

Payments, E-Money and Crypto-Assets Quarterly Legal and Regulatory Update

1 July 2024 - 30 September 2024



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1 PAYMENTS

1.1 EBA updates to the Single Rulebook Q&A on PSD2

During the quarter, the European Banking Authority (**EBA**) updated its Single Rulebook Questions and Answers (**Q&A**) publication on Directive 2015/2366/EU (the **Revised Payment Services Directive or PSD2**) (the **Single Rulebook Q&A**).

The Q&As have been updated in respect of the following:

- Article 97 – Authentication.

The updated Single Rulebook Q&A document can be accessed [here](#).

1.2 EBA consults on draft ITS for uniform reporting templates under the revised SEPA Regulation

On 31 July 2024, the EBA published a consultation paper on its draft implementing technical standards (**ITS**) for uniform reporting templates in relation to the level of charges for credit transfers and share of rejected transactions under Regulation (EU) 260/2012 (the **Single Euro Payments Area or SEPA Regulation**), as amended by Regulation (EU) 2024/886 (the **Instant Payment Regulation**). The templates aim to standardise reporting from payment service providers (**PSPs**) to competent authorities. As a result, the European Commission will be able to monitor the effects of changes to the SEPA Regulation on the fees paid by customers of PSPs for payment accounts, as well as instant and non-instant credit transfers.

Accompanied with the draft ITS is a preparatory statement addressed to the PSPs, in which the EBA stresses that PSPs are expected to record and store information on the level of charges or credit transfers and payment accounts, and numbers of rejected transactions. PSPs must report this information to their competent authorities to comply with reporting requirements under the revised SEPA Regulation. The first reporting deadline is 9 April 2025.

The consultation runs until 31 October 2024 and comments can be submitted until that date.

The consultation paper can be accessed [here](#).

The preparatory statement can be accessed [here](#).

The press release can be accessed [here](#).

1.3 EBA and ECB publish joint report on payment fraud

On 1 August 2024, the EBA and the European Central Bank (**ECB**) published a joint report on payment fraud data. The report assesses payment data reported to the EBA and the ECB covering the period H1 2022, H2 2022 and H1 2023 and is used to evaluate the level of fraud reported by the industry across the European Economic Area (**EEA**) during the period.

The report confirms the beneficial impact of second customer authentication (**SCA**) on fraud levels, with SCA-authenticated transactions showing lower fraud rates than non-SCA transactions, in particular for card payments. The report also assesses the fraud levels on different types of payment instruments, with card payments having the highest fraud rates.

The joint report can be accessed [here](#).

The EBA's press release on the report can be accessed [here](#).

2 DIGITAL FINANCE & CRYPTO-ASSETS

2.1 EBA final report on Travel Rule Guidelines under WCTR

On 4 July 2024, the EBA published a final report on guidelines (**Travel Rule Guidelines**) on information requirements in relation to transfers of funds and certain crypto-assets transfers under Regulation (EU) 2023/1113 (the **Wire and Crypto-asset Transfer Regulation** or **WCTR**). The WCTR recast Regulation (EU) 2015/847, the previous funds transfer Regulation, extending its scope to the transfer of certain crypto-assets.

The Travel Rule Guidelines replace existing guidelines under the previous funds transfer Regulation on the measures payment service providers (**PSPs**) should take to detect missing or incomplete information on the payer or the payee, and the procedures they should put in place to manage a transfer of funds lacking the required information.

The Travel Rule Guidelines specify what information should accompany a transfer of funds or crypto-assets. They also list the steps that PSPs, intermediary PSPs, crypto-asset service providers (**CASPs**) and intermediary CASPs should take to detect missing or incomplete information, and what they should do if a transfer of funds or a transfer of crypto-assets lacks the required information.

The Travel Rule Guidelines will apply from 30 December 2024 and reflect the requirements of the WCTR, also taking effect on that date.

The final report containing the Travel Rule Guidelines can be found [here](#).

The press release can be found [here](#).

2.2 ESMA final report on second set of technical standards under MiCA

On 4 July 2024, the European Securities and Markets Authority (**ESMA**) published a final report on its second set of draft technical standards under the Regulation (EU) 2023/1114 (**Markets in Crypto Markets Regulation** or **MiCA**). The final report explains how ESMA incorporates stakeholder feedback from its consultation on the second package, which was launched in October 2023.

