Ref. Ares(2026)8136519 - 25/08/2026

Final Report

Draft Regulatory Technical Standards on the risk assessment for the purpose of selection of credit institutions, financial institutions and groups of credit and financial institutions for direct supervision under Article 12(7) of Regulation (EU) 2024/1620

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1 Executive Summary

Article 12(7) of Regulation (EU) 2024/1620 (AMLAR) mandates AMLA to define, through draft Regulatory Technical Standards (RTS), important aspects of the methodology it will use to select which obliged entities it will supervise directly.

As a first step, AMLA will determine which entities are eligible to be directly supervised based on geographic criteria. To this effect, the draft RTS introduces thresholds to establish whether an obliged entity's operations under the freedom to provide services are material. These thresholds are alternative, ensuring that both high-volume and high-customer scenarios are captured. They rely on data that is readily available to obliged entities.

The draft RTS also sets out the risk assessment methodology that AMLA will use to decide which eligible obliged entities it will supervise directly. This methodology is aligned with the methodology supervisors will use to assess entity-level money laundering and terrorist financing risk. Aligning methodologies reduces administrative burden and promotes consistency.

Finally, this draft RTS includes a group-wide risk scoring method that is based on a weighted average of entity-level residual risk scores. This method ensures that high-risk entities and significant operations are appropriately reflected in the group's risk score.

Based on the methodology set out in this draft RTS, AMLA will select the most complex, high-risk entities with significant EU presence to deliver a coordinated and consistent approach to cross-border AML/CFT supervision.

Next steps

The draft RTS included in this document have been finalised after considering the feedback received from a three-month public consultation on the draft RTS, which took place between March and June 2025.

The draft RTS will be submitted to the Commission for adoption before being published in the Official Journal of the European Union.

2 Background and rationale

Article 5(2) of Regulation (EU) 2024/1620 (AMLAR) requires AMLA directly to supervise certain obliged entities that are credit institutions, financial institutions, or groups of credit or financial institutions.

Articles 12 and 13 of the AMLAR define the selection process. They specify that credit and financial institutions, or groups of credit and financial institutions that operate in at least six Member States are eligible to be directly supervised by AMLA. AMLA will then select those entities that carry a high level of residual ML/TF risk.

Article 12(7) of the AMLAR requires AMLA to develop a methodology to inform the selection process. Specifically, Article 12(7) of the AMLR requires AMLA to define, in draft Regulatory Technical Standards (RTS), the minimum activities to be carried out under the freedom to provide services for it to be considered as operating in a Member State. It also requires AMLA to develop a methodology for classifying the inherent and residual risk profiles of obliged entities.

2.1 Rationale

The creation of an EU AML/CFT authority with direct supervisory powers over certain obliged entities marks a major shift from the current system, where AML/CFT supervision is exclusively carried out by national authorities. Under the new supervisory system, national and supranational approaches are interlinked and will be harmonized. This means that all obliged entities in the EU will be subject to the same robust supervisory standards. It also means that the methodology used for ML/TF risk assessments purposes at the national level and the methodology under Article 12(7) AMLAR will be aligned. Alignment supports operational efficiency while keeping the cost of regulation under control. In addition, it helps ensure an evenly robust supervision at national and EU level.

AMLA should select the most complex entities with the largest EU footprint and a high ML/TF risk exposure, driven primarily by inherent risk. As an EU supervisor, AMLA is uniquely placed to ensure a coordinated, consistent and effective approach to the AML/CFT supervision of cross-border entities through its comprehensive Union-wide perspective. The first selection of such entities will take place in 2027, with direct supervision due to start in 2028.

2.2 Approach

The draft RTS sets out the thresholds AMLA will apply to determine whether an obliged entity's cross-border operations under the free provision of services are considered 'material' for the

geographic eligibility criterion. It also defines the methodology for assessing the residual ML/TF risk of eligible entities for selection for direct supervision.

2.2.1 MATERIALITY THRESHOLDS FOR OPERATIONS CARRIED OUT UNDER FREEDOM TO PROVIDE SERVICES

The draft RTS sets out when an entity should be considered as operating in a certain Member State for the purposes of Article 12(1) AMLAR. It establishes thresholds for determining whether operations under the freedom to provide services in a Member State are material. Determining materiality in this way is necessary because obliged entities often notify their intention to make use of the free provision of services, but then do not provide such services in practice.

These thresholds are based on the number of customers that are resident in the relevant Member State or the total value in euro of incoming and outgoing transactions generated by those customers. These thresholds are alternative. They have been set at a level that reflects an institution's size and financial capacity. This is important because eligibility carries a fee.

The number of resident customers is used as a proxy because institutions may be unable to identify which customers were onboarded under the freedom to provide services for each Member State. The transaction volume threshold ensures that cases with few customers but high activity are captured.

2.2.2 RISK ASSESSMENT METHODOLOGY FOR THE SELECTION OF OBLIGED ENTITIES FOR DIRECT SUPERVISION

The draft RTS sets out the methodology for determining the ML/TF risk level of each eligible entity. It defines how inherent and residual risk profiles are classified for the purpose of selection for direct supervision. It aligns with the entity-level risk assessment methodology set out in the draft RTS under Article 40(2) AMLD[1]. Applying a single methodology to both assessments reduces complexity and minimizes the operational burden for obliged entities and supervisors, avoiding inefficiencies caused by divergent approaches.

Adjustments to entity-level ML/TF risk scores should be strictly limited to prevent arbitrage and ensure a level playing field. For this reason, the option to modify inherent risk scores based on national specificities or other supervisory considerations, available under the entity-level risk assessment methodology in Article 40(2) AMLD, has been excluded from the methodology for assessing eligible credit and financial institutions under Article 12(7)(b) AMLAR.

