

APRIL 2019

AML & CTF

ABBL's Commitments to support its members

Consolidated Action Plan in the ABBL's pursuit to support the industry's fight against money laundering and terrorist financing

Luxembourg has been engaged in the fight against the abusive use of the financial circuits since 1989.

Due to the continued growth and international connectedness of the Luxembourg financial centre, the ABBL herewith seeks to affirm the necessary consensus with and among its members on the necessity to reinforce action in the industry's fight against money laundering ("AML") and terrorist financing ("CTF").

AML & CTF ABBL's Core Pillars



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ABBL's Commitments



Integrity and reputation

The ABBL is committed to safeguarding the integrity and reputation of Luxembourg financial market and its participants at a national, European and international level.



Vigilance

The ABBL collaborates within the bounds of the law, to achieve exemplary levels of vigilance on AML and CTF matters in the banking and wider financial sector.



Improving AML compliance

The ABBL reaffirms the need to make an effective contribution to AML and CTF at international level.



Prevention

The ABBL is committed to preventing the banking system from being used for illicit purposes.



Stability

The ABBL supports the European Commission in its objective, as expressed in the State of the Union 2018, to strengthen supervision relating to AML and CTF in order to guarantee a stable financial and banking sector.

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ABBL's Action Plan



FIRST ACTION

ABBL promotes sound Corporate Governance

WHY ?

The risk to reputation associated with money laundering needs to be understood and owned at the highest hierarchical level of an organisation and its statutory bodies.

HOW ?

The ABBL supports its members and their statutory bodies in:

- > adapting their internal policies to the highest applicable international standards
- > updating their internal procedures in accordance with Luxembourg new legislation
- > following up on instructions or guidance given by competent regulatory and supervisory authorities



SECOND ACTION

ABBL assists its members

WHY ?

The ABBL issues recommendations intended to guide its members. They provide a relevant point of reference in terms of market-best-practice and advisable or expected conduct. ABBL Members are encouraged to reflect, in substance, any such recommendations and the ABBL Code of Conduct in their internal procedures and actual conduct.

HOW ?

A Vade mecum of the professional obligations relating to the fight of money laundering and terrorist financing is being redrafted as part of the ABBL's engagement to maintain a high level of integrity among its members.

This Vade mecum conveys a core framework of minimum standards as guidance to the ABBL members' Compliance and AFC functions.



THIRD ACTION

ABBL provides relevant information & guidance

WHY ?

To keep ABBL's members regularly informed about any new national and European regulatory or legislative developments.

HOW ?

Through ABBL's Compliance Forum & Committees by providing ABBL's members with:

- > Continuous regulatory oversight
- > Ad-hoc Member Briefings
- > Practical and useful information by email on a case-by-case basis

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ABBL's Action Plan



FOURTH ACTION

ABBL cooperates with authorities

WHY ?

The ABBL collaborates with relevant authorities to achieve a greater effectiveness and efficiency of the AML and CTF frameworks.

HOW ?

The organisation of meetings and conferences with the authorities aims at helping ABBL members understand and meet expectations of the regulator and public authorities



FIFTH ACTION

ABBL encourages training

WHY ?

Continuous training has always been considered a fundamental element in providing relevant expertise to all professional actors in Luxembourg financial centre.

In order to involve the Luxembourg labour and talent pool in – and equip for – the fight against money laundering and terrorist financing, it is important to ensure that relevant skills are maintained and developed.

A particular emphasis has been put on training and life-long learning for bank employees through the new Collective Bargaining Agreement (2018 - 2020).

HOW ?

- > The ABBL cooperates with the House of Training in designing and providing bespoke certificated training programmes
- > The ABBL encourages and expects all of its members to train their staff in relation to AML and CTF

