



Identification of Obligated Entities Eligible for Direct Supervision

AMLA Webinar

10 June 2026



Agenda


- 1) Opening remarks
- 2) General overview
- 3) Structure of the reporting package
- 4) Examples
- 5) FAQ

1. Opening remarks - Simonas KREPSTA Executive Board Member (AMLA)

Practical information

Practical Information

This Session

- This webinar will consist of a **general overview** of the selection process and a **practical walkthrough** the template with live demos.
- The  indicator is used throughout the presentation to represent the current stage of the process.
- Questions received from the public in the dedicated EU survey will be addressed through the session

After the Session

- The **video recording** of the Webinar will be published on AMLA's website, along with this **slide deck** and the **pre-filled templates** used as examples during the session.

2. General Overview

Velimira Nedelcheva, AMLA

WHO?

WHY?

WHAT?

Why is eligibility information being collected ?

Starting in 2028 AMLA will assume direct AML/TF supervision of **up to 40 high-risk cross-border credit and financial institutions or groups thereof** (Article 5(2) and Article 12 AMLAR (Regulation (EU) 2024/1620))

HOW?

WHO?

WHY?

Who is in scope ?

Eligible obliged entities are credit institutions, financial institutions, and groups thereof **operating in at least six Member States** – including their home Member State – either through establishments or through the provision of relevant services under the freedom to provide services above the materiality thresholds set out in Article 1 of the [draft RTS under Article 12\(7\) AMLAR](#).

Context – Eligibility Explained



Operation in at least 6 Member States

An entity/group operates in a MS if:

It has subsidiaries/branches/other establishments in that MS (that are themselves credit or financial institutions)

OR

It offers services under Freedom to provide services (FPS) above thresholds in that MS:

(a) Number of customers resident in that MS exceeds 20 000 for Y2025

(b) Total annual amount of incoming and outgoing transactions generated by customers referred to in point (a) in Y2025 exceeds EUR 50 000 000 (eqv)

Groups

Eligibility information is reported separately for each entity in a group and then summed by AMLA to determine eligibility of the group.

WHAT?

HOW?

How will the selection process unfold ?

The first phase in the process (Q3 2026) is the identification of the pool of provisionally eligible obliged entities to be included in the Q1 2027 data collection for the purposes of selection. Current eligibility data collections organised by financial supervisors at national level are designed to achieve this in accordance with AMLA's specifications.

By March 31st 2027 NCAs will collect the following information from entities and groups identified as provisionally eligible during this first phase :

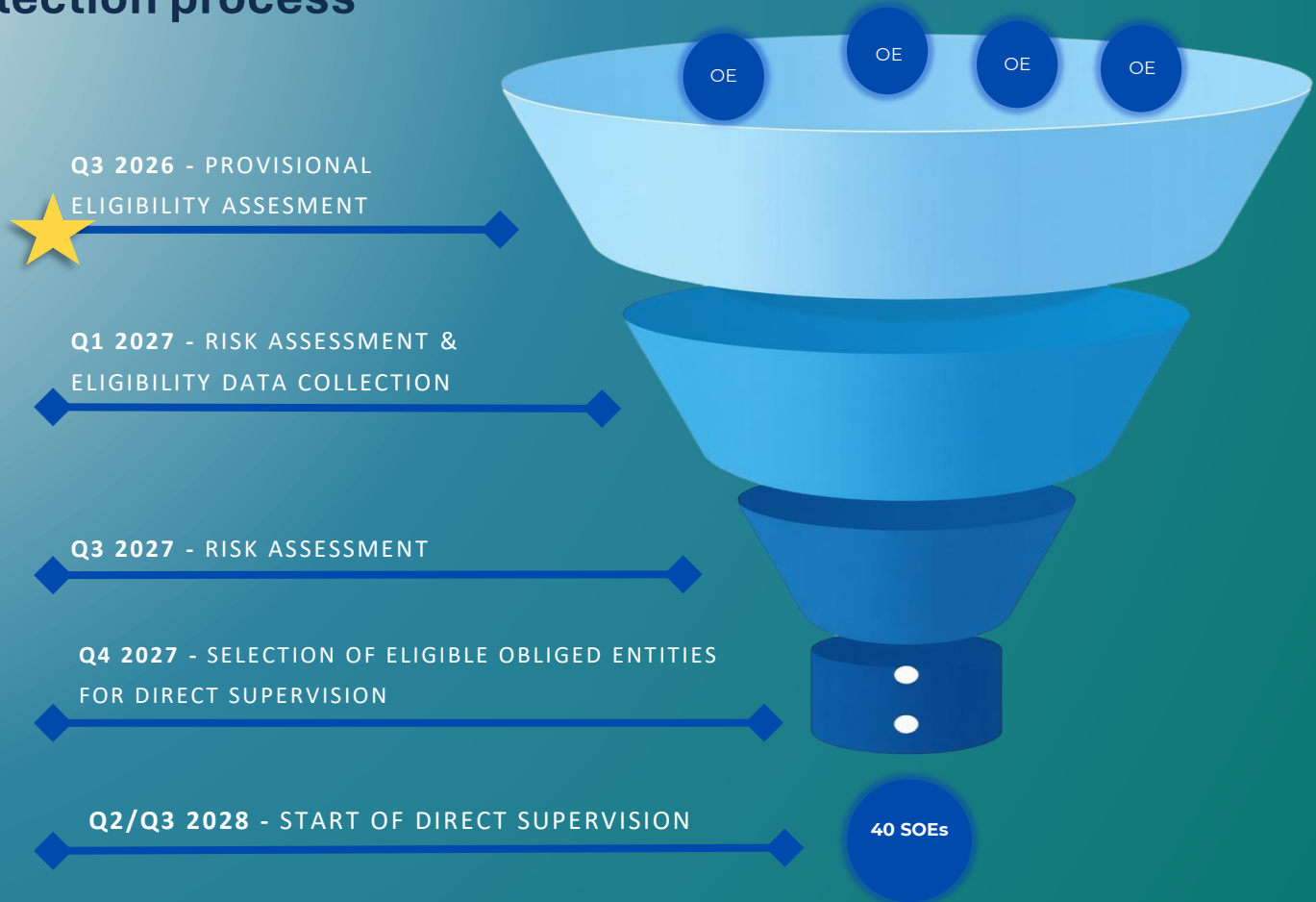
1. Applicable datapoints listed in the annex to the RTS under art. 12(7) AMLAR ;
2. Eligibility information as of 31/12/2026. This will be used for the final assessment of eligibility.

