



Guide to the RAIF AML/CFT Questionnaire

The scope of this guide prepared by the AED is to help the RAIFs to answer properly the questions included on this AML/CFT Questionnaire. RAIFs starting their liquidation process in 2025 need to provide the questionnaire for the period from 1.1.2025 until the start of the liquidation period. If the liquidation process has started before 2025, then no questionnaire is required for 2025.

Chapter 1: Section 1 - Identification

This section includes information to identify the RAIF and its AML/CFT information (identification of its RR, RC, UBO and GoAML registration).

All cells are mandatory unless they turn grey. Red cells indicate entries that require correction or do not meet the expected conditions.

Question		Answer - Explanation
1.1	Name of the RAIF	Insert the precise legal name indicated on the Luxembourg Trade Register (R.C.S.).
1.2	R.C.S. Number of the RAIF	Insert the R.C.S. number of the RAIF as indicated on the Luxembourg Trade Register (R.C.S.).
1.5	Address - Country	Use the CountryCombo
1.6	Inception date	Insert date of incorporation/creation of the RAIF and no the date of registration within the Luxembourg Trade Register (R.C.S.)
1.7	Questionnaire not filled out by the RR/RC	Use the YesNo N/A combo If the RR or RC have not filled out the questionnaire by himself or herself, the person who filled out the questionnaire needs to be officially mandated by the RR or RC to do so. If the RR or RC completes the questionnaire him/herself, please select "N/A".
2	Information regarding the Governing Body of the RAIF	"Governing Body" refers to the body managing the RAIF, being for instance the board of directors/managers of the general partner of the RAIF. Insert precise information of the legal representative(s) of the RAIF (manager/director) indicated on the Luxembourg Trade Register (R.C.S.) up to 6 members.
2.4, 2.8, 2.12, 2.16, 2.20 and 2.24		Use the CountryCombo



3.1	Who is the "Responsible du Respect" in AML/CFT matters?	Use the WhoRR-Combo
3.2	First name of the RR	Insert the name of the governing body (Board of Managers/Directors) or the physical person designated as RR. If the governing body (board of Managers/Directors) is the RR, insert information regarding <u>one of its members</u> available in case of contact by the AED. Additional board members can be indicated in the 'Comment (if necessary)' column.
3.3	Last name of the RR	
3.4	Phone number of the RR	
3.5	Email address of the RR	
3.6	Country of residence of the RR	Use the CountryCombo
3.7 to 3.10		Use the YesNo combo
4.5	Country of residence of the RC	Use the CountryCombo
4.6 to 4.10		Use the YesNo combo
5	Information regarding the Ultimate Beneficial Owners (UBO)	<p>Article 1 (7) (a) (i) of the Luxembourg law dated 12 November 2004 on the fight against money laundering and terrorist financing as amended ("AML/CFT Law") states that the beneficial owner is any natural person who ultimately owns or controls a legal entity through direct or indirect ownership of more than 25% of the shares or voting rights of the legal entity.</p> <p>Moreover, article 1 (7) (a) (ii) of the AML/CFT Law states that if there is no identification of any beneficial owner as described above, "<i>any natural person who holds the position of senior managing official</i>" should be identified as beneficial owner.</p> <p>At least one beneficial owner must be indicated (must be a natural person). For instance, one of the members of the board of directors/managers of the general partner of the RAIF would be indicated as beneficial owner. The other members should be indicated in the comment column.</p>
5.3 and 5.4		Use the CountryCombo



6.1	Are you registered on the goAML web platform to file suspicions with the Financial Intelligence Unit (Cellule de Renseignement Financier)?	<p>Use the YesNo combo</p> <p>Every RAIF has to register itself on the goAML platform to file suspicions with the Luxembourg Financial Intelligence Unit (<i>Cellule de Renseignement Financier</i>) (CRF). Nevertheless, a registration done by the RC of the alternative investment fund manager (AIFM) managing the RAIF can only be accepted if:</p> <ul style="list-style-type: none">- (i) the RC of the AIFM is also appointed as RC of the RAIF managed by the AIFM; and- (ii) this RC registers himself on the goAML web platform as stating proxy ("<i>déclarant mandataire</i>") and after agreement received by the CRF, he can register the RAIF as principal entity ("<i>entité mandante</i>"). <p>Then, the RC of the AIFM/RAIF will be able to file suspicions with the CRF in the name and on behalf of the RAIF. Please refer to the following link of the CRF website: https://faq.goaml.lu/manuels-dutilisation/menu-administration/decl-actifs-delegations/delegations-fonds-dinvestissement/</p>
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Chapter 2: Section 2 - MLTF risks

This section includes information to identify the money laundering and terrorist financing risks faced by the RAIF related to its related parties, AML actions (cooperation with authorities/, internal ML and TF risk assessment) and investment strategy.

