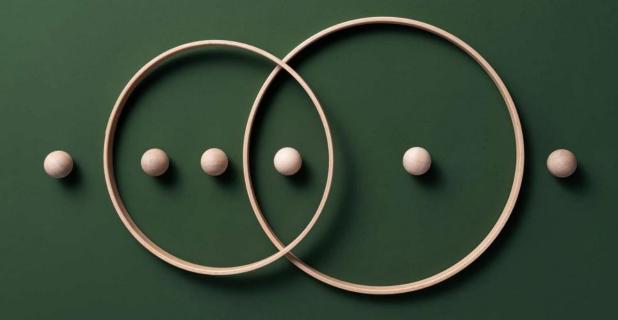
COMPLIANCE & INVESTIGATIONS

CUATRECASAS COMPLIANCE CORNER

3rd EDITION OCTOBER 2025





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1. Regulatory developments

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1 REGULATORY DEVELOPMENTS

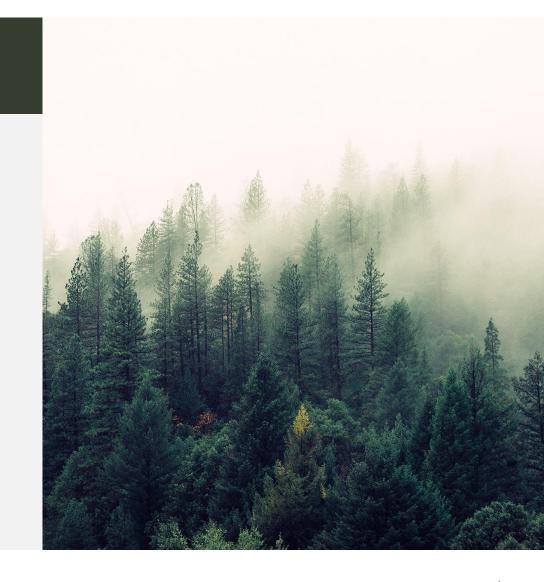
Entry into operation of the AIPI: immediate obligations and November 1 horizon

The Independent Authority for the Protection of Whistleblowers ("AIPI"), created by <u>Law 2/2023</u>, is consolidated as a key body for the protection of people who report regulatory breaches in the public and private sector.

Under the Single Transitional Provision of Royal Decree 1101/2024, of October 29, the appointment and dismissal of individuals and members of the collegiate body responsible for the Internal Information System since the entry into force of Law 2/2023 must be notified to the AIPI within two months.

However, the AIPI has specified in its <u>Information Note of October 8, 2025</u> that the extraordinary two-month period for notification will not begin running until the specific notification form of the person responsible for the internal information channel is accessible through its web portal. Consequently, the *dies a quo* of the two-month period is set by the effective availability of the form on the AIPI website rather than November 1 as previously foreseen.

Therefore, while the electronic office is enabled, and although the notification can be sent to the email made available by the AIPI (aipi@proteccioninformante.es), entities subject to Law 2/2023 are advised to stay tuned for upcoming official communications and practical developments on the notification process and institutional coordination. See more.



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1 REGULATORY DEVELOPMENTS

State Plan to Combat Corruption and Royal Decree 711/2025: roadmap and governance

On July 9, 2025, the Council of Ministers approved the <u>State Plan to Combat Corruption</u>, which defines the roadmap for preventing, detecting, investigating and punishing corruption, recovering assets and promoting integrity. The Plan organizes its measures into five axes: prevention and internal controls; whistleblower protection; investigation and punishment; asset recovery and a culture of integrity in the Administration.

Among the highlights are the creation of a future Independent Public Integrity Agency; the requirement of verifiable compliance systems in public sector entities and their companies; strengthening whistleblower protection; greater powers for the Anti-Corruption Prosecutor's Office and a sanctioning regime for offending companies. It also provides for preventive confiscation mechanisms to recover assets, mandatory training in public ethics and awareness campaigns.

