risk-Assessment-Mitigation.pdf.coredownload.inline.pdf
1.9.12.1	If "Yes" to 1.9.12, specify the main risk factors identified:	R0064	*Free text*	
1.9.12.2	If "Yes" to 1.9.12, specify the associated inherent risk level:	R0065	Low Medium High	This refers to the inherent risk level, i.e., the risk existing before the application of mitigation measures.
1.9.12.3	If "Yes" to 1.9.12, specify the associated residual risk level:	R0066	Low Medium High	This refers to the residual risk level, i.e., the level of risk that remains after applying mitigation measures.
1.9.13	An assessment of the risks related to <u>emerging risks</u> (whether integrated into the overall risk assessment or carried out separately):	R0072	Yes No	This question refers, for example, to risks related to digitalization, the use of virtual assets, cyber-attacks, etc.
1.9.13.1	If "Yes" to 1.9.13, specify the main risk factors identified:	R0074	*Free text*	
1.9.13.2	If "Yes" to 1.9.13, specify the associated inherent risk level:	R0075	Low Medium High	This refers to the inherent risk level, i.e., the risk existing before the application of mitigation measures.
1.9.13.3	If "Yes" to 1.9.13, specify the associated residual risk level:	R0076	Low Medium High	This refers to the residual risk level, i.e., the level of risk that remains after applying mitigation measures.
1.10	What is the minimum frequency for updating this overall risk assessment ?	R0030	Annually Other frequency	If the frequency is less than one year (e.g., semi-annually), you should answer "Annually".
1.10.1	If 'Other frequency' in 1.10, specify which frequency:	R0031	*Free text*	
1.11	Has the professional defined its ML/TF appetite ?	R0032	Yes No	"Risk appetite" in terms of AML/CFT refers to the level of ML/TF risk that a professional is willing to accept (e.g., accepted distribution countries, types of policyholders targeted, etc.). This notably refers to the CL 23/13 on the revised European Banking Authority's Guidelines on money laundering and terrorist financing risk factors.
	If "No" to 1.11, specify the reasons and the remedial actions in place: If "Yes" to 1.11, please answer the following sub-questions:	R0077	*Free text*	
1.11.1	Who approved the ML/TF risk appetite ?	R0033	Board of Directors/ Board of Managers Executive Committee Board of Directors/ Board of Managers and Executive Committee Other	
1.11.1.1	If "Other" in 1.11.1, specify which body:	R0034	*Free text*	
1.11.2	Are the AML/CFT policies/procedures and controls in place consistent with the previously defined risk appetite ?	R0035	Yes No Partially	This refers, for example, to the professional's implementation of indicators to regularly monitor compliance with the initially defined risk appetite.
1.11.2.1	If "No" or "Partially" to 1.11.2, specify the main inconsistencies identified:	R0078	*Free text*	
1.11.3	Is the residual ML/TF risk as determined through the overall ML/TF risk assessment:	R0036	Equal to the defined ML/TF risk appetite Lower than the defined ML/TF risk appetite Higher than the defined ML/TF risk appetite	
1.11.3.1	If "Higher than the defined ML/TF risk appetite" in 1.11.3, specify the reasons and planned actions:	R0079	*Free text*	
1.12	During the 2024 financial year, has the professional developed and launched new products, new business practices (including new distribution mechanisms) or used new technologies (e.g., electronic identification processes) ? If "Yes" to 1.12, please answer the following sub-questions:	R0037	Yes No	
1.12.1	Has the professional identified and assessed the ML/TF risks which may result from the development of these new products, new business practices or the use of new technologies ?	R0038	Documented assessment carried out before launch/use Documented assessment carried out after launch/use Assessment not carried out or not documented in writing	
1.12.2	Is there an internal procedure governing this process ?	R0039	Yes No	

1.13	Is there an AML/CFT action plan at the professional level which should allow for the mitigation of ML/TF risks ?	R0040	Yes No	For life insurance undertakings, this notably refers to the compliance plan within the meaning of the CL 23/15.
1.13.1	If "Yes" to 1.13, briefly describe this plan:	R0080	*Free text*	

SECTION 2. Organisation and Internal Governance

Governance as of January 1, 2025 and internal resources

2.1	The Responsible for Compliance:			This notably refers to Article 38 of the RGL CAA.
2.1.1	Position of the Responsible for Compliance within the undertaking/firm:	R0101	Director/Manager Authorised manager Effective management (other than the Authorised manager) Other	
2.1.1.1	If "Other", specify which position:	R0102	*Free text*	
2.1.4	Body to which the Responsible for Compliance reports directly:	R0105	Board of Directors/ Board of Managers Executive Committee Board of Directors/ Board of Managers and Executive Committee Other effective management body (not listed above) Other	
2.1.4.1	If "Other effective management body (not listed above)" or "Other", specify which body:	R0106	*Free text*	
2.2	The Compliance Officer (AML/CFT):			This notably refers to Article 38 of the RGL CAA.
2.2.1	Number of years of service in this function within the undertaking/firm:	R0110	*Number*	
2.2.2	Number of years of experience (in total) in AML/CFT:	R0111	*Number*	
2.2.5	Organisation/department/person to whom the Compliance Officer (AML/CFT) reports directly:	R0114	Board of Directors/ Board of Responsible for Compliance Authorised manager (if different from the Responsible for Compliance) Commercial department Operations/Contract department Financial department Legal department Other effective management member (not listed above) Other	
2.2.5.1	If " Other effective management member (not listed above)" or "Other", specify which:	R0115	*Free text*	
2.3	Does the Compliance Officer (AML/CFT) have other responsibilities (and tasks) within the undertaking/firm ?			
2.3.1	Key function Solvency II function: Compliance Officer	R0118	Yes No	
2.3.2	Key function Solvency II function: Risk management	R0119	Yes No	
2.3.3	Legal function	R0120	Yes No	
2.3.4	Commercial function	R0121	Yes No	
2.3.5	Data Protection Officer (DPO)	R0122	Yes No	
2.4	Percentage of working time dedicated to the function of Compliance Officer (AML/CFT) on a full-time basis:	R0125	%	
2.5	Is the possible delegation of certain AML/CFT functions to other employees of the undertaking/firm carried out in accordance with Article 39 of the RGL CAA ?	R0126	Yes No Not applicable	Article 39 of the RGL CAA concerns in particular professional experience, knowledge of AML/CFT matters, conditions of access to information and availability in order to guarantee effective and autonomous performance of the roles. If there is no delegation, enter "Not applicable".
2.5.1	If "No" to 2.5, specify the reasons:	R0244	*Free text*	
2.6	Total number of employees, expressed in FTE, employed by the professional:	R0127	*Number*	Details: - 1 FTE = 1 employee working full-time throughout the year; 1 employee working 4 days out of 5 = 0.8 FTE; 1 full-time employee hired from 1st July = 0.5 FTE. - For professionals that are brokerage firms, the question refers to the number of employees dedicated to insurance distribution activities.
2.7	Number of employees, expressed in FTE, dedicated to the AML/CFT field (including the AML/CFT Compliance Officer):	R0128	*Number*	Precisions: - If the AML/CFT Compliance Officer (full-time employee) dedicates 10% of his/her time to AML/CFT and another employee (half-time employee) dedicated 5%, the answer is 0.125 i.e. ((1 X 10%) + (1 X 50% X 5%)) - For professionals who are brokerage firms, the question refers to the number of employees in the insurance distribution activities dedicated to AML/CFT.
2.8	Average number of years of experience per employee in the AML/CFT team (excluding the AML/CFT Compliance Officer):	R0129	*Number*	
2.9	Does the professional have a parent undertaking that is the head undertaking of the Group ?	R0130	Yes No	
	If "Yes" to 2.9, please answer the following sub-questions:			
2.9.1	Does the Compliance Officer (AML/CFT) have a direct reporting line to the Group Compliance function in AML/CFT areas ?	R0131	Yes No	
2.9.2	What is the minimum frequency of reporting of the Compliance Officer (AML/CFT) to the parent undertaking's AML/CFT department/manager ?	R0132	Daily Weekly Monthly Quarterly Semi-annually Annual Other frequency	
2.9.2.1	If "Other frequency" in 2.9.2, specify which frequency:	R0133	*Free text*	
2.11	Are AML/CFT compliance elements incorporated into the objectives of the following employee categories ?			
2.11.1	Commercial/Sales team ?	R0137	Yes No	
2.11.1	Operations/contracts/customer management team ?	R0138	Yes No	
2.11.1	Management ?	R0139	Yes No	

