"In accordance with the provisions of Article 61.6 of Law 10/2010 of 28 April on Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT), the Secretariat of the COPBLAC shall publish on its website the final administrative sanctions imposed for the commission of offences set out in Articles 51 and 52 of Law 10/2010, with the exception of those set out in paragraph 3(a), indicating the type and nature of the offence committed and the penalty or penalties imposed for each of the offences committed, but without identifying the entity, person or persons responsible for the offence. This information must remain available on the Commission's website for a period of five years."

REQUIREMENTS AND SANCTIONS IMPOSED FOR FAILURE TO COMPLY WITH ML/TF PREVENTION OBLIGATIONS

Year 2020

Imposition on a credit institution of a sanction consisting of a fine of three million nine hundred thousand euros (€3,900,000) and a private reprimand, for committing a serious infringement by failing to fulfil the obligation to provide the internal control body with the material, human and technical resources necessary for the performance of its functions, as defined and penalised under Articles 52(1)(o) and 57 of Law 10/2010 of 28 April.

A credit institution has been imposed a penalty consisting of a fine of one million four hundred and one thousand five hundred and one euros (€1,401,501) and a private reprimand, as the perpetrator of a serious infringement for failure to comply with the obligation to identify the beneficial owner, as defined and penalised under Articles 52.1.b) and 57 of Law 10/2010 of 28 April.

A credit institution is hereby imposed a penalty consisting of a fine of one hundred and ninety-four thousand one hundred and fifty-one euros (€194,151) and a private reprimand, for having committed a serious infringement by failing to fulfil the obligation to approve in writing and implement adequate internal control policies and procedures,

in accordance with Articles 26 and 26 bis of Law 10/2010 of 28 April, as defined and penalised under Articles 52(1)(m) and 57 of the same law.

Imposition on a credit institution of a sanction consisting of a fine of seven hundred and thirty-six thousand two hundred and twenty-two thousand euros (€736,222) and a private reprimand, for committing a serious infringement by failing to comply with the obligation to provide the internal control body with the material, human and technical resources necessary for the performance of its functions, as defined and penalised under Articles
52.1.o) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of five million five hundred and eighty-three thousand and one euros (€5,583,001) and a private reprimand, for committing a serious infringement by failing to comply with the obligation to carry out a special review, in accordance with Article 17, as defined and penalised under Articles 52.1.g) and 57 of Law 10/2010 of 28 April, in conjunction with a serious infringement for failure to comply with the obligation to report on the basis of circumstantial evidence, as defined and penalised under Articles 52.1.h) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a penalty consisting of a fine of three million seven hundred and forty-two thousand and one euros (€3,742,001) and a private reprimand, as the perpetrator of a serious infringement for failure to comply with the obligation to obtain information on the purpose and nature of the business relationship, in accordance with Article 5, as defined and penalised under Articles 52.1(c) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of one million nine hundred and one thousand and one euros (€1,901,001) and a private reprimand, for committing a serious infringement by failing to comply with the obligation to apply enhanced due diligence measures, in accordance with Article 11, as defined and penalised under Articles 52.1.f) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of one million nine hundred and one thousand and one euros (€1,901,000) and a private reprimand, for committing a serious infringement by failing to comply with the obligation to refrain from

enforcement, in accordance with Article 19, as defined and penalised under Articles 52.1.i) and 57 of Law 10/2010 of 28 April.

Imposition on an online gambling operator of a penalty consisting of a fine of sixty thousand and one euros (€60,001) and a private reprimand, as the perpetrator of a serious offence for breach of the obligation to undergo an external audit, in accordance with Article 28, as defined and penalised under Articles 52.1.q) and 57 of Law 10/2010 of 28 April.

A real estate company has been imposed a penalty consisting of a fine of one hundred and three thousand seven hundred and ninety thousand euros (€103,790) and a private reprimand, for committing a serious offence by failing to comply with the obligation to undergo an external audit, in accordance with Article 28, as defined and penalised under Articles 52.1.q) and 57 of Law 10/2010 of 28 April.

A real estate firm has been imposed a penalty consisting of a fine of sixty thousand and one euros (€60,001) and a private reprimand, for committing a serious infringement by failing to comply with the obligation to notify the Commission's Executive Service of the proposed appointment of the representative of the regulated entity, in accordance with Article 26 ter, as defined and penalised under Articles 52.1.n) and 57 of Law 10/2010 of 28 April.

