



## Opening Speech before the Economy Commission of the Spanish Parliament

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I am appearing before this Commission, in accordance with the provisions of Article 17 of the Spanish Securities Market Act, to respond to questions on the CNMV's 2018 Annual Report, which was sent to you all prior to this session.

In the report, you will find detailed information on the CNMV's activity in 2018, and on the context in which such activity was carried out.

I must admit that it is a very extensive report, of more than 300 pages, which is consistent with the variety and complexity of the tasks and responsibilities of the institution, although this year, for the first time, we have included at the beginning of the report a summary of 18 pages - 18 pages more - which I consider enables easy reading. It is something that we will be doing again in the coming years.

I would like to briefly comment on the issues which my speech is going to be focused on.

First of all, taking into account the renewal of membership that has taken place in this Commission since April 2018, which was the last time that I appeared, I am going to briefly mention the institutional position and nature of the CNMV.

I am then going to comment, by referring to the Report, on the situation and evolution of the markets in 2018 (including, obviously, referrals to the first quarter of 2019) and the CNMV's activity.

Finally, I am going to briefly refer to other issues which I consider are of special interest:

- 2018 as the first year of implementation of the famous MiFID II Directive;
- the need to help make our financial markets and centres more efficient and competitive;
- the European Union Capital Markets project;
- added value, which in terms of retail investor protection, is delivered by the CNMV, on a daily basis, as a supervisor;
- the work undertaken by the CNMV with regard to relevant corporate transactions;
- the role of the CNMV in the area of sustainable finance;

- and finally, the need for the CNMV to regain the managerial autonomy that it had some years ago. I am referring, in particular, to regaining a minimum of autonomy in relation to the management of its personnel, which is crucial in order to have what we all want: a good-level supervision for markets and financial institutions in the field of investment services.

Needless to say, if the honourable Members of this Commission are interested in any other issue or specific matter, I am at your disposal to provide the relevant explanations or information, during the question time or subsequently in writing.

It also goes without saying that it is an honour and pleasure to appear before this Commission, despite the unique moment, just a few days before the deadline provided for in the Constitution for the investiture, and I would, therefore, like to thank you all for being here today.

## I

With regard to the CNMV's position and general characteristics, I would like to highlight that the CNMV is an institution: (i) that is consolidated; (ii) independent; (iii) with relevant functions of increasing complexity; and (iv) with a very important European and international angle.

First and foremost, we are a consolidated institution.

Since its creation more than 30 years ago, the CNMV has maintained substantially identical profiles and functions. I think that this is something extremely valuable per se, in terms of accumulation of know-how and of corporate and institutional "goodwill". There are only a few bodies in our country that can say this.

Secondly, we are an independent institution. I always like talking about the CNMV's independence with due modesty. It is not an independence for reasons of principles or essentialism, but rather an independence that is justified solely on functional grounds, to ensure that the function is exercised on an ongoing basis, in the medium and long term, and neutrally with regard to the vicissitudes of political life. At the international level, there cannot be more consensus on this in relation to financial supervision, in general.

I must say, incidentally, that in our experience, this independence is highly respected, in practice, every day. I think that the CNMV's view as an institution independent from the Government or the Central State Administration is important and forms part of the culture of our country. However, I also consider that real independence requires a sufficient degree of independence to manage the institution's resources; this is where we fall short, and I will refer to this in the latter part of this speech.

Thirdly, the CNMV is an institution with relevant functions of increasing complexity.

We supervise banks (as providers of investment services) and investment firms (broker-dealers and brokers); collective investment schemes and their management companies; venture capital and alternative investment firms; crowdfunding platforms, etc.

And we also supervise issues and public offers, including initial public offerings; takeover bids and listed company corporate transactions; organised securities markets

(including stock exchanges) and their infrastructure for trading, clearing and settlement; obligations of reporting transactions; the rules - the obligation to cross guarantees, settle and clear with the clearing house, etc.- given in respect of derivative instruments; market abuse legislation; financial information of listed companies and issuers and their price-sensitive information; audit committees of all public-interest entities (not only of listed companies); corporate governance rules; benchmarks legislation, etc.

Incidentally, it is impressive how control has increased in recent years following the financial crisis. Many more areas and rules subjected to supervision, which have required considerable adaptation, and which justify the moderate growth in recent years of the CNMV's staff, which currently comprises around 450 persons, considering the headquarters in Madrid and the Barcelona office.