In July 2027 the risk assessment methodology set out in the RTS under art. 12(7) AMLAR will be used to assess the residual ML/TF risk of entities and groups in this eligible pool, based on the previously collected datapoints.

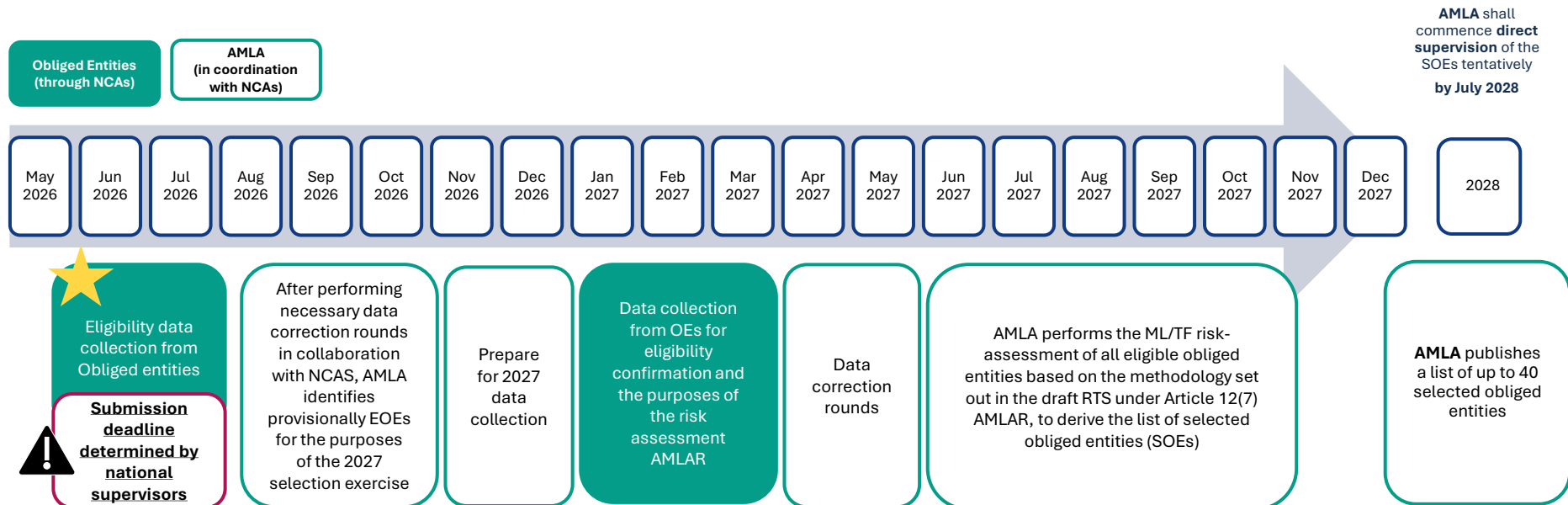
Based on this assessment, **up to 40 high-risk eligible entities and groups will be selected for direct supervision by AMLA.**