Execution of customer due diligence measures by third parties

2.12	Does the professional work with third parties who are involved in an outsourcing relationship (subcontracting) ?	R0140	Yes No	This notably refers to Article 35 of the RGL CAA. If the professional is an insurance broker or an insurance brokerage firm, the question refers to third parties other than an insurance undertaking. If the professional is a life insurance undertaking, this question <u>does not</u> refer to intermediaries distributing insurance products.
	If "Yes" to 2.12, please answer the following sub-questions:			
2.12.1	Specify the number of third parties as of December 31, 2024:	R0141	*Number*	
2.12.2	Indicate the date (yyyy-mm-dd) on which the following AML/CFT functions or activities were fully or partially outsourced:			This refers to the start date of outsourcing. If the function or activity is not outsourced, enter "2" (*1900-01-02*). In case of multiple outsourcing relationships, enter the start date of the oldest outsourcing relationship.
2.12.2.1	Customer due diligence measures (when entering into and/or monitoring the business relationship)	R0245	*Date*	
2.12.2.2	AML/CFT training	R0246	*Date*	
2.12.2.3	Transaction monitoring (including complex and unusual operations and transactions)	R0247	*Date*	
2.12.2.4	Drafting the submission of suspicious transaction reports	R0248	*Date*	
2.12.2.5	System for monitoring States, natural and legal persons, entities and groups subject to restrictive measures in financial matters	R0249	*Date*	The detection system for identifying States, individuals, legal entities, entities, and groups subject to restrictive measures in financial matters and/or for investigating related alerts should be considered.
2.12.2.6	System for monitoring PEPs	R0250	*Date*	The detection system for identifying PEPs and/or for investigating PEPs alerts should be considered.
2.12.2.7	Other	R0251	*Date*	
	If "Other", specify the function/activity outsourced:	R0252	*Free text*	
2.12.4	Did the professional carry out and document a risk assessment in relation to the outsourced functions prior to the conclusion of the contract ?	R0143	Yes No Partially	
2.12.4.1	If "No" or "Partially" to 2.12.4, specify the reasons and remedial actions in place:	R0253	*Free text*	
2.12.5	Does the professional carry out regular control of compliance by the third-party representative with the commitments arising from the contract ?	R0254	Yes No Partially	
2.12.5.1	If "No" or "Partially" in 2.12.5, specify the reasons:	R0255	*Free text*	
2.12.6	Has the professional established processes with these third parties to ensure the transmission of information ?	R0256	Yes No	This specifically refers to the immediate availability, regardless of confidentiality or professional secrecy rules or any other obstacles, of the information gathered while complying with the customer due diligence requirements and of the transmission, upon request and without delay, of a copy or originals of the supporting documents obtained in this respect.
2.13	Does the professional use third parties to carry out customers due diligence measures ?	R0146	Yes No	This notably refers to Article 34 of the RGL CAA. If the professional is a life insurance undertaking, intermediaries distributing insurance products should be considered.
	If "Yes" to 2.13, please answer the following sub-questions:			
2.13.1	Specify the number of third parties as of December 31, 2024:	R0147	*Number*	
2.13.2	Specify the number of third parties established in a high-risk country as of December 31, 2024:	R0148	*Number*	By "high-risk country", reference should be made to the countries listed in Article 1, paragraph 30 of the AML/CFT Law.
2.13.2.1	If the answer to 2.13.2 is greater than 0, specify the number of third parties established in a high-risk country which <u>do not</u> benefit from a statutory exemption as provided for in Article 34, paragraph 1 of the RGL CAA:	R0149	*Number*	
2.13.3	Specify whether verification of the quality of third parties (e.g. authorisation validity etc.) is carried out and documented:			
2.13.3.1	- prior to the intervention of the third party:	R0150	Yes No	
	If "No" to 2.13.3.1, specify the reasons:	R0257	*Free text*	
2.13.3.2	- periodically:	R0151	At least once a year Every 2-3 years Other frequency Never	
	If "Other frequency" or "Never" in 2.13.3.2, specify the reasons:	R0258	*Free text*	
2.13.4	Has the professional received a written commitment from third parties concerning the obligations referred to in Article 34 of the RGL CAA ?	R0152	Yes No Partially	
2.14	Does the professional systematically conclude a brokerage agreement with the insurance undertakings with which the business is placed ?	R0153	Yes No	
2.14.1	If "Yes" to 2.14, do these agreements specifically include customer due diligence provisions ?	R0154	Yes No	

			Partially	
	Recruitment, training and awareness-raising of the staff			
2.15	During the recruiting process, does the professional set up adequate procedures aimed at ensuring that the following staff			
2.15.1	Management members (including the effective management) ?	R0155	Yes No	
2.15.2	The Responsible for Compliance ?	R0156	Yes No	
2.15.3	The Compliance Officer (AML/CFT) ?	R0157	Yes No	
2.16	Does the Compliance Officer (AML/CFT) set up an AML/CFT awareness-raising programme adapted to the level of sensitivity and exposure to ML/TF risks of the staff ?	R0158	Yes No	
2.17	Indicate the rate of completion of AML/CFT training for the following categories of staff:			The percentage of the relevant staff who have actually completed the training(s), in accordance with the AML/CFT awareness-raising program established by the professional, should be taken into consideration.
2.17.1	- Dedicated AML/CFT compliance staff (including the Compliance Officer AML/CFT);			
2.17.1.1	In 2024	R0159	%	
	If the answer is different from 100%, specify the reasons:	R0259	*Free text*	
2.17.1.2	In 2023	R0160	%	
2.17.1.3	In 2022	R0161	%	
2.17.2	- The relevant staff (excluding the dedicated AML/CFT compliance staff);			This refers to members of the staff who are in direct contact with customers or whose tasks expose them to the risk of being confronted with attempts at money laundering or terrorist financing or whose tasks consist directly or indirectly in AML/CFT (e.g. contract/transaction/customer management team, commercial/sales team, insurance agents and/or agencies, etc.).
2.17.2.1	In 2024	R0162	%	
2.17.2.2	In 2023	R0163	%	
2.17.2.3	In 2022	R0164	%	
2.17.4	- Management members and the effective management;			
2.17.4.1	In 2024	R0159	%	
	If the answer is different from 100%, specify the reasons:	R0260	*Free text*	
2.17.4.2	In 2023	R0160	%	
2.17.4.3	In 2022	R0161	%	
2.17.6	- Newly hired staff members;			
2.17.6.1	In 2024	R0174	%	
2.17.6.2	In 2023	R0175	%	
2.17.6.3	In 2022	R0176	%	
2.17.8	- Other staff;			All staff not listed in the above questions should be considered.
2.17.8.1	In 2024	R0180	%	
2.17.8.2	In 2023	R0181	%	
2.17.8.3	In 2022	R0182	%	
2.18	Does the professional work with sub-brokers ?	R0183	Yes No	
	If "Yes" to 2.18, please answer the following sub-questions:			
2.18.1	Indicate the rate of completion of sub-brokers in AML/CFT training provided by the professional:			
2.18.1.1	In 2024	R0184	%	
2.18.1.2	In 2023	R0185	%	If the question is not applicable because the professional did not work with sub-brokers during the financial year in question, indicate 100%.
2.18.1.3	In 2022	R0186	%	If the question is not applicable because the professional did not work with sub-brokers during the financial year in question, indicate 100%.
2.18.2	Has the professional set up periodic controls to ensure that the sub-broker complies with and applies the professional's AML/CFT policies/procedures ?	R0187	Yes No	
2.19	Specify whether the latest AML/CFT training provided is based on or incorporates the following elements:			
2.19.1	A reference to the professional's AML/CFT policies/procedures	R0188	Yes No	
2.19.2	Recent changes in AML/CFT obligations applicable to professionals	R0189	Yes No	
2.19.3	References to legal and regulatory AML/CFT requirements in force in Luxembourg	R0190	Yes No	
2.19.4	Practical elements enabling the staff concerned to recognise operations that may be related to ML/TF	R0191	Yes No	For example, practical elements relating to tax offences, corruption, etc.
2.19.5	Practical examples/cases of ML/TF operations applicable to the insurance sector	R0192	Yes No	
2.19.6	Elements enabling the relevant staff to better understand the risks related to terrorist financing	R0261	Yes No	
2.19.7	Elements enabling the relevant staff to better understand the risks related to restrictive measures in financial matters	R0262	Yes No	
2.19.8	Elements enabling the relevant staff to better understand the risks related to proliferation financing	R0263	Yes No	
	AML/CFT policies and procedures			
2.20	Has the latest version of the professional's AML/CFT policy/procedures been formally validated ?			
2.20.1	By the Responsible for Compliance ?	R0193	Yes No	
2.20.3	By the Management (Board of Directors or Executive committee or Board of managers or other effective management body)	R0195	Yes No	
2.21	Indicate the date (yyyy-mm-dd) of the most recent update of the professional's AML/CFT policy/procedures regarding the following elements:			If a single document covers multiple topics or areas, the same date should be entered for each of them. If a topic is not covered by any policy/procedure, enter "2" (1900-01-02).
2.21.1	the customer acceptance policy/procedures	R0196	*Date*	
2.21.2	the measures to be taken with regard to customer due diligence (identification and verification of the identity of policyholders, proxies, insured persons, beneficial owners and beneficiaries and obtaining information and documents on the purpose and nature of the business relationship)	R0197	*Date*	
2.21.3	the measures to be taken in the event of enhanced customer due diligence (including remote entry into a business relationship without any other appropriate guarantee, PEPs, and high-risk countries)	R0198	*Date*	
2.21.9	the procedures to be followed in order to monitor the development of business relationships as well as operations executed for customers, in order to, in particular, to detect suspicious transactions	R0204	*Date*	
2.21.10	the procedures to be followed in case of suspicion or reasonable grounds to suspect ML, an associated predicate offence or TF	R0205	*Date*	
2.21.13	the procedures for internal reporting of breaches of professional obligations with regard to ML/TF by a specific, independent and anonymous channel	R0208	*Date*	
2.21.16	the procedures to be followed for reviewing and updating documents, data or information on existing customers	R0211	*Date*	
2.21.19	The procedures to be followed in terms of cooperation with the authorities	R0214	*Date*	
2.21.24	the measures to be followed regarding procedures and controls related to tax offences	R0219	*Date*	It should be noted that, on April 2, 2020, the Association of Insurance Companies of the Grand Duchy of Luxembourg (ACA) published a list of indicators related to the professional obligation to file a suspicious transaction report in connection with the predicate offence of money laundering arising from aggravated tax fraud or tax evasion. (https://www.aca.lu/wp-content/uploads/2022/11/gt_aml_div_annexe-2-liste-d-indicateurs-concernant-aml-ou-escroquerie-fiscale.pdf).
2.21.25	a list of high-risk countries	R0220	*Date*	By "high-risk countries", reference should be made to the countries listed in Article 1, paragraph 30 of the AML/CFT Law.
2.21.26	a list of professions or activities considered to be sensitive with regard to ML/TF	R0221	*Date*	Professions or sectors of activity are considered sensitive when they are particularly exposed to ML/TF risks due to specific vulnerabilities such as corruption, insider trading, extensive use of cash payments (as notably indicated in analyses and reports by the FIU, NRA reports, FATF typology guides), etc.
2.21.27	the measures related to the implementation of the CAA quantitative questionnaire (including criteria for manual update of the quantitative questionnaire and practical guidance on how to complete the questionnaires).	R0222	*Date*	For life insurance undertakings, reference is made to the quantitative questionnaire of the CL 18/9. For insurance brokers and insurance brokerage firms, reference is made to the quantitative questionnaire of the CL 23/3.
2.22	How often does the Compliance Officer (AML/CFT) plan to monitor and update the AML/CFT policy/procedures of the professional ?			
2.22.1	- At least once a year	R0223	Yes No	
2.22.2	- Each time AML/CFT standards and measures change	R0224	Yes No	
2.22.3	- Each time the professional's activities and/or the nature of customers change	R0225	Yes No	
2.24	Is the revision of AML/CFT policies/procedures systematically accompanied by an impact analysis and, where appropriate, an action plan ?	R0227	Yes No	
2.25	Does the professional systematically communicate any updates to their AML/CFT policies/procedures ?	R0228	Yes No	
	SECTION 3. Customer due diligence measures (upon onboarding and ongoing monitoring of the business relationship)			
	Customer acceptance process and due diligence requirements			
3.1	Has the professional classified all existing customers according to different levels of ML/TF risk, considering the following risk factors and variables ?			Reference is made to the individual assessment of ML/TF risk at customer level.
3.1.1	- Type of customers ?	R0300	Yes No	
3.1.2	- Countries or geographical areas ?	R0301	Yes No	
3.1.3	- Products, services ?	R0302	Yes No	
3.1.4	- Operations, transactions ?	R0303	Yes No	
3.1.5	- Distribution channels ?	R0304	Yes No	
3.2	Does the professional have a customer acceptance committee or equivalent body ?	R0305	Yes No	This notably refers to Article 8 of the RGL CAA.

