



## Circular letter

2024 Questionnaire on  
financial crime

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## 2024 Questionnaire on financial crime

**To the Management Board and the Board of Directors of all:**

- **Credit institutions;**
- **Investment firms;**
- **Investment fund managers including registered AIFMs, Luxembourg branches of investment fund managers, SIAG, FIAAG and investment funds which did not designate an investment fund manager;**
- **Payment institutions and electronic money institutions;**
- **Virtual Asset Service Providers**
- **Specialised professionals of the financial sector; and**
- **Central Securities Depositories**

**incorporated under Luxembourg law.**

**To all Luxembourg branches of the above-listed entities having their registered office in an EU country or a third country.**

Luxembourg, 28 January 2025

Ladies and Gentlemen,

As previously announced (please refer to the communiqué of 9 December 2024), the annual online questionnaire for the year 2024 collecting standardised key information concerning **money laundering and terrorism financing (ML/TF)** risks to which the professionals under supervision are exposed and the implementation of related risk mitigation measures and **targeted financial sanctions measures** will be launched on **24 February 2025**.

This cross-sector questionnaire contributes to the CSSF's ongoing assessment of ML/TF risks present in the financial sectors under its Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) supervision, and forms part of the AML/CFT risk-based supervision approach put in place by the CSSF.

The 2024 questionnaire remains mostly unchanged compared to the previous year. However, some questions have been removed, added, or amended. The new and amended questions have been indicated in the questionnaire.

Answers to the questions will have to be submitted through the CSSF eDesk platform **by 4 April 2025 (at the latest)**.

In order to ease the process the CSSF provides for the Application Programming Interface ("API") solution allowing to pre-populate the questionnaire. The API solution is based on the use of a structured exchange file (json format) to be transmitted to the CSSF via the S3 ("simple storage service") protocol. This file will then pre-fill the questionnaire available on the CSSF eDesk platform. The entity will also be able to update directly in eDesk the data pre-filled through S3. The manual input of the responses directly in the eDesk online form remains possible.

The technical guidance including on the enrolment process, is accessible through the following link [Methods of transmitting reports via S3 Application Programming Interface – Technical guidance – CSSF](#). The user guide containing the technical details (json schema, naming convention) will be accessible the latest by mid-February 2025 on the CSSF website.

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

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

The completion of the questionnaire, however, may be assigned within the CSSF eDesk platform to another employee of the entity or third party, while bearing in mind that the **ultimate responsibility** for the adequate completion of the questionnaire shall remain with the "RC" or the "RR". This implies that the aforementioned person and his/her potential delegate hold an eDesk account, which requires a LuxTrust authentication.

In order to avoid connection problems when the questionnaire will be launched, the CSSF invites all entities it supervises for AML/CFT purposes to ensure they have an eDesk account. Reference is made to the "eDesk - Authentication – User guide" on the CSSF [eDesk application homepage](#) for further details.

**Claude WAMPACH**  
Director

**Marco ZWICK**  
Director

**Jean-Pierre FABER**  
Director

**Françoise KAUTHEN**  
Director

**Claude MARX**  
Director General

<sup>1</sup> As per Article 1(1) of the CSSF Regulation N°12-02 of 14 December 2012 on the fight against money laundering and terrorist financing as amended by CSSF Regulation N°20-05 of 14 August 2020

<sup>2</sup> As per Article 1(1) of the CSSF Regulation N°12-02 of 14 December 2012 on the fight against money laundering and terrorist financing as amended by CSSF Regulation N°20-05 of 14 August 2020