

30 May 2025

Talos Investments Limited
16-113, 16th floor Wework at Hub71
Al Khatem Tower
Abu Dhabi Global Market Square
Al Maryah Island
Abu Dhabi
United Arab Emirates

Attention:

[REDACTED]

[REDACTED]

Sent by e-mail:

[REDACTED]

Dear Sirs

PENALTY IMPOSED FOR CONTRAVENTIONS OF THE COMMON REPORTING STANDARD REGULATIONS 2017

1. This notice is issued by the FSRA of the ADGM to Talos Investments Limited (“TIL”) pursuant to subsection 9(1) of the Regulations.

DEFINED TERMS

2. The meaning of any defined term used in this notice is provided either at its first occurrence in parentheses or in Annexure A.

SUMMARY

3. The FSRA considers that TIL has classified itself as an RFI for the purposes of the Regulations.
4. The FSRA considers that TIL has failed to submit:
 - a. its Risk Assessment by the Filing Deadline, in contravention of subsection 6(1) of the Regulations; and
 - b. the required Annual Return for RY2023 by the Filing Deadline, in contravention of subsection 6(1) of the Regulations,

and accordingly, subsection 9(1)(b) of the Regulations applies.

FINANCIAL SERVICES REGULATORY AUTHORITY
سلطة تنظيم الخدمات المالية

ADGM Building, ADGM Square, Al Maryah Island, PO Box 111999, Abu Dhabi, UAE
مبنى أبوظبي العالمي، مربعة أبوظبي العالمي، جزيرة الماريه، ص ب 111999، الإمارات العربية المتحدة

T +971 2 333 8888 adgm.com

Confidential

5. The FSRA has decided to impose a penalty of AED 50,000 on TIL pursuant to subsection 9(1) of the Regulations and the penalties set out in the Cabinet Resolution.

BACKGROUND

6. On 12 July 2023, TIL registered as an RFI on the AEOI Portal.
7. On 13 May 2024, the FSRA emailed TIL to inform it that the AEOI Portal was open for RFIs. TIL was requested to register or review its information on the AEOI Portal and amend it if necessary. The email stated that the next stage of the reporting cycle after registration would be filing Annual Returns and Risk Assessments.
8. On 31 May 2024, the FSRA emailed TIL, attaching FCCP Notice No. 44 concerning opening the AEOI Portal to submit Annual Returns and Risk Assessments. The notice advised that the AEOI Portal was open for filing Annual Returns and Risk Assessments, subject to registration having been completed and authorised (where applicable). It reminded RFIs of the Registration and Filing Deadlines.
9. On 10 June 2024, the FSRA emailed TIL reminding it of the Registration and Filing Deadlines. The email clarified that failure to complete registration (where necessary) by the Registration Deadline could impact an RFI's ability to file by the Filing Deadline. The email advised that failure to file Annual Returns and Risk Assessments by the Filing Deadline would result in penalties being applied.
10. On 25 June 2024, the FSRA sent an email to TIL reminding it that, if not yet completed, it needed to have its registration authorised by the FSRA and then file any required Annual Returns or Risk Assessments by the Filing Deadline to avoid penalties applying.
11. On 27 June 2024, the FSRA sent an email reminder to TIL of the Filing Deadline for Annual Returns and Risk Assessments. The email advised that failure to file on time would result in penalties being applied.
12. On 9 July 2024, the FSRA emailed TIL to inform it that it had not met its reporting obligations pursuant to the Regulations for RY2023. The FSRA informed TIL that this non-compliance would result in the application of penalties and urged it to fulfil its compliance obligations without delay.
13. To date, TIL has failed to submit:
 - a. its Risk Assessment; and
 - b. its Annual Return,

and accordingly, the FSRA considers TIL to have contravened subsection 6(1) of the Regulations.