	If "Yes" to 3.2, please answer the following sub-questions:			
3.2.1	What is its composition ?			
3.2.1.1	- Compliance Officer (AML/CFT)	R0306	Yes permanent member Yes optional member (on a risk-based approach) No	
3.2.1.2	- Responsible for Compliance	R0307	Yes permanent member Yes optional member (on a risk-based approach) No	
3.2.1.4	- Authorised Manager (if different from the Responsible for Compliance)	R0309	Yes permanent member Yes optional member (on a risk-based approach) No Not applicable	
3.2.1.5	- Other senior management member (excluding the Authorised Manager and the Responsible for Compliance)	R0310	Yes permanent member Yes optional member (on a risk-based approach) No Not applicable	
3.2.1.6	- Commercial/Sales team	R0311	Yes permanent member Yes optional member (on a risk-based approach) No	
3.2.1.7	- Legal team	R0312	Yes permanent member Yes optional member (on a risk-based approach) No Not applicable	
3.2.1.8	- Contract/operations/customer management team	R0313	Yes permanent member Yes optional member (on a risk-based approach) No Not applicable	
3.2.1.11	- Other(s)	R0316	Yes No	
3.2.1.11.1	If "Yes" to 3.2.1.11, specify which department/function:	R0317	*Free text*	
3.2.2	Does the documentation related to the acceptance committees (memo, agenda, minutes, etc.) systematically formalise the following points ?			
3.2.2.1	- The identified ML/TF risk factors ?	R0318	Yes No	
3.2.2.2	- Controls and mitigation measures carried out or planned ?	R0319	Yes No	
3.2.2.3	- Decisions taken by the committee ?	R0320	Yes No	
3.2.3	Is there a procedure related to the acceptance committee ?	R0321	Yes No	
	If "Yes" to 3.2.3, does the procedure specify:			
3.2.3.1	- The roles and tasks of this committee ?	R0322	Yes No	
3.2.3.2	- The associated governance ?	R0323	Yes No Partially	This notably includes consideration of the committee's composition, responsibilities, and meeting frequency.
3.2.3.3	- The decision-making process ?	R0324	Yes No	
3.3	Does the professional document all contact with a questionnaire/form adapted to the nature of the contact and the business relationship (even if it does not lead to establishing a business relationship) ?	R0325	Yes No	
3.4	In which cases do the professional's AML/CFT policies/procedures require systematic implementation of enhanced due diligence measures ?			This question applies both to the onboarding of a business relationship and to its ongoing monitoring.
3.4.1	Remote entry into a business relationship without any other appropriate guarantee	R0326	Yes No Not applicable	This notably refers to Article 27 of the RGL CAA.
3.4.2	Business relationships and transactions involving PEPs	R0327	Yes, at onboarding Yes, during ongoing monitoring Yes, at onboarding and during ongoing monitoring No	This notably refers to Article 28 of the RGL CAA.
3.4.3	Business relationships and operations involving high-risk countries	R0328	Yes, at onboarding Yes, during ongoing monitoring Yes, at onboarding and during ongoing monitoring No	This notably refers to Article 29 of the RGL CAA. By "high-risk countries", reference should be made to the countries listed in Article 1, paragraph 30 of the AML/CFT Law.
	If "Yes, at onboarding" or "Yes, during ongoing monitoring" or "Yes, at onboarding and during ongoing monitoring" in 3.4.3, specify whether this includes:			
3.4.3.1	The country of residence of the policyholder	R0329	Yes No	
3.4.3.2	The country of residence of the beneficial owner(s)	R0330	Yes No	By "beneficial owner" reference is made to the natural persons specified in Article 1, paragraph 7 of the AML/CFT Law.
3.4.3.3	The country of origin of the funds	R0331	Yes No	
3.4.3.4	The country of destination of the funds	R0368	Yes No	
3.4.4	Business relationships and transactions involving persons, entities or groups subject to restrictive measures in financial matters	R0332	Yes, at onboarding Yes, during ongoing monitoring Yes, at onboarding and during ongoing monitoring No	This notably refers to Article 31 of the RGL CAA.
3.4.5	Business relationship/customer/prospect that has previously been the subject of a suspicious transaction report to the FIU	R0369	Yes, at onboarding Yes, during ongoing monitoring Yes, at onboarding and during ongoing monitoring No	This notably refers to Article 46 of the RGL CAA. Suspicious transaction reports include suspicious activity reports, suspicious transaction reports, and reports related to terrorism or terrorist financing.
3.5	In which situations is the prior involvement of the Compliance Officer (AML/CFT) systematically required ?			This question applies both to the onboarding of a business relationship and to its ongoing monitoring.
3.5.1	Remote entry into a business relationship without any other appropriate guarantee	R0342	Yes No Not applicable	
3.5.2	Business relationships and transactions involving PEPs	R0343	Yes, at onboarding Yes, during ongoing monitoring Yes, at onboarding and during ongoing monitoring No	
3.5.3	Business relationships and operations involving high-risk countries	R0344	Yes, at onboarding Yes, during ongoing monitoring Yes, at onboarding and during ongoing monitoring No	By "high-risk countries", reference should be made to the countries listed in Article 1, paragraph 30 of the AML/CFT Law.
3.5.4	Business relationships and transactions involving persons, entities or groups subject to restrictive measures in financial matters	R0345	Yes, at onboarding Yes, during ongoing monitoring Yes, at onboarding and during ongoing monitoring No	
3.6	In which situations is prior authorisation from a senior management member systematically required ?			This question applies both to the onboarding of a business relationship and to its ongoing monitoring.
3.6.1	Business relationships and transactions involving PEPs	R0350	Yes, at onboarding Yes, during ongoing monitoring Yes, at onboarding and during ongoing monitoring No	
3.6.2	Business relationships and operations involving high-risk countries	R0351	Yes, at onboarding Yes, during ongoing monitoring Yes, at onboarding and during ongoing monitoring No	By "high-risk countries", reference should be made to the countries listed in Article 1, paragraph 30 of the AML/CFT Law.
3.6.3	Business relationships and transactions involving persons, entities or groups subject to restrictive measures in financial matters	R0352	Yes, at onboarding Yes, during ongoing monitoring Yes, at onboarding and during ongoing monitoring No	
3.7	Do the enhanced due diligence measures implemented by the professional systematically include the following:			This question applies both to the onboarding of a business relationship and to its ongoing monitoring.
3.7.3	Obtaining additional information on the customer and on the beneficial owner(s)	R0370	Yes, at onboarding Yes, during ongoing monitoring Yes, at onboarding and during ongoing monitoring No	By "beneficial owner" reference is made to the natural persons specified in Article 1, paragraph 7 of the AML/CFT Law.
3.7.4	Obtaining additional information on the nature and the reasons for intended operations	R0371	Yes, at onboarding Yes, during ongoing monitoring Yes, at onboarding and during ongoing monitoring No	For example, a reassessment of the overall consistency of the file (notably between transactions conducted and customer knowledge, information and documents concerning the source of the funds, etc.), followed, where applicable, by the regularization of missing information and/or documents.
3.7.5	Obtaining documentary evidence concerning, in particular, the nature of the customer's activities, the source of customer's income and/or savings, the source and composition of his wealth and his tax residence.	R0372	Yes, at onboarding Yes, during ongoing monitoring Yes, at onboarding and during ongoing monitoring No	For example: - collecting a supporting document proving the source of funds, - collecting a recent proof of address (e.g., a utility bill copy, etc.), - collecting a tax notice issued by an external firm or any other supporting document (e.g., proof of tax regularization, etc.) confirming that the assets are known to the tax authorities (in the country where the client is tax resident) and properly taxed.
3.7.6	Verifying the additional information obtained with independent and reliable sources	R0373	Yes, at onboarding Yes, during ongoing monitoring Yes, at onboarding and during ongoing monitoring No	For example, searching for other information (background checks, potential adverse media, etc.) from reliable and independent sources.