The package includes six regulatory technical standards (**RTS**) and two implementing technical standards (**ITS**) as follows:

- RTS specifying the content, methodologies and presentation of information in respect of sustainability indicators in relation to adverse impacts on the climate and other environment-related adverse impacts;
- RTS on continuity and regularity in the performance of crypto-asset services;
- RTS specifying the manners in which transparency data for crypto-asset service providers operating a trading platform for crypto-assets is to be presented;
- RTS specifying records to be kept of all crypto-asset services, activities, orders and transactions undertaken;
- RTS specifying the content and format of order book records for crypto-asset service providers operating a trading platform for crypto-assets;
- ITS setting out forms, formats and templates for the crypto-asset white papers;
- RTS specifying the data necessary for the classification of crypto-asset white papers and the practical arrangements to ensure that such data is machine-readable;
- ITS setting out the technical means for appropriate public disclosure of inside information and for delaying the public disclosure of inside information.

The draft technical standards will be submitted to the European Commission for adoption.

The final report can be found [here](#).

2.3 EBA statement and supervisory priorities for issuers of ARTs and EMTs

On 5 July 2024, the EBA published a document setting out its supervisory priorities for issuers of e-money tokens (**EMTs**) and asset-referenced tokens (**ARTs**) for 2024/2025. The MiCA Regulation has applied to issuers of EMTs and ARTs since 30 June 2024. The EBA's main priorities relate to:

- **Internal governance and risk management:** This needs to be robust and effectively help entities achieve their objectives and identify, assess, manage and mitigate against risks.
- **Financial resilience:** Key elements to ensure financial resilience are the provision of sufficient capitalisation and the appropriate composition and management of asset reserves. These elements are also required to address the liquidity risks associated with the permanent rights of redemption of the holders.
- **Technology risk management:** It is important that information, communication and technology risks relating to distributed ledger technology must be controlled and not become detrimental to holders.
- **Financial crime risk management:** Money laundering and terrorist financing risks and sanctions evasion are examples of financial crime which pose a major concern in relation to crypto markets.

The EBA explains that supervision of ART and EMT issuance is expected to be risk-based, with supervisory activities focusing on the most relevant and impactful risks and considering the specific risks of the entities, as well as the risks to the holders. The EBA will conduct a regular risk assessment integrating market developments, supervisory experience and regulatory changes. This will form the basis for an annual review of its supervisory priorities.

The EBA has also published a statement which clarifies its expectations that issuers and offerors of EMTs and ARTs are to comply promptly with MiCA. The statement also reminds consumers of the risks of crypto-assets.

The priorities document can be accessed [here](#).

The EBA statement can be accessed [here](#).

The related EBA press release can be accessed [here](#).

2.4 ESAs consult on guidelines on explanations, opinions and standardised test for classifying crypto-assets under MiCA

On 12 July 2024, the European Supervisory Authorities (EBA, EIOPA and ESMA) (**ESAs**) published a consultation paper containing draft guidelines on explanations and opinions, and the standardised test for crypto-assets, under Article 97(1) of the MiCA Regulation. Section 4 of the consultation paper sets out draft guidelines which aim to assist both competent authorities and market participants in adopting a common approach to the classification of crypto-assets.

These draft guidelines propose a standardised test, along with templates for explanations and legal opinions describing the regulatory classification of crypto-assets:

- *For other crypto-assets (i.e. that are not ARTs or EMTs under MiCA):* The white paper must be accompanied by an explanation of the crypto-asset's classification. For instance, it must state that it is not an EMT, ART or crypto-asset outside the scope of MiCA.
- *For ARTs:* Issuers of ARTs must present a legal opinion clarifying the classification of the crypto-asset. For instance, it must state that it is not an EMT or a crypto-asset that could fall outside the scope of MiCA.

The consultation period ran until 12 October 2024.

The consultation paper can be accessed [here](#).

2.5 EBA consultation paper on guidelines on reporting of data to assist authorities in their supervisory duties and significance assessment under MiCA

On 15 July 2024, the EBA published a consultation paper on draft guidelines on templates to assist competent authorities in performing their supervisory duties regarding issuers' compliance under Titles III and IV of the MiCA Regulation. The Guidelines aim to ensure that competent authorities have sufficient comparable information to be able to supervise the compliance of issuers of ARTs, EMTs and other types of crypto-assets under MiCA.