For its part, Royal Decree 711/2025, of August 26, promotes the implementation of the Plan by creating the Interministerial Commission in charge of coordinating and supervising its implementation to guarantee coherence between departments. The Interministerial Commission is attached to the Ministry of Finance and includes several ministries and the Director of the Cabinet Office of the Presidency of the Government and, soon, the future Public Integrity Agency. It will meet at least quarterly and will operate with existing means, without increasing spending. Coordination between the Agency and the AIPI will be crucial to avoid overlap and consolidate an effective integrity system.

In summary, the Plan sets out the "what"—objectives and measures—and Royal Decree 711/2025 provides the "how"—governance and monitoring—to reinforce the institutional commitment to joint and verifiable anti-corruption action in the General State Administration.



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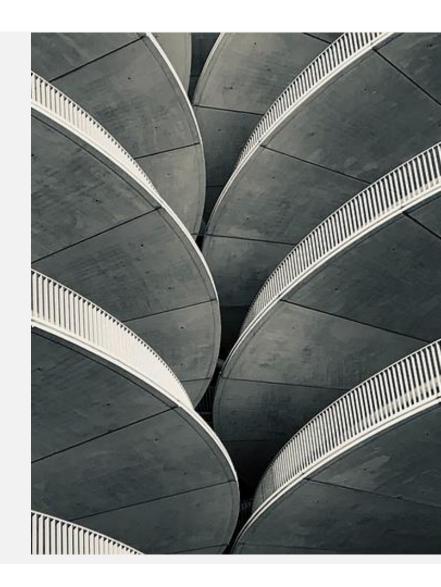
1 REGULATORY DEVELOPMENTS

Spain imposes arms embargo and restrictions on imports from Israel

> Spain has approved Royal Decree-Law 10/2025 on urgent measures against the genocide in Gaza and in support of the Palestinian people, imposing restrictions on the trade and transit of defense materials, as well as on the import of goods from Israeli settlements in the Occupied Palestinian Territories. See more. The Royal Decree-Law has been validated by the Congress of Deputies (Resolution of October 8, 2025), despite proposals for a peace plan.

EU hardens stance on Iran and reimposes sanctions

- > The Council of the European Union ("EU") has decided to reimpose restrictive measures against Iran in response to Iran's continued failure to comply with its nuclear commitments under the Joint Comprehensive Plan of Action ("JCPoA"). These measures include reinstating previously lifted sanctions such as a ban on arms exports, restrictions on the transfer of nuclear technology, and limitations on financial and commercial activities with Iranian entities linked to the nuclear program.
- The Council decision reinforces the EU's commitment to nuclear non-proliferation and international security, and it is in line with the actions taken by other international partners. European companies with interests in Iran will have to review their operations and trade relations to ensure compliance with the new restrictions and avoid possible sanctions. See more.



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1 REGULATORY DEVELOPMENTS

Updating the Community list of dual-use goods and technologies

- > Export control of dual-use items—goods, software and technology that can have both civilian and military applications in the **EU** is based on a common list of dual-use items that must be controlled in all Member States. This list—<u>Annex I of the EU Dual-Use Regulation</u>—is usually amended at least once a year by a Delegated Act.
- > Recently, the European Commission has announced a further update to Annex I, which incorporates internationally agreed changes under major export control regimes, such as the Wassenaar Arrangement, the Australia Group, the Missile Technology Control Regime and the Nuclear Suppliers Group. These changes reflect technological advances and new global security concerns. The new list will be applicable in all EU Member States and will enter into force after the usual two-month examination period by the Council and the European Parliament. Companies and operators exporting dual-use items will need to carefully review the updated list to ensure they comply with new legal obligations and avoid sanctions. See more.