Performance of customer due diligence by insurance agents and/or agencies

3.8	Does the professional work with insurance agents or agencies ?	R0365	Yes No	
3.9	If "Yes" to 3.8, do the contracts with the insurance agent and/or agency stipulate that the professional's AML/CFT policies/procedures apply equally to the agents/agencies as to the professional themselves ?	R0366	Yes No	
3.9.1	If "No" to 3.9, specify the reasons and remedial actions in place:	R0374	*Free text*	
3.9.1	If "Yes" to 3.9, has the professional implemented a monitoring/governance framework to ensure that the AML/CFT commitments and provisions arising from the contract are respected and properly enforced by the agents and/or insurance agencies ?	R0367	Yes No	
3.9.1.1	If "No" to 3.9.1, specify the reasons:	R0375	*Free text*	

Automated acceptance process

3.10	Is there an automated acceptance process that does not involve the intervention of a natural person on the professional's side ?	R0376	Yes No	This notably refers to Article 8 of the RGL CAA.
	If "Yes" to 3.10, please answer the following sub-questions:			
3.10.1	Start date of this process (yyyy-mm-dd)	R0377	*Date*	
3.10.2	Does this automated acceptance process only cover new customers presenting a low AML/CFT risk in accordance with the professional's risk-based approach ?	R0378	Yes No	
3.10.3	Has this process been authorised in advance by the CAA ?	R0379	Yes No	
3.10.4	Is this process in line with the professional's AML/CFT policies/procedures ?	R0380	Yes No	
3.10.5	Date of the last review of the process by the professional to ensure that it cannot be misused for ML/TF purposes (yyyy-mm-dd)	R0381	*Date*	If no review has been carried out, enter "2" (1900-01-02).
3.10.6	If "No" to any of the sub-questions in 3.10, specify the reasons and remedial actions in place:	R0382	*Free text*	

Verification of the identity of beneficial owners

3.11	For business relationships involving customers who are legal persons or other legal arrangements, do the professional's AML/CFT policies/procedures provide for verifying the identity of the beneficial owner(s) using information obtained from the following sources:			This question applies both at the start of the business relationship and during ongoing monitoring. By "beneficial owner" reference is made to the natural persons specified in Article 1, paragraph 7 of the AML/CFT Law. If the professional has no legal persons or other legal arrangements among its customers, select "Not applicable". This notably refers to Article 3, paragraph 2, sub-paragraph 1, point b, of the AML/CFT Law and to Article 21 of the RGL CAA.
3.11.1	- From the customer ?	R0383	Yes, systematically Yes, following a risk-based approach No Not applicable	
3.11.2	- From the central registers ?	R0384	Yes, systematically Yes, following a risk-based approach No Not applicable	For example, the professional obtains proof of registration or an extract from the register. This notably refers to Article 3, paragraph 4, subparagraph 1 of the AML/CFT Law.
3.11.3	- From any other independent and reliable sources available ?	R0385	Yes, systematically Yes, following a risk-based approach No Not applicable	
3.12	Has the professional implemented policies/procedures or controls to detect any discrepancies between the information available in the central registers and the information it holds on beneficial owners ?	R0386	Yes, systematically Yes, following a risk-based approach No Not applicable	This question also applies both at onboarding and during ongoing monitoring. The term "Discrepancies" include erroneous data or the absence of all or part the data, as well as the absence of a registration, an amendment or a deletion. This notably refers to: - Article 3, paragraph 4, subparagraph 1, of the AML/CFT Law ; - Article 8 of the law of 13 January 2019 on the Register of Beneficial Owner, as amended ; - Article 19 of the law of 10 July 2020 establishing a Register of Fiducies and Trusts, as amended.