Section 4 of the consultation paper sets out the draft guidelines which specify templates which issuers of ARTs and EMTs should use to provide requested necessary information to their competent authorities and to the EBA. The templates comprise information on the number of holders, market capitalisation and composition of the reserve of assets, transactions per day, own funds, liquidity, and entities involved in the custody, operation or distribution of the tokens. The templates with common reference and remittance dates and common thresholds will allow competent authorities to monitor compliance by issuers of ARTs and EMTs with critical MiCA requirements and provide the EBA with the information necessary to conduct the significance assessment.

The deadline for the submission of comments on the consultation paper was 15 October 2024.

The consultation paper can be accessed [here](#).

The press release can be accessed [here](#).

2.6 ESMA opinion on risks presented by global crypto firms seeking limited authorisation under MiCA

On 31 July 2024, ESMA published an opinion to support the convergent application of MiCA addressing the risks presented by global crypto firms seeking authorisation as CASP trading venues under the MiCA Regulation. ESMA notes that the particular importance of Multifunction Crypto-asset Intermediaries (MCIs), i.e. those firms (or groups of affiliated firms) offering a large variety of services, products and functions, at the level of an individual entity or group of affiliated entities, typically centred around the operation of a trading platform.

ESMA provides clarification on the risk of regulatory and supervisory arbitrage. This may arise from MCIs that structure their business in a way that enables them to only seek authorisation under MiCA for brokerage services, but where a large part of their group activities (in particular the operation of a trading platform for cryptoassets) falls outside the scope of MiCA. Such firms are an essential point of attention for ESMA considering the impact they have on the functioning of crypto-asset markets and all such firms must be held to the standards for operating a trading platform under MiCA to ensure investor protection, market integrity and financial stability.

In the opinion, ESMA sets out general considerations related to outsourcing/delegation to third countries and effective oversight and supervisory activities, as well as requirements for the authorisation of firms in the EU and the narrow scope of the reverse solicitation under MiCA. It also outlines specific requirements that should be met relating to best execution, conflicts of interest, the obligation to act honestly, fairly and professionally in the best interests of clients and the obligation relating to the custody and administration of crypto-assets on behalf of clients.

The opinion can be found [here](#).

The press release can be found [here](#).

2.7 European Commission adopts Delegated Regulation on complaints handling for issuers of ARTs under MiCA

On 30 September 2024, the European Commission adopted a Commission Delegated Regulation containing RTS specifying the requirements, templates and procedures for the handling of complaints relating to ARTs under Article 31(5) of MiCA.

The Delegated Regulation sets out effective and transparent procedures for the prompt, fair and consistent handling of complaints by holders of ARTs. Among other things, it covers the definitions of complaints and complainants, the requirements

related to the complaints management policy and function, and the provision of information to holders of ARTs and other interested parties. A template for the filing of complaints is contained in the Annex to the Delegated Regulation.

In accordance with Article 290(2) of the Treaty of the Functioning of the EU, the Delegated Regulation will be published in the Official Journal of the EU and enter into force if the European Parliament or the Council of the EU do not object to it. The scrutiny period generally lasts about two months.

The Delegated Regulation and Annex can be downloaded [here](#).

3 CENTRAL BANK OF IRELAND

3.1 Central Bank - Impact of the MiCA Regulation on VASPs

On 2 May, the Central Bank of Ireland (**CBI**) updated its webpage on the impact of the MiCA Regulation on Virtual Asset Service Provider (**VASP**) registrations in Ireland.

MiCA will apply to CASPs from 30 December 2024. However, a firm registered and operating as a VASP prior to 30 December 2024 will be permitted, post 30 December 2024, to avail of a transitional period enabling them to continue to operate for up to 12 months or until their CASP authorisation is granted or refused.

The CBI has clarified that, in their experience, an assessment of a VASP registration application takes a minimum of ten months to conclude and a VASP registration does not lead to a simplified CASP assessment under the MiCA Regulation. The CBI stresses that firms should focus on the preparation of a CASP application rather than seeking a VASP registration.

