

DUE DILIGENCE CHARTER

A Voluntary Industry Framework for the Luxembourg Financial and Insurance Ecosystem

Finance & Technology Luxembourg

Version of September 2026

DUE DILIGENCE CHARTER

Ten principles for proportionate ICT due diligence in Luxembourg

01 VOLUNTARY INDUSTRY FRAMEWORK

This Charter establishes a voluntary, non-binding reference framework to standardize, streamline, and proportionately align ICT due diligence interactions between financial and insurance sector clients and ICT service providers, preserving each party's regulatory accountability and contractual autonomy.

02 PROPORTIONALITY & RISK-BASED SCOPING

Parties shall tailor the depth, breadth, and frequency of due diligence requests to the criticality of the supported function, service context, and actual risk exposure, and avoid uniform or maximalist approaches.

03 PRECISION & MUTUAL TRANSPARENCY

All requests and responses shall be explicitly scoped, purpose-driven, and limited to information material to the contractual and regulatory objective, with a clear distinction between mandatory regulatory requirements, contractual obligations, and internal policies.

04 RECOGNITION & REUSE OF EVIDENCE

Parties should prioritise the reuse of existing documentation, independent assurance reports, and recognised certifications, minimise redundant requests, and support delta-based updates over full resubmissions.

05 CONTROLLED TRANSPARENCY & DATA PROTECTION

Information sharing shall employ tiered disclosure mechanisms (e.g., executive summaries, redacted documents, controlled-access reviews, NDAs) to balance legitimate information needs with the protection of intellectual property, security configurations and commercial confidentiality.

06 INTERNAL ALIGNMENT & SINGLE-POINT COORDINATION

Both clients and providers shall establish internal coordination mechanisms to consolidate requests, ensure consistency across functions (procurement, ICT, security, legal, compliance) and designate accountable owners for due diligence exchanges.

07 CONSTRUCTIVE ENGAGEMENT & TIMELY EXECUTION

Parties shall maintain professional, solution-oriented dialogue, provide reasonable timelines calibrated to the complexity of the request and proactively communicate any material changes, limitations or delays that affect due diligence outcomes.

08 REGULATORY COMPLEMENTARITY

The Charter is designed to complement, not replace, applicable regulations (e.g., DORA), supporting consistent mapping to supervisory expectations, the Register of Information, and third-party risk management obligations.

09 RESPONSIBLE TECHNOLOGY & AI USE

Parties may leverage digital platforms and AI tools to enhance due diligence efficiency, provided they maintain human oversight, ensure data confidentiality, comply with applicable security standards and retain full accountability for accuracy and integrity.

10 CONTINUOUS ECOSYSTEM IMPROVEMENT

Participants are encouraged to adopt this Charter pragmatically, contribute to its evolution through structured feedback and support its operational deliverables i.e. standardized packages to foster industry-wide maturity.

This Charter is accompanied by a Declaration of Adherence form, which outlines the applicable criteria, rules and responsibilities. FTL's website further details the Charter's principles: https://www.financeandtechnology.lu

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