The draft RTS also introduces a methodology for calculating a group-wide ML/TF risk score. This score is derived from a weighted average of entity-level residual risk scores, reflecting each entity's significance within the group. The approach ensures that entities with higher ML/TF risk,

[1] For more details on the methodology, please refer to the Final report on the draft RTS under art. 40(2) AMLD.

operating in riskier sectors or representing a substantial share of group operations, are given the appropriate weight, preventing lower-risk entities from disproportionately reducing the group's overall risk score.

During a transition period, two data points will not be required. These data points form an important part of the risk assessment but may be difficult to obtain in time for the first selection process, or cannot be applied because the underlying legal framework will not yet be in force. They will, however, be required for subsequent selection rounds.

2.3 Impact Assessment and public consultation

On 12 March 2024, the European Banking Authority (EBA) received a Call for Advice (CfA) from the European Commission (EC) on certain draft regulatory technical standards (RTS) under the new EU AML/CFT framework. This CfA included the mandate under Article 12(7) of Regulation (EU) 2024/1620 on the risk assessment for the purpose of selection for direct supervision. The European Commission emphasised that the drafting work requested from EBA would *"be instrumental for ensuring that the regulatory technical standards can be submitted by AMLA to the Commission for adoption in due time"*.

The EBA publicly consulted on a version of this RTS between 6 March and 6 June 2025. It also assessed the costs and benefits its proposals would have if they were adopted.

The EBA submitted its response to the European Commission on 30 October 2025.

AMLA assessed the EBA proposals, and the extent to which these proposals align with AMLA's own objectives and approach. AMLA also considered legal certainty, alignment with other mandates, and timeliness. AMLA is satisfied that the EBA's proposals are proportionate and conducive to effective outcomes and adopts them as their own. Minor clarifications were brought to the draft RTS to ensure its consistent application. These clarifications relate in particular to the application of this draft RTS to groups of credit and financial institutions, and to credit and financial institutions that operate through branches. They do not alter the substance of the EBA's proposals.

Since the substance of the EBA's proposals remain unchanged, and since the EBA carried out a public consultation and reflected the feedback in its proposals, further public consultations will not be necessary.

3 Draft regulatory technical standards

COMMISSION DELEGATED REGULATION (EU) …/…

of XXX

supplementing Regulation (EU) 2024/1620 of the European Parliament and of the Council of 31 May 2024 with regard to regulatory technical standards specifying the methodology for assessing credit institutions, financial institutions and groups of credit and financial institutions for the purposes of the selection for direct supervision by the Authority for Anti-Money Laundering and Countering the Financing of Terrorism

(Text with EEA relevance)

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EU) 2024/1620 of the European Parliament and of the Council of 31 May 2024, establishing the Authority for Anti-Money Laundering and Countering the Financing of Terrorism and amending Regulations (EU) No 1093/2010, (EU) No 1094/2010 and (EU) No 1095/2010, and in particular Article 12(7) thereof,

Whereas:

(1) In accordance with Regulation (EU) 2024/1620, certain obliged entities in the financial sector shall be directly supervised by the Authority for Anti-Money Laundering and Countering the Financing of Terrorism (the Authority). The selection of these obliged entities takes place in two stages. In the first stage, the Authority identifies all credit institutions, financial institutions or groups of credit and financial institutions that are operating in at least six Member States, including the home Member State, either via establishment or by conducting relevant operations under the freedom to provide services. In the second stage, the ML/TF risk profile of these entities is classified, to identify those that present a high residual risk.

(2) The ability to provide services in different Member States without having to create an establishment in those Member States is a key feature of the freedom to provide services. In the current context of digitalisation of financial services, a growing number of institutions use this ability to provide their services in other Member States. In some instances, however, entities notify their financial supervisors of their intention to exercise this freedom but do not start this activity in practice. In other instances, entities exercise this freedom, but it does not represent a major part of their overall operations. Considering the above, materiality thresholds should be established to

qualify as eligible for the selection of entities whose operation under the freedom to provide services is material. The thresholds and criteria developed in this Regulation should not be used to define the activity under the freedom to provide services principle for any other purposes.

(3) All entities operating in at least six Member States through establishments or by conducting relevant operations under the freedom to provide services and whose residual risk profile is 'high' should qualify for direct supervision in accordance with Article 13(1) of Regulation (EU) 2024/1620.

(4) To reduce the operational burden on obliged entities and financial supervisors and to ensure alignment between national and EU-level AML/CFT supervision, the assessment of the minimum activities to be carried out by a credit institution or financial institution to be considered as operating in a Member State other than that where it is established, should be based on data points collected for the purpose of the methodology for assessing the risk profiles of obliged entities in line with Article 40(2) of Directive (EU) 2024/1640. For the same reason, the methodology for the selection of directly supervised entities should build on the methodology for assessing the risk profiles of obliged entities in line with Article 40(2) of Directive (EU) 2024/1640. These risk profiles should be aggregated for the classification of the group risk profile, at the level of the highest parent company in the European Union which is a credit or financial institution.

(5) To avoid that, as an effect of the aggregation of the entity-level score, the ML/TF risk profile of a high ML/TF risk group being unduly reduced because some of its components have a low risk profile, the group-wide methodology for the purposes of selection should reflect the relative importance of each entity within the group, in terms of size and risk, and attribute a higher weight to the most important entities.

(6) It is essential to ensure full comparability of the outcomes of the selection process. Given the diversity of approaches adopted by financial supervisors, under the preceding AML/CFT regime which had been established by Directive (EU) 2015/849, to the evaluation of the residual risk profile of obliged entities, the methodology applied for the first round of selection should have different features from the one applied for the subsequent rounds, where a higher degree of harmonisation is envisaged. Some transitional rules should therefore be set, with the objective of limiting the possibility of adjusting the controls quality score based on qualitative assessments of the effectiveness of the entities' controls. This would ensure a smoother transition to the application of the full methodology, when the Authority will have been able to foster, and then ensure, the consistency of supervisory practices.

(7) This Regulation is based on the draft regulatory technical standards submitted to the Commission by the Authority.

