

The Commission de Surveillance du Secteur Financier (CSSF) has announced that will allow UK firms currently providing financial services in Luxembourg under the EU passport to continue their activities for a limited period after the occurrence of a hard Brexit (the “transitional regime”). The transitional regime applies only to the scenario of a hard Brexit and only to contracts that have entered into force before Brexit (“existing contracts”) as well as to contracts concluded after Brexit with close links to existing contracts (“closely-related contracts”). The transitional period will be 12-months following the date of a hard Brexit. UK firms that intend to benefit from this transitional regime will be required to submit an application for an authorisation to the CSSF. The notification must be submitted no later than 15 September 2019 and the authorisation of this may take up to 12 months.