

## Administrative sanction of 1 December 2021

**Administrative sanction  
imposed on the investment  
fund manager Alter Domus  
Management Company S.A.  
(formerly known as  
*Luxembourg Fund Partners  
S.A.*)**

Luxembourg, 7 February 2023

Pursuant to Article 51(2) of the amended Law of 12 July 2013 on Alternative Investment Fund Managers (hereafter the "Law") and on the basis of Article 51(1) of the Law, the CSSF imposed, on 1 December 2021, an administrative fine amounting to EUR 174,400 on the investment fund manager Alter Domus Management Company S.A. (formerly known as *Luxembourg Fund Partners S.A.*) (hereafter the "Manager") 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 Law.

The administrative fine is imposed on the basis of Article 11(1), Article 13(1) and Article 16 of the Law, following *ad hoc* investigations carried out by the CSSF into the sub-fund LFP I SICAV SIF - Columna Commodities Fund (hereafter the "Sub-fund"). The Sub-fund was incorporated within the investment fund LFP I SICAV SIF S.A. which was subject to the provisions of the amended Law of 13 February 2007 relating to specialised investment funds and was definitively withdrawn from the official list of specialised investment funds by decision of the CSSF taken on 3 July 2019. The Sub-fund went into liquidation on 16 February 2017, prior to the sale of the Manager to the Alter Domus group effective as of 28 December 2017.

During its investigations, the CSSF identified the existence of material and persistent failures - originating before the liquidation of the Sub-Fund - to comply with the provisions of the Law relating to general requirements on due diligence, on conflicts of interest and in terms of procedures and organisation.