HAS ADOPTED THIS REGULATION:

Section 1

Minimum activities to be carried out under the freedom to provide services

Article 1 - Materiality thresholds for operations under the freedom to provide services

1. The minimum activities carried out by a credit institution or a financial institution under the freedom to provide services in a Member State other than the Member State where it is established shall be considered material for the purposes of meeting the conditions of Article 12(1) of Regulation (EU) 2024/1620, where:

   (a) the number of its customers that are resident in that Member State exceeded 20 000 as of 31 December in the previous year; or

   (b) the total annual amount of incoming and outgoing transactions generated by customers referred to in point (a) in the previous year exceeds EUR 50 000 000, or the equivalent in national currency.

   For the purposes of the first subparagraph, all activities carried out under the freedom to provide services in a given Member State by a credit institution or a financial institution shall be taken into account, irrespective of whether those activities are carried out directly, through its branches, its agents, or its distributors.

   Where several credit institutions or financial institutions within the same group carry out activities under the freedom to provide services in the same Member State, their activities in that Member State shall be aggregated for determining the minimum activities pursuant to points (a) and (b) of the first subparagraph.

2. Whether the activity of a credit institution or a financial institution or a group thereof meets any of the materiality thresholds referred to in paragraph 1, points (a) and (b), shall be determined based on the data points listed in Section C of Annex I.

Section 2

Risk assessment

Article 2 - Assessment and classification of the inherent risk at entity level

1. The methodology for assessing and classifying the inherent and residual risk profile of a credit institution or financial institution as referred to in Article 12, paragraphs (5) and (6), of Regulation (EU) 2024/1640 as low, medium, substantial or high, shall consist of the following sequential steps:

(a) identify all the inherent risk indicators that apply to the credit institution or financial institution and allocate a score to each of these indicators, in accordance with paragraph 2;

(b) identify all the sub-categories of indicators listed in Section A of Annex I, within the 'products and services' category, that apply to the credit institution or financial institution, and calculate a combined score for each of those sub-categories, in accordance with paragraph 3;

(c) calculate combined scores for all categories of indicators listed in Section A of Annex I, in accordance with paragraph 4;

(d) calculate the inherent risk score of the credit institution or financial institution, in accordance with paragraph 5;

(e) classify the inherent risk profile of the credit institution or financial institution, in accordance with paragraph 6.

2. Each score allocated to an inherent risk indicator shall be a numerical value without decimal places ranging from 1, that corresponds to the lowest level of risk, to 4, that corresponds to the highest level of risk. The inherent risk indicators shall be established based on the data points listed in Section A of Annex I. The scores shall be calculated based on pre-determined thresholds.

3. A sub-category shall apply only if at least one of its indicators applies to the credit institution or financial institution. Each combined score per sub-category shall be a numerical value with two decimal places ranging from 1, that corresponds to the lowest level of risk, to 4, that corresponds to the highest level of risk. Each combined score per sub-category shall be calculated from the scores allocated to its inherent risk indicators, in accordance with paragraph 2. For this purpose, a weighted arithmetic average method shall be used. The weight applied to each indicator shall be based on its risk significance. The weights shall be expressed as a numerical value without decimal places ranging from 1, that corresponds to the lowest level of risk significance, to 5 that corresponds to the highest level of risk significance.

4. Each combined score per category shall be a numerical value with two decimal places ranging from 1, that corresponds to the lowest level of risk, to 4 that corresponds to the highest level of risk. Each combined score per category shall be calculated from the scores allocated to its inherent risk indicators, in accordance with paragraph 2. By way of derogation, the combined score of the 'products and services' category shall be calculated from the combined scores attributed to its sub-categories, in accordance with paragraph 3. For this purpose, a weighted arithmetic average method shall be used. The weight applied to each indicator or sub-category shall be based on its risk significance. The weights shall be expressed as a numerical value without decimal places ranging from 1, that corresponds to the lowest level of risk significance, to 5, that corresponds to the highest level of risk significance.

5. The inherent risk score shall be a numerical value with two decimal places ranging from 1, that corresponds to the lowest level of risk, to 4, that corresponds to the highest level of risk. The inherent risk score shall be calculated from the combined scores per category determined in accordance with paragraph 4. For this purpose, a weighted

arithmetic average method shall be used. The weight applied to each category shall be dependent on the score it received. Categories that received a higher risk score shall have a greater weight than categories that received a lower risk score.

6. The classification shall be based on the inherent risk score attributed to the credit institution or financial institution in accordance with paragraph 5. The classification shall be made in accordance with the following conversion rules:

$$\text{Score} < 1.75\text{: Low risk (1)}$$

$$1.75 \leq \text{Score} < 2.5\text{: Medium risk (2)}$$

$$2.5 \leq \text{Score} < 3.25\text{: Substantial risk (3)}$$

$$\text{Score} \geq 3.25\text{: High risk (4)}$$

Article 3 - Assessment and classification of the quality of AML/CFT controls

1. The methodology for assessing and qualifying the quality of the AML/CFT controls put in place by a credit institution or financial institution to mitigate the inherent risks to which it is exposed shall consist of the following sequential steps:
   (a) identify all the controls quality indicators that apply to the credit institution or financial institution and allocate a score to each of these indicators, in accordance with paragraph 2;
   (b) calculate combined scores for all applicable categories of indicators listed in Section B of Annex I, in accordance with paragraph 3;
   (c) where supervisors have assessed that a combined score per category does not adequately reflect the level of quality of the controls falling within the relevant category, adjust the score accordingly, in accordance with paragraph 4;
   (d) calculate the controls quality score of the credit institution or financial institution, in accordance with paragraph 5;
   (e) classify the credit institution or financial institution in accordance with paragraph 6.
2. Each score allocated to a controls quality indicator shall be a numerical value without decimal places ranging from 1, that corresponds to the highest level of quality, to 4, that corresponds to the lowest level of quality. The controls quality indicators shall be established based on the data points listed in Section B of Annex I. The scores shall be calculated based on pre-determined thresholds.
3. Each combined score per category shall be a numerical value with two decimal places ranging from 1, that corresponds to the lowest level of risk, to 4, that corresponds to the highest level of risk. Each combined score per category shall be calculated from the scores allocated to its controls quality indicators, in accordance with paragraph 2. For this purpose, a weighted arithmetic average method shall be used. The weight applied to each indicator shall be based on its significance. The weights shall be expressed as a

numerical value without decimal places ranging from 1, that corresponds to the lowest level of significance, to 5, that corresponds to the highest level of significance.