Extension of birth and childcare leave to 19 weeks

- > Royal Decree-Law 9/2025, of July 29, extends the number of weeks of leave for birth and childcare for each parent from 16 to 19. For single-parent families, the leave will be 32 weeks.
- From the 19 weeks (32 weeks for single-parent families), the first 6 must be immediately after birth; 11 (22 for single-parent families) can be enjoyed until the child is 12 months old, and 2 weeks (4 for single-parent families) can be enjoyed until the child is 8 years old.
- This regulation is relevant for companies' diversity, equality and inclusion policies, which must be updated in accordance with the new regulations, and it offers the possibility of reviewing the work-life balance mechanisms available in organizations.
- See more: Cuatrecasas Blog Post and Legal Flash.



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1 REGULATORY DEVELOPMENTS

Regulation (EU) 2023/2854: Keys to the Data Act and its operational impact

Since September 12, Regulation (EU) 2023/2854 ("Data Act") has been in force, amending Regulation (EU) 2017/2394 and Directive (EU) 2020/1828 and establishing harmonized rules for access, use, exchange and portability of personal and non-personal data generated by products connected to the Internet (i.e., the Internet of Things or "IoT") and related services.

What products and services does it affect?

The Data Act affects manufacturers of connected products, related service providers and data holders that operate or make data available in the EU, as well as EU users and public bodies that require access to data. It also includes data processing service providers such as Cloud and Edge that provide services to customers in the EU.

What does the Data Act require?

The main requirements are (i) to provide users with secure access and extraction of readily available data in standard formats, (ii) to inform transparently before any contract on data management, and (iii) to allow users to share data with third parties without unjustified hindrance. In addition, it requires data protection and confidentiality measures, as well as removal of technical and contractual barriers so that customers can easily switch data service providers.



Regulation (EU) 2024/900: New transparency obligations in political advertising

On October 10, 2025, Regulation (EU) 2024/900 (the "TTPA") came into force and is applicable to all political advertising broadcast in the EU, regardless of the location of the advertiser or the medium (online/offline). The TTPA sets harmonized standards to ensure transparency and accountability in political advertising, especially in the digital environment.

What products and services does it affect?

The TTPA regulates all political advertising broadcasted or targeted in the Union, by any medium and at any level, and imposes obligations on sponsors and service providers. It affects not only the main political players, but also organizations, entities and individuals (including those outside the EU when targeting people in the EU) whose advertising may influence elections or legislative processes.

What does the Regulation require?

The main obligations include identifying whether the advertising campaign is political, clearly labeling ads, obtaining express consent for the use of personal data, keeping records, and reporting information to authorities. Failure to comply can lead to penalties of up to 6% of the offender's annual turnover or annual budget.



2. Good to know

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2 GOOD TO KNOW

Evolution and developments of the Law on Interest Groups in Spain

Parliamentary processing of the <u>Draft Law on Transparency and Integrity of the Activities of Interest Groups</u> ("**Law on Interest Groups**") is progressing after approval of the draft bill in January and its submission to Congress. For the first time, the initiative creates, for the General State Administration and the institutional public sector, a homogeneous framework to organize their influence, while reinforcing transparency, traceability and control.

As we mentioned in the first edition of this <u>newsletter</u>, the bill currently requires mandatory registration in a public, interoperable registry of any person or entity that intends to influence decisions or regulations, accessible through the Transparency Portal and the Conflicts of Interest Office.

In addition, it introduces the "legislative footprint" in each regulatory initiative, detailing contacts, contributions and players involved and the extent of the subjective scope, expressly including national authorized officials (secretaries, auditors and local treasurers) as being subject to reinforced transparency obligations. It also strengthens the sanctioning regime and the code of conduct, and a more intense supervisory role of the Conflicts of Interest Office.

What stage are we at and what can we expect? With the text already in Congress, the amendments and committee debate is expected before the Plenary discussion. If approved in terms the current terms, we can anticipate:

- the implementation of the interoperable state registry;
- common legislative footprint guidelines in ministries and agencies; and
- adaptated calendar for lobbies and Administrations, with regulatory development on registration, reporting and control formats.

In the medium term, we can expect that codes of conduct and internal protocols will be updated for senior managers, management staff and groups included in the new objective and subjective scope, as well as training and specific compliance audits.