Imposition on a property company of a sanction consisting of a fine of one hundred and three thousand seven hundred and ninety thousand euros (€103,790) and a private reprimand, as the perpetrator of a serious infringement for failure to comply with the obligation to establish adequate internal control mechanisms, as defined and penalised under Articles 52.1(ñ) and 57 of Law 10/2010 of 28 April.

A credit institution has been imposed a penalty consisting of a fine of five hundred and sixty thousand and one euros (€560,001) and a private reprimand, for committing a serious infringement by failing to comply with the obligation to carry out a special review, in accordance with Article 17, as defined and penalised under Articles 52.1(g) and 57 of Law 10/2010 of 28 April.

An investment services firm is hereby imposed a penalty consisting of a fine of sixty thousand and one euros (€60,001) and a private reprimand, for having committed a serious infringement by failing to comply with the obligation to carry out an external review, in accordance with Article 28, as defined and penalised under Articles 52.1.q) and 57 of Law 10/2010 of 28 April.

Imposition of a sanction on an investment services firm consisting of a fine of sixty thousand and one euros (€60,001) and a private reprimand, for having committed a serious infringement by failing to comply with the obligation to provide staff training, in accordance with Article 29, as defined and penalised in Articles
52.1.r) and 57 of Law 10/2010 of 28 April.

Imposition of a penalty consisting of a fine of sixty thousand and one euros (€60,001) and a private reprimand **on an entity trading in works of art**, for committing a serious infringement by failing to comply with the obligation to undergo an external audit, in accordance with Article 28, as defined and penalised under Articles 52.1.q) and 57 of Law 10/2010 of 28 April.

Imposition on an entity trading in works of art of a penalty consisting of a fine of sixty thousand and one euros (€60,001) and a private reprimand, as the perpetrator of a serious offence for failure to comply with the obligation to provide staff training, in accordance with Article 29, as defined and penalised in Articles
52.1.r) and 57 of Law 10/2010 of 28 April.

A **directive to a credit institution** requiring it, without prejudice to its obligation to adopt all necessary measures to ensure strict compliance with all its ML/TF prevention obligations, to ensure that its risk analysis, which shall be reviewed periodically, complies with the provisions of Article 32 of the Regulation implementing Law 10/2010 of 28 April; establish an accounting and transaction recording system that ensures the subsequent integrity of the records; ensure that its illustrative list of transactions likely to be linked to Money Laundering takes account of its type of business; duly apply to all its customers the customer due diligence measures laid down in Law 10/2010 of 28 April; ensure that its computerised alert system and the recording of such alerts are effective in detecting transactions

showing signs of ML or TF; maintain a register of reports of transactions made by employees, managers and agents to the prevention bodies, and a register of special reviews. Furthermore, it must ensure that special reviews and, where applicable, reports based on indications, comply in all cases with the terms set out in the legal provisions in force.

A requirement for a credit institution to ensure that its risk analysis, which is to be reviewed periodically, complies with the provisions of Article 32 of the Regulation implementing Law 10/2010 of 28 April; to ensure that its illustrative list of transactions likely to be linked to Money Laundering takes into account its type of business and the branch's experience; has specific procedures in place for the detection and reporting, on the basis of indications, of the possible involvement of employees and private bankers in ML/TF activities; duly applies the customer due diligence measures set out in Law 10/2010 of 28 April to all its customers; ensure that its computerised alert system and the recording of such alerts are effective in detecting transactions showing signs of ML or TF; maintain a record of reports of transactions made by employees, senior managers and agents to the prevention bodies, and a record of special reviews. It must also ensure that special reviews and, where applicable, reports based on indications of suspicious activity comply in all cases with the terms set out in the legal provisions in force.

A **requirement for a credit institution** to ensure that its risk analysis, which shall be reviewed periodically, complies with the provisions of Article 32 of the Regulation implementing Law 10/2010 of 28 April; to ensure that its prevention manual incorporates structured procedures relating to the onboarding of customers and their classification according to risk, the process of special scrutiny and reporting on the basis of indications, and compliance with the requirements set out by the legally authorised public authorities; that it has a prevention unit; that it ensures the internal audit department periodically verifies all relevant processes of the AML/CFT system; that it duly applies to all its customers the customer due diligence measures laid down in Law 10/2010 of 28 April; ensure that its computerised alert system and the recording of such alerts are effective in detecting transactions showing signs of ML or TF; maintain a register of reports of transactions made by employees, managers and agents to the prevention bodies, and a register of

special audits. Furthermore, it must ensure that the special audits and, where applicable, reports based on indications, comply in all cases with the terms set out in the legal provisions in force.