The CBI has also provided clarifications about the commencement of MiCA and clarified that an applicant firm, which is not registered and operating as a VASP prior to 30 December 2024, will not be able to avail of the MiCA transition period and will not be permitted to operate as a CASP until authorisation under MiCA has been granted under the CASP process.

The CBI webpage on the impact of the MiCA Regulation on VASPs can be accessed [here](#).

3.2 Central Bank - Updates on MiCA authorisation process and FAQs

The CBI has further updated its MiCA webpage with information on the authorisation process for CASPs and Issuers of ARTs and EMTs.

The webpage provides an overview of the authorisation process for CASPs, setting out the following stages:

- *Pre-application stage*: this includes an initial engagement stage with the CBI and the submission of a Key Facts Document (**KFD**);
- *Submission stage*: the applicant will submit their formal application which is reviewed for completeness by the CBI. Where a complete application is received, the assessment timeframe set out under MiCA will commence.

The CBI webpage also includes a link to its frequently asked questions (**FAQs**) on the Regulation, which notably outline that firms must refrain from providing crypto-asset services in relation to non-compliant EMTs and ARTs from 30 June 2024.

The CBI webpage on the MiCA Regulation can be accessed [here](#).

The MiCA FAQs can be accessed [here](#).

4 ANTI-MONEY LAUNDERING (AML) AND COUNTERING THE FINANCING OF TERRORISM (CFT)

4.1 Targeted Update on Implementation of the FATF Standards on Virtual Assets and VASPs

On 9 July 2024, the Financial Action Task Force (**FATF**) published a report providing the fifth update on jurisdictions' compliance with its Recommendation 15 and its Interpretative Note (R.15/INR.15). Recommendation 15 was updated in 2019 to apply anti-money laundering and counter-terrorist financing (**AML/CFT**) measures to virtual assets and VASPs.

The report finds that global implementation is still lagging with regard to the implementation of AML/CFT regulation. Based on 130 FATF mutual evaluation and follow-up reports since the adoption of the revised R.15/INR.15 in 2019, 75% of jurisdictions are only partially compliant, or not compliant at all, with FATF's requirements. This figure is identical to that of April 2023.

A majority of countries with materially important virtual asset sectors have the necessary core measures in place. However, there is much work to be done to complete the global system of AML/CFT regulation for the virtual asset sector. FATF states that it will continue to prioritise closing the gaps.

A copy of the report can be accessed [here](#).

A summary of the Report's findings can be accessed [here](#).

5 DATA PROTECTION

5.1 EU-US Data Privacy Framework-FAQ Document for European Individuals

On 16 July 2024, the European Data Protection Board (**EDPB**) adopted a FAQ document for European individuals relating to the EU-US Data Privacy Framework (**EU-US DPF**) in place since July 2023. The EU-US DPF applies to any type of personal data transferred from the EEA to the US, including data processed for commercial or health purposes, and human resources data collected in the context of an employment relationship.

The FAQ document outlines how EU individuals benefit from the DPF. This includes the right to be informed of such a transfer and its purpose, the right to access personal data and the right to correct or delete any incorrect or unlawfully handled data. A Data Privacy Framework List is provided on the US Department of Commerce website to check whether a US company has a valid certification under the EU-US DPF.

In cases where an individual believes that their rights under the EU-US DPF have been violated, or where a company in the US has violated its rights, the FAQs provide information about how to lodge a complaint with a national data protection authority.

The Data Privacy Framework List can be found [here](#).

The EU-US Data Privacy Framework Principles, issued by the US Department of Commerce, can be found [here](#).

The EDPB FAQ document can be found [here](#).

5.2 European Commission launches call for evidence on first review of EU-US Data Privacy Framework

On 9 August 2024, the European Commission launched a call for evidence seeking the views of stakeholders on any relevant aspect of the functioning of the EU-US DPF. Having launched in July 2023 with the aim of ensuring safe and trusted EU-US data flows, the EU-US DPF implemented the following changes:

- Introduction of new binding safeguards to address concerns raised by the European Court of Justice

- Limitation of access to EU data by US intelligence services to what is necessary and proportionate
- Establishment of a Data Protection Review Court (**DPRC**) for EU individuals.

Under Article 45(4)¹ of the GDPR the European Commission must produce a report assessing the effectiveness of the EU-US DPF one year after it has entered into force. This report is then submitted to the European Parliament and Council of the EU and made publicly available.

