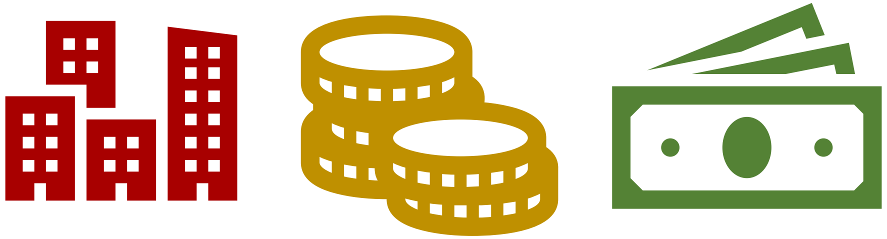
THE PREVENTION OF MONEY LAUNDERING

The Spanish Anti-Money Laundering Registration Centre (CRAB)

BARCELONA, October 2025

DIEGO DE LEÓN, 21 · 28006 · MADRID

- REAL ESTATE
  - Method used by criminal organizations
  - "HIGH-RISK" sector



- ROLE OF REGISTRARS:
  ¿WHAT CAN WE DO?

- **Law 10/2010 of 28th April on Prevention of Money Laundering and Terrorist Financing.**

AIM: TO PREVENT

- Money Laundering: ""the conversion or transfer, concealment or cover-up, acquisition, possession or use of goods or any type of assets knowing that they come from a crime"

- Terrorist financing: ""*the supply, deposit, distribution, or collection of funds or goods by any means for the commission of a terrorism offense as defined in the Criminal Code."*