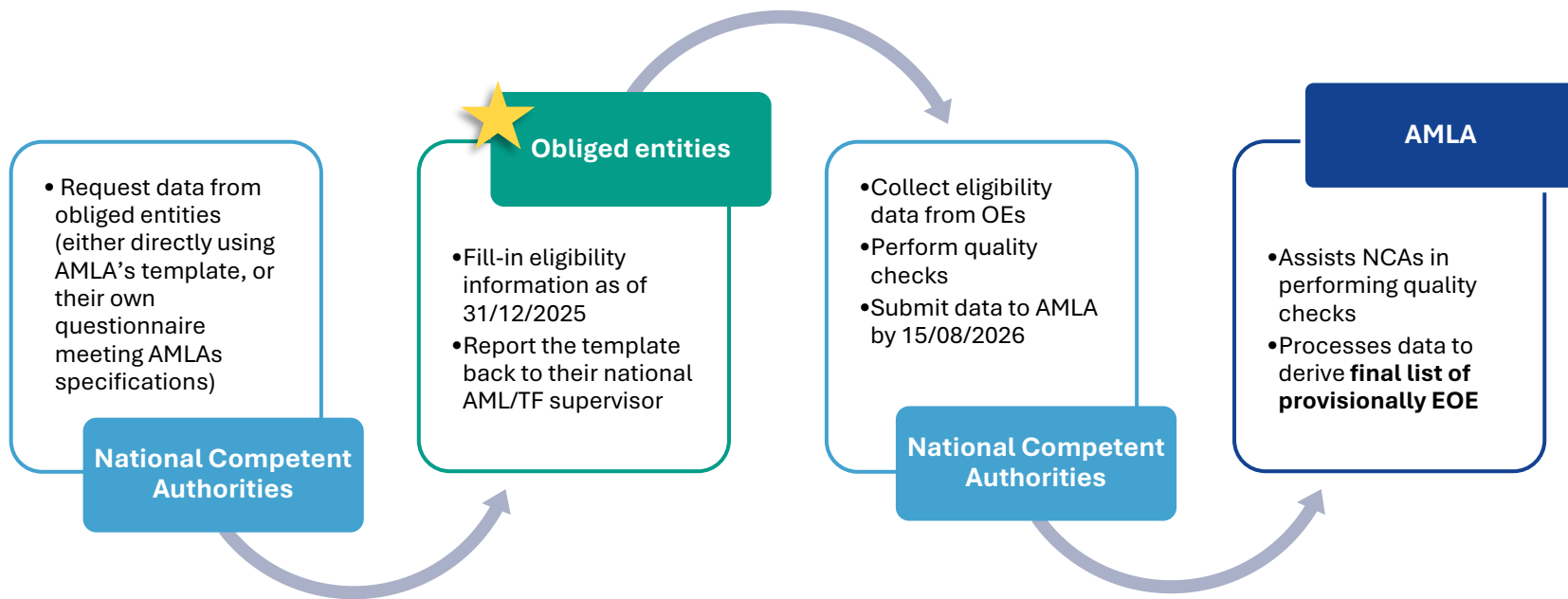
Context - Selection process



Timeline



Data collection process



For further information on practical data-collection arrangements, please contact your national supervisor

WHY?

WHAT?

What information is AMLA collecting ?

All information necessary to assess the eligibility of credit and financial institutions and groups thereof for direct supervision by AMLA as per art. 12(1) AMLAR :

- 1) **Identification information** on reporting obliged entities and groups.
- 2) **List of all credit and financial institution establishments** (subsidiaries, branches and other establishments) in relevant groups.
- 3) **Information on provision of services under FPS** (separately for each constituent entity in the case of groups).

The reference date of the data is 31.12.2025

3. Reporting package

Simon Behar, AMLA

Structure of the reporting package

Template (.xlsx)

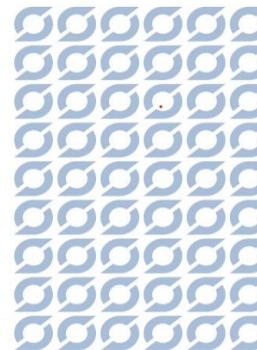
Column name	Legal Entity Identifier (LEI)	National Code Attributed by the Financial Supervisor	Legal Name of the reporting obliged entity	Legal Name of the reporting obliged entity in Latin Characters
Column code	AMD.00.01.C010	AMD.00.01.C020	AMD.00.01.C030	AMD.00.01.C040
Data type	Alphanumerical	Alphanumerical	Alphanumerical	Alphanumerical
Errors	OK	OK	ERROR: This field is mandatory	OK

Interpretative note (.pdf)

Interpretative Note

On the identification of provisionally eligible obliged entities pursuant to the draft ITS under Article 15(3) AMLAR

2026:



Interpretative note

From Interpretative Guidance to Template

INTERPRETATIVE NOTE - IDENTIFICATION OF PROVISIONALLY ELIGIBLE OBLIGED ENTITIES

AMD.01.01 Preliminary Filters

This template will determine which of the subsequent sheets are applicable and must be completed.

