



# ALCO Working Group 50

June 2021

The Association of Luxembourg  
Compliance Officers

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# Purpose of this document

Suggest a standard list of management information to be considered as part of the quarterly (or other frequency) reporting to be done to the Board of the Entity and provide a structure to the document to assist in the categorization of the targeted indicators (e.g, new clients versus legacy, KRI on external party/service providers, KRI linked to tax crime, etc). This document is applicable to the Manco/IFM in relation to an UCI, the AIFM in relation to an AIF and also to a self-managed Fund.

This list is not exhaustive and has been established based on the current AML/CTF requirements as well as the market practice (observed within the working group). The list of management information will be compiled from different sources (TA, Asset Manager, Distributor) and relate to both the liabilities and the the asset sides of the UCI or AIF. KPI/KRIs from the Depositary have currently not been considered.

The list of indicators should be tailor made to the activities of the Fund. Among this population, it might be needful to highlight the ones that we would define as the minima information to be used. In addition we may as well consider indicating whether the criteria refers to the inherent risk or residual risk to better quantify the significance of the indicator.

March XX,  
2021

# 1 – Unit/Shareholder

Dashboard for the area “Unit-/Shareholder						
Section	Indicator	Number	Value (ccy)	% of Capital	Quantitative/ Qualitative	Target as the AML risk appetite
Unit-/Shareholder Population	current population (CP)					
	current population located in High risk countries (incl. BO)					
	current population subject to the periodic review (for the year)					
	current population for which the review to be initiated, to be performed or overdue					
	<b>new population (NP) on boarded incl:</b>					
	•Located in high risk countries (incl. BO)					
	•Nominee					
High Risk	•Platform					
	•Retail					
	current population					
	current population for which the review to be initiated, to be performed or overdue					
Medium Risk	new cases					
	current population (full population)					
	current population for which the review to be initiated, to be performed or overdue					
	new cases					
Low Risk	current population (full population)					
	current population for which the review to be initiated, to be performed or overdue					
	new risk cases					
	current PEPs (full population)					
PEP	current PEPs for which the review to be initiated, to be performed or overdue					
	new PEP on boarded					
	current population					
Blocked accounts	•KYC deficiencies					
	•ML/TF suspicious					
	•Other reason to specify					
	new population					
	•KYC deficiencies					
Tax	•ML/TF suspicious					
	•Other reason to specify					
	current population					
	•the number of UBO located in a CRS out country based on their tax domicile					
	•the number of complex corporate structures involving an offshore country					
SAR / STR	Market Abuse					
	Insider Trading					
	Corruption					
	Fraud / Embezzlement					
	Other crimes					
	Total SAR/STR filed with FIU					
	Total SAR/STR reported to CSSF					
Screening Results	True Hits:					
	•PEP					
	•Adverse Media (crime, regulatory sanctions)					
Financial Sanctions	True hits TFS/PF					
	reported to the Ministry of Finance					
AML reported deficiencies / breaches (linked to AML monitoring)	AML deficiencies / breaches					

## 2 - Asset

Dashboard for the area "Asset"						Overall KPI status			On track	
Section	Indicator	Number	Value (ccy)	% of Assets	Quantitative/ Qualitative	KPI Value	Target as the AML risk appetite	vs. previous quarter	RAG	Comment
Transactions & Payments in High Risk country	Transactions (Purchase, Sale, Transfers, loans)									
	Payments received in relation to assets									
	Payments made in relation to assets									
Transactions with High Risk Counterparties	Persons / Securities subject to financial sanctions									
	Persons identified as presenting High ML Risks									
	Persons identified as presenting High TF Risks									
SAR / STR	Market Abuse									
	Insider Trading									
	Corruption									
	Fraud / Embezzlement									
	Other crimes									
	Total SAR/STR filed with FIU									
	Total SAR/STR reported to CSSF									
Screening Results	True Hits: •PEP •Adverse Media (crime, regulatory sanctions)									
Financial Sanctions	True hits TFS/PF									
	reported to the Ministry of Finance									
AML reported deficiencies / breaches (linked to AML monitoring)	AML deficiencies / breaches									