Order requiring **a securities firm** to take the necessary measures to comply with the provisions of Law 10/2010 of 28 April, in particular with regard to the obligation to keep the prevention manual and customer identification due diligence measures duly up to date.

A directive to a credit institution to comply with the due diligence obligations laid down in Law 10/2010 of 28 April; and to refine the control processes for the reclassification of customers into lower risk categories.

A directive to a credit institution to ensure it has a fully effective system for accessing customer information for the purposes of ongoing monitoring; to ensure that the customer due diligence measures laid down in Law 10/2010 of 28 April are duly applied to all its customers; to ensure, in relation to its ML/TF prevention units, that it has sufficient human and material resources at all times; to ensure that its computerised alert system and the recording of such alerts are effective in detecting transactions showing signs of ML and TF; to implement a fully effective system for receiving and processing reports from employees, managers and agents, establishing a recording system that ensures the integrity and immutability of the information; ensure that any special investigations and reports based on indications it carries out comply in all cases with the terms set out in the legal provisions in force, and establish quality control procedures for external expert reports.

Year 2021

Imposition on a credit institution of a sanction consisting of a fine of one million two hundred and fifty thousand nine hundred and sixteen euros (€1,250,916) and a private reprimand, as the perpetrator of a serious infringement for failure to comply with the obligation to identify the beneficial owner, in accordance with Article 4, as defined and penalised under Articles 52.1.b) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of two hundred and fifteen thousand seven hundred and seventy-eight euros (€215,778) and a private reprimand, as the perpetrator of a serious infringement for failure to comply with the obligation to obtain information on the purpose and nature of the business relationship, in accordance with Article 5, as defined and penalised under Articles 52.1(c) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of two hundred and thirty-two thousand three hundred and seventy-six euros (€232,376) and a private reprimand, for committing a serious infringement by failing to comply with the obligation to apply ongoing monitoring measures to the business relationship, in accordance with Article 6, as defined and penalised under Articles 52.1.d) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of two hundred and thirty-two thousand three hundred and seventy-six euros (€232,376) and a private reprimand, as the perpetrator of a serious infringement for failure to comply with the obligation to apply enhanced due diligence measures, in accordance with Articles 11 to 16, as defined and penalised under Articles 52.1.f) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of eight hundred and eighty thousand and one euros (€880,001) and a private reprimand, for committing a serious infringement by failing to comply with the obligation to carry out a special review, in accordance with Article 17, as defined and penalised under Articles 52.1(g) and 57 of Law 10/2010 of 28 April, in conjunction with a serious infringement for failure to comply with the

obligation to report on the basis of indications, as provided for and penalised in Articles 52.1.h) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of one hundred and sixty-five thousand nine hundred and eighty-four euros (€165,984) and a private reprimand, as the perpetrator of a serious infringement for failure to comply with the obligation to approve in writing and implement adequate internal control policies and procedures, in accordance with Article 26, including the written approval and implementation of an explicit customer admission policy, as defined and penalised in Articles 52.1.m) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of one hundred and sixty-five thousand nine hundred and eighty-four euros (€165,984) and a private reprimand, for committing a serious infringement by failing to fulfil the obligation to provide the internal control body with the material, human and technical resources necessary for the performance of its functions, as defined and penalised under Articles 52.1.o) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of one hundred and twenty-three thousand and one euros (€123,001) and a private reprimand, as the perpetrator of a serious infringement for failure to comply with the obligation to obtain information on the purpose and nature of the business relationship, in accordance with Article 5, as defined and penalised under Articles 52(1)(c) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of one hundred and twenty-three thousand and one euros (€123,001) and a private reprimand, for committing a serious infringement by failing to comply with the obligation to implement measures for the ongoing monitoring of the business relationship, in accordance with Article 6, as defined and penalised under Articles 52.1.d) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a penalty consisting of a fine of one hundred and twenty-three thousand and one euros (€123,001) and a private reprimand, for committing a serious infringement by failing to comply with the obligation to apply enhanced

due diligence, in accordance with Articles 11 to 16, as defined and penalised under Articles 52.1(f) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of eight hundred and thirty-three thousand and one euros (€833,001) and a private reprimand, for committing a serious infringement by failing to comply with the obligation to carry out a special review, in accordance with Article 17, as defined and penalised under Articles 52.1(g) and 57 of Law 10/2010 of 28 April.

