

Administrative penalty of 26 July 2022

Administrative penalty imposed on the credit institution BEMO EUROPE - Banque Privée S.A.

Luxembourg, 13 October 2022

On 26 July 2022, the CSSF imposed an administrative fine amounting to 356,000 euros on the credit institution BEMO EUROPE - Banque Privée S.A. ("the Bank").

The fine was imposed on the basis of the provisions of

- (i) Article 2-1 paragraph (1) and Article 8-4 paragraphs (1) and (3) of the amended Law of 12 November 2004 on the fight against money laundering and terrorist financing (hereafter the "AML/CFT Law") for non-compliance with certain professional AML/CFT obligations and of
- (ii) Article 63 paragraphs (1) and (2) of the amended Law of 5 April 1993 on the financial sector (hereafter the "LFS") with regard to inadequate management of conflicts of interest.

This administrative fine was imposed following a CSSF on-site inspection that had started in 2020 and targeted the framework of fight against money laundering and combating the financing of terrorism during which important weaknesses were identified, especially in the processes of entering into a business relationship, ongoing due diligence, transaction monitoring, name matching controls, internal organisation and governance. The identified deficiencies were drawn on facts observed at the time of the on-site inspection. The Bank has initiated remedial actions in order to address the identified deficiencies.

In determining the amount of the administrative fine, the CSSF duly took into consideration the cooperation of the Bank and the remedial actions undertaken by the Bank in order to address the deficiencies identified.

This disclosure is made in accordance with Article 8-6 paragraph (1) of the AML/CFT Law, respectively Article 63 paragraph (2) of the LFS.