SECTION 4. On-going due diligence

Review and updating of information and related statistics

4.0	Indicate the number of existing customers as of December 31, 2024 who are classified by the professional as:			If the professional uses a 4-level risk scale, levels 2 and 3 should be considered as "Medium". If the professional uses a 2-level risk scale, only the "Low" and "High" risk levels should be considered.
4.0.1	- Low ML/TF risk customers ?	R0498	*Number*	
4.0.2	- Medium ML/TF risk customers ?	R0499	*Number*	
4.0.4	- High ML/TF risk customers ?	R1400	*Number*	
4.0.4	- Customers with no AML/CFT risk level assigned by the professional	R1401	*Number*	
4.0.5	If the answer to 4.0.4 is greater than 0, specify the reasons and the remedial action in place:	R1402	*Free text*	
4.1	During the ongoing monitoring of the business relationship, does the professional ensure that the customer's risk level is reassessed and updated following any significant changes or the emergence of new risks ?	R0400	Yes No	This notably refers to Article 4(6) of the RGL CAA.
4.2	Specify how often existing customer documents, data and information are reviewed and updated:			
4.2.1	Review and update without delay at each situation qualified as appropriate times:	R0401	Yes No Partially	This notably refers to Article 33(3) of the RGL CAA.
4.2.1.1	If "Partially" or "No" to 4.2.1, specify the reasons:	R1403	*Free text*	
4.2.2	Review and update in the absence of situation qualified as appropriate times:			This notably refers to Article 33(1) of the RGL CAA.
4.2.2.1	<u>- Customers assessed as Low Risk:</u>	R0402	Every year Every 2 years Every 3 years Every 4 years Every 5 years Every 6 years Every 7 years Other frequency	
	If "Other frequency", specify which one:	R0403	*Free text*	
4.2.2.1.1	How many existing customers assessed as Low risk were, according to the professional's AML/CFT policies and procedures, supposed to be reviewed and updated in terms of their documents, data, and information during the 2024 financial year ?	R1404	*Number*	
4.2.2.1.2	Of those Low-risk customers identified by the professional as requiring such reviews, what percentage had actually been reviewed and updated by the professional as of December 31, 2024 ?	R1405	%	This refers to those customers for whom the professional completed all actions related to the review and update (such as file analysis/review, any communication with the customer, follow-up, analysis of customer 's responses, etc.) and for whom a final, documented decision was taken.
4.2.2.2	<u>- Customers assessed as Medium Risk:</u>	R0404	Every year Every 2 years Every 3 years Every 4 years Every 5 years Every 6 years Every 7 years Other frequency	
	If "Other frequency", specify which one:	R0405	*Free text*	
4.2.2.2.1	How many existing customers assessed as Medium risk were, according to the professional's AML/CFT policies and procedures, supposed to be reviewed and updated in terms of their documents, data, and information during the 2024 financial year ?	R1406	*Number*	
4.2.2.2.2	Of those Medium-risk customers identified by the professional as requiring such reviews, what percentage had actually been reviewed and updated by the professional as of December 31, 2024 ?	R1407	%	This refers to those customers for whom the professional completed all actions related to the review and update (such as file analysis/review, any communication with the customer, follow-up, analysis of customer 's responses, etc.) and for whom a final, documented decision was taken.
4.2.2.3	<u>- Customers assessed as high risk:</u>	R0406	Every year Every 2 years Every 3 years Every 4 years Every 5 years Every 6 years Every 7 years Other frequency	
	If "Other frequency", specify which one:	R0407	*Free text*	
4.2.2.3.1	How many existing customers assessed as High risk were, according to the professional's AML/CFT policies and procedures, supposed to be reviewed and updated in terms of their documents, data, and information during the 2024 financial year ?	R1408	*Number*	
4.2.2.3.2	Of those High-risk customers identified by the professional as requiring such reviews, what percentage had actually been reviewed and updated by the professional as of December 31, 2024 ?	R1409	%	This refers to those customers for whom the professional completed all actions related to the review and update (such as file analysis/review, any communication with the customer, follow-up, analysis of customer 's responses, etc.) and for whom a final, documented decision was taken.
4.2.2.4	<u>- Customers classified as PEP:</u>	R0408	Every year Every 2 years Every 3 years Every 4 years Every 5 years Every 6 years Every 7 years Other frequency	
	If "Other frequency", specify which one:	R0409	*Free text*	
4.2.2.4.1	How many existing customers classified as PEP were, according to the professional's AML/CFT policies and procedures, supposed to be reviewed and updated in terms of their documents, data, and information during the 2024 financial year ?	R1410	*Number*	
4.2.2.4.2	Of those PEP customers identified by the professional as requiring such reviews, what percentage had actually been reviewed and updated by the professional as of December 31, 2024 ?	R1411	%	This refers to those customers for whom the professional completed all actions related to the review and update (such as file analysis/review, any communication with the customer, follow-up, analysis of customer 's responses, etc.) and for whom a final, documented decision was taken and formalised.

System for the supervision of business relationships, operations and transactions

4.4	Does the professional have a policy and transaction management tool ?	R0430	Yes No	
4.4.1	If "No" to 4.4, specify how the professional carries out a review of transactions throughout the business relationship:	R1412	*Free text*	
4.5	If "Yes" to 4.4, the <u>customer</u>'s level of ML/TF risk is calculated and integrated:	R0431	a) In the policy and transaction management tool b) In a tool integrated with the policy and transaction management tool (fully automated information exchange) c) In a tool partially integrated with the policy and transaction management tool (partially automated information exchange) d) In an independent tool e) Manually (e.g. Excel spreadsheet) f) Customer risk level not available	
4.5	If "No" to 4.4, the <u>customer</u>'s ML/TF risk level is calculated and integrated:	R0432	d) In an independent tool e) Manually (e.g. Excel spreadsheet) f) Customer risk level not available	
4.5.1	If the answer to 4.5 is "customer risk level not available" or "Manually", specify the reasons and the system in place:	R1413	*Free text*	
4.6	If "Yes" to 4.4, the ML/TF risk score per <u>contract</u> (from the <u>quantitative questionnaire)</u> is calculated and integrated:	R0433	a) In the policy and transaction management tool b) In a tool integrated with the policy and transaction management tool (fully automated information exchange) c) In a tool partially integrated with the policy and transaction management tool (partially automated information exchange) d) In an independent tool e) Manually (e.g. Excel spreadsheet) f) Score per contract not available	For life insurance undertakings, reference is made to the quantitative questionnaire of the CL 18/9. For insurance brokers and insurance brokerage firms, reference is made to the quantitative questionnaire of the CL 23/3.
4.6	If "No" to 4.4, the ML/TF risk score per <u>contract</u> (from the <u>quantitative questionnaire</u>) is calculated and integrated:	R0434	d) In an independent tool e) Manually (e.g. excel file) f) The score per contract is not	For life insurance undertakings, reference is made to the quantitative questionnaire of the CL 18/9. For insurance brokers and insurance brokerage firms, reference is made to the quantitative questionnaire of the CL 23/3.
4.6.1	If the answer to 4.6 is "Score per contract not available" or "Manually", specify the reasons and the system in place:	R1414	*Free text*	
4.7	When is the CAA quantitative questionnaire completed in relation to the acceptance of a transaction/operation ?	R0435	before at the same time after	For life insurance undertakings, reference is made to the quantitative questionnaire of the CL 18/9. For insurance brokers and insurance brokerage firms, reference is made to the quantitative questionnaire of the CL 23/3.
4.8	Does the professional have tool(s) which include blockages requiring the intervention of the Compliance Officer (AML/CFT)			
4.8.1	PEP alert among one of the parties to the transaction	R0436	Yes No	
4.8.2	Alert among one of the parties to the transaction as a result of screening against lists of states, persons, entities or groups subject to restrictive measures in financial matters	R0437	Yes No	
4.8.3	Alert among one of the parties to the transaction as a result of screening against internal lists of business relationships refused by the professional or by other Group entities	R0438	Yes No Not applicable	
4.8.4	Party to the transaction that has been subject to a suspicious report submitted to the CRF	R0439	Yes No Not applicable	Suspicious reports include suspicious transaction reports, suspicious activity reports and reports relating to terrorism or terrorist financing.
4.8.5	Other type of alert	R0440	Yes No	
4.8.5.1	If "Yes" to 4.8.5, specify which type:	R1415	*Free text*	
4.9	Does the professional have an automated transaction monitoring system ?	R0441	Yes No	
	If "Yes" to 4.9, please answer the following sub-questions:			
4.9.1	Does the automated transaction monitoring system include transactional scenarios that have been predefined and validated by the professional ?	R1416	Yes No	
4.9.2	Does the automated transaction monitoring system include transaction scenarios related to terrorist financing ?	R1417	Yes No	
4.9.3	Does the automated transaction monitoring system allow the detection of complex or unusual operations and transactions ?	R1418	Yes, a priori (before acceptance) Yes, a posteriori (after acceptance) Yes, a priori and a posteriori No	This notably refers to complex or unusual operations and transactions as referred to in Article 30 of the RGL CAA.
4.10	Does the professional's monitoring system (whether automated or not) allow the detection of the following situations ?			
4.10.1	<u>- at the acceptance of the business relationship:</u>			
4.10.1.1	Business relationships and transactions involving PEPs	R0442	Yes No	
4.10.1.2	Business relationships and transactions involving persons, entities or groups subject to restrictive measures in financial matters	R0443	Yes No	
4.10.1.3	Business relationships and operations involving high-risk countries	R0444	Yes No	By "high-risk countries", reference should be made to the countries listed in Article 1, paragraph 30 of the AML/CFT Law.
4.10.2	<u>- During the monitoring the business relationship</u>:			
4.10.2.1	Business relationships and transactions involving PEPs	R0445	Yes No	
4.10.2.2	Business relationships and transactions involving persons, entities or groups subject to restrictive measures in financial matters	R0446	Yes No	
4.10.2.3	Business relationships and operations involving high-risk countries	R0447	Yes No	By "high-risk countries", reference should be made to the countries listed in Article 1, paragraph 30 of the AML/CFT Law.
	If one of the answers to the sub-questions in 4.10 is "No", specify the reasons and the monitoring system in place:	R1419	*Free text*	
4.11	Does the professional's control/supervisory system (whether automated or not) include the individuals, entities, and groups listed in or targeted by:			For professionals without a filtering tool, this refers to manual screening against the lists referenced below.
4.11.1	Official lists issued by the United Nations ?	R0450	Yes No	
4.11.2	Official lists issued by the European Union ?	R0451	Yes No	
4.11.3	Official lists issued by the competent Luxembourg authorities ?	R0452	Yes No	
4.11.4	PEPs lists ?	R0453	Yes No	
4.11.5	Internal lists of business relationships refused by the professional ?	R0454	Yes No	
4.11.6	Internal lists of business relationships refused by other Group entities ?	R0455	Yes No Not applicable	
4.11.7	Other	R0456	Yes No	
4.11.7.1	If "Yes" to 4.11.7, specify which list:	R1420	*Free text*	
4.12	In the absence of significant movement/modification to the contract, what is the frequency of screening (whether the system is automated or not) by the professional across all existing contracts ?			For professionals without a filtering tool, this refers to the frequency of manual screening against the UN, EU, LU and PEP lists.
4.12.1	To detect natural and legal persons, entities and groups subject to restrictive measures in financial matters ?	R0457	Daily Weekly Monthly Other frequency	For example: if the frequency is a few hours, select "Daily." If it's every two days, select "Weekly." Upon detecting persons, entities, or groups targeted by restrictive measures in financial matters, professionals must apply the required measures without delay (i.e., within a few hours) and notify the competent authorities in terms of financial sanctions.
4.12.2	To detect persons, entities and groups classified as PEPs ?	R0458	Daily Weekly Monthly Other frequency	For example: if the frequency is a few hours, select "Daily." If it's every two days, select "Weekly."
	If "Other frequency" in 4.12.1 or 4.12.2, specify which frequency:	R1421	*Free text*	
4.13	Which parties to the contract are subject to screening ?			For professionals without a filtering tool, this refers to the frequency of manual screening against the UN, EU, LU and PEP lists.
4.13.1	Policyholder (natural person, legal person or other legal arrangement)	R0459	Yes No	
4.13.2	Beneficial owner of the policyholder legal person or other legal arrangement	R0460	Yes No Not applicable	By "beneficial owner" reference is made to the natural persons specified in Article 1, paragraph 7 of the AML/CFT Law.
4.13.3	Proxy ("mandataire") or representative	R0461	Yes No Not applicable	
4.13.4	Insured person	R0462	Yes No Not applicable	
4.13.5	Beneficiary designated/identified by name	R0463	Yes No Not applicable	
4.13.6	Parties in relation to unlisted underlying assets conferring control rights to the professional (legal entity, beneficial owner/manager/executive of the unlisted underlying asset, etc.)	R0464	Yes No Partially Not applicable	
4.13.7	Assignee of rights (new policyholder or beneficiary)	R0465	Yes No Not applicable	