In short, final approval of the Law on Interest Groups will configure a more transparent and predictable public-private interaction ecosystem, with clear obligations for stakeholders and public decision-makers.



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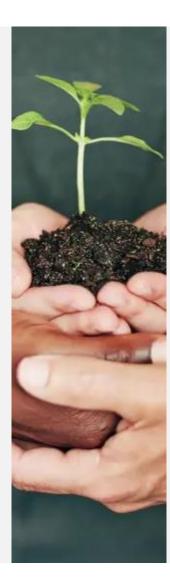
2 GOOD TO KNOW

Sustainability news

The EU is carrying out a thorough review of its sustainability regulations to try to simplify reporting and due diligence requirements through the Omnibus I package. See more.

Given the magnitude of the Omnibus I reform, in April 2025, the European Commission (EC) approved the Stop-the-Clock Directive (2025/794/EU) that postponed by two years the reporting obligations under the Corporate Sustainability Reporting Directive (2022/2464/EU), the "CSRD Directive," for second and third wave companies. First wave companies—large public-interest companies (more than 500 employees)—which began reporting in 2025 under CSRD for the 2024 financial year were not included the "CSRD Directive," for second and third wave companies. First wave companies—large public-interest companies (more than 500 employees)—which began reporting in 2025 under CSRD for the 2024 financial year were not included. See more.

On July 11, 2025, the EC adopted a <u>Delegated Regulation</u> (the "ESRS *Quick Fix*") that gives flexibility to wave one companies regarding reporting obligations. This allows for a more gradual application of the first batch of European Sustainability Reporting Standards (ESRS) approved by <u>Delegated Regulation 2023/2772/EU</u>. <u>See more</u>.



Future regulatory development of the working day register

On September 30, 2025, he Council of Ministers authorized the urgent processing of a draft Royal Decree on working time registration, which is expected to introduce the obligation for companies to have a tool to allow the working day register to be telematic, interoperable and immediately available, and even remotely, by the Labour Inspectorate.

This comes after the Congress rejected the processing of the Bill to reduce the maximum working day to 37.5 hours per week.

Although this regulation will go through the urgent procedure, which shortens the deadlines, it is not likely to be approved before the end of the year, since the State Council's opinion and the reports from the rest of the bodies and administrations involved, as well as of the employers organizations and trade unions must still be issued.

Introducing the obligation to have a record of working hours in the terms described will be a relevant novelty for companies to be added to their compliance procedures or tools.

See more: Labor Newsletter 3rd quarter and post.



3. Relevant cases

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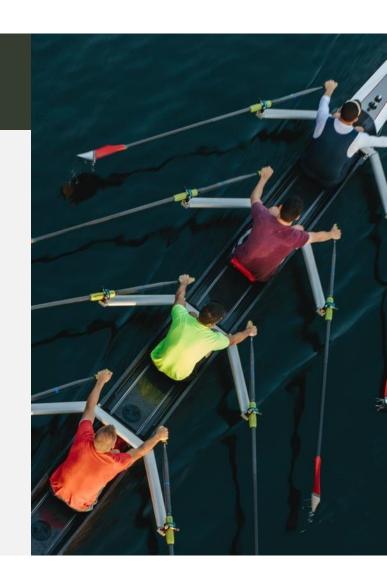
U.S. sanctions offensive: OFAC all-time record and warning to non-banking financial industry

On June 12, 2025, the Office of Foreign Assets Control ("**OFAC**") imposed a \$216 million <u>penalty</u>—the largest to date on a non-bank financial institution—for "serious and sustained" violations of the U.S. sanctions regime.

The case, which affects GVA Capital, underlines that sanctioning liability is not limited to traditional banks: fund managers, investment vehicles, fintech and other market players are under the same standard of diligence. The resolution emphasizes the regulatory expectation of knowing who is behind the money and of accrediting, with evidence, that the controls work in practice.