Column code	Legal references and instructions
AMD.01.01.C010	<p>Is there an EU parent undertaking above the reporting obliged entity? (Y/N)</p> <p>Indicate whether there is an entity in the EU above the reporting obliged entity that falls within the definition of a parent undertaking under Art. 2(1)(42) AMLR. If so, the answer must be 'Yes'.</p> <p>If the EU parent undertaking is itself not (yet) an obliged entity (such as a holding, see general remarks above), the answer must still be 'Yes'.</p> <p>If the reporting obliged entity is an EU parent undertaking itself, or a solo entity, or there is no obliged entity above it in the EU, the answer must be 'No'.</p>
AMD.01.01.C020	Does the reporting obliged entity have a head office outside the EU? (Y/N)

Mouse here for template description	Preliminary Filters	
Template applicable to you? >>	Please fill AMD.00.01.C120	
Column name	Is there an EU parent undertaking above the reporting obliged entity? (Y/N)	<p>Indicate whether there is an entity in the EU above the reporting obliged entity that falls within the definition of a parent undertaking under Art. 2(1)(42) AMLR. If so, the answer must be 'Yes'. If the EU parent undertaking is itself not (yet) an obliged entity (such as a holding, see general remarks above), the answer must still be 'Yes'.</p> <p>If the reporting obliged entity is an EU parent undertaking itself, or a solo entity, or there is no obliged entity above it in the EU, the answer must be 'No'.</p>
Column code	AMD.01.01.C010	
Data type	LIST_AMLA_04	
Errors	OK	
Type your data >>	****	****

Who should fill the template?

→ ALL entities that receive the template!

General Principle

- Financial supervisors of the home Member State collect the eligibility information from credit institutions and financial institutions.
- **In case of groups** : the information for all credit institutions and financial institutions in the group is **collected from the parent undertaking by the relevant financial supervisor in the Member State where it established.**

In most cases, only those entities which are parent undertakings or operate through FPS are contacted by supervisors.

In practice

What if an entity/group which is obviously not eligible receives the template?

Such entities/groups must still fill and submit the template, thereby informing their home financial supervisor that they are not eligible.

For such entities, most sheets will not apply!


What if several entities within the same group are asked to fill out the template?

Every entity that was contacted by their home financial supervisor is required to fill and submit the template.

If several entities in a group are contacted, only one must to complete the template in full and all other can refer to this entity as the “designated reporting obliged entity”.

Reporting Scope - FAQ

Who should report ?

- **Basic principle** : All entities that receive the template must fill it and submit it back to the financial supervisor in their home Member State.
- **In the case of groups** :
 -  **Only one entity within a group must report eligibility information** contained in template sheets [AMLD.01.01](#) through to [AMLD.02.04](#) for the entire group across the EU (**full list of all group establishments – cf. next slide - and their operations through FPS in all EU Member States**). It is the responsibility of groups to provide eligibility information at all levels of ownership (all subsidiaries, including indirectly owned subsidiaries) within the EU in a single template (no double reporting, no need for aggregation by AMLA).
 - In most cases this will be the parent undertaking of the group, which will receive the template from the financial supervisor in its home Member State.
 - It may happen that several entities across the Union within the same group receive the template, in this case the group must select a **Designated Reporting Obligated Entity** (cf. sheet [AMD.00.02](#)) which will report eligibility information for the entire group across the EU to the financial supervisor in its home Member State.
 - All entities across the EU in a group that received the template but are not the **Designated Reporting Obligated Entity** must still submit the template back to the financial supervisor in their home Member State by filling sheets [AMLD.00.01](#) and [AMLD.00.02](#).

Data Quality Dashboard



Who? All reporting entities.



What? Overview of applicable sheets and errors detected by embedded data quality checks.



How? The content of this sheet is updated sequentially as the template is being filled.



When? Check this dashboard **after filling each other sheet.**

Overall quality status of the workbook:
Cannot be submitted - please fix errors

NOTE:

- This overview will dynamically update once you enter data in the sheets.
- Based on your answers in sheet AMD.00.01 ("Entity identification") and - eventually - in sheet AMD.01.01 ("Preliminary filters"), different obligations emerge.
- The overall quality status of your workbook (see above) indicates whether (i) the workbook is ready for submission, (ii) errors need to be fixed, or (iii) information is missing.