Fourthly, the CNMV is an institution with a very important European and international angle. Evidence of this is that we are members of ESMA, the European Securities and Markets Authority, although there are also other international organisations, which are also important for the CNMV, in particular IOSCO (the International Organization of Securities Commission, which as you may well be aware, has its headquarters in Madrid), the FSB (Financial Stability Board) and the Ibero-American Institute of Securities Markets.

I would like to clarify one point. In fact, it is not appropriate to talk about international activity with regard to ESMA, the European Authority, as ESMA already forms part of our daily activities. I, as Chairman of the CNMV, am a member of its Executive Committee, and I am also a member of its governing body, the Board of Supervisors (of which the Chairpersons or persons with equivalent positions of the 28 EU countries are members, and they meet almost every month, and also hold conference calls and adopt decisions through written procedure).

For her part, the Vice Chairwoman of the CNMV chairs two important committees, of which the 28 countries are also members, the Reporting Committee (which deals with financial and non-financial information which must be disclosed by issuers) and the Sustainable Finance Committee. More than 80 managers and technical staff of the CNMV regularly participate in committees and work groups of the organisation.

We increasingly have the impression that the CNMV simultaneously plays two roles of similar significance and importance: the supervisor of the securities market in Spain and a member of ESMA, an organisation in which we are committed to playing a leading role.

## II

With regard to market trends, the securities market was bearish in 2018, particularly in the last quarter. Practically all of the international indices declined, and they only partially recovered in the first quarter of 2019. The negative trend was even more marked in the Spanish securities market and in sectors such as banking, which weighed heavily on our stock market, in particular.

Trading volumes of Spanish shares were maintained (930 billion euros), although transactions closed on non-Spanish markets and multilateral trading facilities did increase, exceeding 37% (compared to 32% in 2017, and 28% in 2016). Our stock

exchanges are losing market share and this trend has continued in 2019 (from January to September 2019, this percentage has already exceeded 40%).

A trend which is a cause for concern in a strong competitive environment, which has been fuelled even further by MiFID II, and in which the so-called systematic internalisation (systematic counterparties offered by large operators, subject to certain rules, instead of placing the orders in the market) is gaining ground, and which requires us to ensure that regulations promote competition in our markets or that, at least, they do not undermine it (I am thinking, for example, of initiatives such as levying, at this point in time, a tax on the acquisition of Spanish shares similar to those existing in France or Italy, although not in the majority of the European countries).

The negative trend in the securities markets contributed to the reduction, in 2018, of the fund-raising activity of Spanish listed companies through capital increases. The volume was only of 7.4 billion euros, compared with more than 27 billion euros in 2017. And this also led to a very limited number of IPOs. During the year, there were only three in the primary market (Metrovacesa, Árima and Solarpack, two of them with a relatively small volume). Other important projects, such as the relisting of CEPSA, were finally cancelled.

However, 2018 was a year of certain activity in terms of takeover bids. In fact, we authorised six, most notably, the takeover bid for Abertis.

On the other hand, and in line with the bearish context that I have just mentioned, for the first time since 2012, assets of our collective investment schemes decreased slightly, which, however, considering funds and open-ended collective investment companies, remains close to 300 billion euros, a considerable figure but much lower, in absolute and relative terms, than that of countries such as Germany and France (even taking into account Spanish investments in foreign funds, which exceeded 150 billion euros). This is related to the low level of savings of Spaniards and their investment patterns, strongly oriented towards real estate investments, an issue to which one of the “sections” of the Report refers, which concludes by highlighting that not only would higher household savings be desirable but also a more balanced mix between real estate and financial investments, which would surely lead to higher rates of economic growth in the medium term.

With regard to fixed income, in the context of a market with low interest rates, the trend of our issuers to increasingly issue outside Spain continued, a trend that we at the CNMV are attempting to counteract with various measures. In 2018, cross-border issues amounted to almost 90% of the total volume recorded by the CNMV (which totalled 101 billion euros, which is still, however, slightly higher).

With regard to entities and financial intermediaries which trade on the securities market and other entities registered with the CNMV, in general, the number of entities increased, being worthy of note the positive performance of the venture capital sector, and, due to their reduced activity and profitability, broker-dealers and brokers (a sector which currently shows signs of weakness, partly owing to increased competition arising from MiFID II and disruption caused by technological change; in fact, 39 of the 91 broker-dealers and brokers that were registered incurred losses in 2018, and their overall result decreased to 116 million euros, 34% less).