REGISTRARS' DUTY OF COLLABORATION

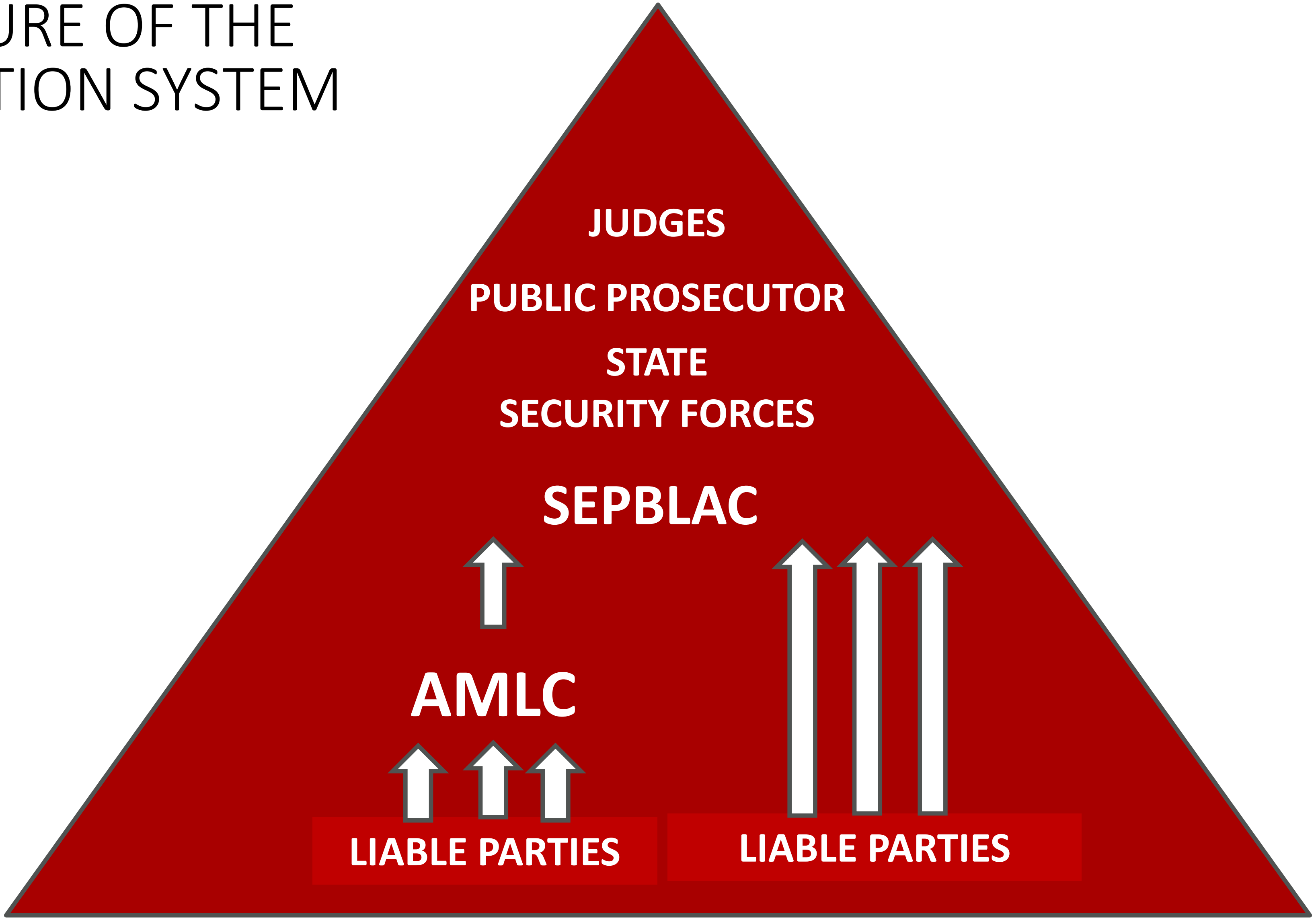
PRINCIPLES

- Principle of liability exemption
- Non-application of the duty to abstain in any operation with indications
- Existence of a centralized prevention body: AMLC
- Ongoing training
- Duty of secrecy and duty of confidentiality (Articles 24 and 30 LPBCFT)
- Sanctions (Articles 51 and 51 LPBCFT)

PILLARS

- COMMUNICATIONS MADE **BY LAND REGISTRARS:** ORIGINAL SOURCE OF INFORMATION
- **ANTIMONEY LAUNDERING REGISTRATION CENTRE (AMLC/CRAB):**
  - Examines suspicious transactions on behalf of Registrars
  - Centralises communications
  - REPORTS TO THE SEPBLAC

STRUCTURE OF THE PREVENTION SYSTEM



REGISTRARS AND RED-FLAG INDICATORS

RED-FLAG INDICATORS are a series of indicators designed to provide guidance to Registrars on some of the **transactions with a potential risk** of being associated with money laundering;

- Means of payment
- Nationality or residence
- Origin and destination of funds
- Empowerments
- NGO's
- Amounts

EXAMPLES

PEOPLE

- Tax havens. Golden Visa
- High-risk jurisdictions
- NGO's
- Public Administration
- Trust

TYPE OF TRANSACTION

- Early cancellation of mortgage loans
- Repeated cancellation of mortgage Loans
- Montgage loans from non-financial entities >300.000 €
- Short-time deferred price
- Massive credit transactions

