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New developments regarding collective actions contained in the Draft Organic Law on the efficiency of the public service of justice and actions for the protection and defence of the rights and interests of consumers and users

1. Introduction

On 22 March 2024, the text of the Draft Organic Law on the efficiency of the public service of justice and actions for the protection and defence of the rights and interests of consumers and users (the “**Draft**”, available at this [link](#)) was published in the Official Gazette of the Spanish Parliament. This Legal Briefing addresses the new procedural regime for collective actions that the Draft Law seeks to introduce, which is the complete transposition of the European Union Directive 2020/1828 of 25 November 2020 on representative actions for the protection of the collective interests of consumers (the “**Directive**”)¹.

If the Draft were to be approved in the terms in which it has been proposed, the procedural regime for actions in defence of the interests of consumers and users would be subject to very significant modifications. Thus, the current procedural regime for the protection of collective and diffuse interests in defence of consumers would be eliminated and replaced by a specific procedure set out in the new Title IV, within Book IV of Law 1/2000 of 7 January on Civil Procedure (the “**LEC**”; Articles 828 *et seq.* of the LEC), which would be devoted to the exercise of collective actions for injunctive and redress measures on behalf of the interests of consumers and users by entities authorised for this purpose. It would also be possible to bring declaratory actions which, for procedural purposes, are regarded as collective actions for injunctions. It should be noted, as will be explained in the following sections, that the system chosen for the procedural conduct of these collective actions will be, by default, an opt-out system or a system of express withdrawal from the collective action in the event that consumers do not wish to be bound by the result of the action, except in exceptional cases.

The Draft not only amends the LEC, but is accompanied by amendments to: (i) Royal Legislative Decree 1/2007, of 16 November, approving the revised text of the General Law for the Protection of Consumers and Users and other complementary laws (“**TRLGDCU**”); Law 7/1998, of 13 April, on general contracting conditions; (ii) Law 34/2002, of 11 July, on information society services and electronic commerce; (iii) Law 22/2007, of 11 July 2007, on the distance marketing of consumer financial services; (iv) Law 43/2007, of 13 December 2007, on the protection of consumers in the contracting of goods with an offer of restitution of the price; (v) Law 2/2009, of 31 March 2009, regulating the contracting with consumers of mortgage loans or credits and intermediation services for the conclusion of loan or credit contracts; (vi) Law 17/2009, of 23 November 2009, on free access to service activities and their exercise; (vii) Law 16/2011, of 24 June 2011, on consumer credit contracts; and (viii) Law 4/2012, of 6 July, on timeshare contracts, the acquisition of long-term holiday products, resale and exchange contracts and tax regulations, and the revised text of the Law on guarantees and rational use of medicines and health products approved by Royal Legislative Decree 1/2015, of 24 July.

The main new features proposed by the Draft on this matter are summarised below.

¹ The predecessor of the present Draft is the Preliminary Draft Law of 9 January 2023 (the “**Preliminary Draft**”), which was analysed in a [previous Legal Briefing](#), and whose content is similar to the Draft except for the changes that will be highlighted in this Legal Briefing.

2. Provisions common to both actions for injunctive measures and actions for redress measures

A. Material scope of the procedural mechanism for collective actions

As already provided for in the Preliminary Draft, the scope of application of the mechanism for collective actions is broad and goes beyond the provisions of the Directive, covering the exercise of collective actions against any type of breach that has harmed the rights and interests of consumers and users in any way. This means that it will not solely apply to the matters listed in Annex I to the Directive.

B. Legal standing of qualified entities

The system of collective actions introduced by the Preliminary Draft grants extraordinary legal standing for the exercise of such actions both to the Public Prosecutor's Office and to the entities that have been authorised for this purpose under the provisions of the TRLGDCU, which is also amended by the Draft.

The requirements already provided for in the Preliminary Draft have been maintained for the designation of qualified entities. Under the provisions of Article 54 of the TRLGDCU, consumer and user associations that meet certain requirements established by Article 55 of the TRLGDCU, as well as the bodies or entities of the General State Administration, the Autonomous Communities and local corporations responsible for the defence of consumers and users, may have qualified-entity status for the exercise of national collective actions or the exercise of collective actions in other EU Member States.