The call for evidence monitors the continued provision of adequate protection for the personal data of EU individuals transferred to the US.

The feedback window closed on 6 September 2024.

The call for evidence is available [here](#).

6 MISCELLANEOUS

6.1 ESAs announce implementation of new EU systemic cyber incident co-ordination framework

On 17 July 2024, the ESAs announced plans to establish a framework to strengthen co-ordination in response to systemic cyber incidents, referred to as the EU systemic cyber incident co-ordination framework (**EU-SCICF**). This follows on from a recommendation from the European Systemic Risk Board (**ESRB**) in January 2022 that the ESAs should expand upon their role in DORA and develop the EU-SCICF on a gradual basis.

The new framework aims to facilitate an effective financial sector response to cyber incidents which pose a risk to financial stability.

Participating members will be alerted and will share information on potential systemic cyber incidents or threats. The EU-SCICF will serve as a forum for relevant authorities to communicate and co-ordinate on any necessary action and on the tools required to counter the crisis from a macroprudential perspective.

Over the coming months, the ESAs will establish the following entities to implement the framework:

- **The EU-SCICF Secretariat:** supporting the functioning of the framework.
- **The EU-SCICF Forum:** working on testing and maturing the functioning of the framework.
- **The EU-SCICF Crisis Co-ordination:** facilitating the co-ordination of actions by the participating authorities when a crisis arises.

The ESAs will report any legal or operational hurdles encountered in the initial set up to the European Commission. Further development of the framework will depend on the findings in that report, other measures taken by the Commission and the availability of resources.

The ESA press release can be found [here](#).

A factsheet providing an overview of the EU-SCICF can be found [here](#).

6.2 Senior Executive Accountability Regime (SEAR) - Systems “How To” Guide

On 1 July 2024, the CBI published the “Senior Executive Accountability Regime (**SEAR**) Systems “How To” Guide”. The Guide aims to support regulated financial service providers (**RFSPs**) subject to the SEAR Regulations when submitting

¹ (EU) 2016/679

Statement of Responsibilities and Management Responsibilities Maps through the CBI portal or the European Central Bank (ECB) Information Management System (**IMAS**) Portal.

The Guide can be found [here](#).

6.3 Joint Committee of ESAs final report on draft RTS on sub-contracting ICT services supporting functions under DORA

On 26 July 2024, the Joint Committee of the ESAs published its final report on draft RTS to specify the elements a financial entity needs to determine and assess when sub-contracting ICT services supporting critical or important functions, as mandated by Article 30(5) of DORA.

The RTS addresses requirements for when the use of sub-contracted ICT services supporting critical or important functions (or material parts of such functions) by ICT third-party service providers is permitted by financial entities. The revised RTS helpfully clarifies that financial entities are expected to focus on subcontractors that “*effectively underpin*” the ICT service supporting critical or important functions.

The consultation paper can be found [here](#).

The EBA press release can be found [here](#).

The final report can be found [here](#).

6.4 CSRD is transposed into Irish law

The Corporate Sustainability Reporting Directive (EU) 2022/2464 (**CSRD**) requires all in-scope EU large companies, all EU listed companies (except listed micro-enterprises) and certain subsidiaries/branches of non-EU companies to disclose information in their annual financial statements on the impact of their activities on people and the environment and the risks and opportunities arising from environmental and social issues.

This sustainability information must be reported from a “double materiality” basis so that investors are provided with adequate information to understand: (i) the impact that the company has on sustainability matters and (ii) how sustainability matters affect the company’s development, performance and position. It must also be prepared in accordance with specific sustainability reporting standards published by EFRAG (**ESRS**), and where applicable, be produced in machine-readable format. The sustainability information reported by in-scope companies is subject to an assurance requirement and must be published together with the related assurance report.

The CSRD’s extensive reporting obligations are introduced on a phased basis with the first group of companies being required to apply the requirements for the 2024 financial year, for financial statements published in 2025². All other large companies with greater than 250 employees must comply for the first time in respect of the financial year 1 January 2025 (reporting in the annual financial statements published in 2026) and listed SMES must comply for the first time in respect of the financial year 1 January 2026 (reporting in the annual financial statements published in 2027) with an opt-out possible until 2028.