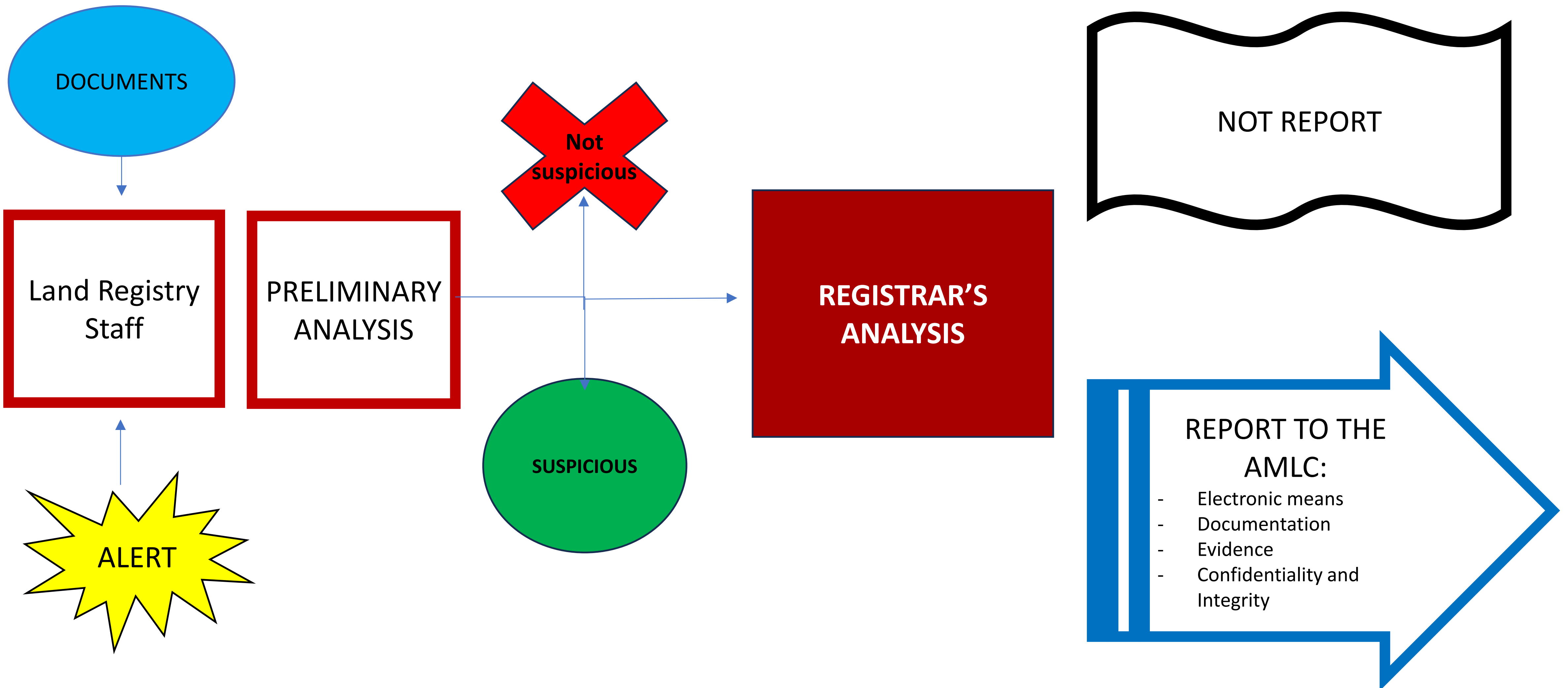
PRICE

- Difference between market price and settled Price
- Means of payment: cash, debts recognition and datio in solutum

