

Regulatory Landscape - Financial Crime

This section lists out the regulations and directives that provide the requirements relating to financial crime, including anti-money laundering.

Title	Key dates	Key Information
<p>Regulation (EU) 2023/1113 (Transfer of Funds Regulation – TFR)</p>	<p>Publication date: June 9, 2023</p> <p>Effective date: June 29, 2023</p> <p>Application date: December 30, 2024</p>	<p>This regulation establishes rules on the information accompanying transfers of funds and certain crypto-assets. In doing so, it lays down uniform requirements for payment service providers (PSPs) and crypto-asset service providers (CASPs) to collect and transmit specific details about the senders and recipients of transfers. The overall aim is to ensure the traceability of these transactions to prevent, detect and investigate money laundering and terrorist financing, fully aligning the EU framework with the Financial Action Task Force (FATF) travel rule standards.</p> <p>The regulation provides for the following requirements:</p> <ul style="list-style-type: none"> ● Mandates the PSP or CASP of the sender to collect and verify information against reliable sources before initiating the transfer. Reciprocally, the provider for the recipient must have effective procedures in place to detect whether the required information is missing or incomplete before making the funds available. ● Introduces specific transparency and risk-mitigating measures for transfers involving self-hosted (unhosted) wallets. For example, when a transfer exceeding €1,000 involves a self-hosted wallet, the CASP must verify whether the wallet is actively owned or controlled by their own customer. <p>This regulation amends Directive (EU) 2015/849.</p> <p>This regulation repeals Regulation (EU) 2015/847.</p>
<p>Directive (EU) 2015/849 (4th Anti-Money Laundering Directive – 4th AMLD)</p>	<p>Publication date: June 5, 2015</p> <p>Effective date: June 25, 2015</p> <p>Member state</p>	<p>This directive establishes a common framework to prevent the use of the European Union's financial system for the purposes of money laundering and terrorist financing. In doing so, it lays down rules for credit institutions, financial institutions and other designated obliged entities (such as lawyers, accountants and real estate agents) to identify and mitigate financial crime risks.</p> <p>The directive provides for the following requirements:</p>

	<p>transposition deadline: June 26, 2017</p> <p>Application date: June 26, 2017</p>	<ul style="list-style-type: none"> ● Risk-based approach. Requires obliged entities and member states to actively identify, assess and understand their exposure to money laundering and terrorist financing risks, and to apply proportionate internal controls and mitigation measures. ● Customer due diligence (CDD). Mandates stringent requirements for verifying the identity of customers and their ultimate beneficial owners before establishing a business relationship or executing specific transactions, with enhanced due diligence (EDD) strictly required for higher-risk scenarios (such as dealing with politically exposed persons or entities from high-risk third countries). ● Beneficial ownership transparency. Requires member states to establish interconnected central registers holding adequate, accurate and current information on the ultimate beneficial owners (UBOs) of corporate and other legal entities, as well as trusts. ● Suspicious transaction reporting. Obliges entities to promptly report any suspicious transactions or activities, including attempted transactions, directly to their national financial intelligence unit (FIU) without tipping off the client. ● Cooperation and FIUs. Strengthens the operational independence and powers of national FIUs, enhancing their ability to cooperate and seamlessly exchange vital intelligence across borders to effectively trace illicit financial flows. <p>The directive amends Regulation (EU) No. 648/2012.</p> <p>This directive repeals the following:</p> <ul style="list-style-type: none"> ● Directive 2005/60/EC. ● Directive 2006/70/EC.
<p>Directive (EU) 2018/843 (5th Anti-Money Laundering Directive – 5th AMLD)</p>	<p>Publication date: June 19, 2018</p> <p>Effective date: July 9, 2018</p> <p>Member state transposition deadline: January 10, 2020</p>	<p>This directive amends Directive (EU) 2015/849. In doing so, it introduces stricter transparency and counter-terrorist financing rules across the European Union, responding directly to vulnerabilities highlighted by the 2016 terrorist attacks in Europe and the Panama Papers leak. The overall aim is to close regulatory loopholes, tackle the anonymity of certain financial products, and empower authorities to better track illicit financial flows.</p> <p>The directive also amends the following legislation:</p> <ul style="list-style-type: none"> ● Directive 2009/138/EC. ● Directive 2013/36/EU.