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Question		Answer - Explanation
1.2 and 1.5		Use the CountryCombo
1.7, 1.10 and 1.13		Use the YesNo combo
2	Advisors ML/TF risks	"Advisors" term refers to investment advisors or "conseillers en investissement" (this excludes legal or tax advisors)
2.1 to 2.3		Use the YesNo combo
3.6		Country(ies) to be indicated if the answer to point 3.3, 3.4 or 3.5 is other than 0.
4.3		Country(ies) to be indicated if the answer to point 4.1 is "YES"
5.1, 5.4, 5.7, 5.10 and 5.13		Use the YesNo combo If "No" is selected, answer the two following questions with "0". Example: if Q 5.1 is "No", Q 5.2 and Q 5.3 = "0".
5.3, 5.6, 5.9, 5.12 and 5.15		AuM figures are required in EURO without decimals and without commas or dots (i.e., 1 million = 1000000). The "AuM as of 31/12/2024 (EUR)" refers to the total market value of the investments managed by the company on behalf of investors.
5.10	Have you identified investors in identified higher-risk countries/jurisdictions?	Higher risk countries or jurisdictions are identified through various official sources such as the Financial Action Task Force (FATF) lists and reports from regulatory bodies like the European Securities and Markets Authority (ESMA). These identified countries/ Jurisdictions are labeled as non-cooperative or blacklisted territories. Being listed and identified by the FATF or other reputable institutions serves as a signal for heightened vigilance in terms of AML/CFT.



7.1	What is your own assessment of your ML risk? (of the RAIF)	Use the ML Risk-Combo The “ <i>internal ML risk assessment</i> ” refers to the inherent risk (i.e., before mitigating measures) of the RAIF.
7.2	Have you separately assessed the TF risk to which you as exposed?	Use the TF Risk-Combo The “ <i>internal TF risk assessment</i> ” refers to the inherent risk (i.e., before mitigating measures) of the RAIF.
7.3	If no, please explain	Use the Combo Box If you selected “other reason”, please briefly describe in Comment column
7.4	What is your overall assessment of your inherent TF risk? (of the RAIF)	Use the TF Risk-Combo The “ <i>internal TF risk assessment</i> ” refers to the inherent risk (i.e., before mitigating measures) of the RAIF.
8.1.1 to 8.1.4		All figures are required in EURO without decimals and without commas or dots (i.e., 1 million = 1000000).
8.1.1.	What is the total AuM of the RAIF as of 31/12/2024 (in EUR)?	Assets under management refers to the total market value of the investments managed by the company on behalf of investors.
8.1.2.	What is the total NAV of the RAIF as of 31/12/2024 (in EUR)?	Total net asset value refers to the company's total assets minus its total liabilities
8.2	What is your predominant investment strategy?	select the predominant investment strategy from the dropdown menu. If the selected predominant investment strategy is “Other”, then answer to point 8.20 is mandatory.
8.3 to 8.11 and 8.13 to 8.14		Use the YesNo combo
8.4, 8.6, 8.8, 8.10, 8.12, 8.14, 8.16, 8.18 and 8.21	Percentage of total investments	Insert the percentage of the investments done in the different investment strategies listed from 8.3 to 8.17 included. The amounts have to be inserted without the percentage sign. The total percentages in point 8.24 needs to be equal to 100%.
8.22	Do you invest in dual-use items?	Use the YesNo combo If the answer is “YES”, then answer to point 8.23 is mandatory.



Chapter 3: Section 3 - Mitigations

This section includes information related to mitigation measures put in place by the RAIF in order to fight against the MLTF risks described in above-mentioned Section 2.