A credit institution has been imposed a penalty consisting of a fine of eight hundred and forty-five thousand five hundred and one euros (€845,501) and a private reprimand, for committing a serious infringement by failing to comply with the obligation to report on the basis of evidence, in accordance with Article 18, as defined and penalised under Articles 52.1.h) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a penalty consisting of a fine of one hundred and five thousand and one euros (€105,001) and a private reprimand, as the perpetrator of a serious infringement for failure to comply with the obligation to approve in writing and implement adequate internal control policies and procedures, in accordance with Article 26, including the written approval and implementation of an explicit customer admission policy, as defined and penalised under Articles 52.1.m) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a penalty consisting of a fine of one hundred and nine thousand five hundred and one euros (€109,501) and a private reprimand, as the perpetrator of a serious infringement for failing to comply with the obligation to provide the internal control body with the material, human and technical resources necessary for the performance of its functions, as defined and penalised under Articles 52(1)(o) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of two hundred and sixty-one thousand four hundred and sixteen euros (€261,416) and a private reprimand, for committing a serious infringement by failing to comply with the obligation to obtain information on the purpose and nature of the business relationship, in

terms of Article 5, as defined and penalised under Articles 52(1)(c) and 57 of Law 10/2010 of 28 April.

A credit institution has been imposed a penalty consisting of a fine of two hundred and sixty-one thousand four hundred and sixteen euros (€261,416) and a private reprimand, for committing a serious infringement by failing to comply with the obligation to implement measures for the ongoing monitoring of the business relationship, in accordance with Article 6, as defined and penalised under Articles 52.1.d) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of three hundred and sixty-two thousand one hundred and twenty-three euros and fifty cents (€362,123.50) and a private reprimand, as the perpetrator of a serious infringement for failure to comply with the obligation to carry out a special review, in accordance with Article 17, as defined and penalised under Articles 52.1.g) and 57 of Law 10/2010 of 28 April, in conjunction with failure to comply with the obligation to report on the basis of suspicion.

Imposition on a credit institution of a sanction consisting of a fine of one hundred and sixty thousand seven hundred and eight euros and fifty cents (€160,708.50) and a private reprimand, for committing a serious infringement by failing to fulfil the obligation to approve in writing and implement adequate internal control policies and procedures, in accordance with Article 26, including the written approval and implementation of an explicit customer admission policy, as defined and penalised in Articles 52.1.m) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of one hundred and fourteen thousand and one euros (€114,001) and a private reprimand, for committing a serious infringement by failing to comply with the obligation to obtain information on the purpose and nature of the business relationship, in accordance with Article 5, as defined and penalised under Articles 52.1(c) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of one hundred and fourteen thousand and one euros (€114,001) and a private reprimand, for committing a serious infringement by failing to comply with the obligation to apply measures for the

continuous monitoring of the business relationship, in accordance with Article 6, as defined and penalised under Articles 52.1(d) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a penalty consisting of a fine of one hundred and fourteen thousand and one euros (€114,001) and a private reprimand, for committing a serious infringement by failing to comply with the obligation to apply enhanced due diligence measures, in accordance with Articles 11 to 16, as defined and penalised under Articles 52.1.f) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of nine hundred and sixty-eight thousand eight hundred and eighty-four euros (€968,884) and a private reprimand, for having committed a serious infringement by failing to comply with the obligation to carry out a special review, in accordance with Article 17, as defined and penalised under Articles 52.1.g) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a penalty consisting of a fine of two hundred and ninety-two thousand four hundred and thirty-three euros (€292,433) and a private reprimand, as the perpetrator of a serious infringement for failure to comply with the obligation to report on the basis of evidence, in accordance with Article 18, as defined and penalised under Articles 52.1.h) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of one hundred and fourteen thousand and one euros (€114,001) and a private reprimand, for having committed a serious infringement by failing to fulfil the obligation to provide the representative before the Commission's Executive Service and the internal control body with the material, human and technical resources necessary for the performance of their duties, in accordance with Article 5, as defined and penalised under Articles 52(1)(o) and 57 of Law 10/2010 of 28 April.

Imposition on a law firm of a sanction consisting of a fine of ninety thousand euros (€90,000) and a private reprimand, for failure to comply with the obligation to have an annual report drawn up by an external expert, in accordance with Article 28, as defined and penalised under Articles 52.1(q) and 57 of Law 10/2010 of 28 April.

