

Disclosure of information on measure imposed on supervised entity

Supervisory measure against MAKI d.o.o. Koper owing to breaches identified in the area of anti-money laundering and combating the financing of terrorism (hereinafter: AML/CFT)

Information on person responsible for breach	
Business name and registered office of legal person	MAKI podjetje za turizem, trgovino in storitve d.o.o. Koper, Pristaniška ulica 11, 6000 Koper - Capodistria (hereinafter: the undertaking)
Information on breach	
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 and 145/22; hereinafter: the ZPPDFT-2)	<p>Banka Slovenije conducted a follow-up inspection of the undertaking between December 2024 and February 2025.</p> <p>In the inspection Banka Slovenije identified breaches of the ZPPDFT-2, for which reason in accordance with the first paragraph of Article 164 of the ZPPDFT-2 in connection with Article 42a of the Bank of Slovenia Act (Official Gazette of the Republic of Slovenia, Nos. 72/06 [official consolidated version], 59/11 and 55/17; hereinafter: the ZBS-1), and with the second and third paragraphs of Article 280 of the Banking Act (Official Gazette of the Republic of Slovenia, Nos. 92/21, 123/21 [ZBNIP] and 2/25; hereinafter: the ZBan-3) it imposed an order on the rectification of breaches with additional measures for the more effective rectification of identified breaches (hereinafter: the order) on the undertaking.</p>
Nature of identified breaches	Having regard for the penal provisions of the ZPPDFT-2, some of the identified breaches are serious and most serious in nature, and in Banka Slovenije's assessment have a significant impact on the management of money laundering and terrorist financing (ML/TF) risks, which was deficient at the undertaking.
Operative part of order on rectification of breaches	
<ol style="list-style-type: none">On the basis of the follow-up inspection of the undertaking in the area of AML/CFT that has taken place between December 2024 and February 2025, Banka Slovenije finds that the undertaking did not remedy the breaches identified in points 1.a), 1.b), 1.c), and 1.d) of the Order on the rectification of breaches PDO-24.70-002/23-005 from 20 October 2023 (hereinafter: order on the rectification of breaches).In accordance with the first paragraph, point 6 of the second paragraph and point 12 of the second paragraph in connection with the third paragraph of Article 280 of the ZBan-3, first paragraph of Article 164 of the ZPPDFT-2 and Article 42.a of the ZBS-1, Banka Slovenije imposes an order on the undertaking with the following additional measures:<ol style="list-style-type: none">restriction on the execution of transactions of up to 1.000 EUR on a single transaction, whereas all currency exchange operations carried out by the same customer within the same day count as a single transaction (point 6 of the second paragraph of Article 280 of the ZBan-3);monthly reporting:<ol style="list-style-type: none">of all transactions executed by customers in a particular month (date of transaction, identifier (number) of transaction, currency, amount, value in EUR),of measures taken to rectify breaches cited in points 1.a), 1.b), 1.c) and 1.d) of the order on the	

<p>rectification of breaches, by the fifteenth day of the month for the previous month.</p> <ol style="list-style-type: none"> 3. The undertaking shall rectify the breaches cited in points 1.a), 1.b), 1.c) and 1.d) of the order on the rectification of breaches by 30 June 2025. The undertaking shall submit a written report to Banka Slovenije within ten days of the deadline on the measures taken to rectify the breaches. The undertaking shall begin implementing the additional measure cited in point 2.a) of this order the next working day following the reception of the order. For the implementation of the additional measure cited in point 2.b) of this order, the undertaking shall ensure monthly reporting of executed transactions and measures taken to rectify breaches in the previous month, by the fifteenth day of the month. The undertaking shall provide the first report to Banka Slovenije by 15 April 2024 for the period from the reception of this order until the end of March 2025. 4. The undertaking shall submit to Banka Slovenije by 31 March 2025 a new and updated action plan for the rectification of the breaches cited in points 1.a), 1.b), 1.c) and 1.d) of the order on the rectification of breaches, which shall include a plan on the implementation of the additional measures cited in point 2 of this order. 5. The undertaking shall communicate the names of the persons at the undertaking responsible for rectifying the identified breaches cited in points 1.a), 1.b), 1.c) and 1.d) of the order on the rectification of breaches and for implementing the additional measures cited in point 2 of this order to Banka Slovenije within 15 days from the reception of this order. 6. An objection to this order shall not stay its enforcement (third paragraph of Article 375 of the ZBan-3 in connection with first paragraph of Article 164 of the ZPPDFT-2 and Article 42a of the ZBS-1). 7. The breaches identified in this order also constitute misdemeanours pursuant to the penal provisions of the ZPPDFT-2, and Banka Slovenije will therefore initiate misdemeanours proceedings against the undertaking and the responsible persons. 8. In accordance with Article 176 of the ZPPDFT-2, in connection with the imposed supervisory measures Banka Slovenije shall publish the following information on its website after the imposed measure becomes final: <ul style="list-style-type: none"> – the business name and registered office of the legal person or name of the natural person; – a description of the circumstances and conduct that constitute a breach of the aforementioned law or require the enforcement of the ordered measure; – the nature of the identified breaches or the type of deficiencies for which the measure was ordered; – the operative part of the decision by which the proceedings are legally finalised; – details of any rectification of a breach or implementation of an ordered measure.
<p>Information on any rectification of breach or implementation of ordered measure</p>
<p>The undertaking has not submitted a new and updated action plan for the rectification of breaches and implementation of the additional measures to Banka Slovenije and has not communicated the name of the person at the undertaking responsible for rectifying the identified breaches and implementation of the additional measures. The final deadline for the rectification of the breaches is 30 June 2025. Within ten days of the final deadline, the undertaking shall submit a written report to Banka Slovenije on the measures taken to rectify the breaches.</p>
<p>Information as to whether judicial review proceedings have been initiated against the decision in accordance with the ZBan-3</p>
<p>Judicial review proceedings have not been initiated, and the order is legally final.</p>