

Administrative sanction of 9 December 2021

Administrative sanction imposed on the investment fund manager Franklin Templeton International Services S.à r.l.

Luxembourg, 11 February 2022

On 9 December 2021, the CSSF imposed an administrative fine amounting to EUR 261,000 in total on the investment fund manager Franklin Templeton International Services S.à r.l. (the “Manager”), which is subject to Chapter 15 of the amended Law of 17 December 2010 relating to undertakings for collective investment and authorised as alternative investment fund manager according to the provisions of the amended Law of 12 July 2013 on alternative investment fund managers.

This administrative fine was imposed on the basis of the provisions of Article 2-1, paragraph (1), and Article 8-4, paragraphs (1), (2) and (3), letter a), of the amended Law of 12 November 2004 on the fight against money laundering and terrorist financing (the “Law of 2004”). It follows an on-site inspection carried out by the CSSF and targeted the framework of fight against money laundering and combating the financing of terrorism. The deficiencies identified relate specifically to shortcomings regarding the customer due diligence requirements, the on-going due diligence requirements, weaknesses of customer due diligence performed by and the oversight performed on a third-party, as well as branch oversight in terms of AML/CFT compliance.

In determining the amount of the administrative fine, the CSSF duly took into consideration the cooperation and remedial actions already undertaken by the Manager in order to address the deficiencies identified, as well as those to which the Manager has committed in its remediation plan.

The identified deficiencies relate to facts observed at the time of the on-site inspection. Since then, the Manager has undertaken remedial actions to address them.

This publication is done according to Article 8-6, paragraph (1), of the Law of 2004.