The requirements for consumer associations to be designated as qualified entities for the exercise of national or cross-border collective actions are essentially the same as those established in Article 4(3) of the Directive; among others, they must have effectively and publicly carried out an activity aimed at protecting and defending the rights and interests of consumers for a minimum period of 12 months prior to the date of application for designation, they must be non-profit, independent and not under the influence of persons with an economic interest in the exercise of representative actions. Associations must be registered in the State Register of Consumer and User Associations or in the corresponding registers of associations with a smaller territorial scope. The Directorate General for Consumer Affairs of the General State Administration will be responsible for designating the entities that are authorised to bring collective actions in Spain or other Member States. In addition, the Ministry of Consumer Affairs must create and keep updated a publicly accessible database with the designated qualified entities, as well as inform the European Commission of any changes.

Collective actions may also be brought in Spain by qualified entities from other EU Member States that appear on the list published by the European Commission. However, their standing to bring collective actions is more limited than that of national entities, since in addition to the requirements established by Article 835(2), the entities authorised by other Member States must have been authorised "before the infringing conduct takes place". Consequently, they may only bring collective actions concerning conduct that occurred after their authorisation in the relevant Member State.

Qualified-entity status may be revoked if the association no longer complies with the requirements for its designation. If a lack of the requirements for qualified-entity status is found, a defendant in a collective action may object to the qualified entity's standing to bring an action within 20 days of the service of the claim (the time limit is increased by 10 days compared to the Preliminary Draft), or as soon as it becomes aware of such a deficiency, if it could only become known after the event.

Finally, regarding waiver and withdrawal, the Draft refers to the general rules established in the LEC.

C. Non-participation by consumers in collective proceedings and suspension of the limitation period for the exercise of individual actions

To guarantee the effectiveness of the proceedings, consumers and users will not be able to participate individually in collective actions. Instead, only qualified entities may participate. This exclusion is shared by both actions for injunctive and redress measures.

Without prejudice to the foregoing, Article 832 of the LEC provides that the exercise of a collective action will suspend the limitation period for individual actions for redress measures. The Eleventh Transitional Provision of the Draft provides that this suspension will only occur with respect to individual actions brought for infringements committed after 25 June 2023.

D. Objective and territorial jurisdiction for the hearing of collective actions

Regarding jurisdiction, the Unipersonal Courts of First Instance (*Juzgados de Primera Instancia*) – or, if other amendments contemplated in the Draft are also approved, the Multi-Judge Courts of First Instance (*Tribunales de Primera Instancia*) – will have objective jurisdiction to hear collective actions, regardless of the subject matter of the action. In addition, the General Council of Judicial Power may designate one or more courts per province so that, due to their specialisation, they will have exclusive jurisdiction over those proceedings in which collective actions are brought.

In turn, territorial jurisdiction shall lie with the Court of First Instance of the defendant's domicile or, in the absence thereof, where the defendant has a place of business. In the event that the defendant does not have a domicile or establishment in Spanish territory, the court of the place where the infringing conduct has been carried out or has produced its effects, at the claimant's choice, will have jurisdiction. This is without prejudice to the application of European Union regulations or conventional rules on jurisdiction.

E. Multiple collective actions

Article 833 governs the joinder of actions and proceedings when multiple collective actions are brought.

On one hand, the joinder of actions for injunctive and redress measures into a single set of proceedings and involving a single claim is permitted, provided that they refer to the same infringing behaviour. However, at the time of certification, the court may order their successive and separate processing for reasons of complexity or delay of the proceedings. In such a case, the action for redress measures shall be suspended until the injunctive action is resolved.

On the other hand, if different qualified entities bring collective injunctive actions against the same infringer, they may be joined whenever possible and depending on whether the state of the proceedings so permits. In contrast, collective actions for redress measures may not, in principle, be joined. In such cases, the proceedings initiated subsequently will be discontinued immediately. Within the framework of the earlier proceedings, the competent court may decide to join the two proceedings, provided that a decision on the certification of the action has not yet been made in the earlier proceedings and if this is in the interests of the proper administration of justice. However, if a final order for certification – either granting or refusing certification – has already been made in the earlier proceedings, or if the court decides not to join the two proceedings, the subsequent proceedings shall be dismissed as soon as a final order for certification or refusing certification has been made in the earlier proceedings.