In contrast, for their part, profit recorded by the 119 collective investment scheme management companies registered with the CNMV at the end of 2018 (10 more than in 2017) increased significantly to 1.115 billion euros (bank subsidiaries are included in this figure).

In any event, following the absorption process in recent years of the majority of the broker-dealers and brokers that were bank subsidiaries, a new perspective is proposed in the Report to analyse the sector, which distinguishes between investment firms forming part of groups whose parent companies are commercial banks and independent entities (including independent fund management companies and certain banks specialised in the field of investment services).

As such, independent entities would currently represent approximately 30% of activity (measured in terms of revenue from fees for investment services, which in our country amounted to approximately 5.1 billion euros in 2018).

An independent sector specialised in the field of investment services, which is as strong as possible, is positive and desirable. The greater the importance of independent entities, the greater the innovation, dynamism and competition in the sector for the benefit of Spanish investors and the efficiency of our financial system, whose function is to promote reliable and efficient savings of citizens and to finance our economy and our businesses, and ultimately, to contribute to growth and employment.

### III.

Apart from that, the Report details the supervisory activity of the CNMV in different areas and also explains the sanctioning activity in 2018. In this regard, I would like to highlight that, in 2018, the CNMV started to make use of the possibility provided for by law since 2015 of making the initiation of a sanctioning procedure public in certain cases, and not only its conclusion.

The Report contains detailed information on these and many other aspects of the CNMV's activity in 2018, including information regarding the activity of our complaints service; attending investor queries; steps taken in relation to the FinTech phenomenon; actions related to the so-called crypto-assets and financial boiler rooms or unlicensed entities, or on the Commission's international activity.

Also noteworthy is the CNMV's work related to Brexit, which has been particularly intensive in 2018 and to date this year. Work focused, on the one hand, on analysing possible effects and avoiding distortions (carried out within ESMA and also in collaboration with the Ministry of Economy) and, therefore, aimed at attracting part of the activity currently being carried on in the United Kingdom, which will be passported to countries that will continue forming part of the European Union.

The Report also includes the CNMV's accounts for 2018, which were recently published in the Spanish Official State Gazette after they were audited by EAMR. It should be noted that total expenditure - in other words, the cost of the agency - amounted to 44.3 million euros (2.8% more than in 2017), and total revenue amounted to 65.3 million euros (2.3% more).

Therefore, in 2018, the CNMV recorded a surplus of 21 million euros, very similar to the figure for 2017. It is envisaged that this surplus, as in previous financial years, will

be paid into the Public Treasury. We have been recording a significant surplus for several years now. It is clear that the fees charged to finance the CNMV, laid down by law and which we collect from the sector and supervised entities, are higher than our costs. Even though the surplus will be reduced considerably in this financial year, we intend to formally propose a reduction this year.

To conclude this section, I would like to highlight that, for the first time, the Report includes performance indicators (deadlines for the authorisation of entities etc.), and CNMV activity indicators, launching an annual series, which will help evaluating the authority's performance.

#### IV.

I shall now briefly refer to some specific issues and matters.

##### **MiFID II**

2018 was an important year from the perspective of regulating securities markets and investment services, as it was the first year of implementation of MiFID II, the European Directive of 2014 on markets in financial instruments, and of a series of provisions that can be considered as part of the same regulatory package (such as the PRIIPs or MiFIR regulation), a legislative package, for the benefit of investors, which entails more transparency, greater control with regard to whom the products are offered, further training for staff who provide information or advice, more counselling, as well as more rigour with regard to conflicts of interest, etc. This has also entailed important changes in market regulations: an attempt to further promote trading in organised markets, more competition between markets and their infrastructures, etc.

At the beginning of 2018, we were the only large European country that had not completed the transposition of all these rules (which could have caused many problems and forced the CNMV and the sector to go through a provisional stage), but fortunately, at the end of the year, everything had been duly transposed into our legal system.

I would like to acknowledge the efforts of the Ministry of Economy for achieving this, and in particular, the impetus given by Minister Calviño in the transposition process. And also for the extensive implementation work undertaken, within that provisional context, by Spanish banks and investment firms.

It is still early to assess the effects of the new legislation. We are starting to see the effects within the context of ESMA and at the local level. My view, in any case, is positive; undoubtedly, the new rules are triggering more transparency and competition, and therefore, lower costs for investors, better dispute resolution mechanisms and more and better advice. I have no doubt that in the medium and long term, this will boost the sector's efficiency and investor confidence, and will benefit all of us.