Template (sheet) ID <small>Click on link to navigate to sheet</small>	Template name	Template applicable to your entity?	Template quality status	Number of errors
AMD.00.01	Entity identification	Yes	OK	0
AMD.00.02	Reporting obliged entity	No	OK	0
AMD.00.03	Comments	Yes, but optional	OK	0
AMD.01.01	Preliminary Filters	Yes	Errors detected	3
AMD.02.01	EU Parent Undertaking	No	OK	0
AMD.02.02	Non-EU Ultimate Parent	Please fill AMD.01.01.C020	Please fill AMD.01.01.C020	0
AMD.03.01	Establishments	Please fill AMD.01.01.C030	Please fill AMD.01.01.C030	0
AMD.04.01	Freedom to provide services	No	OK	0

> **DataQualityDashboard** AMD.00.01 AMD.00.02 AMD.00.03 AMD.01.01 AMD.02.01 AMD.02.02 AMD.0...

AMD.00.01 Identification of the reporting obliged entity



Who? All reporting entities.



What? Basic identification information in applicable fields



How? Information about the entity filling and submitting the template

Anti-Money Laundering Authority

Mouse here for template description

Identification of the reporting obliged entity

Template applicable to you? >> Yes

Column name	Legal Entity Identifier (LEI)	National Code Attributed by the Financial Supervisor	Legal Name of the reporting obliged entity	Legal Name of the reporting obliged entity in Latin Characters	Category of the Entity
Column code	AMD.00.01.C010	AMD.00.01.C020	AMD.00.01.C030	AMD.00.01.C040	AMD.00.01.C050
Data type	Alphanumeric	Alphanumeric	Alphanumeric	Alphanumeric	LIST_AMLA_01
Errors	OK	OK	OK	OK	OK
Type your data >>	12345678910111213141 ****	BE123 ****	Strawberry SRL ****	Strawberry SRL ****	Credit institutions ****

DataQualityDashboard AMD.00.01 AMD.00.02 AMD.00.03 AMD.01.01 AMD ... + :

AMD.00.02 Designated Reporting Obligated Entity



If several entities in a group receive the reporting package : the group **must** appoint a *Designated Reporting Obligated Entity*.

The *Designated Reporting Obligated Entity* reports eligibility information on behalf of the entire group (establishments + FPS)



Who? ONLY reporting entities that are part of a group but not reporting on behalf of the group.



What? If answer to **AMD.00.01.C120** is YES fill in data of the entity in your group who will report on behalf of it.



How? Information on the entity in the group who will report eligibility information on behalf of the group.

Mouse here for template description	Designated Reporting Obligated Entity			
Template applicable to you? >>	Yes			
Column name	Legal Entity Identifier (LEI) of the Designated Reporting Obligated Entity	National Code Attributed by the Financial Supervisor for Designated Reporting Obligated Entity	Legal Name of the Designated Reporting Obligated Entity	Financial Supervisor of the Designated Reporting Obligated Entity
Column code	AMD.00.02.C010	AMD.00.02.C020	AMD.00.02.C030	AMD.00.02.C040
Data type	Alphanumerical	Alphanumerical	Alphanumerical	LIST_AMLA_03
Errors	OK	OK	OK	OK
Type your data >>	23456789101112131415	DE1234	Cherry GmbH	DE-Federal Financial Supervisory
Yes	****	****	****	****

AMD.00.03 Comments



Who? All reporting entities but optional



What? Uncertainty about reported information, need to provide any relevant context etc



How? Clarification on a specific data point

Mouse here for template description	Comments		
Template applicable to you >>	Yes, but optional		
Column name	Template Reference	Column Reference	Comment Content
Column code	AMD.00.03.C010	AMD.00.03.C020	AMD.00.03.C030
Data type	LIST_AMLA_00007	LIST_AMLA_00008	Alphanumerical
Errors	OK	OK	OK
Type your data >>	AMD.00.01	C040	A comment here
Type your data >>			<input type="text"/>

Navigation bar: < > ... AMD.00.01 AMD.00.02 **AMD.00.03** AMD.01.01 AMD.02.01 AMD.02.02 At ... + : ◀ ▶

AMD.01.01 – Preliminary filters



Who? Only entities reporting solo or on behalf of a group



What? Establishment/FPS filters



How? Select all answers applicable to the OE or group



Next : These answers determine the applicability of following sheets

Mouse here for template description		Preliminary Filters				
Template applicable to you? >>		Yes				
Column name	Is there an EU parent undertaking above the reporting obliged entity? (Y/N)	Does the reporting obliged entity have a head office outside the EU? (Y/N)	Does the reporting obliged entity have establishments or sister undertakings in the EU? (Y/N)	Does the reporting obliged entity operate through Freedom to Provide Services in other EU Member States? (Y/N)	Number of EU Member States in which the reporting obliged entity operates through Freedom to Provide Services.	
Column code	AMD.01.01.C010	AMD.01.01.C020	AMD.01.01.C030	AMD.01.01.C040	AMD.01.01.C050	
Data type	LIST_AMLA_04	LIST_AMLA_04	LIST_AMLA_04	LIST_AMLA_04	Integer	
Errors	OK	OK	OK	OK	OK	
Type your data >>	Yes ****	No ****	Yes ****	Yes ****	5 ****	

AMD.02.01 EU Parent Undertaking



Who? Only entities reporting on behalf of a group



What? If answer in AMD.01.01.C010 is **“Yes”**



How? Identify the reporting obliged entity's Parent Undertaking.