Without prejudice to the foregoing, if the older proceedings are dismissed for any other reason, the suspension of the proceedings initiated subsequently shall be lifted in order to continue with their processing. In particular, Article 850(3) of the LEC provides that, if the court finds that there is a conflict of interest in the funding by third parties, it shall dismiss the proceedings and may designate another qualified entity that has participated in the exercise of the same collective action.

In any case, if the joinder of proceedings is agreed, in principle, the qualified entities must contribute equally to the costs of the proceedings.

F. Publicity of collective actions through the Register of General Conditions of Contracting and of Collective Actions

To publicise collective actions, the current Register of General Conditions of Contracting will be renamed the “Register of General Conditions of Contracting and of Collective Actions”. The publication of all information necessary for the supervision of collective actions will be required, including, *inter alia*: (i) the claims in respect of which collective actions are brought; (ii) information on the consumers and users affected; (iii) the order certifying (or refusing to certify) the action; (iv) the form of access to the electronic platform through which consumers may withdraw from (or be bound by) the collective action and request compliance with and enforcement of the judgment or redress agreement; or (v) the final judgment that ends the proceedings or the agreement for redress measures and its approval.

G. The possibility of requesting the disclosure of evidence

The Draft establishes a mechanism to access sources of evidence held by the opposing party or third parties which is inspired – and, to a large extent, supported – by the regulation introduced in Article 283 *bis* of the LEC regarding actions for damages arising from infringements of competition law.

Thus, Article 838 of the LEC provides that a court may order the opposing party or a third party to disclose relevant evidence, either at the request of the claimant or the defendant. Such evidence may include that which is necessary to identify the consumers and users affected by the action. Such a request must contain a well-grounded statement of the facts or evidence to which the party has had reasonable access and which are sufficient to justify the viability of the collective action.

The disclosure of evidence shall be governed, in all cases, by the principle of proportionality and shall respect the confidential nature of the evidence disclosed. In matters not expressly regulated by Article 838 of the LEC, the provisions of the sections of Article 283 *bis* of the LEC to which reference is made shall apply.

3. Special features regarding the exercise of actions for injunctive relief

For the exercise of collective actions through which a defendant is required to cease their conduct, the Draft establishes some specific procedural mechanisms, which were already provided for in the text of the Preliminary Draft, and which are briefly summarised below. According to the provisions of the Explanatory Memorandum, these special mechanisms will also apply to the exercise of actions that are merely declaratory in nature.

- i)** The exercise of an action for injunctive relief does not require the consumers and users affected to express their wish to join it in order to benefit from an eventual judgment upholding the injunction.
- ii)** Collective actions for injunctions are only permissible if the qualified entity can prove that it has requested that the defendant cease the infringing conduct, out of court and at least one month before the filing of the claim. The request for cessation must contain a reliable record of its date, contents and receipt.
- iii)** The proceedings will be carried out through an oral hearing, with preferential processing and with certain special features, including, among others, the following: (i) the claim must identify the consumers affected (or, if this is not possible, the requirements that must be met); (ii) the deadline for replying to the claim will be one month; or (iii) in any event, the judgment will be open to challenge on appeal.
- iv)** Regarding interim injunctions, the provisional cessation of the infringement may be requested, provided that the infringing conduct is proven to be ongoing. Furthermore, depending on the economic importance

and social repercussions of the interests affected, the qualified entity may be exempted from the duty to provide security.

4. Special features regarding the exercise of actions for redress measures

A. The opt-out mechanism as the preferred system for the exercise of collective actions for redress measures

As already mentioned, the Draft maintains the opt-out mechanism as the default system applicable to collective actions for redress measures. Consequently, in the exercise of collective actions for redress measures, all consumers who are affected by the material scope of the collective action will be bound by the proceedings and by the result of the same, unless they expressly express their wish to withdraw.