It is also true that some changes, such as those that have affected the analysis service, may be having some negative side effects. We European regulators and supervisors must assess the effects of the new rules (in part, incidentally, the legacy of our British colleagues, who will now be leaving), and be open to make the necessary adjustments.

## **Competition of our market**

Secondly, I would like to insist on the need to contribute, through regulations (and also through supervision) to reinforcing the efficiency and competition of our financial markets and centres. We know that this objective is fully shared by the Ministry of Economy, to which we have made several proposals, and it is one of the strategic lines of action of the CNMV, which is included, as in previous years, in the CNMV activity plan for 2019.

It is essential to have a competitive regulatory framework which is equivalent to that of other relevant European countries. Local peculiarities and restrictions which could lead to confusion or competitive disadvantages should be avoided, which of course also include the fiscal angle, which, for example, should not act as a disincentive for certain businesses and activities in the field of financial services and investment to be located in Spain. This is not considered from a perspective of comparing small or particular European countries, but rather countries such as Germany, France and Italy.

Likewise, it would be appropriate to seek the incorporation of formulas or opportunities already accredited in advanced markets, the availability of which could encourage good-level firms or entities to choose Spain.

## **Capital markets union**

Thirdly, I would like to refer to some concerns or matters, which in our opinion, should be borne in mind in the next phases of the European capital markets union, the name of which, incidentally, as I have mentioned, could be reconsidered to highlight the importance of the project for European citizens; for example, to be renamed as "Investment and savings union".

It is essential to reconsider and relaunch the project after having achieved a large part of the (modest) objectives in the first phase and in view of the Brexit "earthquake".

My first concern is that the capital markets union cannot be a project that weakens financial markets which, as is the case with the Spanish financial markets, have a certain size and a critical mass. The aim of the CMU is to increase the market share of funding through the markets and for funding to reach SMEs. This requires penetration; Europe needs to have an integrated capital market but also a variety of markets with a critical mass and complete ecosystems.

In addition, experience shows (as we have seen with Brexit), that it is not wise to rely on a single or dominant financial centre, nor should you put all your eggs in one basket.

This is relevant in the case of any new regulation, and in particular, for review purposes, following the initial implementation period of MiFID II. It goes without saying that the supervisory factor also forms part of these ecosystems. A more integrated supervision of the capital markets in Europe does not necessarily mean more centralisation. It is important for countries such as Spain to continue having a relevant supervisor at the local level. ESMA must focus on promoting supervisory coordination and convergence.

A second concern is that the CMU project solely focuses on the financial regulation area. It should also include taxation, which is like the elephant in the room. It is impressive how tax regulations influence the structure of the market in different

European countries and in particular the way in which investment products are marketed in each of them.

In France, for example, more than 80% of investment funds are distributed through products with an insurance component. And the differences between countries in terms of the treatment given to investments in SMEs and to venture capital are tremendous. If we want markets that are truly linked and integrated, the tax angle must be addressed.

Likewise, the provision of cross-border investment services, in particular to retail investors, must be subject to effective supervision, as occurs with financial services that are provided at the local level.

The current European regulation confers the exclusive competence to supervise on the home State, whose incentives and capacity to exercise such competence when their entities provide investment services to investors in other countries is limited at times. Without abandoning this principle, more exchange of information and cooperation between home State and host State is required, in order to ensure a level playing field in terms of competence and the appropriate level of supervision.

I am referring to areas such as the marketing of CFDs (contracts for difference), which as you may well be aware, is mainly carried out by phone or via the Internet, by entities located in Cyprus and in other countries.

#### **Protection of retail investors**

I would also like to highlight, in particular, the continuous efforts and intense activity of the CNMV, naturally, of supervising the rules on marketing products and services to investors, efforts and an activity essentially aimed at protecting the interests of retail investors.

Our inspections and much of our work fulfil this objective, in general, but I would like to give you some examples of the work done since the beginning of 2018:

As you may well be aware, entities are obliged to obtain and have information available with regard to the knowledge and experience of their clients in order to assess whether they are selling the appropriate products, and also to give them certain mandatory warnings.

After detecting situations of over-valuation of the training, financial knowledge and investment experience of the clients, the CNMV has initiated sanctioning procedures and has issued a public communication requesting the correction of these types of deficiencies. In addition, specific inspection activities are currently being carried out in this regard.