A law firm has been imposed a penalty consisting of a fine of sixty thousand euros (€60,000) and a private reprimand for failing to comply with the obligation to have an annual report drawn up by an external expert, in accordance with Article 28, as defined and penalised under Articles 52.1.q) and 57 of Law 10/2010 of 28 April.

A law firm has been imposed a penalty consisting of a fine of sixty thousand euros (€60,000) and a private reprimand, for failing to comply with the obligation to notify the Commission's Executive Service of the proposed appointment of the representative of the regulated entity, in accordance with Article 26 ter, as defined and penalised under Articles 52.1.n) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of two hundred and seventy-six thousand two hundred and seventy-nine euros (€276,279) and a private reprimand, as the perpetrator of a serious infringement for failure to comply with the obligation to obtain information on the purpose and nature of the business relationship, in accordance with Article 5, as defined and penalised under Articles 52.1(c) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of three hundred and forty-eight thousand three hundred and seventy-three euros (€348,373) and a private reprimand, for committing a serious infringement by failing to comply with the obligation to apply measures for the ongoing monitoring of the business relationship, in accordance with Article 6, as defined and penalised under Articles 52.1.d) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of one hundred and thirty-two thousand and ninety-three euros (€132,093) and a private reprimand, for committing a serious infringement by failing to comply with the obligation to apply enhanced due diligence measures, in accordance with Articles 11 to 16, as defined and penalised under Articles 52.1.f) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of three hundred and forty-eight thousand three hundred and seventy-three euros (€348,373) and a private reprimand, for committing a serious infringement by failing to comply with the obligation to carry out a special review, in accordance with Article 17, as defined and penalised under Articles 52.1.g) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a penalty consisting of a fine of one hundred and thirty-two thousand and ninety-three euros (€132,093) and a private reprimand, for committing a serious infringement by failing to comply with the obligation to approve in writing and implement adequate internal control policies and procedures, in accordance with Article 26, including the written approval and implementation of an explicit customer admission policy, as defined and penalised under Articles 52(1)(m) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of three hundred and thirty-five thousand and forty-seven euros (€355,047) and a private reprimand, for committing a serious infringement by failing to comply with the obligation to identify the beneficial owner, as defined and penalised in Articles 52.1.b) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of eight hundred and eighty-four thousand seven hundred and sixty euros (€884,760) and a private reprimand, for committing a serious infringement by failing to comply with the obligation to carry out a special review, as defined and penalised under Articles 52.1(g) and 57 of Law 10/2010 of 28 April, in conjunction with a serious infringement for failure to comply with the obligation to notify the commencement of proceedings, in accordance with Article 18, as defined and penalised under Articles 52.1.h) and 57 of Law 10/2010 of 28 April.

A directive to an investment services firm to adopt various measures enabling it to comply with the obligations laid down in Law 10/2010 of 28 April, relating to the firm's governance services (thereby extending the scope of its internal audit), measures relating to the functioning of the internal control body, the supervision of subsidiaries in

third countries, the application of due diligence measures, and measures relating to the automated alert system, amongst others.

A requirement for a credit institution to adopt various measures enabling it to comply with the obligations set out in Law 10/2010 of 28 April, relating to customer onboarding policy, the ongoing monitoring of business relationships, systems for generating and processing automated alerts, and procedures to ensure the proper transmission of information between legal departments and units responsible for Money Laundering.

A directive to a credit institution to adopt various measures enabling it to comply with the obligations laid down in Law 10/2010 of 28 April, relating to the retention of customer identification documentation, continuous monitoring of the business relationship, procedures to ensure proper cooperation and the transfer of information between the legal departments and the anti-money laundering units, as well as the recording and retention of internal communications made by employees, amongst other things.

A formal notice to an insurance company to provide all the information requested in previous notices regarding its activities in Spain, in accordance with the provisions of Law 10/2010 of 28 April.

A directive to an investment services firm to adopt various measures enabling it to comply with the obligations laid down in Law 10/2010 of 28 April, in particular with regard to customer due diligence measures.

A notice to an investment services firm to adopt various measures enabling it to comply with the obligations laid down in Law 10/2010 of 28 April, in particular with regard to customer identification due diligence measures.

A directive to an investment services firm to adopt various measures enabling it to comply with the obligations laid down in Law 10/2010 of 28 April, in particular with regard to customer identification due diligence measures.