4. Each adjustment of a score per category shall be based on a supervisory assessment or an external auditors' assessment available to the relevant supervisor. Each adjustment shall be duly justified and recorded. For the purposes of this paragraph:

   (a) a supervisory assessment shall mean any assessment of the effectiveness, or compliance with AML/CFT legal requirements, of all or part of a credit institution or financial institution's AML/CFT governance, procedures, systems and controls carried out by a supervisor within the course of its supervisory activities. This includes, but is not limited, to full scope or targeted on-site inspections, thematic off-site reviews and other off-site analyses;

   (b) an external auditor's assessment shall mean any assessment of the effectiveness, or compliance with AML/CFT requirements, of all or part of a credit institution or financial institution's AML/CFT governance, procedures, systems and controls carried out by external auditors.

5. The controls quality score shall be a numerical value with two decimal places ranging from 1, that corresponds to the lowest level of risk), to 4, that corresponds to the highest level of risk. The controls quality score shall be calculated from the combined scores per category determined in accordance with paragraphs 3 and 4. For this purpose, a weighted arithmetic average method shall be used. The weight applied to each category shall be dependent on the score it received. Categories that received a higher score that corresponds to a lower level of quality shall have a greater weight than categories that received a lower score that corresponds to a higher level of quality.

6. The classification shall be based on the controls quality score attributed to the credit institution or financial institution in accordance with paragraph 5. The classification shall be made in accordance with the following conversion rules:

$$\text{Score} < 1.75\text{: Very good quality of controls (A)}$$

$$1.75 \leq \text{Score} < 2.5\text{: Good quality of controls (B)}$$

$$2.5 \leq \text{Score} < 3.25\text{: Moderate quality of controls (C)}$$

$$\text{Score} \geq 3.25\text{: Poor quality of controls (D)}$$

Article 4 - Assessment and classification of the residual risk at entity level

The methodology for assessing and classifying the residual risk profile of a credit institution or financial institution, as referred to in Article 12, paragraph (5) and (6), of Regulation (EU) 2024/1640 as low, medium, substantial or high, shall consist of the following sequential steps:

(a) based on the inherent risk score and the controls quality score attributed to the credit or financial institution, in accordance with Article 2 and Article 3, determining the

residual risk score of the credit and financial institutions by applying the following rules:

(i) where the controls quality score is greater than the inherent risk score, the residual risk score shall be equal to the inherent risk score;

(ii) where the controls quality score is lower than or equal to the inherent risk score, the residual risk score shall be equal to the average of the inherent risk score and the controls quality score;

(b) depending on the residual risk score of the credit institution or financial institution, determined in accordance with point (a), classifying the residual risk profile of the credit institution or financial institution as low, medium, substantial or high, in accordance with the following conversion rules:

Score < 1.75: Low risk (1)

1.75 ≤ Score < 2.5: Medium risk (2)

2.5 ≤ Score < 3.25: Substantial risk (3)

Score ≥ 3.25: High risk (4)

Article 5 - Group-wide risk assessment

1. The Authority, in collaboration with financial supervisors, shall calculate the group-wide risk profile of a group of credit or financial institutions by aggregating the entity-level residual risk scores of all the credit institutions and financial institutions established in the Union, and which are part of the group.

   This paragraph shall also apply, *mutatis mutandis*, to credit institutions or financial institutions that are not part of a group, and that carry out domestic or cross-border activities through one or more branches, for calculation of the aggregated risk profile of such a credit institution or a financial institution and of its branches.

2. The aggregation referred to in paragraph 1 shall be based on a weighted arithmetic average method, with weights proportional to the relevance of each credit institution or financial institution within the group and enhancing the contribution of riskier entities. For the purpose of the aggregation, the following formula shall be applied:

$$\left(\sum_{i=1}^{N} w[i]r[i]^{\alpha}\right)^{\frac{1}{\alpha}}$$

Where:

N: number of entities in the group

r[i]: residual risk score of entity i

w[i]: weight representing the relevance of entity i within the group

α≥1: parameter to enhance the contribution of risker entities

3. The relevance of each credit institution or financial institution within the group shall be measured in accordance with the data points listed in Section A of Annex I, based on:

   (a) the number of its customers on 31 December of the previous year; and

   (b) the total amount in euro of incoming and outgoing transactions carried out in the previous year or the equivalent in national currency; and

   (c) the total amount in euro of the assets held or managed by the credit institution or financial institution on 31 December of the previous year.

4. The result of the aggregation carried out in accordance paragraph 2 shall be converted into a numerical group-wide residual risk score with two decimal places, ranging between 1, that corresponds to the lowest level of risk, to 4, that corresponds to the highest level of risk.

5. Depending on the residual risk score of the group of credit and financial institutions, its residual risk profile shall be classified as low, medium, substantial or high, in accordance with the following conversion rule:

$$\text{Score} < 1.75\text{: Low risk (1)}$$

$$1.75 \leq \text{Score} < 2.5\text{: Medium risk (2)}$$

$$2.5 \leq \text{Score} < 3.25\text{: Substantial risk (3)}$$

$$\text{Score} \geq 3.25\text{: High risk (4)}$$

Section 3

Final provisions

Article 6 - Transitional provisions

1. The following data points shall not be used for the purposes of the first selection process referred to in Article 13(4) of the Regulation (EU) 2024/1620:

   (a) ‘number of customers with high-risk activities’ as listed in Section A of Annex I;

   (b) ‘number of customers whose CDD data and information is not yet in line with the requirements of Article 20 AMLR’ as listed in Section B of Annex I.