Beyond the penalty, the dossier highlights typical shortcomings that OFAC finds unacceptable: insufficient due diligence on investors and beneficial owners, deficiencies in sanctions screening throughout the relationship lifecycle, non-risk-based controls for opaque or multi-jurisdictional structures, governance and independent oversight failures (evidence of effectiveness, internal audit and reporting to the management body). The signal is clear: the sanctioning perimeter reaches LPs, SPVs, CEOs, fund managers and relevant third parties, not just obvious commercial counterparties.

In practice, OFAC consolidates five compliance expectations: (i) robust identification and verification of the beneficial owner; (ii) vehicle- and jurisdiction-specific risk assessment; (iii) continuous sanctions screening—not only in onboarding—and coverage of the entire chain (investors, partners, administrators and suppliers); (iv) reinforced controls for complex structures and operations with corporate layers; (v) and a program governed by senior management, with training, independent testing and document traceability. Cooperation with authorities and early corrective action remain relevant mitigating factors, but they are not a substitute for an effective program.



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3 RELEVANT CASES

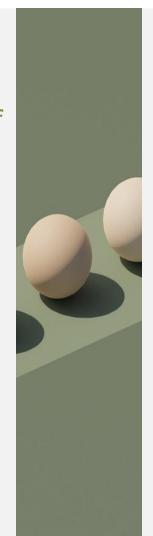
Relevant judgments on the interpretation and scope of the indemnity guarantee and the prohibition of retaliation

<u>Judgment</u> of the Plenary of the Constitutional Court 148/2025 of Sep 9, 2025, Rec. 1186/2024.

The Constitutional Court recognizes the violation of the right to effective judicial protection of a worker who was dismissed for filing a complaint with the works council.

The judgment analyzes the evolution and scope of the indemnity guarantee of workers and the prohibition of retaliation, not only in the exercise of legal actions, but also in previous or preparatory actions aimed at defending the interests and rights of workers to avoid legal proceedings. These actions include claims made to workers' representatives to promote the exercise of their intermediation work, monitoring and compliance with labour regulations.

This resolution broadens and specifies the scope of protection against retaliation by workers.



Supreme Court Judgment No. 737/2025 of July 17, 2025.

The judgment analyzes the classification of the dismissal of a worker, a workers representative, whose contradictory file was processed without the appointment of an impartial secretary and instructor, a requirement provided by the collective agreement.

The Supreme Court declared that omitting this requirement was a breach of an essential procedural guarantee, which deprived the workers' representative of the right to carry out his preventive defence, so it ruled the sanction was null.

Judgments of the High Court of Justice of Madrid, No. 441/2025 of June 5 and 713/2024 of November 18.

The indemnity guarantee and protection against retaliation provided in Law 2/2023 are not applicable to fraudulent use of the whistleblowing channel by a worker, including the possibility of shielding against dismissal.

The STSJ Madrid 441/2025 rejects the violation of fundamental rights in the dismissal of a worker who filed a complaint through the complaints channel (i) one month after the dismissal took place, (ii) immediately after disagreements with the worker to whom she was reporting and (iii) which was unfounded. It is not possible to prove a causal link between the exercise of the right to report and the dismissal.

The STSJ Madrid 713/2024 upholds the disciplinary dismissal against a worker for making unlawful use of the company's complaints channel to protect or shield himself against suspicion of not passing the probationary period.

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3 RELEVANT CASES

The CNMC sets for the first time the scope and duration of the prohibition on direct contracting

In a sanctioning <u>resolution</u> adopted on July 30, the National Commission of Markets and Competition imposed a ban on the infringing company from contracting with the public sector, determining, for the first time, both the scope and duration of the prohibition. <u>See more</u>.

EU-US data transfers: What does the T-553/23 (Latombe v. Commission) ruling imply?

The General Court of the EU has dismissed the appeal filed by Philippe Latombe, who sought the annulment of the European Commission's decision approving the Data Privacy Framework, the new framework for the transfer of personal data between the EU and the U.S. (Implementing Decision (EU) 2023/1795). This ruling confirms the current international transfer regime with the United States, following the precedents of invalidity of the "Safe Harbor" and "Privacy Shield" frameworks (Schrems I and II, respectively).