A directive to an investment services firm to adopt various measures enabling it to comply with the obligations laid down in Law 10/2010 of 28 April, in particular with regard to the external expert review and the identification of the beneficial owner in the case of accounts opened in the name of financial institutions resident abroad that may be acting on behalf of third parties.

A directive to an investment services firm to adopt various measures enabling it to comply with the obligations laid down in Law 10/2010 of 28 April, in particular with regard to compliance with due diligence measures, by obtaining from clients classified as high-risk documentation relating to their identification and the source of funds, as well as the identification of the beneficial owner in cases of accounts opened in the name of financial institutions resident abroad that may be acting on behalf of third parties.

A directive to an investment services firm to ensure that, without prejudice to the duty to adopt whatever measures are necessary to ensure compliance with Law 10/2010 of 28 April, henceforth entrust the conduct of the annual external expert review to a natural person who has not provided, and does not provide, any other kind of remunerated services to the entity during the three years preceding or following the issue of the report.

A **directive to a credit institution** to adopt various measures enabling it to comply with the obligations laid down in Law 10/2010 of 28 April, relating to the institution's governance arrangements (structure of the internal control body), due diligence measures, and the detection, analysis and reporting of suspicious transactions, as well as the provision of the necessary technical and human resources to the AML/CFT unit to enable it to carry out its functions, amongst other things.

A directive to a property developer to ensure that, without prejudice to the duty to adopt whatever measures are necessary to ensure compliance with Law 10/2010 of 28 April, it has an annual training plan in the field of AML/CFT.

A directive to a credit institution to adopt various measures enabling it to comply with the obligations set out in Law 10/2010 of 28 April, relating to its AML/CFT risk analysis, prevention manual, composition of the internal control body, due diligence measures, as well as maintaining a record of special examinations carried out and of reports of suspicious transactions made by employees or senior managers, amongst other matters.

A directive to a credit institution requiring it, without prejudice to the duty to adopt whatever measures are necessary to ensure compliance with Law 10/2010 of 28 April, to adopt, if it has not already done so, the necessary corrective measures to ensure proper reporting to the Financial Ownership Register, as well as the identification of the beneficial owner in all contracts involving legal entities.

Year 2022

NOTE: During 2022, a minor penalty of sixty thousand euros (€60,000) and a private reprimand were also imposed on a credit institution for failing to comply with the obligation to apply ongoing monitoring measures in the business relationship, in accordance with Article 6, in conjunction with a minor infringement for failure to comply with the obligation to apply enhanced due diligence measures, in accordance with Articles 11 to 16, as defined and penalised in Articles 56 and 58 of Law 10/2010 of 28 April.

Imposition on an insurance company of a penalty consisting of a fine of three hundred and fifty-five thousand six hundred and thirty-nine point fifty euros (€355,639.50) and a private reprimand, as the perpetrator of a serious offence for failure to comply with the obligation to cooperate, in accordance with Article 21, following a written request from one of the support bodies of the COPBLAC, as defined and penalised in Articles 52.1.k) and 57 of Law 10/2010 of 28 April.

Imposition on an insurance company of a sanction consisting of a fine of sixty thousand euros (€60,000) and a private reprimand, as the perpetrator of a serious offence for failing to comply with the obligation to notify the Commission's Executive Service of the proposed appointment of the representative of the obliged entity, or for refusing to address the objections or observations raised in accordance with Article 26 ter, as provided for and penalised under Articles 52.1.n) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of one hundred and forty-four thousand three hundred and seventy-six euros (€144,376) and a private reprimand, as the perpetrator of a serious infringement for failure to comply with the obligation to carry out a special review, in accordance with Article 17, as defined and penalised under Articles 52(1)(g) and 57 of Law 10/2010 of 28 April, in conjunction with a serious infringement for failure to comply with the obligation to report on the basis of indications, as defined and penalised under Articles 52(1)(h) and 57 of the same law.

A payment institution is hereby imposed a penalty consisting of a fine of seventy thousand five hundred and one euros (€70,501) and a private reprimand, as the perpetrator of a serious infringement for failure to comply with the obligation to retain documents, in accordance with Article 25, as defined and penalised in Articles 52.1.l) and 57 of Law 10/2010 of 28 April.

A payment institution is hereby fined three hundred and sixty-one thousand and one euros (€361,001) and issued with a private reprimand for committing a serious infringement by failing to comply with the obligation to carry out a special review, in accordance with Article 17, as defined and penalised under Articles 52.1(g) and 57 of Law 10/2010 of 28 April, in conjunction with a serious infringement for failure to comply with the obligation to report on the basis of evidence, in accordance with Article 18, as defined and penalised under Articles 52.1.h) and 57 of the same Law.