Mouse here for template description	EU Parent Undertaking					
Template applicable to you? >>	Yes					
Column name	Legal Entity Identifier (LEI) of the EU Parent Undertaking	National Code of the EU Parent Undertaking	Legal Name of the EU Parent Undertaking	Legal Name of the EU Parent Undertaking in Latin Characters	Parent Undertaking Subject to AML/CFT Supervision in the EU	Member State of the EU Parent Undertaking
Column code	AMD.02.01.C010	AMD.02.01.C020	AMD.02.01.C030	AMD.02.01.C040	AMD.02.01.C050	AMD.02.01.C060
Data type	Alphanumerical	Alphanumerical	Alphanumerical	Alphanumerical	LIST_AMLA_04	LIST_AMLA_02
Errors	OK	OK	OK	OK	OK	OK
Type your data >>	123457E+19	DE1234567	Fruit Group Parent AG	Fruit Group Parent AG	No	DE - Germany
	****	****	****	****	****	****

AMD.02.02 Head office outside of the EU




Who? All entities that have a head office outside of the EU (unless someone else reports this)



What? If answer in AMD.01.01.C020 is **“Yes”**



How? Identify the head office of the reporting obliged entity outside the EU


Anti-Money Laundering Authority

Mouse here for template description	Head office outside of the EU			
Template applicable to you? >>	Yes			
Column name	Legal Entity Identifier (LEI) or an equivalent national code of the Head office outside of the EU	Legal Name of the Head office outside of the EU	Legal name of the Head office outside of the EU Parent in Latin characters	Country of the Head office outside of the EU
Column code	AMD.02.02.C010	AMD.02.02.C020	AMD.02.02.C030	AMD.02.02.C040
Data type	Alphanumerical	Alphanumerical	Alphanumerical	LIST_AMLA_06A
Errors	OK	OK	OK	OK
Type your data >>	984769469486 ****	Fruit Basket US INC ****	Fruit Basket US INC ****	United States of America ****

< >
DataQualityDashboard
AMD.00.01
AMD.00.02
AMD.00.03
AMD.01.01
AMD.02.01
AMD.02.02
AMD.03.01

AMD.03.01 Establishments - FAQ

Which establishments must be reported ?

All credit institutions and financial institutions within the meaning of art. 2(1) AMLR as well as branches and other establishments thereof, at all levels of consolidation in the EU (parent undertaking and all direct and indirect subsidiaries and branches thereof, as well as other establishments) must be separately reported in sheet **AMD.03.01**.

In practice :

- ⚠ Only credit institutions and financial institutions within the meaning of art. 2(1) AMLR and branches and other establishments thereof must be included.**
- **Legal entities, branches and other establishments must be reported separately.**
 - Obligated entities under art. 3(3) AMLR must be excluded.
 - Entities that are subject to AML/TF supervision at national level but are not credit institutions or financial institutions within the meaning of art. 2(1) AMLR must be excluded.
 - *A fortiori*, entities that are not subject to AML/TF supervision at all (e.g. support functions) must be excluded.

Should **AMD.04.01** be filled for all establishments ?

No. Customer/transactions datapoints are requested only for entities operating cross-border through FPS.

AMD.04.01 Freedom to provide services - FAQ

What to report ?

Inactive FPS Passports : Where an obliged entity holds an FPS passport in a given Member State but has no corresponding activity to report in sheet **AMD.04.01** in relation to that Member State (no resident customers, and therefore no related transactions) there is no need to count it in **AMLD.01.01.C050** in order to fill a row in **AMLD.04.01** only with zeros.

FPS below materiality threshold : Where an obliged entity holds an FPS passport in a given Member State and operates in that Member State below the materiality thresholds (customers <20 000 or annual transactions <50 000 000€), it should still be counted in **AMLD.01.01.C050** and data provided in **AMD.04.01**.

What is a customer ?

Customer : Where an obliged entity holds an FPS passport in a given Member State, all customers (within the meaning of definition 6 in the Appendix to the **Interpretative Note**) of this establishment that are resident in the said Member State must be counted. The figure reported in **AMD.04.01.C030** should aggregate all relevant customers of the obliged entity irrespective of product/business line.

In practice:

- All customers should be included (active and non-active, including those holding dormant accounts and those that have terminated their business relationship during the reference year);
- Customers that, within one obliged entity, have more than one product or service should be counted only once (no double counting of customers per obliged entity);
- For joint accounts, each holder is regarded as a single customer.

Legal Persons : For customers that are legal entities, residence should be interpreted as *country of establishment*.