The <u>General Court of the European Union</u> found that, at the time of the decision, the U.S. offered a level of protection for personal data substantially similar to that required by the "<u>GDPR"</u> and by the EU Charter of Fundamental Rights, and found that the Data Protection Review Court ("**DPRC**") has sufficient guarantees of independence and impartiality.

In addition, it concluded that U.S. law, following recent reforms, establishes adequate controls and oversight over the bulk collection of data by intelligence agencies, including ex-post oversight by the DPRC. To be sure, all of this provides legal certainty for European companies to transfer data to the U.S. under the new framework, without requiring additional safeguards, although the European Commission must continuously monitor U.S. legal developments.





4. Beyond our borders: international trends and developments

3rd Edition. October 2025



BEYOND OUR BORDERS: INTERNATIONAL TRENDS AND DEVELOPMENTS

United Kingdom | The new corporate crime of "failure to prevent fraud" comes into force

On September 1, 2025, the new corporate crime of "failure to prevent fraud" incorporated by the <u>Economic Crime and Corporate Transparency Act</u>, came into force, raising the bar of diligence for large companies by requiring them to demonstrate, with evidence, that their anti-fraud controls work.

The crime imposes liability on large organizations when an "associated person" (employees, agents, subsidiaries or other third parties) commits fraud to benefit the entity. The available defense is to prove the presence of "reasonable procedures" to prevent fraud. The penalties can be unlimited fines, and the prosecution of entities operating in the United Kingdom is carried out by the Serious Fraud Office and the Crown Prosecution Service.

The application threshold aligns with the Companies Act's concept of "large organisation", i.e., at least two of the following: more than 250 employees; more than £36 million in turnover; or more than £18 million in assets. The "reasonable procedures" standard is analogous to that of the <u>UK Bribery Act</u> and is based on robust risk assessment, proportional controls, third-party due diligence, targeted training and an effective response and investigation framework.



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4 BEYOND OUR BORDERS: INTERNATIONAL TRENDS AND DEVELOPMENTS

China | Strengthening export controls and U.S. response with increased technology and investment scrutiny

China has announced new export restrictions on metals and critical materials used in semiconductors, batteries and advanced devices, expanding its licensing regime to inputs with dual-use potential and high strategic value. The measures, which would come into force on December 1, 2025, are framed in the Export Control Law and complementary regulations on national security and management of key resources. They also strengthen the traceability of use and end user and impose additional due diligence obligations on exporters, distributors and logistics operators. The move is in addition to pre-checks on graphite, gallium, germanium and certain rare earth products, and extends the perimeter to new strategic metals relevant to energy storage, electric mobility and power electronics.

In response, the United States has stepped up its own control architecture with updates to export and re-export rules for advanced computing and chip-making equipment, new additions to the Entity List, and increased scrutiny of outbound investments in sensitive technologies. Washington is also promoting coordination with allies to tackle diversions via third countries and strengthen extraterritorial compliance in regional assembly and redistribution centres.

For companies with global chains, the environment demands more granular trade compliance management: updated tariff and dual-use classification in China and the U.S.; end-use and end-user documentation; segmentation of suppliers by exposure to metals and critical components; strengthened export control and sanctions contractual clauses; and contingency plans for possible bottlenecks and extension of license terms. The documentary consistency and operational evidence of the compliance program will be decisive in regulatory inspections and audits.