Imposition on a payment institution of a penalty consisting of a fine of seventy thousand five hundred and one euros (€70,501) and a private reprimand, as the perpetrator of a serious infringement for failure to comply with the obligation to establish adequate internal control mechanisms, in accordance with Article 26 ter, as defined and penalised under Articles 52.1.ñ) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of one hundred and sixty-nine thousand four hundred and seventy-five point twenty-five euros (€169,475.25) and a private reprimand, as the perpetrator of a serious infringement for failing to comply with the obligation to obtain information on the purpose and nature of the business relationship, in accordance with Article 5, as defined and penalised under Articles 52.1(c) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a penalty consisting of a fine of sixty thousand euros (€60,000) and a private reprimand, for committing a serious infringement by failing to approve in writing and implement adequate internal control policies and procedures, in accordance with Article 26, including the written approval and implementation of an explicit customer admission policy, as defined and penalised in Articles 52.1.m) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a penalty consisting of a fine of five hundred and thirty-three thousand four hundred and seventy-nine point seventy-six euros (€533,479.76) and a private reprimand, as the perpetrator of a serious infringement for failing to fulfil the obligation to provide the representative before the Commission's Executive Service and the internal control body with the material, human and technical resources necessary for the performance of their duties, as defined and penalised in Articles 52(1)(o) and 57 of Law 10/2010 of 28 April.

Imposition on a law firm of a penalty consisting of a fine of sixty thousand euros (€60,000) and a private reprimand, as the perpetrator of a serious offence for failing to comply with the obligation to have an annual report drawn up by an external expert, in accordance with Article 28, as defined and penalised under Articles 52.1(q) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a penalty consisting of a fine of two hundred and forty-three thousand seven hundred and seven point twenty euros (€243,707.20) and a private reprimand, as the perpetrator of a serious infringement for failure to comply with the obligation to identify and provide information on the beneficial owner, in accordance with Articles 4, 4 bis and 4 ter, as defined and penalised under Articles 52.1.b) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of two hundred and forty-three thousand seven hundred and seven euros and twenty cents (€243,707.20) and a private reprimand, as the perpetrator of a serious infringement for failure to comply with the obligation to obtain information on the purpose and nature of the business relationship, in accordance with Article 5, as defined and penalised under Articles 52.1(c) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of two hundred and forty-three thousand seven hundred and seven euros and twenty cents (€243,707.20) and a private reprimand, as the perpetrator of a serious infringement for failure to comply with the obligation to continuously monitor the business relationship, in accordance with Article 6, as defined and penalised under Articles 52.1.d) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of one hundred and eighty-two thousand four hundred and seventy point eight euros (€182,470.80) and a private reprimand, as the perpetrator of a serious infringement for failure to comply with the obligation to apply enhanced due diligence measures, in accordance with Articles 11 to 16, as defined and penalised under Articles 52.1.f) and 57 of Law 10/2010 of 28 April.

Imposition on a credit institution of a sanction consisting of a fine of four hundred and twenty-seven thousand four hundred and thirteen euros and forty cents (€427,413.40) and a private reprimand, as the perpetrator of a serious infringement for failure to comply with the obligation to carry out a special review, in accordance with Article 17, as defined and penalised under Articles 52.1(g) and 57 of Law 10/2010 of 28 April.

A credit institution has been imposed a sanction consisting of a fine of sixty thousand and one euros (€60,001) and a private reprimand, as the perpetrator of a serious infringement for failure to comply with the obligation to adopt in writing and implement adequate internal control policies and procedures, in accordance with Article 26, as provided for and penalised under Articles 52.1.m) and 57 of Law 10/2010 of 28 April.

A directive to a credit institution to take, without delay, the necessary measures to remedy all the deficiencies identified in its 2021 external expert's report, adopting a remedial plan in the case of deficiencies that cannot be resolved immediately. Furthermore, it must have an external expert's report that is fully compliant with the provisions of Article 28 of Law 10/2010 of 28 April, containing a specific section assessing the measures adopted to remedy the aforementioned deficiencies.

A requirement for **a credit institution** to have an external expert's report on its internal control measures that is fully compliant with the provisions of Article 28 of Law 10/2010 of 28 April, with the deficiencies identified in the external expert's report analysed during the inspection having been rectified. Furthermore, the required external expert's report must include a specific section assessing the degree of compliance with the approved remedial plans. The institution must also establish quality control procedures for external expert's reports.

