



Report on compliance with the Law on the Prevention of Money Laundering and Combatting the Financing of Terrorism

With regard to compliance with Law 10/2010 and Royal Decree 304/2014 concerning the Prevention of Money Laundering and Combatting the Financing of Terrorism (LPBIFT), during the period of March 2015 to March 2016, the following measures have been taken:

- Tracking of the procedures and measures of control set out in the Manual for the Prevention of Money Laundering, second revision, November 2015:
 - o **Corporate Alliances:** In order to comply with the LPBIFT, all companies that contact us are informed that they must provide us with a copy of the deeds establishing their company together with a declaration of real ownership.
 - o **Partners and donors:** We require their tax identity numbers (VAT numbers) and personal data.
 - o New data base functions (Episocis) to store all VAT numbers and documents in the contact records themselves.
 - o Designed procedures for administering the reception of large numbers of VAT numbers.
 - o The sending by email of lists to the following banks “La Caixa” and Banc Santander of donors without VAT numbers donating more than €100 euros, for their identification.
 - o **Fundraising activities:** We identify the organisers by means of a the promoter’s file, the VAT number, and we store the graphic and photographic information corresponding to each event.
- Delivery of the Manual to the accounting company (annual accounts audit).
- Participation in the not-for-profit Forum organised by Audiconsultores devoted to Legal Compliance vs. Responsibility.
- Active participation in the Spanish Fundraising Association (AEFr) meeting in which joint actions for partner organisations were drawn up:
 - o Attempt to identify a direct contact conversant with this sector within the Executive Services of the Committee on the Prevention of Money Laundering and Monetary Offences (SEPBLAC) with whom to discuss our concerns and from whom to learn more about procedures and priorities.
 - o Contact other institutions in the sector such as the Spanish Foundations Association, the Lealtad Foundation and the Platform for Social Action to find out about their opinions, actions and initiatives in an attempt to create a block of such organisations for institutional action.
 - o Share information and documentation between partner organisations.
 - o Maintain and broaden relations with financial entities in order to make them our allies in this matter.



- Continue with political action to match responsibility for the identification of donors donating more than €1,000 with that of financial entities. A new round of contacts will be held with all the parliamentary groups.
- Convey the consultations within the entities to Garrigues for them to draw up a policy for us on the minimum policies to adopt in terms of risk.