2. Article 3, paragraph 1, point (c), shall not apply to the assessment of the quality of controls performed for the purposes of the first selection process referred to in Article 13(4) of Regulation (EU) 2024/1620.

3. By way of derogation from paragraph 2, the controls quality score may be adjusted by increasing or decreasing it by one level, based on outcomes of on-site inspections that took place in the two calendar years before the launch of the assessments, where this information is relevant for the classification of the entity's ML/TF risk profile. Where the risk is increased by one level, the adjusted score shall be set at the minimum value of the corresponding level. Where the risk is decreased by one level, the adjusted score shall be set at the maximum value of that corresponding level.

4. The adjustment applied in accordance with paragraph 3 shall always be duly justified and recorded.

Article 7 - Entry into force

This Regulation shall enter into force on the twentieth day following that of its publication in the Official Journal of the European Union.

It shall apply from [*Date of application*].

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at Brussels,

For the Commission

The President

[For the Commission

On behalf of the President]

[Position]

Annex 1 - Data Points

Section A – Inherent risk

			Sectors									
Risk Category	**Sub-Category**	**Data points**	**CI**	**CP**	**LI**	**EMI**	**PI**	**BC**	**IF**	**AMC**	**CASP**	**O**
Customers	Customers	Total number of customers	x	x	x	x	x	x	x	x	x	x
		Number of customers which are Natural Persons (NP) per country	x	x	x	x	x	x	x	x	x	x
		Number of customers which are Legal Entities (LE) per country	x	x	x	x	x	x	x	x	x	x
		Number of customers NP who are PEPs per country	x	x	x	x	x	x	x	x	x	x
		Number of customers LE whose UBO are PEPs per country	x	x	x	x	x	x	x	x	x	x
		Number of customers with at least one transaction in the previous year	x	x		x	x	x	x	x	x	x
		Number of new customers in the previous year	x	x	x	x	x	x	x	x	x	x
		Number of legal entities with complex corporate structure	x	x	x	x	x		x	x	x	x
		Number of customers with high risk activities	x	x	x	x	x	x	x	x	x	x
		Number of legal entities with at least 1 UBOs located in non-EEA countries (residence)	x	x	x	x	x		x	x	x	x
		Number of customers with cross border transactions involving non-EEA countries	x	x	x	x	x	x	x	x	x	x
		Number of walk-in customers	x			x	x	x			x	
		Number of occasional transactions carried by walk in customers	x			x	x	x			x	

			Sectors									
Risk Category	Sub-Category	Data points	CI	CP	LI	EMI	PI	BC	IF	AMC	CASP	O
		Number of customers with requests from FIU	x	x	x	x	x	x	x	x	x	x
Products	Payment Accounts	Number of payment accounts	x	x		x	x					x
		Total Value (EUR) of incoming transactions in the previous year	x	x		x	x					x
		Number of incoming transactions in the previous year	x	x		x	x					x
		Total Value (EUR) of outgoing transactions in the previous year	x	x		x	x					x
		Number of outgoing transactions in the previous year	x	x		x	x					x
	Virtual IBANs	Total Number of master accounts with linked vIBANS	x			x	x					
		Number of transactions on Virtual IBANs (incoming) in the previous year	x			x	x					
		Total Value (EUR) of transactions on Virtual IBANs (incoming) in the previous year	x			x	x					
		Number of transactions on Virtual IBANs (outgoing) in the previous year	x			x	x					
		Total Value (EUR) of transactions on Virtual IBANs (outgoing) in the previous year	x			x	x					
		Total Number of re-issued IBANs	x			x	x					
		Total Number of re-issued IBANs where the end-user is not a customer of the obliged entity	x			x	x					
		Total Number of Prepaid Cards issued during the previous year	x			x	x				x	

			Sectors									
Risk Category	Sub-Category	Data points	CI	CP	LI	EMI	PI	BC	IF	AMC	CASP	O
	Prepaid Cards	Total Value (EUR) of the issued prepaid cards during the previous year (turnover)	x			x	x				x	
		Total Value (EUR) outstanding on prepaid cards issued during the previous year (turnover)	x			x	x				x	
		Total number of customers using prepaid cards	x			x	x				x	
		Total number of customers using prepaid cards with more than 3 prepaid cards	x			x	x				x	
	Lending	Total Number of outstanding loans	x	x								
		Total Value (EUR) of outstanding loans	x	x								
		Total Number of outstanding real estate loans	x	x								
		Total Number of outstanding real estate loans with third party payments in the past calendar year	x	x								
		Total Value (EUR) of loans granted during the previous year	x	x								
		Total Number of outstanding asset backed loans with cash collateral	x	x								
		Total Number of loan repayments during the previous year	x	x								
		Total Number of prematurely repaid loans during the previous year	x	x								
		Total Number of loan repayments from non-EEA	x	x								

			Sectors									
Risk Category	Sub-Category	Data points	CI	CP	LI	EMI	PI	BC	IF	AMC	CASP	O
		countries during the previous year										
		Total Number of consumer loans granted during the previous year that are not associated to the acquisition of any product/service	x	x								
	Factoring	Total Number of factoring contracts granted in the previous year	x	x								
		Total Value (EUR) of factoring contracts granted during the previous year	x	x								
		Total Value (EUR) of factoring contracts granted to obligors established in non-EEA countries during the previous year	x	x								
	Life insurance contracts	total amount (EUR) of gross written premiums in the previous year (incoming)			x							
		total of amount (EUR) of surrender value of the insurance contracts at the end of the previous year			x							
		% of all gross written premium (amount in EUR) paid directly to the life insurance broker in the previous year			x							
		Number of insurance contracts that are not used for low risk contracts			x							
	Currency	Number of currency exchange transactions carried out during the previous year (sell)	x			x	x	x				