A requirement for a mutual guarantee society to produce an external expert's report on its internal control measures that is fully compliant with the provisions of Article 28 of Law 10/2010 of 28 April and its implementing regulations, and to take the necessary measures to rectify the shortcomings identified in the inspection report. Furthermore, it must establish quality control procedures for external expert reports.

A **directive to a credit institution** to adopt, in order to remedy the deficiencies identified during the inspection, measures relating to internal policies and regulations, the assessment of ML/TF risk within the group, the control and monitoring of ML/TF risk at subsidiaries and branches in third countries, as well as measures relating to the implementation of Delegated Regulation (EU) 2019/758.

A **requirement for a credit institution** to adopt measures, in order to remedy the deficiencies identified during the inspection, relating to policies, internal regulations, organisational structure and internal control, procedures for the implementation of the Money Laundering Directive, retention of customer documents, procedures relating

the detection, analysis and reporting of suspicious transactions, staff training, subsidiaries and branches in third countries, the policy on the appointment of agents and other intermediaries, as well as other aspects of internal control.

A **requirement** for **a credit institution** to adopt measures, in order to remedy the deficiencies identified during the inspection, relating to risk assessment, internal policies and regulations, the composition and functioning of the internal control body (OCI), the allocation of human and technical resources to the operational prevention unit, the assignment of risk levels to customers, the ongoing monitoring of the business relationship and the detection, analysis and reporting of suspicious transactions, amongst other matters.

A requirement for a payment institution to implement the necessary measures to comply with the provisions of Law 10/2010 of 28 April, regarding customer due diligence measures, the recording of transactions and the retention of documentation, as well as specific mechanisms for monitoring the activity of its agents; ensure that its system for generating, processing and recording automated alerts is effective in detecting transactions showing signs of money laundering; ensure that any special examinations and reports based on suspicious activity it carries out comply with the legal provisions in force; implement an internal verification procedure to assess the adequacy and effectiveness of internal control measures; and have, in due time and form, a comprehensive annual report from an external expert on its internal control measures.

A requirement for a credit institution to have, by 31 December 2022 at the latest, a prevention manual that is kept up to date; to have a model for Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) that provides an overview of the risk assumed; ensure that there is no excessive delegation of the functions entrusted by the regulations to the internal control body (ICB) in relation to decision-making on the special reviews analysed; establish policies and procedures relating to AML/CFT; take the necessary measures to ensure that the ongoing monitoring of customer business relationships where due diligence has been completed is carried out effectively; maintain a register of persons holding public office; ensure that its system for generating and processing

computerised alerts and their recording is effective in detecting transactions showing signs of money laundering; implements an effective system for receiving reports from its employees, directors and agents; ensures that the special reviews and transactions based on suspicious indications it carries out comply with the legal provisions in force; maintains a register of special reviews and a register of reports based on suspicious indications; establishes adequate internal control procedures; and obtains a comprehensive report from an external expert.

A **requirement for a credit institution** to ensure, by 31 March 2023 at the latest, that its analysis of the risk of Money Laundering and Terrorist Financing complies with the provisions of Article 32 of the Regulation under Law 10/2010 of 28 April; duly applies customer due diligence measures to all its customers; ensures that its system for generating, processing and recording computerised alerts is effective in detecting transactions showing signs of Money Laundering; guarantees that its procedures for identifying the parties involved in transactions and for retaining documents are fully in line with the provisions set out in the regulations; and has a comprehensive report from an external expert.

A directive to a law firm to produce an external expert's report on the situation as at 31 December 2022, which must be submitted to its Board of Directors by 31 March 2023, and to establish quality control procedures for external expert reports.

A requirement for a centre of land registrars to have an external expert's report on its internal control measures as at 31 December 2022, which must be submitted to the Governing Board of the Association of Land Registrars by 31 March 2023.

A directive to a financial institution to adopt, by 30 November 2022, a remedial plan, the implementation of which must not exceed three months, in order to comply in a timely and proper manner with its obligations to report information to the FTF, as well as to immediately rectify all the deficiencies identified by the Commission's Executive Service's Data Processing and Quality Unit in the information reported.

A directive to an insurance company to take the necessary measures to rectify the deficiencies identified during the inspection in relation to its internal policies and procedures, as well as the technical and human resources of the AML/CFT unit within the group.