4.13.8	Beneficiary of the payout	R0466	Yes No	
4.13.9	Intermediary	R0467	Yes No Not applicable	
4.13.10	Legal representative of the intermediary	R0468	Yes No Not applicable	
4.13.11	Other	R0469	Yes No	
4.13.11.1	If "Yes" to 4.13.11, specify which party to the contract:	R1422	*Free text*	
4.14	Does the professional's control/supervisory system (whether automated or not) ensure systematic traceability of the analysis of each alert, enabling in particular the tracking of:			
4.14.1	The details of the alert and the parties involved ?	R0470	Yes No	
4.14.2	The reasons for confirming or denying the alert ?	R0471	Yes No	
4.14.3	The names of the individuals/employees who analysed the alert ?	R0472	Yes No	
4.14.4	The names of the individuals/employees who validated the alert ("four-eyes" control), if applicable ?	R0473	Yes No Not applicable	
4.14.5	The date of analysis and validation ?	R0474	Yes No	
4.15	Does the professional have a filtering tool ?	R0475	Yes No	
4.16	If "Yes" to 4.15, specify the type of tool used ?	R0476	External tool (external provider) Tool developed internally by the professional/Group	
4.16.1	If "External tool" in 4.16, specify the name of the tool:	R0477	*Free text*	
4.17	If "Yes" to 4.15, how often are the official lists updated in the filtering tool ?	R0478	Daily Weekly Monthly Other frequency	For example: if the frequency is a few hours, select "Daily." If it's every two days, select "Weekly." After adoption or updates to official lists (UN, EU, LU), the professional must ensure that the internal filtering tool, or one provided by an external services provider, is updated without delay.
4.17.1	If "Other frequency" in 4.17, specify which frequency:	R0479	*Free text*	
4.18	If "Yes" to 4.15, does the filtering tool configuration/parameters account for orthographic/spelling variations in names (first names, last names, or legal names) that do not exactly match those on the official lists ?	R0480	Yes No	
4.19	Has the professional implemented regular controls to ensure diligent handling of AML/CFT alerts, including false positives and name-match ambiguities (homonyms) ?	R0481	Yes No	"False positive": the result of an analysis that allows to reasonably verify that the searched/screened name and the listed name are not the same.
4.19.1	If "No" to 4.19, specify the reasons:	R1423	*Free text*	
4.20	Does the professional have an operational procedure of the filtering system ("dispositif de filtrage") ?	R0482	Yes No	This question applies whether the filtering system is automated or not.
	If "Yes" to 4.20, does the procedure include the following elements:			
4.20.1	Description of the supervisory system (use of a filtering tool and/or manual checks)	R0483	Yes No	
4.20.2	Lists used	R0484	Yes No	
4.20.3	Frequency of the screening	R0485	Yes No	
4.20.4	List of parties to the contracts subject to screening	R0486	Yes No	
4.20.5	Parameters/configuration of the filtering tool	R0487	Yes No Not applicable	For professional without a filtering tool, select "Not applicable".
4.20.6	Due diligence procedures for processing alerts (including homonyms)	R0488	Yes No	
4.20.7	Documentation methods for searches and decisions made	R0489	Yes No	
4.20.8	Procedures for submitting written reports to the Compliance Officer (AML/CFT), and associated deadlines for submission	R0490	Yes No	
4.20.9	Procedure for applying restrictive measures in financial matters	R0491	Yes No	
4.20.10	Procedures for informing the Ministry of Finance of the implementation of any restrictive measures in financial matters	R0492	Yes No	
4.20.11	If the detection gives rise to a suspicion of money laundering, of an associated underlying offense, or of terrorist financing: procedures for submitting a report to the FIU	R0493	Yes No	
4.20.12	Responsibilities of the various parties involved (including the Responsible for Compliance and the Compliance Officer AML/CFT)	R0494	Yes No	
4.20.13	Indicate the date (yyyy-mm-dd) of the last update of the operational procedure on the filtering system:	R1424	*Date*	

Alerts generated by the supervisory system

4.21	Indicate for the 2024 financial year:			These questions concern alerts generated by the supervisory system, whether automated or not.
4.21.1	The total number of alerts generated relating to PEPs, including false positives, whether the detection system is automated or not:	R0495	*Number*	"False positive": the result of an analysis that allows to reasonably verify that the searched/screened name and the listed name are not the same.
4.21.2	The total number of alerts generated relating to restrictive measures in financial matters (UN, EU, LU lists), including false positives, whether the detection system is automated or not:	R1426	*Number*	"False positive": the result of an analysis that allows to reasonably verify that the searched/screened name and the listed name are not the same.
4.21.2.1	If the answer to 4.21.2 is greater than 0, specify the number of alerts still under review/analysis as of December 31, 2024:	R1427	*Number*	Upon detecting persons, entities, or groups targeted by restrictive measures in financial matters, professionals must apply the required measures without delay (i.e., within a few hours) and notify the competent authorities in terms of financial sanctions.
4.21.3	The number of alerts generated relating to complex or unusual operations and transactions, whether the detection system is automated or not	R1428	*Number*	This notably refers to complex or unusual operations and transactions as referred to in Article 30 of the RGL CAA.
4.21.4	Number of operations or individuals detected that were the subject of a written report to the Compliance Officer (AML/CFT), whether submitted via a tool or by other means	R0497	*Number*	This notably refers to Article 37 of the RGL CAA. The term "operations or persons detected" should be taken to mean: - persons as referred to in Articles 28, 29 and 31 of the RGL CAA, - funds coming from or going to States, natural or legal persons, entities or groups as referred to in Article 31 of the RGL CAA, or high-risk countries as referred to in Article 29 of the RGL CAA, and - complex or unusual operations and transactions as referred to in Article 30 of the RGL CAA.
4.21.5	If one of the answers to questions 4.21.1, 4.21.2, 4.21.3 or 4.21.4 is zero, specify the reasons and, where appropriate, planned actions:	R1429	*Free text*	For example, no alert detected, information not available, etc.