Risk Category	Sub-Category	Data points	Sectors									
			CI	CP	LI	EMI	PI	BC	IF	AMC	CASP	O
	Exchange (involving cash)	Number of currency exchange transactions carried out during the previous year (buy)	x			x	x	x				
		Number of currency exchange transactions carried out during the previous year, where the transaction is above EUR 1 000 (sell)	x			x	x	x				
		Number of currency exchange transactions carried out during the previous year, where the transaction is above EUR 1 000 (buy)	x			x	x	x				
		Total Value (EUR) of currency exchange transactions carried out during the previous year (sell)	x			x	x	x				
		Total Value (EUR) of currency exchange transactions carried out during the previous year (buy)	x			x	x	x				
		Value (EUR) of currency exchange transactions cash-to-cash carried out during the previous year	x			x	x	x				
	Custody of crypto assets	Number of customers owning crypto-assets	x			x	x				x	
		Total value (EUR) of crypto assets held on customer custody wallets in the previous year	x			x	x				x	
Services	Invest. Services and Activities - reception and	number of retail clients	x						x	x		
		number of professional clients	x						x	x		
		Number of AML/CFT regulated customers outside the EEA	x						x	x		

			Sectors									
Risk Category	Sub-Category	Data points	CI	CP	LI	EMI	PI	BC	IF	AMC	CASP	O
	transmission of orders											
	Invest. Services and Activities - custody account keeping	number of retail clients	x						x			
		number of professional clients	x						x			
		% of assets under custody for which the obliged entity does not have a direct business relationship with the final investor	x						x			
		Number of AML/CFT regulated customers outside the EEA	x						x			
	Invest. Services and Activities - Portfolio manang ement	number of retail clients	x						x	x		
		number of professional clients	x						x	x		
		total assets under management	x						x	x		
		Number of customers for which customer holding total assets with a value of at least EUR 5 000 000	x						x	x		
	Money Remittance	Total Number of money remittance payments in the previous year (incoming)	x			x	x					
		Total Number of money remittance payments in the previous year (outgoing)	x			x	x					
		Total Value (EUR) of remittance payments in the previous year (incoming)	x			x	x					
		Total Value (EUR) of remittance payments in the previous year (outgoing)	x			x	x					
		Total Number of money remittance transactions above	x			x	x					

			Sectors									
Risk Category	Sub-Category	Data points	CI	CP	LI	EMI	PI	BC	IF	AMC	CASP	O
		1 000 euro in the previous year (incoming)										
		Total Number of money remittance transactions above 1 000 euro in the previous year (outgoing)	x			x	x					
	Wealth Management	Total Number of customers (NP) with total assets under management over a value of at least EUR 5 000 000 AND with total assets over a value of at least EUR 50 000 000	x		x				x		x	
		Total Number of customers (NP) that fall under the definition of private banking (EBA Risk Factor Guidelines)	x		x				x		x	
	Correspondent services	Total Value (EUR) of transactions executed on behalf of the respondent client in the previous year (incoming)	x				x				x	
		Total Value (EUR) of transactions executed on behalf of the respondent client in the previous year (outgoing)	x				x				x	
		Total Value (EUR) of transactions going through payable through accounts in the previous year (incoming)	x				x				x	
		Total Value (EUR) of transactions going through payable through accounts in the previous year (outgoing)	x				x				x	
		Total Value (EUR) of transactions going trough nested accounts in the previous year (incoming)	x				x				x	
		Total Value (EUR) of transactions going trough nested accounts in the previous year (outgoing)	x				x				x	

Risk Category	Sub-Category	Data points	Sectors									
			CI	CP	LI	EMI	PI	BC	IF	AMC	CASP	O
	Trade finance	Total Number of trade finance customers	x	x								
		Total Number of trade finance transactions in the previous year (incoming)	x	x								
		Total Number of trade finance transactions in the previous year (outgoing)	x	x								
		Total Value (EUR) of trade finance transactions in the previous year (incoming)	x	x								
		Total Value (EUR) of trade finance transactions in the previous year (outgoing)	x	x								
	E-Money	Number of e-money payment transactions in the previous year (incoming)	x			x						
		Number of e-money payment transactions in the previous year (outgoing)	x			x						
		Total Value (EUR) of e-money payment transactions in the previous year (incoming)	x			x						
		Total Value (EUR) of e-money payment transactions in the previous year (outgoing)	x			x						
		Value (EUR) of e-money payment transactions by non-identified customers in the previous year	x			x						
	TCSP services	Total Number of legal entity customers using TCSP services in the previous year	x						x			
	Crypto cash cards	Number of non-EEA crypto companies for which the obliged entity acts as a BIN-sponsor	x			x	x					

			Sectors									
Risk Category	Sub-Category	Data points	CI	CP	LI	EMI	PI	BC	IF	AMC	CASP	O
	Exchange crypto for funds	Total amount (EUR) crypto-funds in the previous year	x			x	x		x		x	
		Total number of transactions crypto-funds in the previous year	x			x	x		x		x	
		number of customers using this type of service in the previous year	x			x	x		x		x	
		Total number of transactions crypto-funds from unhosted wallets in the previous year	x			x	x		x		x	
	Exchange funds for crypto	Total amount (EUR) funds-crypto in the previous year	x			x	x		x		x	
		Total number of transactions funds-crypto in the previous year	x			x	x		x		x	
		number of customers using this type of service in the previous year	x			x	x		x		x	
		Total number of transactions funds-crypto to unhosted wallets in the previous year	x			x	x		x		x	
	Exchange crypto for crypto	Total amount (EUR) crypto-crypto in the previous year	x			x	x		x		x	
		Number of customers using this type of service in the previous year	x			x	x		x		x	
		Total number of transactions crypto-crypto in the previous year	x			x	x		x		x	
		Total number of transactions crypto-crypto to unhosted wallets in the previous year	x			x	x		x		x	
		Total number of transactions crypto-crypto from unhosted wallets in the previous year	x			x	x		x		x	

