

## Disclosure of information on measure imposed on supervised entity

### Supervisory measure against Infra Investments d.o.o. (in bankruptcy) owing to breaches identified in the area of anti-money laundering and combating the financing of terrorism

<b>Information on perpetrator</b>	
Business name and registered office of legal person	Infra-Investments, trgovina in storitve, d.o.o. (in bankruptcy), Štihova ulica 13, 1000 Ljubljana, registration number 8015368000 (hereinafter: the undertaking)
<b>Information on breach</b>	
Description of circumstances and conduct constituting a breach of the Prevention of Money Laundering and Terrorist Financing Act (Official Gazette of the Republic of Slovenia, Nos. 48/22, 145/22, 17/25 and 56/25; hereinafter: the ZPPDFT-2)	<p>On the basis of two requests for inspection (referenced PDO-24.70-002/20-1 of 18 December 2020 and referenced PDO-24.70-013/23 of 18 December 2023), Banka Slovenije conducted two inspections at the undertaking in the area of anti-money laundering and combating the financing of terrorism (hereinafter: AML/CFT). The first was a thematic inspection in the area of virtual currencies, which also covered the undertaking, and was conducted at the undertaking between 15 January and 16 April 2021. The second was a comprehensive inspection conducted at the undertaking between 13 February and 15 April 2024, and covered the area of restrictive measures in addition to AML/CFT.</p> <p>Breaches of the ZPPDFT-2 were identified in the two inspections. Banka Slovenije issued the undertaking with the order on the rectification of breaches referenced PDO-24.70-002/20-5 of 9 July 2021 owing to breaches identified during the first inspection, with a deadline for the rectification of breaches of 31 December 2021, and with the order on the implementation of additional measures for more effective rectification of identified breaches referenced PDO-24.70-002/20-6 of 19 October 2022 owing to breaches identified during a follow-up inspection, with a deadline for the rectification of breaches of 31 March 2023. Banka Slovenije issued the undertaking with the order on the rectification of breaches with additional measures for more effective rectification of identified breaches referenced PDO-24.70-013/23-2 of 3 September 2024 owing to breaches identified during the second inspection, with a deadline for the rectification of breaches of 31 March 2025.</p> <p>In accordance with paragraph 1 of Article 282 of the ZBan-3 in connection with paragraph 1 of Article 164 of the ZPPDFT-2, with regard to the rectification or cessation of the breaches, Banka Slovenije issued a resolution on the joinder of proceedings and a declaratory decision on the cessation of breaches on 9 December 2025.</p>
<b>Nature of identified breaches</b>	Because the undertaking ceased providing all services in connection with virtual currencies on 30 June 2025, Banka Slovenije finds that the breaches referred to in point 1.a) (breaches of points 2 and 5 of paragraph 1 of Article 17 of the ZPPDFT-1) and point 1.b) (breaches of paragraph 2 in connection with paragraph 3 of Article 13 of the ZPPDFT-1) of the order on the rectification of breaches referenced PDO-24.70-002/20-5 of 9 July 2021 (in connection with the order on the implementation of additional measures for more effective rectification of identified breaches referenced PDO-24.70-002/20-6 of 19 October 2022) have ceased.

	<p>Because the undertaking ceased providing all services in connection with virtual currencies, Banka Slovenije finds that the breaches referred to in point 1.a) (point 3 of paragraph 1 of Article 21 in connection with paragraphs 1 and 2 of Article 53 and point 4 of paragraph 1 of Article 150 of the ZPPDFT-2), point 1.b) (paragraph 4 in connection with paragraph 7 of Article 18 of the ZPPDFT-2 and in connection with Sections 6.4.1.2 and 2.3 of the ML/TF risk assessment guidelines), point 1.c) (paragraph 2 of Article 19 in connection with point 1 of paragraph 2 of Article 64 of the ZPPDFT-2), point 1.d) (paragraphs 1 and 6 of Article 54 of the ZPPDFT-2), point 1.e) (paragraph 1 of Article 55 of the ZPPDFT-2) and point 1.f) (paragraph 1 of Article 76 of the ZPPDFT-2) of the order on the rectification of breaches with additional measures for more effective rectification of identified breaches referenced PDO-24.70-013/23-2 of 3 September 2024 have ceased.</p>
<p><b>Operative part of resolution on joinder of proceedings and declaratory decision on cessation of breaches</b></p>	
<ol style="list-style-type: none"> <li>1. The inspection referenced PDO-24.70-002/20 conducted at the supervised entity <b>Infra-Investments d.o.o. (in bankruptcy)</b>, Štihova ulica 13, Ljubljana, registration number: 8015368000 (hereinafter: the undertaking) and the inspection referenced PDO-24.70-013/23 are hereby merged into the inspection referenced PDO-24.70-013/23.</li> <li>2. Banka Slovenije finds that the breaches identified in the inspection referenced PDO-24.70-002/20 and cited in points 1.a) and 1.b) of the order on the rectification of breaches referenced PDO-24.70-002/20-5 of 9 July 2021 in connection with the order on the implementation of additional measures for more effective rectification of identified breaches referenced PDO-24.70-002/20-6 of 19 October 2022 ceased upon the cessation of trading by the undertaking that was providing services in connection with virtual currencies.<sup>1</sup></li> <li>3. Banka Slovenije finds that the breaches identified in the inspection referenced PDO-24.70-013/23 and cited in points 1.a), 1.b), 1.c), 1.d), 1.e) and 1.f) of the order on the rectification of breaches with additional measures for more effective rectification of identified breaches referenced PDO-24.70-013/23-2 of 3 September 2024 ceased upon the cessation of trading by the undertaking that was providing services in connection with virtual currencies.</li> </ol>	
<p><b>Information on any rectification of breach or implementation of ordered measure</b></p>	
<p>In accordance with paragraph 1 of Article 282 of the ZBan-3, Banka Slovenije issued a decision finding that the breaches referred to in points 1.a) and 1.b) of the order and the breaches referred to in points 1.a), 1.b), 1.c), 1.d), 1.e) and 1.f) of the second order with additional measures had ceased upon the undertaking ceasing to provide services in connection with virtual currencies.</p>	
<p><b>Information as to whether judicial review proceedings have been initiated against the decision in accordance with the ZBan-3</b></p>	
<p>Judicial review proceedings have not been initiated, and the decision is <i>res judicata</i>.</p>	

<sup>1</sup> Under the applicable ZPPDFT-2, “services in connection with virtual currencies” are defined as “crypto-asset services” as defined in point 16 of Article 3(1) of [Regulation \(EU\) 2023/1114](#) of the European Parliament and of the Council of 31 May 2023 on markets in crypto-assets, and amending Regulations [\(EU\) No 1093/2010](#) and [\(EU\) No 1095/2010](#) and Directives [2013/36/EU](#) and [\(EU\) 2019/1937](#) (OJ L 150 of 9 June 2023, p. 40; [Regulation 2023/1114/EU](#)), with the exception of providing advice on crypto-assets referred to in point 16(h) of Article 3(1) of the aforementioned regulation.