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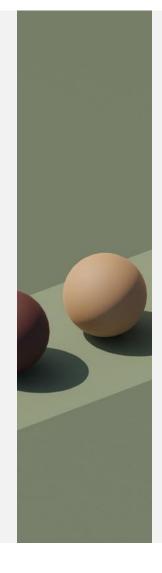


4 BEYOND OUR BORDERS: INTERNATIONAL TRENDS AND DEVELOPMENTS

U.S. | New digital privacy paradigm: tension between business innovation and consumer privacy protection

The U.S. has seen a significant increase in class action suits related to digital privacy, especially in California, where the <u>Invasion of Privacy Act (CIPA)</u>, originally designed to protect telephone communications, has been reinterpreted against the use of tracking technologies on websites (cookies, pixels, and chatbots). The plaintiffs allege that the use of these tools without the user's explicit consent constitutes a violation of privacy, with potential statutory damages of up to \$5,000 per violation.

In this context, the <u>California Senate</u> is considering <u>House Bill 690 (SB 690)</u>, which seeks to amend CIPA to create a broad exemption for the use of online tracking technologies when used for a "legitimate business purpose". This would align CIPA with the <u>CCPA</u> (Consumer Privacy Act) allowing businesses to process personal information for business purposes or subject to consumer opt-out rights, without fear of litigation under CIPA.



Mexico | New Federal Economic Competition Law promotes the development of free competition compliance programs

This July, a series of important reforms to the Federal Economic Competition Law came into force —which we anticipated here —of which the tightening of the sanctioning framework and the new power of the National Antitrust Commission to certify compliance programs stand out. Having a robust antitrust compliance program becomes essential to prevent infringements and, where appropriate, to mitigate the liability of companies subject to investigation. See more.

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4 BEYOND OUR BORDERS: INTERNATIONAL TRENDS AND DEVELOPMENTS

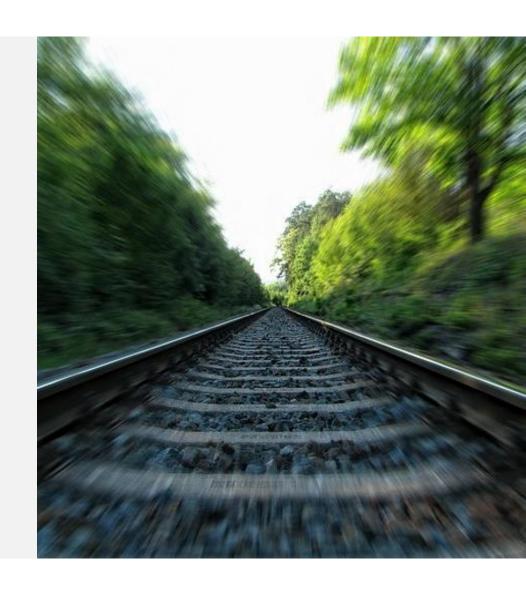
Chile New obligations of the Financial Analysis Unit (UAF) under Circular No. 62

<u>Circular No. 62</u> of Chile's Financial Analysis Unit ("**UAF"**), in force since July 1, 2025, unifies and updates the regulation on the prevention of money laundering, terrorist financing and arms proliferation, repealing most of the previous circulars. Among its main novelties are the following: (i) it strengthens the requirements for reporting suspicious transactions; (ii) expands the scope of reports of cash transactions; (iii) extends the obligation to identify final beneficiaries; and (iv) requires keeping detailed records and updating internal manuals every two years. This regulation applies to all obligated entities in the private sector, including banks, fintechs, real estate and automotive, which must adapt their prevention systems and adopt a risk-based approach to comply with new regulatory requirements. See more.

Peru | SMV issues first technical report on the evaluation of a Prevention Model for administrative liability of legal entities for commission of crimes

The Superintendence of the Securities Market ("SMV") has issued its first technical report on the implementation and operation of a Prevention Model in the framework of an investigation for alleged aggravated unfair collusion, under <u>Law No. 30424</u>, which regulates the administrative liability of legal entities in criminal proceedings and its regulations.

As stated in Edition 37 of the Crime Prevention Model Bulletin – Special Edition, the SMV concludes that the Prevention Model implemented by the company was adequate to prevent and mitigate the risks of committing the crime under investigation.