Risk Category	Sub-Category	Data points	Sectors									
			CI	CP	LI	EMI	PI	BC	IF	AMC	CASP	O
	Transfer crypto-assets	Total amount (EUR) that customers transferred in the previous year	x			x	x		x		x	
		Number of customers using this type of service in the previous year	x			x	x		x		x	
		Total number of transfers of crypto-assets in the previous year	x			x	x		x		x	
		Total number of transactions to unhosted wallets in the previous year	x			x	x		x		x	
		Total number of transactions from unhosted wallets in the previous year	x			x	x		x		x	
	Management of UCITS	Number of retail investor customers								x		
		Number of professional investor customers								x		
		Total assets under management of UCITSs								x		
	Management of AIFs	Number of retail investor customers								x		
		Number of professional investor customers								x		
		Number of open-ended funds								x		
		Number of closed-ended funds								x		
		Total assets under management								x		
		Total assets under management in unlisted assets								x		

			Sectors									
Risk Category	Sub-Category	Data points	CI	CP	LI	EMI	PI	BC	IF	AMC	CASP	O
	Safe Custody Services	Total Number of customers using safe deposit boxes	x									
	Crowdfunding	Total Value (EUR) of funding projects in the previous year	x	x		x	x		x		x	
		Total Number of projects being funded in the previous year	x	x		x	x		x		x	
		Total Number of donors from high-risk countries	x	x		x	x		x		x	
		Total Number of projects where the owner is from a high-risk country	x	x		x	x		x		x	
	Cash Transactions	Number of cash transactions in the previous year (withdrawals)	x	x	x	x	x				x	
		Number of cash transactions in the previous year (deposits)	x	x	x	x	x				x	
		Total Value (EUR) of cash transactions in the previous year (withdrawals)	x	x	x	x	x				x	
		Total Value (EUR) of cash transactions in the previous year (deposits)	x	x	x	x	x				x	
		Total Number of natural persons totalling cash transactions over 20 000 EUR during the previous year	x	x	x	x	x				x	
Geographies	Geographies	Number of incoming transactions in the previous year by country	x	x	x	x	x	x			x	x
		Total value (EUR) of incoming transactions in the previous year by country	x	x	x	x	x	x			x	x
		Number of outgoing transactions in the previous year by country	x	x	x	x	x	x			x	x

			Sectors									
Risk Category	Sub-Category	Data points	CI	CP	LI	EMI	PI	BC	IF	AMC	CASP	O
		Total value (EUR) of outgoing transactions in the previous year by country	x	x	x	x	x	x			x	x
		Total value (EUR) of entity's investment undertakings (CIUs) by country								x		
		Number of investors by country							x	x		
		Total value (EUR) of assets under management by country								x		
		Number of institutions established in foreign countries to whom you provide correspondent services (by country)	x				x				x	
		Total value of incoming funds moved on behalf of the respondent's clients by country of respondent's establishment	x				x				x	
		Total value of outgoing funds moved on behalf of the respondent's clients by country of respondent's establishment	x				x				x	
		Number of branches by country	x	x	x	x	x	x	x	x	x	x
		Number of subsidiaries by country	x	x	x	x	x	x	x	x	x	x
		Country where the entities undertaking is located (parent company)	x	x	x	x	x	x	x	x	x	x
Distribution channels	Distribution channels	Number of new customers onboarded remotely in the previous year	x	x	x	x	x				x	x
		Number of new customers onboarded in the previous year by third parties	x	x	x	x	x				x	x

			Sectors									
Risk Category	Sub-Category	Data points	CI	CP	LI	EMI	PI	BC	IF	AMC	CASP	O
		Number of customers onboarded in the previous year by third parties not directly subject to AML/CFT supervision	x	x	x	x	x				x	x
		Number of agents by country				x	x		x			
		Number of distributors by country				x						
		Total value of gross written premiums through insurance contracts issued through brokers, broken down by country the brokers are established			x							
		Number of white labelling partners by country of establishment	x			x	x				x	x

Section B – AML/CFT Controls

Category	Data Points	CI	CP	LI	EMI	PI	BC	IF	AMC	CASP	O
1 - Governance, Culture & Compliance function (Role and responsibilities of the management body, AML/CFT risk culture, AML/CFT Compliance Function and Resources, AML/CFT training)	Date at which the procedures covering the entirety of the AML/CFT framework (including initial and ongoing CDD, transaction and business relationship monitoring, STR, and financial sanction screening) were checked as being in compliance with existing laws and regulations applicable at that date	x	x	x	x	x	x	x	x	x	x
	Number of dedicated AML/CFT compliance staff (in FTE)	x	x	x	x	x	x	x	x	x	x

Category	Data Points	CI	CP	LI	EMI	PI	BC	IF	AMC	CASP	O
	% of personnel per category who have received AML training during the last calendar year: a) AML/CFT compliance staff b) non-AML/CFT compliance staff (e.g. customer facing staff) c) agents and distributors d) Board members / non-executive directors	x	x	x	x	x	x	x	x	x	x
2 - Internal Controls & Outsourcing (Internal controls and reporting systems, Outsourcing and reliance on third parties, Internal audit function / external expert, Record keeping)	Frequency of reporting by the AML compliance officer to the management body (never, monthly, quarterly, half-yearly, yearly)	x	x	x	x	x	x	x	x	x	x
	Tasks outsourced by the obliged entity (in total or in part) to service providers: CDD Training Transaction Monitoring Suspicious Transaction Reports Sanctions Screening PEP detection Compliance Monitoring Checks	x	x	x	x	x	x	x	x	x	x
	AML/CFT tasks outsourced to an external service provider located in third country that is not part of the group (Y/N)	x	x	x	x	x	x	x	x	x	x
	Existence of AML/CFT tasks outsourced to an external service provider located in third country that is part of the group (Y/N)	x	x	x	x	x	x	x	x	x	x
	Dates when the AML/CFT obligations/ controls were last assessed by an internal/external audit: a. BWRA b. determination of ML/TF risk profile of customers in a business relationship c. AML/CFT-related awareness-raising and staff training measures d. Identification and identity verification procedures e. Policies and procedures for monitoring and analysing business relationships, including transaction monitoring	x	x	x	x	x	x	x	x	x	x