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Question		Answer - Explanation
1.1 to 1.2		Use the YesNo combo
3.1	Have all relevant staff members been trained in 2024 on AML/CFT-related matters? (Art.4 (2) of the AML/CFT Law)?	Article 4 (2) of the AML/CFT Law states that the term "employees" includes "the members of the management bodies and the effective direction". Consequently, the term "relevant staff members" refers to employees of the RAIF and the members of the management bodies and the effective direction of the RAIF, being for instance the members of the board of managers/directors of the general partner of the RAIF.
3.1., 3.2. and 3.4 to 3.6		Use the YesNo combo
4.1	Do you ensure that AML/CFT due diligence on your investments is performed?	Use the YesNo combo
5.1 to 5.6		Use the Frequency-Combo
5.6	What is the frequency of the update of the TFS lists? (please choose the closest that applies)	"TFS" stands for targeted financial sanctions.
6.1	Do you have blocked positions due to AML/CFT deficiencies? (non-compliance with the law)	Use the YesNo combo
6.2	Brief description of the reason for the blocking (legal basis)	Insert the breached article(s) of the related law



6.3	Number of blocked positions	If the answer to this point is other than 0, answers to point 6.4 & 6.5 are mandatory
6.4	Total value of assets concerned (EUR)	AuM figures are required in EURO without decimals and without commas or dots (i.e., 1 million = 1000000).
6.6	Blocked Positions affected by Targeted Financial Sanctions?	Use the YesNo combo
7.1	AML/CFT reporting	Use the YesNo combo
8.1	AML/CFT oversight on service providers	Use the YesNo combo
9.1	What is your own assessment of the quality of your AML/CFT organization for the year 2024?	Use the MLTFRisk-Combo



Chapter 4: Section 4 - TF

This section includes information to identify the terrorist financing risks faced by the RAIF towards high-risk TF activities/sectors including an assessment of non-profit organizations (NPOs) most vulnerable to TF risks; TF/TFS actions (sources used to perform TF risk assessment, training and procedures) and TF questions specified to the National VRA.

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Question		Answer - Explanation
1.2 to 1.10		Use the YesNo combo
1.12	Number of domestic NPOs and charities	If the answer to this point is other than 0, answers to point 1.13 & 1.14 are mandatory
1.13 and 1.17	Total value of assets concerned (EUR)	AuM figures are required in EURO without decimals and without commas or dots (i.e., 1 million = 1000000).
1.18	Within the NPOs and/or charities, which of the following main actors were (select from drop down list):	Use the 'TF- NPO actors list' Combo Box
2.1	Do you have a dedicated TF section in your procedures?	Use the YesNo combo
2.2	What source(s)/platform(s) do use to perform your TF risk assessment?	Use the 'TF sources' Combo Box If 'Other source(s)' is selected, please indicate in Question 2.3 which other source(s) is used
2.4	Do you rely on the TF Vertical Risk Assessment (VRA TF) to perform your TF assessment? (Y/N)	Use the YesNo combo <u>Questions 2.4 to 2.6 are particularly dedicated to TF Vertical Risk Assessment</u>
2.5	What source(s)/platform(s) do use to download your VRA TF?	Use the 'National Vertical Risk Assessment download list' Combo Box If 'Other' is selected, please indicate in Question 2.6 which other source(s)/platform(s) is/are used
2.7	What version/year of the NRA is used?	Use the Combo Box to select the version/year of the NRA that is used <u>Questions 2.7 to 2.9 are particularly dedicated to National Risk Assessment</u>



2.8 to 2.9		Use the YesNo combo
3.2 to 3.4		Use the YesNo combo
4.2 to 4.3		Use the YesNo combo
4.4	How have you identified the PEPs? Please select from the list	Use the 'PEP identification sources' Combo Box
4.5	Do you identify the origins/ source of wealth regarding the investments used by the NPOs / Charities / Trusts / Foundations or any other similar legal arrangement.	Use the YesNo combo A 'legal arrangement' may refer to or include Trusts, fiducies, Treuhand and Fideicomiso but exclude life insurance policies. Please refer to FATF Vertical risk assessment - legal persons and legal arrangements - February 2022, section 2.2 and 3.3 for detailed overview of the types of entities
5.1		Use the YesNo combo If "No" is selected, please explain why not (free text to question 5.2).
5.3		Use the Frequency-Combo

New definition '**entities**' added to the definitions list.

Conclusion:

Each RAIF AML/CFT Questionnaire with data not respecting the recommendations of this guide, especially regarding the Combo Boxes and/or AuM figures, will not be accepted by the AED and be sent back to the sender.