



EthiFinance Ratings SL
Calle Velázquez 18, 3º D
28001, Madrid
Spain

To European Securities and Markets Authority
Submitted via website

March 18th, 2025

Ref: Consultation on the Guidelines on Internal Controls for Benchmark Administrators, Credit Rating Agencies and Market Transparency Infrastructures (ESMA80-1286971524-661)

Dear ESMA,

With reference to the above consultation paper dated December 19th, 2024, we are pleased to hereby submit the views of EthiFinance Ratings SL (EFR).

Q1: Do you have any comments on the proposed Guidelines under the section on IC Framework? In providing your comments, please refer to the general principle, component and/or characteristic that you are commenting on.

The proposal is in line with the existing guidelines already published by ESMA in 2020 for CRAs, so we at EthiFinance already comply with them.

Q2: Are there any other comments you wish to raise on this section?

EthiFinance Ratings has no comments on this section.

Q3: Do you have any comments on the proposed Guidelines under this section on IC Functions? In providing your comments, please refer to the general principle, component and/or characteristic that you are commenting on

The proposal is in line with the existing guidelines already published by ESMA in 2020 for CRAs, so we at EthiFinance already comply with them.

With regard to the 'Information Security Management Function', Component 2.3, we understand that it no longer applies to CRAs as we are subject to DORA.

Q4: Do you have any comments on ESMA's approach to proportionality for Internal Control Functions?

In a number of points in the consultation paper, we note that ESMA has stated that it will apply the guidelines in a proportionate manner, EthiFinance welcomes this statement and expects it to be applied in practice.

For example, Compliance characteristic 2.1.3 has been extended to include the obligation for compliance functions to monitor IT processes. As a small CRA we often have very small teams, so it may be the case that IT supervision could be provided by other second-line functions of the group, such as Information Security, or through a third line/external supervision.

Q54: Are there any other comments you wish to raise on this section?

EthiFinance Ratings has no comments on this section.

We would like to thank you for your attention. We are at your disposal for any further information you may require.

EthiFinance Ratings SL