Another example refers to the warnings issued in specific cases to strengthen information for investors. Thus, a CNMV Circular establishes the obligation of issuing a warning to retail clients when the difference between the price payable by a client for a product and its fair value exceeds certain thresholds. The objective is for investors to be aware of the costs incurred in their investments. The CNMV is actively verifying that these types of warnings are duly issued, both in the case of equities issued in Spain and for securities marketed in our country on the basis of a European Community passport.



The CNMV also monitors cross-border funds, which are European in general, and which are marketed in Spain, in order to request, where necessary, the same warnings with regard to the risks for investors as those required for the registration of national funds. Thus, we have requested various entities to warn clients of the high credit risk attached to some cross-border funds which invest in low-quality fixed interest rate instruments.

In 2019, we are also conducting a horizontal review on the certificates accrediting the training of the sales staff of entities, in order to verify that certifying and educational institutions comply with the commitments undertaken on the occasion of their inclusion on the CNMV's list of certificates or qualifications. This is in addition to the attention paid in this regard in our inspections of entities.

I also consider that it is important to highlight the monitoring of potential risks or market situations that may affect the interests of retail investors. For example, in recent years, the CNMV has identified guaranteed equity funds or similar funds, which, given the evolution of interest rates, have reached their earnings target prior to the date originally foreseen. Recently, we have identified that this has been the case of a total of 96 funds (with assets amounting to almost 7 billion euros) and we have urged the management companies to inform investors, reminding them of their right to reimburse at no cost within the relevant liquidity windows.

I would also like to mention the reviews carried out by the CNMV in 2018 with regard to the duty to inform on costs and key investor information documents. These reviews were conducted on a sample of more than 15 banks and were preliminary reviews, as the entities were in the implementation stage, and in order to promote the appropriate enforcement of such obligation as of its first implementation.

Finally, another example is our attention to costs incurred by collective investment schemes, and indirectly by investors, which are a very important issue from a supervisory perspective given their impact on return and potential conflicts of interest.

In 2018, just over half of the management companies (62 of a total of 115) used their group companies to execute transactions in the securities, fixed income and the derivatives markets. Approximately half of these were analysed, and various incidents were detected, such as charging fees above market fees for independent parties (in particular, currency transactions with the depository). The publication of a Technical Guide on this matter has been included in the 2019 Activity Plan.

### **Takeover bids and other corporate transactions**

On the other hand, the CNMV has to intervene, verifying compliance with the relevant requirements and rules, for the purpose of the different types of corporate transactions, capital increases, mergers, takeover bids, etc., a field in which our mission is also to foster the flow of traffic, and particularly, in the case of takeover bids: (i) that the offer reaches investors so that the opportunity to divest at specific prices they represent becomes reality without undue delays; and (ii) that the companies affected do not suffer the constraints arising from the situation any longer than is necessary.

Shareholders of listed companies are always, in addition to private investors, more so in the case of large companies, investment funds, pension funds or insurance companies, who invest the savings of thousands of investors, lawfully seeking returns. Securities

supervisors exist to help build market and investor confidence, and it is essential that when takeover bids and other corporate transactions are considered, we act in a manner that is consistent with this.

I would like to mention two important cases which we have addressed since 2018.

The first is the takeover bid for Abertis (which concluded in May 2018) and where we were convinced of the objective that if, having verified that everything complies with the law, the bid and the price offered (which, incidentally, included a very important premium) would reach the company's shareholders. At that point in time, two Ministries considered, contrary to our technical criterion, that we should put the authorisation for the takeover bid at a standstill, as they considered that the offeror should obtain certain permissions. I am not going to go into any further details. I would just like to say that, in line with our status of independent authority and with the philosophy to which I have referred to, we, respectfully, maintained our view. And I consider that by doing so, we helped to strengthen the image of our market and of Spain as an open and reliable country to invest in.

Another situation which has engaged our attention since mid-2018 and to which we have devoted and continue devoting resources and attention has been that related to Distribuidora Internacional de Alimentación S.A. (DIA), a company that was also the object of a takeover bid. The only thing that I can say is that we have meticulously and diligently monitored the evolution of the company and of the share at all times, and even prepared in advance our actions for specific scenarios.

The CNMV's actions should not delay processes or the resolution of problems that could affect the company, but this is even more important, in particular, in situations of crisis such as that which affected DIA, a company with more than 4,300 stores and more than 26,000 employees in Spain alone. Furthermore, I consider that in this case, we have acted at all times guided by the principle of investor protection, prudently and with neutrality.