Only in exceptional circumstances may the court order that the proceedings be governed by an opt-in mechanism, whereby consumers must expressly bind themselves to the collective action and the outcome of the proceedings. While the Preliminary Draft required for this purpose that the redress amount exceed 5,000 euros per beneficiary, the Draft has lowered this requirement to 3,000 euros of redress per beneficiary. Thus, whenever the claim exceeds the threshold of 3,000 euros per beneficiary, and insofar as it is necessary for the better administration of justice, the court may agree that only those consumers who expressly state their wish to join the collective action and the outcome of the proceedings shall be bound by it. In addition, and in any event, consumers affected by the collective action who have their habitual residence abroad must expressly express their wish to be bound by the proceedings and the outcome of the action (i.e., an opt-in system).

B. Special procedural features: special relevance of the certification phase of collective actions for redress measures

The special procedural features provided for in the Draft for the exercise of actions for redress measures are essentially the same as those proposed in the Preliminary Draft, although there has been a general extension of the procedural deadlines. The following are the most relevant features:

- i) Special features regarding the contents of the claim, which must state, among other matters: (a) the conduct, the harm suffered by consumers and users, and the causal link between the two; (b) the consumers and users affected by the collective action, in as much detail as possible; (c) the homogeneity of the action; or (d) the full statement of the sources of funding used to fund the collective action, including any possible sources of funding by third parties.
- ii) One of the most relevant new features, already introduced by the Preliminary Draft, is the inclusion of the certification phase of the collective action through the convening of a hearing. The purpose of this certification hearing will be to: (a) resolve procedural issues and corroborate the requirements to be met by the claimant as a qualified entity; (b) verify the homogeneity of the claims of the different consumers and users included in the action; (c) define the subject matter of the action and the group of consumers affected by the proceedings; (d) identify any issue that makes the action manifestly unfounded; and (e) have the court carry out a check of the qualified entity's sources of funding. Notably, the Draft has added that the court may request the claimant to provide the funding contract at a hearing fixed for this purpose.

Once the certification hearing has been completed, the court will issue an order, granting or refusing certification. In either of the two cases, an appeal may be lodged, which will be processed on a preferential basis. The order granting certification must be published in the Register of General Conditions of Contracting and of Collective Actions, and the claimant entity must set up an electronic

platform for the management of the proceedings and for consumers to show their desire to withdraw from (or be bound by) the action. The costs arising from these steps shall be borne by the claimant entity and shall be considered legal costs.

- iii) Once the certification order has been issued, if certification is refused, another collective action for redress that has the same object as the one that was refused will not be permitted, even if the claimant entity is different.

If the order grants certification of the action, the court must also fix, among other matters, a time limit within which the consumers affected by the collective action must express their wish to withdraw from (or be bound by) the action and, consequently, from the outcome of the proceedings.

- iv) The Draft provides for the possibility for the certification order to provide for the proceedings to be settled by successive rulings, if requested by all parties or ordered by the court for the proper administration of justice. In such a case, a judgment shall first be issued which deals exclusively with the defendant's liability for the infringing conduct by declaring or rejecting it. A judgment that rejects the existence of liability shall be subject to appeal, while a judgment that upholds it shall not be subject to direct appeal, without prejudice to the possibility of appealing its findings when appealing the judgment that determines the amounts to be paid. If the defendant is found liable, a further stage will be opened for the quantification of the amount to be paid to the consumers.
- v) Finally, regarding the steps to be taken after the certification order, the claimant will send the court a list of consumers who have expressed their wish to be or not to be affected by the certification order. This list of consumers shall be sent to the claimant, who shall have one month to file submissions. After hearing the defendant, where appropriate, the court shall make an order approving the list of individual consumers.

Once the order has been issued, the defendant shall have a period of two months to respond to the claim. Once the response to the claim has been admitted for processing, the parties will be granted a period of twenty days to submit written evidence. Furthermore, the parties may announce the documents or expert reports not submitted with the claim or defence whose usefulness and relevance have been ascertained at a later date.