SUMMARY

Receive = Report

All entities that receive the template must report



Groups

One entity reports eligibility information for the group



Structure

Understand your group's structure



Applicability

Not all sheets are applicable to all entities



Data Quality Dashboard

Always go back to the Data Quality Dashboard



4. Examples

David Müller, AMLA

Example 1 – Solo Entity operating cross-border through FPS

Eligibility of solo entities:

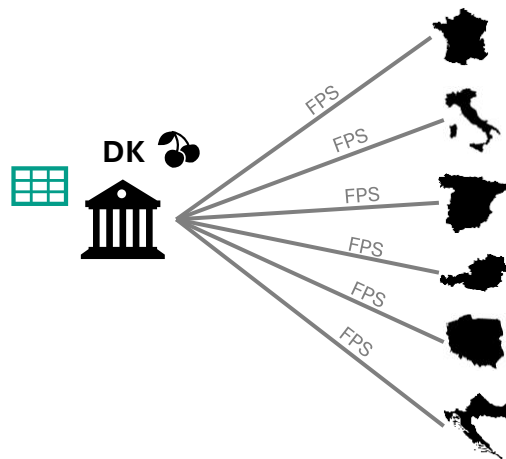
- Credit institutions or financial institutions eligible on solo basis as a result of cross-border activities under freedom to provide services.

Note:

- To simplify reporting, no transaction data has to be reported when an entity has more than 20,000 customers through FPS in a given Member State (thus meeting the materiality threshold).

Example:

Cherry Bank (located in Denmark) offering services in six Member States through FPS:



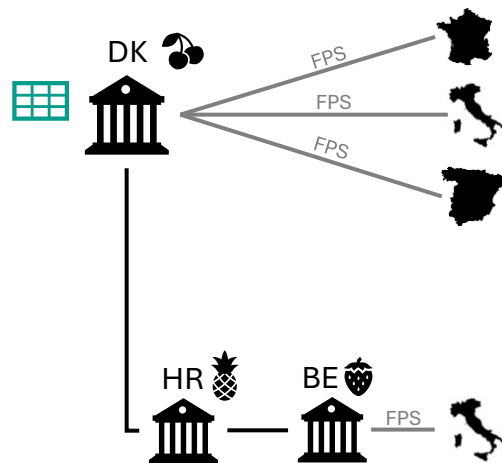
Example 2 – Group with EU OE parent undertaking and FPS

Group of OEs with EU parent OE

- Group of credit institutions and financial institutions with a parent OE in the EU
- **The parent undertaking fills the template with eligibility information for the entire group (establishments + FPS),** and submits it to the financial supervisor in its home member state (here, Denmark)
- If both the parent undertaking and one of its subsidiaries have been requested to report, AMLA will only consider the data submitted by the parent.

Example:

Cherry Bank (located in Denmark) offers services in three EU Member States through FPS and has one establishment in Croatia, which in turn has a Belgian subsidiary offering services through FPS in Italy.



Example 3 – Group with a non-yet OE EU parent undertaking + cross-border operation through FPS

Group of OEs with not-yet-OE parent

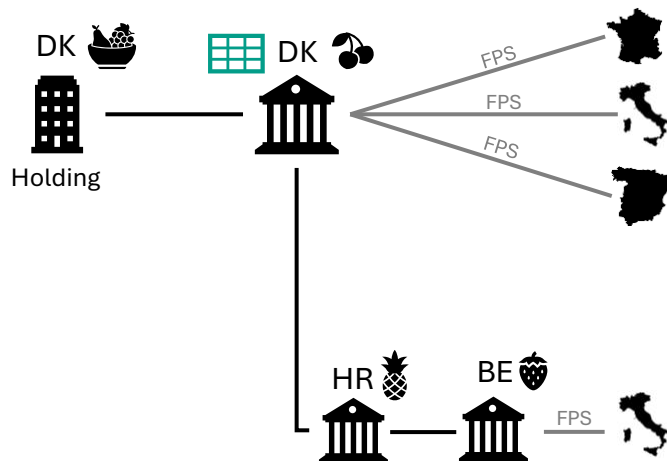
- Group of credit institutions and financial institutions with a parent undertaking set to become an obliged entity when AMLR becomes applicable.
- Where the ultimate parent undertaking is not yet an obliged entity, eligibility data should be reported by the obliged entity at the highest level of consolidation within the group.

Note:

- Until AMLR becomes applicable on 10 July 2027, holding companies are not obliged entities and can therefore not be considered as parent undertakings for reporting purposes

Example:

Cherry Bank (located in Denmark) offers services in three Member States through FPS and has one establishment in HR, which in turn has a BE subsidiary offering services through FPS in IT. Their parent undertaking is Fruitbasket HoldCo (DK), which will become an OE on July 10th 2027.