Category	Data Points	CI	CP	LI	EMI	PI	BC	IF	AMC	CASP	O
	f. Policies and procedures for suspicious transaction reporting g. Record keeping policies and procedures h. Resources dedicated to AML/CFT i. Organisation of the AML/CFT system, governance and reporting to management bodies.										
3 - Risk assessment (Business Wide Risk Assessment (BWRA) and Customer ML/TF risk assessment and classification (CRA))	Last approval date of the BWRA	x	x	x	x	x	x	x	x	x	x
	Senior management approved the last version of the BWRA (Y/N)	x	x	x	x	x	x	x	x	x	x
	Date of the last update of the CRA	x	x	x	x	x	x	x	x	x	x
	Number of customers per ML/TF risk category (low risk, medium-low risk, medium-high risk, high-risk)	x	x	x	x	x	x	x	x	x	x
4 - Customer due diligence & monitoring (Customer Due Diligence and Ongoing monitoring of business relationships)	Number of customers that are legal entities /trusts whose beneficial owners have not been identified	x	x	x	x	x	x	x	x	x	x
	Number of customers that are legal entities /trusts whose beneficial ownership has been identified, but the identity of whom has not been verified	x	x	x	x	x	x	x	x	x	x
	Number of customers without identification and verification documentation/ information	x	x	x	x	x	x	x	x	x	x
	Number of customers whose CDD data and information is not yet in line with the requirements of Article 20 AMLR	x	x	x	x	x	x	x	x	x	x
	Number of customers without ML/TF risk profile (excluding customers with whom the obliged entity does not have a business relationship)	x	x	x	x	x	x	x	x	x	x

Category	Data Points	CI	CP	LI	EMI	PI	BC	IF	AMC	CASP	O
	Number of customers for whom updates of customer information were due in the last calendar year, in accordance with the obliged entity's policies and procedures	x	x	x	x	x	x	x	x	x	x
	Number of customers for whom customer information was reviewed and updated in the last calendar year	x	x	x	x	x	x	x	x	x	x
5 - Transaction monitoring and Suspicious Activity Reporting	The obliged entity has a transaction monitoring system in place (Y/N)	x	x	x	x	x	x	x	x	x	x
	The transaction monitoring system is: a) Not automated; or b) At least partly automated	x	x	x	x	x	x	x	x	x	x
	If manual system: Average time in days to analyse the transaction since the moment it occurred	x	x	x	x	x	x	x	x	x	x
	If automated system: The system can generate alerts in case of inconsistencies between CDD information relating to the customer and the following elements: a) Number of transactions b) Value of aggregated transactions c) value of single transactions d) counterparties e) countries	x	x	x	x	x	x	x	x	x	x
	If automated system: Number of alerts not analysed at the end of the calendar year	x	x	x	x	x	x	x	x	x	x
	If automated system: Average time to analyse an alert in the last calendar year (number of days between that the alert was generated and the moment that the alert was closed)	x	x	x	x	x	x	x	x	x	x
	If automated system: Ratio between number of alerts and number of STRs	x	x	x	x	x	x	x	x	x	x
	The entity has implemented a tool that enables it to analyse the information available on distributed ledgers and generate alerts where unusual patterns or risk factors are	x			x	x		X		x	

Category	Data Points	CI	CP	LI	EMI	PI	BC	IF	AMC	CASP	O
	identified, in relation to the transactions carried out by the customer (Y/N)										
	Average number of days between the date of identification of potential suspicious transactions (prior to the analysis of the transaction) and the date when the transaction is reported to the FIU (after the analysis of the transaction) during the last calendar year	x	x	x	x	x	x	x	x	x	x
	Total number of STRs submitted to the FIU during the last calendar year	x	x	x	x	x	x	x	x	x	x
6 - Targeted Financial Sanctions and Compliance with Fund Transfers Regulation	Maximum number of hours between the publication of the TFS by the authorities and the implementation of these changes in the institution's screening tools	x	x	x	x	x	x	x	x	x	x
	Number of outbound transfers for which requests were received from a counterparty in the transfer chain for information that is missing, incomplete or provided using inadmissible characters in the last calendar year	x	x		x	x				x	x
	Total number of outbound transfers in the last calendar year	x	x		x	x				x	x
	% of outbound transfers rejected or returned by the counterparty in the transfer chain due to information that is missing, incomplete or provided using inadmissible characters in the last calendar year	x	x		x	x				x	x
7 - Group-wide AML/CFT Framework (AML/CFT governance structures, Group-wide ML/TF risk assessment, Group policies and procedures, including sharing of information, Group-wide AML/CFT function)	% of group entities that provided reports to the Group AML compliance on the following areas in the last calendar year (should only be answered by the parent company): a) CDD b) ongoing monitoring c) STRs d) identity and transaction level information on high risk customers e) deficiencies	x	x	x	x	x	x	x	x	x	x

Category	Data Points	CI	CP	LI	EMI	PI	BC	IF	AMC	CASP	O
	% of jurisdictions in which the group is established covered by reviews (including access to customer and transaction level data) performed by the group AML/CFT compliance function in the last three calendar years. (applies only to groups that have been existing for more than 3 years and should only be filled in by the parent company)	x	x	x	x	x	x	x	x	x	x
	Number of group entities for which deficiencies were identified by competent AML/CFT supervisors in the last calendar year (should only be filled in by the parent company) - EU/EEA entities - Non-EU/EEA	x	x	x	x	x	x	x	x	x	x

Section C – Datapoints for the calculation of the materiality thresholds for operations under the freedom to provide services

1. List of the European Union countries where the credit or financial institution is operating in practice under freedom to provide services

2. Total number of customers who are resident in the Member State where the credit or financial institution is operating on a freedom to provide service basis, at the end of the last calendar year

2.A. Volumes of transactions generated by the customers under point 2 over the last calendar year