# 3 - Distributor

Dashboard for the area "Distributor"						Overall KPI status		On track		
Section	Indicator	Number	Value (ccy)	% of Capital	Quantitative/ Qualitative	KPI Value	Target as the AML risk appetite	vs. previous quarter	RAG	Comment
Distributor (Intermediaries & Third Party Introducers)	current distributors (full population)									
	current distributors located in High risk countries									
	current distributors subject to the periodic review (for the year)									
	current distributors for which the review to be initiated, to be performed or overdue									
	new distributors onboarded									
High Risk	current population									
	current population for which the review to be initiated, to be performed or overdue									
	new cases									
Medium Risk	current population (full population)									
	current population for which the review to be initiated, to be performed or overdue									
	new cases									
Low Risk	current population (full population)									
	current population for which the review to be initiated, to be performed or overdue									
	new risk cases									
Third party Introducer	current population									
	new population									
Blocked accounts	current population									
	•KYC deficiencies									
	•ML/TF suspicious									
	•Other reason to specify									
SAR / STR	new population									
	•KYC deficiencies									
	•ML/TF suspicious									
	•Other reason to specify									
	Market timing									
	Insider Trading									
	Corruption									
Screening Results	Fraud / Embezzlement									
	Other crimes									
	Total SAR/STR filed with FIU									
	Total SAR/STR reported to CSSF									
Financial Sanctions	True Hits:									
	•Adverse Media (crime, regulatory sanctions)									
AML reported deficiencies / breaches (linked to AML monitoring)	True hits TFS/PF									
	reported to the Ministry of Finance									
AML reported deficiencies / breaches (linked to AML monitoring)	AML deficiencies / breaches									

## 4 – Initiator / Investment Manager

Dashboard for the area “Initiator & Investment Manager”						Overall KPI status		On track		
Section	Indicator	Number	Value (ccy)	% of AUM	Quantitative/ Qualitative	KPI Value	Target as the AML risk appetite	vs. previous quarter	RAG	Comment
Initiator & Investment Manager	current population									
	current population located in High risk countries									
	current population subject to the periodic review (for the year)									
	current population for which the review to be initiated, to be performed or overdue									
	new initiator / investment manager onboarded									
High Risk	current population									
	current population for which the review to be initiated, to be performed or overdue									
	new cases									
Medium Risk	current population (full population)									
	current population for which the review to be initiated, to be performed or overdue									
	new cases									
Low Risk	current population (full population)									
	current population for which the review to be initiated, to be performed or overdue									
	new risk cases									
SAR / STR	Market Abuse									
	Insider Trading									
	Corruption									
	Fraud / Embezzlement									
	Other crimes									
	Total SAR/STR filed with FIU									
Screening Results	True Hits:									
	•PEP •Adverse Media (crime, regulatory sanctions)									
Financial Sanctions	True hits TFS/PF									
	reported to the Ministry of Finance									
AML reported deficiencies / breaches (linked to AML monitoring)	AML deficiencies / breaches									

## 5 – Central Administration

Dashboard for the area “Central Administration”									
Section	Indicator	Number	Value (ccy)	% of AUM	Quantitative/ Qualitative	Target as the AML risk appetite	vs. previous quarter	On track	
								RAG	Comment
Central Administration	Status of the Due Diligence								
SAR / STR	Market Abuse								
	Insider Trading								
	Corruption								
	Fraud / Embezzlement								
	Other crimes								
	Total SAR/STR filed with FIU								
	Total SAR/STR reported to CSSF								
Screening Results	True Hits:								
	*Adverse Media (crime, regulatory sanctions)								
AML reported deficiencies / breaches (linked to AML monitoring)	AML deficiencies / breaches								

## 6 - Miscellaneous

KPI dashboard for the area “Miscellaneous”			Information
Section	Indicator	Date of Assessment / Implementation	Observation
New Regulation			
AML Risk rating of the Fund			