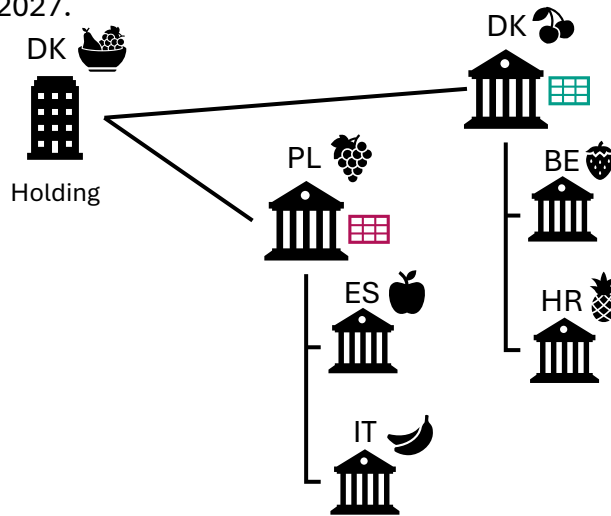
Example 4 – Group with non-yet EU OE parent undertaking and more than one reporting OE

Group of CIs and FIs with non-yet OE parent undertaking and more than one reporting entity.

- Group of credit institutions and financial institutions with a holding company parent undertaking (to become an OE when AMLR becomes applicable on 10 July 2027)
- When several entities in the group are locally requested to report, the group should choose a *Designated Reporting Obligated Entity* to report eligibility information for the entire group (establishments + FPS).
- In the example, Cherry Bank (DK) is the group's *Designated Reporting Obligated Entity*.
- Any other entity in the group contacted by its home supervisor should fill [AMD.00.01](#) and report the Cherry Bank (DK) as the designated reporting obligated entity in [AMD.00.02](#). It can ignore the rest of the sheets.

Example:

Cherry Bank (DK) has two establishments, and Grape Insurance (PL) has two establishments. Their parent undertaking is Fruitbasket HoldCo (DK), which will become an OE on July 10th 2027.



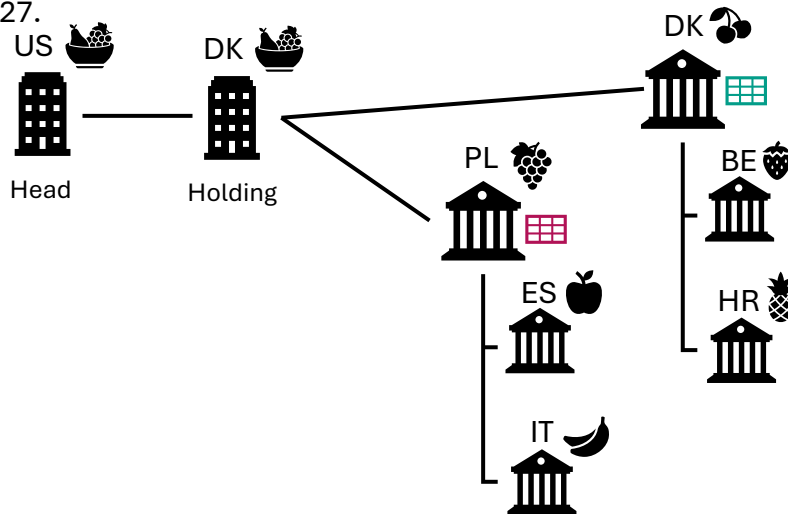
Example 5 – Group with non-yet EU OE parent undertaking + head office outside the EU, and more than one reporting OE

Group of CIs and FIs with non-OE parent undertaking + head office outside the EU, and more than one reporting entity

- Follow the structure of Example 4
- In addition, make sure to report both
 - The holding company in the EU (AMD.02.01)
 - The head office outside the EU (AMD.02.02)

Example:

Cherry Bank (DK) has two establishments, and Cherry Insurance (PL) has two establishments. Both are held by Fruitbasket HoldCo (DK), which will become an OE on July 10th 2027.



5. Frequently asked questions

Simon Behar, AMLA

FAQ - General

If an entity is asked to fill this template, does it mean it will be selected ?

Not necessarily. Eligibility information is collected to assess which credit institutions, financial institutions and groups thereof meet the criteria set in art. 12(1) AMLAR to be eligible for direct supervision by AMLA (operation in six EU Member States through establishments or FPS).

Once this pool of eligibles has been identified, up to 40 eligible obliged entities or groups among those assessed as having a high residual ML/TF risk will be selected by AMLA for direct supervision, based on criteria set in art. 13 AMLAR.

When and how will entities be informed if they are selected for direct supervision ?

During 2027 AMLA will notify each selected obliged entity in writing of the decision resulting from the selection process.

After the expiry of the time limit set for submitting requests for substantive review following individual notifications, AMLA will publish the list of selected obliged entities on its website.



THANK YOU!