### **Sustainable finance**

If I may, I would also like to refer to the CNMV's activity and view on sustainable finance, a reality arising from the fact that investors are increasingly bearing in mind environmental, social and good governance factors in their investment decisions, and in general, greater social awareness for a sustainable economy.

In our role as a supervisor it is essential to ensure that potential investors have information and can receive proper advice on these matters and that the information is clear and reliable. An example of this is our review, which in fact we have been carrying out since 2018, of the non-financial information statement (NFIS), which, as is the case of other large corporates, listed companies of a certain size must also submit.

Currently, the CNMV is also very active in initiatives in this field.

We are closely monitoring the European Commission's proposals stemming from the Activity Plan approved for 2018. These include, most notably, a taxonomy or a common language for economic activities that are considered as sustainable, the duty of management companies and institutional investors, as well as of financial advisers to

report on how ESG factors (environmental, social and governance factors) are taken into account in their activity or on standards on green bonds.

Furthermore, in June of this year, ESMA created a sustainability committee, which as I have mentioned, is chaired by the Chairwoman of the CNMV. A few months ago, IOSCO also created a standing committee, known as Sustainable Finance Network (SFN), of which around 40 countries are members, and where the CNMV leads one of the two workstreams.

## V

Finally, I would like to mention that it is essential for the CNMV to regain at least part of the autonomy that it had a few years ago in relation to the management of its personnel.

This is a crucial issue. When the CNMV was created in 1988 (I was there), the aim was to create an independent institution, but above all, an institution to exercise the function of supervision in an in-depth and reliable manner; the objective was to create a supervisor that was well equipped, capable of attracting and retaining talent and truly monitoring increasingly complex and sophisticated markets, as well as financial institutions which, whether we like it or not, have well-trained and well-paid staff.

For this reason, it was established that the CNMV's staff would be employees hired on a group contract basis, and the institution was granted a degree of flexibility in its management similar to that of the Bank of Spain. This is what we want to regain.

This is compatible with the rule provided for in the Spanish Securities Market Act, which requires the annual budget, including staffing, to be approved by the Government, and spending a single euro more than the total budgetary expenditure is prohibited, unless it is authorised by the Ministry of Finance or the Government itself. And naturally, this is compatible with limitations that prevent increases, in general, of the personnel's remuneration.

Our personnel, unlike other areas of the Administration, are highly specialised staff who are of interest to and easily attracted by entities operating in the sector (including, incidentally, the Bank of Spain).

It is not a question of our technical staff receiving the remuneration that is typical of the private sector. We simply want to have flexibility to organise ourselves and to respond to the changing requirements of financial supervision, and above all, the possibility of offering our professionals a minimum professional career, and attracting and retaining the talent required to respond to the strong social pressure of having efficient and quality supervision.

We also want the compliance of what was expressly provided for in the Spanish Securities Market Act in one of its provisions in 2015, and which has been deactivated in the annual budgetary laws: to be exempted from global public employment offering mechanisms (as occurs in the case of the Bank of Spain or the FROB), enabling us to fill vacancies immediately, without having to wait for annual job vacancies.

Recently, Oliver Wyman, a leading international consulting firm, has analysed the CNMV for a benchmarking exercise which it also conducts for 15 other top-level international financial supervisors. In general, the CNMV obtained reasonable results,

but the mark for the section “performance management” was very unsatisfactory, the only reason for this being our low level of autonomy and flexibility.

As you may well be aware, we are financed directly through issuers and the financial sector – who are interested in a good supervision – and not via taxpayers, in general, and therefore, surprisingly, despite the surplus that I have mentioned before, we cannot allocate any amount whatsoever to any type of restructuring of our staff, even if minimal, a workforce, which, incidentally (comparatively speaking, is also highlighted by the consulting firm that I have mentioned before), now has an average age well above that of our peers.

And you cannot imagine to what extent we have to request authorisation from the Ministry of Finance, which is normally refused, for things such as the minimum promotion of a technical staff member to reinforce the sub-directorate created to coordinate matters related to new technologies in the sector (FinTech) or cybersecurity, or to pay a total of approximately 15,000 euros during three months to thirty employees to adequately cover on-call duties (a term which refers to circumstances where the markets are open, from time to time, on non-working days or outside normal working hours), on-call duties which, at a certain point in time, it was advisable to reinforce.

I would like to apologise for this small confession. Of course, we intend to insist and do insist on this point.

And this concludes my speech. I am now available to answer your questions.