	<p>Application date: January 10, 2020</p>	
<p>Directive (EU) 2024/1640 (6th Anti-Money Laundering Directive – 6th AMLD)</p>	<p>Publication date: June 19, 2024</p> <p>Effective date: July 9, 2024</p> <p>Member state transposition deadline: July 10, 2027</p> <p>Application date: July 10, 2027</p>	<p>This directive establishes the mechanisms to be put in place by member states for the prevention of the use of the financial system for the purposes of money laundering and terrorist financing. In doing so, it acts as a central pillar of the EU's overhauled AML/CTF legislative package.</p> <p>The directive provides for the following requirements:</p> <ul style="list-style-type: none"> ● Beneficial ownership registers. Mandates that national central registers holding beneficial ownership information are accurate, adequate and up-to-date. It grants register operators new powers to verify data and carry out on-site inspections, while ensuring immediate, unfiltered access for FIUs, competent authorities, and persons with a verified legitimate interest (such as journalists and civil society organisations). ● Bank account and real estate registers. Requires member states to establish centralised, automated mechanisms (like central registries or electronic data retrieval systems) allowing the identification of natural or legal persons holding bank accounts, payment accounts, crypto-asset accounts and real estate, ensuring FIUs have immediate access to this cross-referenced data. ● Supervision and risk assessments. Sets out clear rules on the responsibilities and tasks of national AML/CTF supervisory authorities, requiring them to apply a strict risk-based approach to supervision. It also mandates rigorous, cyclical ML/TF risk assessments at both the national and supra-national (EU) levels. ● Empowering FIUs. Harmonises and strengthens the powers, tasks and operational independence of national FIUs, ensuring they have access to the financial, administrative and law enforcement information necessary to effectively detect, analyse and suspend suspicious transactions. ● Cooperation and information sharing. Mandates secure and effective cooperation and information exchange not only among FIUs and supervisors across different member states, but also with the newly established central EU Anti-Money Laundering Authority (AMLA). <p>The directive amends Directive (EU) 2019/1937.</p> <p>This directive repeals Directive (EU) 2015/849.</p>
<p>Regulation (EU) 2024/1624</p>	<p>Publication date: June 19, 2024</p>	<p>This regulation establishes a single, uniform rulebook for the prevention of the use of the financial system for the purposes of money laundering or terrorist financing. In</p>

<p>(Anti-Money Laundering Regulation – AMLR)</p>	<p>Effective date: July 9, 2024</p> <p>Application date: July 10, 2027</p>	<p>doing so, it shifts the core AML/CTF obligations for private sector entities from a directive-led framework (which previously required national transposition and led to divergent rules) to a directly applicable EU regulation.</p> <p>The regulation provides for the following requirements:</p> <ul style="list-style-type: none"> ● Expanded scope of obliged entities. Extends mandatory AML/CTF obligations to new sectors, including all types of crypto-asset service providers (CASPs), crowdfunding platforms, operators acting on behalf of third-country nationals for residency permits, traders of luxury goods (such as high-value cars, airplanes, yachts and jewellery), and professional football clubs and agents. ● Harmonised customer due diligence (CDD). Lays down highly detailed and standardised CDD requirements that obliged entities must apply when establishing business relationships or carrying out occasional transactions of at least €10,000. It also mandates strict enhanced due diligence (EDD) measures for high-risk third countries and cross-border correspondent relationships involving crypto-assets. ● Beneficial ownership transparency. Clarifies and harmonises the rules for identifying beneficial owners by requiring the independent assessment of both "ownership interest" and "control". Furthermore, it mandates that foreign (non-EU) legal entities must register their beneficial ownership in EU central registers if they enter into business relationships with EU obliged entities, acquire real estate in the Union, or receive public contracts. ● EU-wide cash limit. Introduces a strict, EU-wide maximum limit of €10,000 for cash payments made to or by persons trading in goods or providing services, heavily restricting the anonymity associated with large cash transactions.
<p>Regulation (EU) 2024/1620 (Anti-Money Laundering Authority Regulation – AMLAR)</p>	<p>Publication date: June 19, 2024</p> <p>Effective date: June 26, 2024</p> <p>Application date: July 1, 2025</p>	<p>This regulation establishes the Authority for Anti-Money Laundering and Countering the Financing of Terrorism (AMLA), a new decentralised EU agency headquartered in Frankfurt. In doing so, it acts as the institutional capstone of the EU's overhauled AML/CTF legislative package.</p> <p>The regulation provides for the following requirements and powers:</p> <ul style="list-style-type: none"> ● Sets up AMLA, outlining its internal structures, including a general board composed of representatives from national supervisory authorities and an independent executive board. ● Grants AMLA the unprecedented power to directly supervise a selected number of the highest-risk financial sector entities (including credit institutions and crypto-asset service providers) that operate across at least six member states. AMLA will appoint joint supervisory teams for these entities.

		<ul style="list-style-type: none">● Tasks AMLA with overseeing and coordinating the activities of national AML/CTF supervisors for all non-selected entities, ensuring a consistently high standard of supervision and stepping in if national authorities fail to act. <p>The regulation also amends the following legislation (shifting certain AML powers previously held by the European Supervisory Authorities to AMLA):</p> <ul style="list-style-type: none">● <u>Regulation (EU) No. 1093/2010.</u>● <u>Regulation (EU) No. 1094/2010.</u>● <u>Regulation (EU) No. 1095/2010.</u>
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