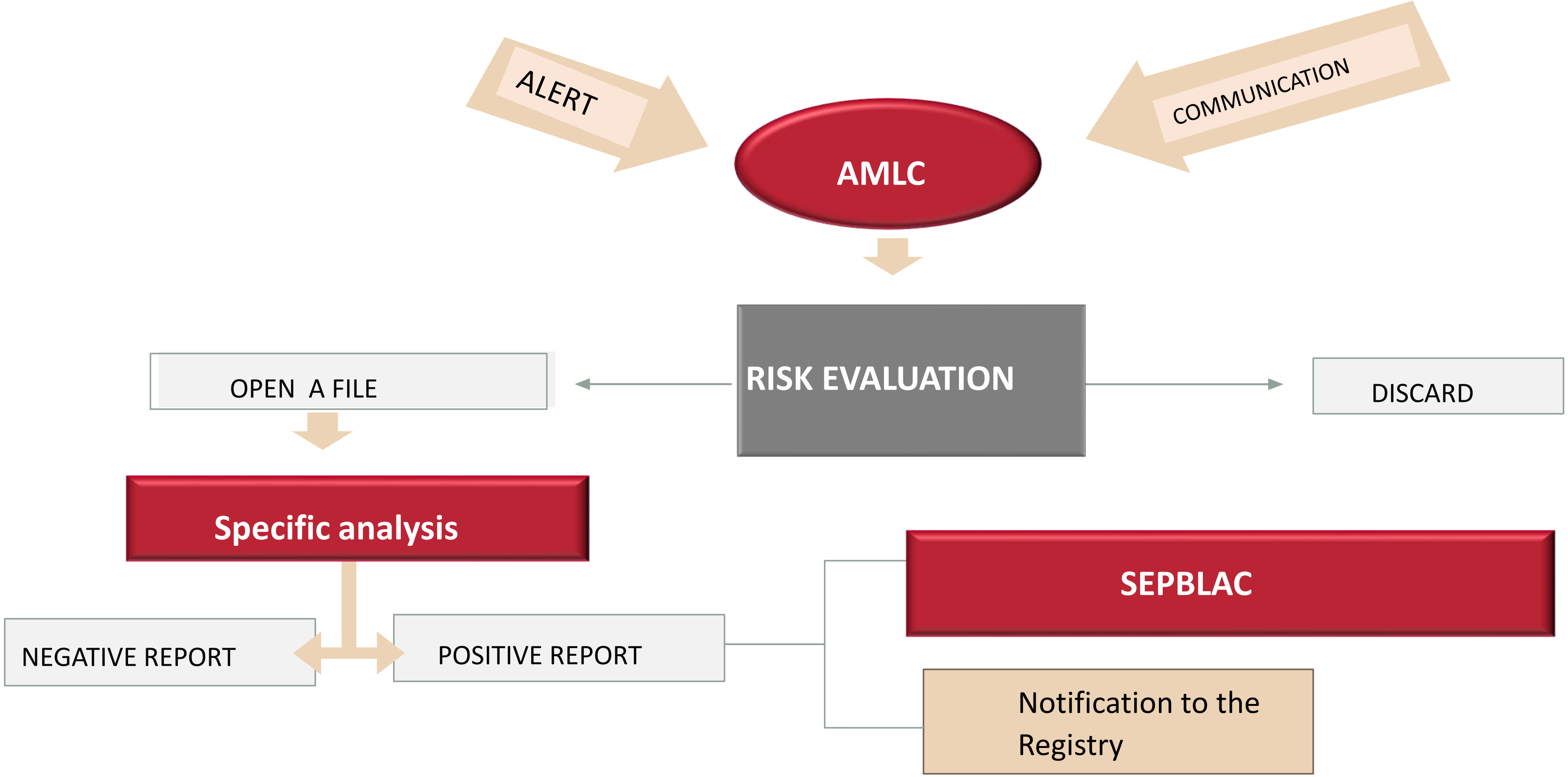
OPEN

CROSS-REFERENCED

HOW TO RESPOND TO A RED FLAG?: REGISTRARS



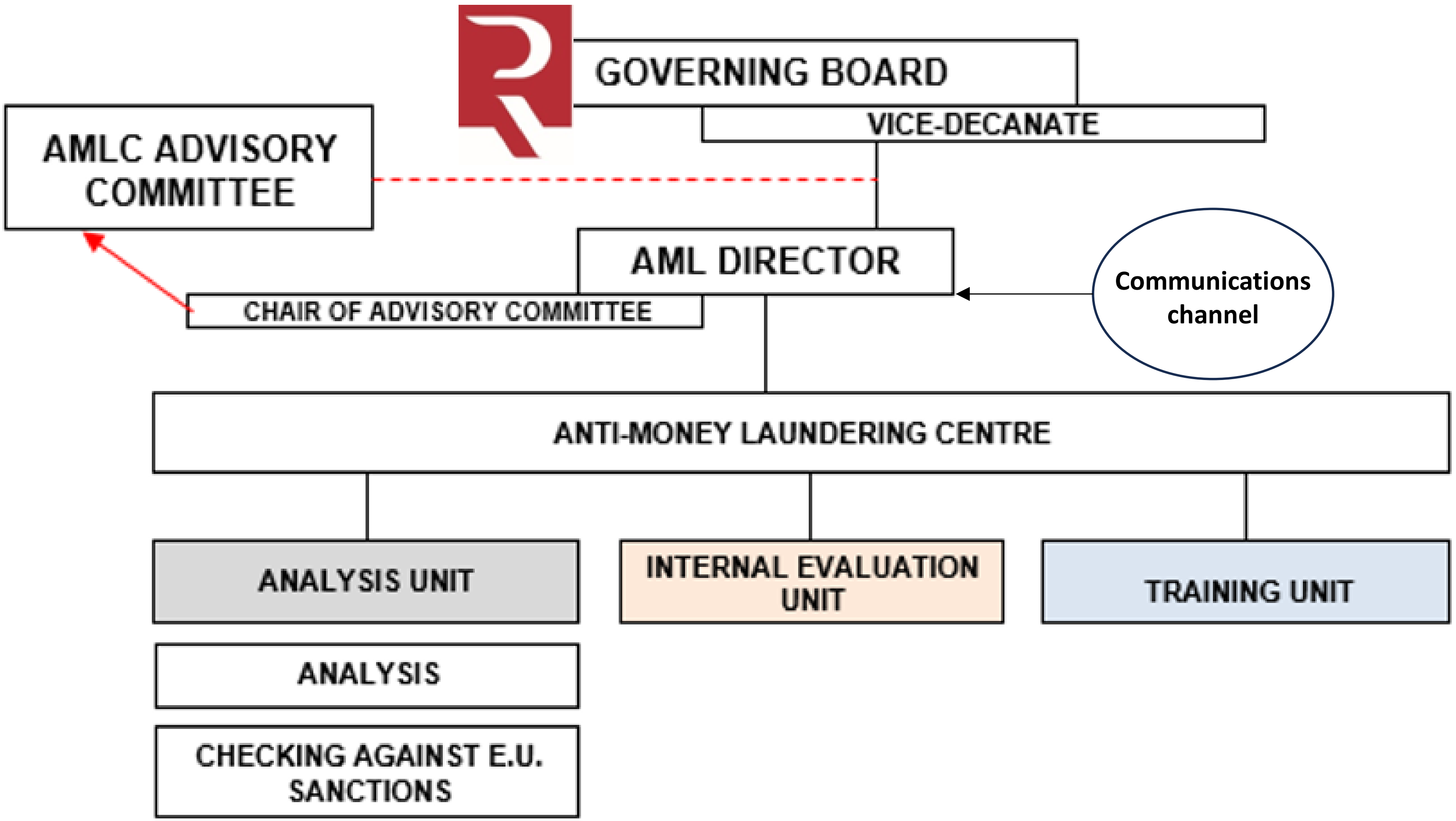
HOW TO RESPOND TO A RED FLAG?: AMLC



ANTIMONEY LAUNDERING REGISTRATION CENTRE

Regulation: Orden ECC 2402/2015, de 11 de noviembre

- REDUCE WORKLOAD OF THE SEPBLAC
- ANALYSIS of any suspicious transactions reported by the Registrars
- ENSURE COMPLIANCE
- PROVIDES SUPPORT FOR COMPLYING:
  - Internal Control
  - Training
  - Screening of sanctioned entities/individuals:
    - Art. 42 of LPBCFT and EU Ruling 269/2014
    - Notify Registrars: Marginal annotation with the prohibition of disposal


GOVERNING BOARD
VICE-DECANATE
AMLC ADVISORY COMMITTEE
AML DIRECTOR
CHAIR OF ADVISORY COMMITTEE
Communications channel
ANTI-MONEY LAUNDERING CENTRE
ANALYSIS UNIT
INTERNAL EVALUATION UNIT
TRAINING UNIT
ANALYSIS
CHECKING AGAINST E.U. SANCTIONS

FIGURES

		TOTAL	COMMERCIAL	PROPERTY
ALERTS	2023	30,831	13,261	17,570
	2024	32,576	15,825	16,751
	2025 (01/01- 30/09)	28,646	15,842	13,454

		TOTAL	NOT REPORTED	REPORTED
REPORTS COMPLETED	2023	667	207	460
	2024	975	106	869
	2025 (01/01- 30/09)	625	40	585

3. REGULATION (EU) 2024/1624 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 31 May 2024 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing

ARTICLE 18 SINGLE ACCESS POINT TO REAL ESTATE INFORMATION

COMPETENT AUTHORITIES have IMMEDIATE and DIRECT ACCESS to REAL ESTATE INFORMATION

VIA SINGLE ACCESS POINT

ELECTRONIC MANNERS

INFORMATION ABOUT:

- Persons/Legal Entities
- Identification of the Property
- Ownership
- Price
- Type of Transaction
- Encumbrances, Restrictions, Guarantees
- History

UP TO DATE AND ACCURATE

NOTIFICATION TO THE COMMISSION: 10th OCT 2029

NEXT STEPS

- Revision of the Directive
- Defining which information we want/can provide and how.
- Balance with other rights
- Setting the role of Land Registrars

THANK YOU