LES CONSULTANTS
CONSEIL & FORMATION

EN

AML/CFT · INSURANCE SECTOR

AML Obligations for Insurance Companies – Luxembourg

8 chapters

Regulatory framework, due diligence obligations, suspicion detection and governance in the insurance sector

8 CHAPTERS

Training programme

1 Introduction and general context

1.1 AML/CFT challenges in Luxembourg
- Protection of the financial system
- Reputation of the financial centre

1.2 Role of insurance companies
- Sectoral responsibility
- Prevention chain

2 Luxembourg legal and regulatory framework

2.1 Legal foundations of AML/CFT
- Law of 12 November 2004
- Applicable European directives

2.2 Insurance regulatory framework
- CAA circulars
- Professional obligations

2.3 Competent authorities
- CAA
- FIU
- National authorities

3 Risk identification and assessment

3.1 Risk-based approach
- General principles
- Company responsibility

3.2 Insurance risk typologies
- Clients
- Products
- Distribution channels

3.3 Internal risk assessment
- Risk Assessment
- Update and traceability

4 Due diligence and KYC obligations

4.1 Identification and verification
- Client
- Beneficial owner
- Policy beneficiary

4.2 Due diligence measures
- Simplified due diligence
- Standard due diligence
- Enhanced due diligence

4.3 Ongoing monitoring of the business relationship
- KYC updates
- Periodic review

5 Detection and reporting of suspicions

5.1 Identification of suspicious transactions
- Insurance-specific red flags
- Behavioural analysis

5.2 Reporting procedure
- Reporting to the FIU
- Confidentiality
- Prohibition of tipping-off

5.3 Internal roles and responsibilities
- AML Control Officer
- AML Compliance Officer

6 Internal organisation and AML/CFT governance

6.1 Internal AML/CFT framework
- AML/CFT policy
- Internal procedures

6.2 Governance
- Board of Directors
- Management
- Control functions

6.3 Record-keeping and controls
- Document retention
- Reporting and internal controls

7 Practical cases and scenarios

7.1 Life insurance typologies
- Surrenders
- Transfers
- High-risk contracts

7.2 Operational analysis
- Identification of red flags
- Selection of appropriate measures

8 Conclusion

8.1 Key messages
- Individual responsibility
- Risk-based vigilance
- Reporting reflex

KEY MESSAGES

Individual responsibility, risk-based vigilance, reporting reflex.