<u>SECTION 5. Internal and external controls</u>

Controls and reports to the Compliance Officer (AML/CFT)

5.1	Has the Compliance Officer (AML/CFT) implemented a control plan to ensure compliance with the AML/CFT framework ?	R0502	Yes No	A control plan (Compliance Monitoring Plan) could include, for example, ex-post checks on a sample of processed transactions, etc.
5.1.4	If "Yes" to 5.1, indicate the percentage of completion of the control plan for the 2024 financial year:	R0557	%	
5.1.5	If the completion rate in 5.1.4 is less than 100%, specify the reasons and the remedial actions in place:	R0558	*Free text*	
5.2	If "Yes" to 5.1, indicate the number of deficiencies and/or irregularities detected through the controls performed:			"Open" means any deficiency or irregularity for which remediation actions are not yet completed. "Overdue by more than 6 months" means any deficiency or irregularity whose planned remediation close date is more than six months past.
5.2.1	Number of deficiencies or irregularities issued during the 2024-year controls for which degree of severity is considered to be High:	R0503	*Number*	
5.2.2	Total number of deficiencies or irregularities considered "open", regardless of year of detection, as of December 31, 2024:	R0559	*Number*	
5.2.3	Total number of deficiencies or irregularities for which degree of severity is considered to be High, considered "open", regardless of year of detection, as of December 31, 2024:	R0560	*Number*	Data consistency: the value entered must be less than or equal to the value indicated in the previous field.
5.2.4	Total number of deficiencies or irregularities considered "open" and "overdue by more than 6 months", regardless of year of detection, as of December 31, 2024:	R0561	*Number*	
5.2.5	Total number of deficiencies or irregularities for which degree of severity is considered to be High, considered "open" and "overdue by more than 6 months", regardless of year of detection, as of December 31, 2024:	R0562	*Number*	Data consistency: the value entered must be less than or equal to the value indicated in the previous field.
5.2.6	If the answer to 5.2.5 is greater than 0, specify the nature of the deficiencies/irregularities, the initial deadline and the reasons for the delay:	R0504	*Free text*	
5.3	Written reports on the results of the controls:			
5.3.3.2	Has the Compliance Officer (AML/CFT) submitted written reports on the results of these controls to the Responsible for Compliance and to the Management ?	R0509	Yes No Not applicable	
5.3.3.3	If "No" or "Not applicable" to 5.3.3.2, specify the reasons why the professional did not provide a written report to the Responsible for Compliance and the management:	R0563	Free text	
5.4	If "Yes" to 5.3.3.2, indicate whether the last report submitted included the following elements:			
5.4.1	Follow-up of recommendations, problems, deficiencies and irregularities identified in the past	R0510	Yes No Not applicable	
5.4.2	Newly identified problems, deficiencies, and irregularities	R0511	Yes No Not applicable	
5.4.3	Impact assessment: associated risks and severity level	R0512	Yes No Not applicable	
5.4.4	Proposed corrective measure(s)/remedial actions(s)	R0513	Yes No Not applicable	
5.5	Has the professional had to sanction employees as a result of these controls ?	R0514	Yes No	
5.5.1	If "Yes" to 5.5, specify the sanctions taken:	R0564	*Free text*	
5.6	Has the Compliance Officer (AML/CFT) submitted for approval to the management and, where applicable, its specialised committees an annual summary report on the activities and functioning of the AML/CFT system			
5.6.1	In 2022	R0515	Yes No	
5.6.2	In 2023	R0516	Yes No	
5.6.3	In 2024	R0517	Yes No	
5.6.4	Date of the last summary report approved by the management (or, where applicable, its specialist committees) (yyyy-mm-dd):	R0518	*Date*	

Internal and external audit controls and reports

5.7	Does the professional have an internal audit function (whether outsourced or in-house) ?	R0519	Yes No Not applicable	Select "not applicable" if no such function exists due to the size or nature of activities of the professional.
	If "Yes" to 5.7, please answer questions 5.8 to 5.13:			
5.8	Has the internal audit function presented to the management (or its specialist committees) an annual summary report on compliance with the professional's AML/CFT policies/procedures ?			
5.8.1	In 2022	R0520	Yes No	
5.8.2	In 2023	R0521	Yes No	
5.8.3	In 2024	R0522	Yes No	
5.8.4	Date of the last summary report approved by management (or its specialist committees) (yyyy-mm-dd):	R0523	*Date*	
5.9	Indicate the date of the last internal audit in each of the following areas (yyyy-mm-dd):			If the same audit mission covered multiple areas, use the same date. If no audit has ever been performed, enter "2" ("1900-01-02").
5.9.1	Overall ML/TF risk assessment and risk appetite at professional level	R0525	*Date*	
5.9.2	Organisation of the AML/CFT system, governance and reporting to management bodies	R0526	*Date*	
5.9.3	Determination of ML/TF risk profile of customers	R0527	*Date*	
5.9.4	Procedures for identifying and verifying the identity of customers	R0528	*Date*	
5.9.5	Policies and procedures for monitoring and analyzing business relationships, including transactions monitoring	R0529	*Date*	
5.9.6	Policies and procedures for suspicious transactions reporting	R0530	*Date*	
5.9.7	System related to restrictive measures in financial matters	R0531	*Date*	
5.9.8	Tax-compliance system	R0532	*Date*	
5.9.9	System for combating terrorist financing	R0565	*Date*	
5.9.10	Record keeping policies and procedures	R0566	*Date*	
5.9.11	Recruitment, training and awareness-raising of the staff	R0567	*Date*	
5.9.12	Resources dedicated to AML/CFT	R0568	*Date*	
5.10	Recommendations issued by the internal audit function in the areas of AML/CFT:			"Open" means any deficiency or irregularity for which remediation actions are not yet completed. "Overdue by more than 6 months" means any deficiency or irregularity whose planned remediation close date is more than six months past.
5.10.1	Number of internal audit recommendations issued during the 2024 year for which degree of severity is considered to be High:	R0535	*Number*	
5.12	Total number of internal audit recommendations considered "open", regardless of year of detection, as of December 31, 2024:	R0539	*Number*	
5.12.1	Total number of internal audit recommendations for which degree of severity is considered to be High, considered "open", regardless of year of detection, as of December 31, 2024:	R0569	*Number*	Data consistency: the value entered must be less than or equal to the value indicated in the previous field.
5.13	Total number of internal audit recommendations considered "open" and "overdue by more than 6 months", regardless of year of detection, as of December 31, 2024:	R0540	*Number*	
5.13.1	Total number of internal audit recommendations for which degree of severity is considered to be High, considered "open" and "overdue by more than 6 months", regardless of year of detection, as of December 31, 2024:	R0570	*Number*	Data consistency: the value entered must be less than or equal to the value indicated in the previous field.
5.13.2	If the answer to 5.13.1 is greater than 0, specify the nature of the recommendation, the initial deadline and the reasons for the delay:	R0571	*Free text*	
5.14	Findings issued by the approved statutory auditor (réviseur d'entreprises agréé) in the Special Report:			"Open" means any deficiency or irregularity for which remediation actions are not yet completed. "Overdue by more than 6 months" means any deficiency or irregularity whose planned remediation close date is more than six months past.
5.14.2	Number of findings issued by the approved statutory auditor in the Special Report on the 2023 financial year for which the degree of severity is considered to be High:	R0543	*Number*	
5.14.3	Total number of findings issued by the approved statutory auditor in the Special Report considered "open", regardless of year of detection, as of December 31, 2024:	R0572	*Number*	
5.14.4	Total number of findings issued by the approved statutory auditor in the Special Report for which the degree of severity is considered to be High, considered "open", regardless of year of detection, as of December 31, 2024:	R0573	*Number*	Data consistency: the value entered must be less than or equal to the value indicated in the previous field.
5.14.5	Total number of findings issued by the approved statutory auditor in the Special Report considered "open" and "overdue by more than 6 months", regardless of year of detection, as of December 31, 2024:	R0574	*Number*	
5.14.6	Total number of findings issued by the approved statutory auditor in the Special Report for which the degree of severity is considered to be High, considered "open" and "overdue by more than 6 months", regardless of year of detection, as of December 31, 2024:	R0575	*Number*	Data consistency: the value entered must be less than or equal to the value indicated in the previous field.
5.14.6.1	If the answer to 5.14.6 is greater than 0, specify the nature of the finding, the initial deadline and the reasons for the delay:	R0576	*Free text*	

Cooperation with the authorities

5.15	What was the number of searches ("perquisitions") carried out at the professional's premises and, where applicable, at the premises of its agents/agencies and/or its branches in connection with money laundering, an associated underlying offence or terrorist financing ?			
5.15.1	In 2022	R0545	*Number*	
5.15.2	In 2023	R0546	*Number*	
5.15.3	In 2024	R0547	*Number*	
5.17	What was the number of suspicious transaction reports filed by the professional submitted to the FIU ?			Suspicious transaction reports include suspicious transaction reports, suspicious activity reports and reports relating to terrorism or terrorist financing.
5.17.1	In 2022	R0551	*Number*	
5.17.2	In 2023	R0552	*Number*	
5.17.3	In 2024	R0553	*Number*	
5.17.4	If the answer to 5.17.3 is greater than 0, specify the average number of days between the date the potential suspicious transaction/activity was identified or the alert generated (before analysis) and the date of reporting to the FIU (after analysis)	R0577	*Number*	
5.18	What is the number of ongoing litigations or legal proceedings in the areas of ML/TF as of December 31, 2024:			
5.18.1	With customers ?	R0554	*Number*	
5.18.2	With intermediaries/third-party introducers ?	R0555	*Number*	
5.18.3	With foreign supervisory authorities ?	R0556	*Number*	
5.18.4	If the answer to any of questions 5.18 is greater than 0, specify the nature of the litigation and/or legal proceedings:	R0578	*Free text*	
5.19	What was the number of requests for information received from the FIU ?			
5.19.1	In 2022	R0579	*Number*	
5.19.2	In 2023	R0580	*Number*	
5.19.3	In 2024	R0581	*Number*	

