

KYA • ASSET MANAGEMENT

Know Your Asset (KYA)

▲ 6 chapters

▲ From KYC to KYA: ownership, provenance, risk-based approach and governance

INTRODUCTION — KYA FRAMEWORK

Shift from KYC to KYA

EU and Luxembourg regulatory context

Look-Through principle

6 CHAPTERS

▲ Training programme

1 Legal and Strategic Context

1.1 Regulatory basis

- ▶ CSSF 12-02
- ▶ EU AMLR / AMLA

1.2 Strategic objectives

- ▶ Risk mitigation
- ▶ Reputation
- ▶ Liability

2 Core KYA Requirements

2.1 Ownership and UBO verification

- ▶ Look-through structures

- ▶ Trusts and offshore entities

2.2 Source of Funds / Asset provenance

2.3 Valuation and economic rationale

3 Risk-Based Approach

3.1 Inherent risk

- ▶ Country
- ▶ Asset type
- ▶ 3.2 Mitigating measures

- ▶ Complexity

3.3 Residual risk decision

4 High-Risk Situations

- ▶ 4.1 Unlisted and alternative assets
- ▶ 4.2 Offshore and trust structures

- ▶ 4.3 Cross-border lending
- ▶ 4.4 Tokenized assets

5 Post-Investment Controls

- ▶ 5.1 Asset-side transaction monitoring
- ▶ 5.2 Trigger events

- ▶ 5.3 Sanctions screening and 50% rule

6 Governance and Documentation

- ▶ 6.1 RR and RC responsibilities
- ▶ 6.2 Reporting to CRF

- ▶ 6.3 KYA Memo and record retention

CONCLUSION

Pre-investment integration, automation and AI, KYA-ESG alignment.