Companies falling within the scope of the CSRD are also required to report taxonomy-related information in accordance with Article 8 of the Taxonomy Regulation in their sustainability statements.

On 9 July 2024, the CSRD was transposed into Irish law via the European Union (Corporate Sustainability Reporting) Regulations 2024 which were published on 9 July 2024 (**Irish CSRD Regulations**) and which amend the Companies Act 2014 and the Irish Transparency Regulations of 2007.

On 4 October 2024, the European Union (Corporate Sustainability Reporting) (No.2) Regulations 2024 were published (**Irish CSRD Amending Regulations**), making a number of technical clarifications to the Irish CSRD Regulations.

A copy of the Irish CSRD Regulations is available [here](#).

² These comprise of large undertakings which are public-interest entities exceeding on their balance sheet dates the average number of 500 employees during the financial year.

A copy of the Irish CSRD Amending Regulations is available [here](#).

6.5 ESAs publish second batch of policy materials under DORA

On 17 July 2024, the Joint Committee of the ESAs published their second batch of policy materials under DORA within the so-called “level 2” rules. Most of the first batch of policy materials within the level 2 rules had been finalised in January 2024. The second batch consists of the following:

- Final report on draft RTS and implementing technical standards (**ITS**) on the content, format, templates and timelines for reporting major information and communication technology (**ICT**) related incidents and significant cyber threats under Article 20 of DORA. Link can be found [here](#).
- Final report on draft RTS on the harmonisation of conditions enabling the conduct of the oversight activities under Article 41(1)(c) of DORA. These RTS relate to the criteria for determining the composition of the joint examination team (**JET**). Link can be found [here](#).
- Final report on draft RTS specifying elements related to threat-led penetration tests (**TLPT**) under Article 26(11) of DORA. Link can be found [here](#).
- Final report on joint guidelines on the estimation of aggregated annual costs and losses caused by major ICT-related incidents under Article 11(11) of DORA. Link can be found [here](#).
- Final report on joint guidelines on the oversight co-operation and information exchange between the ESAs and the competent authorities under Article 32(7) of DORA. Link can be found [here](#).

The guidelines have been adopted by the Boards of Supervisors of the three ESAs (EBA, EIOPA and ESMA) and the final draft technical standards have been submitted to the European Commission for adoption. The expected date of application of the technical standards and guidelines is 17 January 2025.

The press release relating to the publication can be found [here](#).

6.6 Companies Act (Corporate Governance, Enforcement and Regulatory Provisions) Bill

On 24 July 2024, the Companies (Corporate Governance, Enforcement and Regulatory Provisions) Bill was published by the Department of Enterprise, Trade and Employment with its stated policy objective being to enhance and amend the legislative framework provided by the Companies Act 2014 (**Companies Act**) in the areas of governance, administration, insolvency, enforcement, and supervision (**Bill**).

The following may be of particular interest to firms:

- the provisions giving companies the option to hold general meetings either partially or wholly by the use of electronic communications where this is not expressly prohibited under the company’s constitutive rules and subject to certain specific requirements set down in the Bill, including allowing shareholders to participate in the meeting via electronic means; and
- providing for flexibility in the execution of documents containing the company seal so that a company seal and the necessary signatures can be on separate documents which can then be counted as one single document for the purposes of the Companies Act.

The Bill is currently being considered by Dáil Éireann and will then move to Seanad Éireann for its consideration and is expected to be enacted shortly.

This Bill was published by the Department of Enterprise, Trade and Employment on 24 July 2024 together with an Explanatory Memorandum, and is expected to progress swiftly.

A copy of the Bill as initiated in Dáil Éireann is accessible [here](#).

A copy of the Explanatory Memorandum of the Bill is accessible [here](#).

Key contacts

If you have any questions in relation to the content of this update, to request copies of our most recent newsletters, briefings or articles, or if you wish to be included on our mailing list going forward, please contact any of the team members below or your usual contact in Dillon Eustace.

Keith Waine

Partner | Dublin

E keith.waine@dilloneustace.ie

T +353 1 673 1822

Karen Jennings

Of Counsel | Dublin

E karen.jennings@dilloneustace.ie

T +353 1 673 1810

Caoimhe Costello

Solicitor | Dublin

E caoimhe.costello@dilloneustace.ie

T +353 1 673 1856

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