<u>SECTION 6. Subsidiaries and branches</u>

6.1	Does the professional have subsidiaries and/or branches whose activity or part of the activity is subject to the supervision of the CAA ?	R0600	Yes No	
	If "Yes", please answer questions 6.1.1 to 6.5:			
6.1.1	Number of subsidiaries/branches:	R0601	*Number*	
	If the answer to 6.1.1 is greater than 0, please complete the **<u>table in tab ESP.X.20250704.0020</u>**.			The following information should be entered in the table: Name of the subsidiary/branch; Type (subsidiary/branch); Country of establishment of the subsidiary/branch; Total number of employees, expressed in FTE within the subsidiary/branch; Number of employees, expressed in FTE dedicated to AML/CFT within the subsidiary/branch; AML/CFT risk level assigned by the professional to the subsidiary/branch.
6.2	Does the subsidiary's/branch's AML/CFT Compliance function have a direct reporting line to the professional's Compliance Officer (AML/CFT) ?	R0602	Yes No The subsidiary/branch AML/CFT Compliance function is carried out by the professional itself.	
6.2.1	If "Yes" to 6.2, what is the minimum frequency of reporting from the subsidiary's/branch's AML/CFT Compliance function to the professional's Compliance Officer (AML/CFT) ?	R0603	Daily Weekly Bi-monthly (every two weeks) Monthly Quarterly Semi-annually Annually Other frequency	
6.2.1.1	If "Other frequency", specify which one:	R0604	*Free text*	
6.3	Is the professional the parent undertaking of the Group ?	R0605	Yes No	
	If "Yes" to 6.3, indicate the date (yyyy-mm-dd) of the last update of the Group policy/procedure in relation to:			If a single document covers multiple topics or areas, the same date should be entered for each of them. If a topic is not covered by any policy/procedure, enter "2" (1900-01-02).
6.3.1	- AML/CFT:	R0606	*Date*	
6.3.2	- Sharing information for AML/CFT purposes:	R0607	*Date*	
6.3.3	- Data protection:	R0608	*Date*	
6.4	Has the Compliance Officer (AML/CFT) implemented a control plan to ensure that the subsidiaries/branches comply with the Group's AML/CFT framework ?	R0609	Yes No	A control plan (Compliance Monitoring Plan) could include, for example, ex-post checks on a sample of processed transactions, etc.
	If "Yes" to 6.4, please answer the following questions on the results of the controls carried out on the subsidiaries/branches:			"Open" means any deficiency or irregularity for which remediation actions are not yet completed. "Overdue by more than 6 months" means any deficiency or irregularity whose planned remediation close date is more than six months past.
6.5	Number of deficiencies or irregularities issued during the 2024-year controls for which degree of severity is considered to be High:	R0610	*Number*	
6.5.1	Total number of deficiencies or irregularities considered "open", regardless of year of detection, as of December 31, 2024:	R0612	*Number*	
6.5.2	Total number of deficiencies or irregularities for which degree of severity is considered to be High, considered "open", regardless of year of detection, as of December 31, 2024:	R0613	*Number*	Data consistency: the value entered must be less than or equal to the value indicated in the previous field.
6.5.3	Total number of deficiencies or irregularities considered "open" and "overdue by more than 6 months", regardless of their year of issue, as of December 31, 2024:	R0614	*Number*	
6.5.4	Total number of deficiencies or irregularities with a severity/severity rating of High considered "open" and "overdue by more than 6 months", irrespective of their year of issue, as of December 31, 2024:	R0615	*Number*	Data consistency: the value entered must be less than or equal to the value indicated in the previous field.
6.5.4.1	If the answer to 6.5.4 is greater than 0, specify the nature of the deficiencies/irregularities, the initial deadline and the reasons for the delay:	R0611	*Free text*	

SECTION 7. Assessment of the Compliance Officer (AML/CFT)

7.1	Does the Compliance Officer (AML/CFT) consider that the professional has sufficient qualified human resources to properly assess, manage and mitigate the ML/TF risks ?	R0700	Yes No	
7.1.1	If "No" to 7.1, specify the reasons:	R0707	*Free text*	
7.2	Does the Compliance Officer (AML/CFT) consider that the professional has sufficient and appropriate IT tools/technological means to properly assess, manage and mitigate the ML/TF risks ?	R0701	Yes No	
7.2.1	If "No" to 7.2, specify the reasons:	R0708	*Free text*	
7.3	What is the Compliance Officer's (AML/CFT) assessment on the quality of the content of the confidential Know Your Customer (KYC) questionnaires and the supporting documents collected:			
7.3.1	At the on-boarding stage (acceptance of the business relationship) ?	R0702	Very unsatisfactory Unsatisfactory Satisfactory Very satisfied	
7.3.2	When monitoring the business relationship (ongoing due diligence) ?	R0703	Very unsatisfactory Unsatisfactory Satisfactory Very satisfactory	
7.4	What is the Compliance Officer's (AML/CFT) assessment on the AML/CFT training and awareness system in place ?	R0704	Very unsatisfactory Unsatisfactory Satisfactory Very satisfactory	
7.5	In the opinion of the Compliance Officer (AML/CFT), are all the measures put in place sufficient to mitigate the ML/TF risks ?	R0705	Yes No Partially	
7.5.1	If "No" or "Partially" at 7.5, specify the reasons and remedial actions in place:	R0709	*Free text*	
7.6	In the opinion of the Responsible for Compliance, are all the measures put in place sufficient to mitigate the ML/TF risks ?	R0706	Yes No Partially Not applicable (the Compliance Officer is the Responsible for Compliance)	
7.6.1	If "No" or "Partially" to 7.6, specify the reasons and remedial actions in place:	R0710	*Free text*	

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General – List of Subsidiaries and/or Branches – Additional Information

Name of the Subsidiary/Branch	Type	Country of Establishment of the Subsidiary/Branch	Total Number of Employees, expressed in Full-Time Equivalents (FTEs) within the Subsidiary/Branch	Number of Employees, expressed in FTEs, dedicated to AML/CFT within the Subsidiary/Branch	AML/CFT Risk Level assigned by the Professional to the Subsidiary/Branch
C0010	C0020	C0030	C0040	C0050	C0060

List of Abbreviations

AML	Anti-Money Laundering
AML/CFT	Anti-Money Laundering and Countering the Financing of Terrorism
AML/CFT Law	Amended Law of 12 November 2004 on the fight against money laundering and the financing of terrorism
AML/CFT Risks	Risks of money laundering and terrorist financing
CFT	Countering the Financing of Terrorism
CL 18/9	Circular Letter 18/9 of the Commissariat aux Assurances dated 22 October 2018 specifying the procedures for introducing new harmonized questionnaires for life insurance companies to assess the risks of exposure to money laundering and terrorist financing
CL 23/3	Circular Letter 23/3 of the Commissariat aux Assurances dated 7 February 2023 on the quantitative harmonized questionnaire for intermediaries to assess the risks of exposure to money laundering and terrorist financing
CL 23/13	Circular Letter 23/13 of the Commissariat aux Assurances dated 14 November 2023 on the revised Guidelines on money laundering and terrorist financing risk factors – complement of Circular letter 21/16
CL 23/15	Circular Letter 23/15 of the Commissariat aux Assurances dated 11 December 2023 on the definition, validation, operationalization, and monitoring of compliance plans regarding anti-money laundering and countering the financing of terrorism
FATF	Financial Action Task Force
FIU	Financial Intelligence Unit (Cellule de renseignement financier)
FTE	Full-Time Equivalent
NRAs	National Risk Assessments on money laundering and terrorist financing to which Luxembourg is exposed, notably those dated 15 September 2020 and 26 May 2025
PEP(s)	Politically Exposed Persons as defined in Article 1, paragraphs 9 to 12 of the AML/CFT Law
Restrictive measures in financial matters	Restrictive measures in financial matters as referred to in the amended Law of 19 December 2020 on the implementation of restrictive measures in financial matters. For the purposes of this questionnaire, the terms "financial sanctions" and "restrictive measures in financial matters" have the same meaning
RGL CAA	Regulation No. 20/03 of the Commissariat aux Assurances dated 30 July 2020 on the fight against money laundering and the financing of terrorism
UN, EU, LU lists	Official lists issued by the United Nations, the European Union, and the competent Luxembourg authorities concerning financial sanctions