C. Effects of the certification order on individual actions for redress measures and alternative dispute resolution proceedings in consumer disputes

One of the most problematic issues that the new mechanism for collective actions can cause in practice is the parallel processing of collective actions and individual actions with the same material scope. In this respect, Article 853 of the LEC provides for several alternative scenarios on how to combine collective and individual actions:

- i) Regarding those individual actions or individual proceedings for the alternative resolution of consumer disputes that were already being processed at the time the order certifying the collective action was issued, and which were included within the object of the collective action, the court hearing the individual action, *ex officio* or at the request of the defendant, shall order the stay of the proceedings and shall require the individual claimants to state, within 10 days, their wish to be bound by the collective action. If they do so, the court shall dismiss the individual proceedings. If the claimant refuses to be bound by the collective proceedings, or does not comply with the request, the individual proceedings shall continue, and the result of the collective proceedings shall not become *res judicata* against that individual.
- ii) If, within the period provided by the order for certification for consumers to express their wish to withdraw from the collective action under the terms of Article 848(5) of the LEC, one or more

consumers bring an action before the courts – or initiate proceedings for the alternative resolution of consumer disputes – in the exercise of an individual action for redress measures whose object is covered by the order for certification, this will be considered an expression of a wish not to be bound by the collective action and its outcome. However, the court or body hearing the individual action is authorised to inform the consumer of the existence of a collective action with the same object and to offer them the possibility of expressing their wish to be bound by it.

- iii) Finally, once the time limit for consumers to express their wish to opt out of the collective action and its outcome has elapsed, all individual actions for redress measures whose subject matter is covered by the certification order, or all alternative consumer dispute resolution proceedings, will not be permitted or will be dismissed.

Of course, the provisions of the above paragraph shall not apply to consumers who have expressed their wish to opt out of the collective action, or in cases where the collective actions are governed by an opt-in system, in which case subsequent individual actions for redress measures shall be permissible. In such cases, the limitation period for bringing such individual actions shall be resumed from the time when consumers express their wish to withdraw from the action or from the outcome of the proceedings.

D. Third-party funding of collective actions

The Draft permits the possibility that the collective action may be financed by external sources of funding, although it establishes criteria for assessing such third-party funding at the certification stage, in order to determine the possible existence of conflicts of interest. Specifically, a conflict of interest will be deemed to exist where the defendant is a competitor of the funder or a business or professional to whom the funder is dependent, or where the decisions of the claimant entity are influenced by the funder in a way that may harm the interests of consumers and users.

If the court considers that there is a conflict of interest, it shall require the claimant entity to waive or modify the funding within a period not exceeding one month. If the claimant entity does not comply with this request, the court shall dismiss the proceedings or exclude the qualified entity (in the event that there are other claimant entities). To this end, the court may require the claimant to provide the funding contract in order to verify the consequences that its terms would have on the consumers and users affected by the collective action. The contract will be examined at a hearing arranged for this purpose, with the participation of the funder.

The possible conflict of interest may be noted after the certification of the action, *ex officio* or at the request of a party. In such a case, the court shall decide on the matter after a preliminary ruling.

E. Redress agreements and their approval

The Draft provides for the possibility that, once the action has been certified, the qualified entity and the defendant employer may reach redress agreements. The agreement must contain the amounts to be paid to each beneficiary, if possible, or the maximum amount of compensation and the criteria for distributing it among the consumers who are affected.

In order to be binding, the agreement must be approved by the court, which may refuse approval if it considers the agreement to be detrimental to the rights of the consumers and users concerned. To facilitate an agreement being reached, the court may suspend the proceedings for a maximum period of three months. Once approved, the agreement will be binding on those consumers and users affected who have not expressed their wish to withdraw from the collective action after the issuance of the certification order. If the consumers affected are resident outside the national territory, they will only be bound by the agreement if they have expressed their wish to be bound by the collective action. After the approval, a

new collective action may not be brought concerning the same subject matter, even if the claimant is a different entity.

