VOIXA · CHECKLIST

Anti-money laundering in Spain: the minimum file for an obliged entity

If article 2 of Law 10/2010 lists your activity, these are the documents and procedures the Act expects to find. Each line names the article it comes from.

Customers

☐	Identify every customer from reliable documents before the relationship starts	Law 10/2010, art. 3
☐	Identify the beneficial owner (more than 25 per cent, or control)	art. 4
☐	Record the purpose and intended nature of the relationship	art. 5
☐	Monitor the relationship, including the source of funds	art. 6
☐	Apply enhanced measures to PEPs, high-risk countries and non-face-to-face customers	arts. 11, 12 and 14

Reporting and records

☐	A written risk analysis, always	art. 7.1
☐	Special examination of complex or unusual operations, recorded in writing	art. 17
☐	Report suspicions to SEPBLAC without delay; refrain from executing; never tell the customer	arts. 18, 19 and 24
☐	Keep documentation for ten years	art. 25

Internal control

☐	Written policies, a customer admission policy and a prevention manual	art. 26
☐	An internal whistleblowing channel, anonymous if needed	art. 26 bis
☐	A representative before SEPBLAC resident in Spain, and an internal control body	art. 26 ter
☐	Annual external expert review (not for individual professionals)	art. 28
☐	An annual training plan	art. 29

Each line links to our English translation of the article on voixa.es. Prefer we handle it? AML compliance in Spain: https://voixa.es/services/aml-compliance-spain/