5. Cuatrecasas events



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5 CUATRECASAS EVENTS

EVENTS SINCE THE LAST EDITION

International trade under the new Trump administration: challenges and opportunities

ONLINE | October 7 - Session summary



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5 CUATRECASAS EVENTS

UPCOMING EVENTS

2nd Annual Compliance & Investigations Day

After the success of the <u>first edition</u>, which brought together more than 250 professionals, on **November 6, 2025** we will return with a new edition held simultaneously in **Barcelona and Madrid**.

On this occasion, we will have the participation of our specialists in Compliance and Investigations, Criminal Law and Labor Law and other leading experts, including <u>Miguel Ángel Encinar</u>, <u>Coordinating Magistrate of the Technical Office of the Criminal Chamber of the Supreme Court, and Samantha Barrett Badlam</u>, Partner at Ropes & Gray in Washington DC.

2nd Annual Compliance & Investigations Day Program:

- > Compliance trends in the U.S. under the Trump administration.
- > Harassment communication: keys to an effective internal investigation.
- Emerging risks (and opportunities) Sustainability, greenwashing, cybersecurity, Al.
- Internal investigations and fundamental rights.
- Compliance highlights in 2025 and what's next.

Do not forget to register for the event.

Barcelona registration

Madrid registration





6. Behind the Compliance Corner

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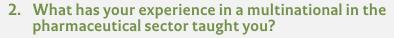
BEHIND THE COMPLIANCE CORNER

Joaquim Salsench: joins the Compliance department at Cuatrecasas

Joaquim Salsench joins Cuatrecasas after several years in a multinational company in the pharmaceutical sector. We talked to him about joining the firm, his vision of regulatory compliance and the challenges faced by this practice in an increasingly demanding global environment.

1. What motivated you to join Cuatrecasas, and what do you hope to contribute to the team?

I was particularly motivated by the possibility of joining a leading firm such as Cuatrecasas, with which I fully share values such as excellence, teamwork and closeness to the client. After working for a multinational company in the pharmaceutical sector, where I had the opportunity to manage complex matters at a global level, I find it quite stimulating to be closer to clients and accompany them in the resolution of sophisticated, high-impact issues, both in the field of Compliance and at the strategic level. I am convinced that the Cuatrecasas environment will allow me to continue developing professionally and provide a practical, global vision aimed at generating value in the firm's projects.



This experience has provided me with a global and eminently practical vision of risk management and regulatory compliance in complex and multicultural environments. Thanks to this, I have learned to address regulatory challenges with effective, flexible solutions adapted to the particularities of each situation. Undoubtedly, this practical, close approach is proving very useful in my day-to-day work at the firm, allowing me to provide agile responses adjusted to the needs of our clients.



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6 BEHIND THE COMPLIANCE CORNER

Joaquim Salsench: joins the Compliance department at Cuatrecasas

3. How do you see the current trends in Compliance, and where do you think the practice is evolving?

I believe that Compliance is undergoing an evolution. The function needs to position itself as a strategic ally within organizations, side by side with the business and pursuing process efficiency. This adds value to the company and comes from a long-term strategic vision, without neglecting the regulatory and geopolitical challenges that mark the present. In this context, it is essential to anticipate regulatory changes and adapt compliance structures to deliver tangible and sustainable value to the business.

In my opinion, Cuatrecasas is positioned as a first-rate strategic ally, capable of offering a comprehensive and specialized service that responds effectively to these challenges.

4. What do you consider the main current challenges in terms of Trade Compliance?

I would highlight the impact of the recent international sanctions, both on Iran and Israel, which have significantly increased the regulatory requirements and the complexity of the geopolitical environment. We are facing a scenario that requires highly specialized and permanently updated advice to operate with full guarantees and minimize risks in an increasingly demanding and changing global context. It is especially motivating to be able to accompany our clients in adaptating and ensuring continuity of their operations in such a dynamic environment.



7. Editorial team

3rd Edition. October 2025



7 EDITORIAL TEAM



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Danae Travé

Labor Associate



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CUATRECASAS COMPLIANCE CORNER

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