Notwithstanding the above, there is also the possibility of reaching a redress agreement before the certification of the action. In this case, the order for approval will establish the period within which the consumers affected must expressly state their wish not to be bound by it. In exceptional circumstances, the court may order that only those consumers who have stated their express wish in this regard will be affected by the agreement, under the same criteria and requirements as in the case of the certification order.

F. Judgment, determination and enforcement of the redress amount

One of the issues that will be most relevant in practice to ensure the effective functioning of the system of collective actions will be the distribution of the redress amount to be determined in the judgment.

Under Article 860 of the LEC, the judgment must specify the redress measures for each consumer identified as a beneficiary of the collective action and, where appropriate, the amount of compensation and the period of time within which the defendant will have to pay it to each consumer. If such identification is not possible, the court shall have the power to set a flat-rate amount of compensation, which may be subject to subsequent review if it is deemed insufficient. In such a case, the judgment will establish the deadline for the party ordered to pay the amount into the deposit and consignment account of the court, as well as the actions to be carried out by the beneficiaries in order to be recognised as such at the enforcement stage. The judgment must also make a ruling on costs.

The judgment may be challenged both on appeal and in cassation, and in both cases, the appeals will be dealt with on a preferential basis.

Once the judgment ordering the payment of sums of money in favour of consumers has become final, Articles 873 *et seq.* of the LEC establish the procedure for the enforcement, whether voluntary or compulsory, of the judgment on the part of the party ordered to pay.

In the event that the consumers are identified in the judgment, the defendant must request the necessary information from the consumer beneficiaries in order to make the payment. If it is not possible to make the payment directly to the beneficiaries for reasons not attributable to the person ordered to pay, the remaining amount may be deposited in the deposit and consignment account of the court. If the person ordered to pay is unable to do so voluntarily, the beneficiary may claim payment using a standard form, without the need for a lawyer or court representative, or through the qualified claimant entity.

In the event that the judgment does not identify the consumer beneficiaries, the defendant must pay the amount of the award under the judgment into the court's deposit and consignment account. If the defendant does not comply voluntarily, the court shall order enforcement *ex officio*.

Once the redress amount has been deposited, the amounts shall be paid to the beneficiaries of the judgment. In order to distribute the amount of the award among the beneficiaries, the Draft provides for the appointment of a liquidator, a professional with experience in accounting. This differs from what was initially established in the Preliminary Draft, which contemplated the designation of the qualified claimant entity as a liquidator. The aim is to have an independent third party to settle the amounts. In the order designating the liquidator, the court will place the money at the liquidator's disposal, establish the period within which the distribution transactions must be carried out, and the liquidator will be given access to the electronic platform established in the certification order, through which consumers will be able to request payment, without the need to use a lawyer or court representative. Article 878(2) of the LEC also provides that, when distributing the amounts, the liquidator must reserve the part that, where appropriate, corresponds to the third-party funder of the proceedings.

The liquidator may apply to the court for an increase in the redress amount if it is insufficient to compensate all the beneficiaries. Any discrepancies regarding the distribution of the funds shall be resolved by the court of first instance which heard the collective proceedings. Once the liquidation has been completed, the liquidator must submit a report to the court concerning the beneficiaries and the payments made.

Finally, and notably, Article 881 of the LEC provides that any undistributed funds resulting from the liquidation, if any, will be returned to the party ordered to pay, will be returned to the party ordered to pay. Accordingly, no *cy-près* solutions are envisaged in the Spanish system, as is the case in other countries, which provide for the surplus to go to third parties (usually charities or non-profit organisations).

5. Entry into force and transitional system

If these amendments are approved with their current contents after their parliamentary processing, the Draft provides for their entry into force 3 months after their publication in the Official State Gazette, with the exception of the amendments to the TRLGDCU, which will enter into force 20 days after their publication in the Official State Gazette.

Without prejudice to the foregoing, the Draft also establishes a transitional regime whereby these amendments will only be applicable to proceedings initiated after their entry into force. Thus, the processing of proceedings for the protection of the collective and diffuse rights and interests of consumers and users that were pending on the date of entry into force of this law will continue to be conducted in accordance with the previous procedural legislation, which will also apply to the possible compulsory enforcement of the resulting judgments.

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