PENALTY

14. The FSRA considers that TIL contravened subsection 6(1) of the Regulations by failing to comply with Article 4(3) and 4(7) of the Cabinet Resolution, and accordingly subsection 9(1) of the Regulations applies.
15. The penalties for the relevant contraventions are set out in Articles 5(3)(b) and 5(6) of the Cabinet Resolution.
16. The total penalty imposed by the FSRA on TIL is AED 50,000.
17. The breakdown of the penalty imposed by the FSRA on TIL pursuant to the Regulations is as follows:

Reference	Contravention	Penalty (AED)
Article 5(3)(b) of the Cabinet Resolution	An RFI fails to submit a Nil Return in accordance with the timeframe stipulated.	10,000
	An RFI continues not to rectify the failure.	+ 30,000 (1,000 per day up to a maximum of 30,000)
Article 5(6)(a) of the Cabinet Resolution	An RFI fails to comply with any other provision(s) of the CRS Cabinet Resolution	10,000

PROCEDURAL MATTERS

Appeal in relation to the penalty imposed

18. Under Article 7(1) of the Cabinet Resolution, which applies pursuant to subsection 9(2) of the Regulations, TIL has until **5:00 pm** on **30 June 2025** to **appeal in writing** to the FSRA, signed by an authorised representative of TIL setting out the grounds of appeal in relation to the penalty imposed.
19. In accordance with Article 7(2) of the Cabinet Resolution, TIL may appeal against any penalty on one of the following grounds:
 - a. that it did not commit the violation attributed to it;
 - b. the administrative penalty imposed is not proportionate to the violation; or
 - c. the administrative penalty imposed exceeds the limit determined for the administrative violation attributed to it in accordance with the provisions of the Cabinet Resolution.
20. Any appeal made should be addressed to:

Mr Adrian Bock
 Executive Director – Enforcement
 Financial Services Regulatory Authority
 Abu Dhabi Global Market Square
 Al Maryah Island
 Abu Dhabi
 United Arab Emirates

Email: [REDACTED]

21. If an appeal is made to the FSRA within time, the FSRA will consider the appeal and provide a written notice of its decision to TIL within sixty (60) business days of the acknowledgement of the appeal.

Manner and time for payment of penalty

22. If an appeal is not made to the FSRA, then the penalty imposed pursuant to this notice is to be paid by TIL within thirty (30) business days after the date of this notice, i.e. on or before **14 July 2025**.
23. Payment of the penalty can be made by electronic funds transfer into the following account:

Account Name	[REDACTED]
Account Number	[REDACTED]
IBAN Number	[REDACTED]
Account Type	[REDACTED]
Bank Name	[REDACTED]
Swift Code	[REDACTED]
Reference	[REDACTED]

24. If the penalty or any part of it remains outstanding on the date it must be paid, the obligation to make the payment is enforceable as a debt by the FSRA.

Publicity

25. The FSRA will generally publish information and statements relating to enforcement action in a manner we consider appropriate and proportionate. The publication of enforcement

outcomes is consistent with the FSRA's commitment to open and transparent processes and our objectives.

Yours sincerely,



Mr. Adrian Bock
Executive Director – Enforcement
Abu Dhabi Global Market Financial Services Regulatory Authority

ANNEXURE A

In this notice, unless the context otherwise requires -

ADGM	means Abu Dhabi Global Market.
AEOI portal	means the Automatic Exchange of Information portal made available by the MOF.
Annual Return	means the annual information return required to be filed pursuant to the Regulations and includes a Nil Return.
Cabinet Resolution	means the UAE's Cabinet of Ministers Resolution No. 93 of 2021 Implementing Certain Provisions of the Multilateral Administrative Agreement for Automatic Exchange of Information.
Filing Deadline	means the deadline for filing Annual Returns and Risk Assessments in the AEOI Portal, being 30 June 2024.
FSRA	means the Financial Services Regulatory Authority.
MOF	means the Ministry of Finance.
Nil Return	has the meaning set out in the Cabinet Resolution.
Regulations	means the Common Reporting Standard Regulations 2017.
RFI	means a Reporting Financial Institution, as defined in the Regulations.
Registration Deadline	means the deadline for an RFI to register in the AEOI Portal, being 14 June 2024.
Risk Assessment	means the risk assessment required to be filed by the MOF and requested by the FSRA in connection with its administration of the Regulations.
RY2023	means the 2023 reporting year for the purposes of compliance with the Regulations.