WORKING ARRANGEMENT

BETWEEN

THE AUTHORITY FOR ANTI-MONEY LAUNDERING AND COUNTERING THE FINANCING OF TERRORISM

AND

THE EUROPEAN PUBLIC PROSECUTOR'S OFFICE

The Authority for Anti-Money Laundering and Countering the Financing of Terrorism (hereinafter referred to as "AMLA") and the European Public Prosecutor's Office (hereinafter referred to as "the EPPO"), hereinafter together referred to as the "Parties", or individually as a "Party",

Having regard to the Treaty on the Functioning of the European Union, and in particular Articles 86, 114 and 325 thereof,

Having regard to the Council Regulation (EU) 2017/1939 of 12 October 2017 implementing enhanced cooperation on the establishment of the European Public Prosecutor's Office ('the EPPO')[1], hereinafter referred to as "the EPPO Regulation", and in particular Articles 22, 24(1), 43(2), 49(1), 99, 103 and 111 thereof,

[1] OJ L 283, 31.10.2017, p. 1.

Having regard to the 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[2], hereinafter referred to as "the AMLA Regulation", and in particular Articles 5, 41, 57(4), 94 and 98 thereof,

Whereas:

(1) The EPPO is competent to investigate, prosecute, and bring to judgement the perpetrators of the criminal offence of money laundering, as described in Article 1(3) of Directive (EU) 2015/849 of the European Parliament and of the Council[3], involving property derived from criminal offences covered by the EPPO Regulation and by Directive (EU) 2017/1371 of the European Parliament and of the Council[4].

(2) AMLA is the Union authority for anti-money laundering and countering the financing of terrorism ensuring an efficient and adequate supervision of obliged entities, strengthening common supervisory approaches, conducting joint analyses and supporting cooperation between FIUs.

(3) Article 24(1) of the EPPO Regulation provides that institutions, bodies, offices and agencies of the Union and the authorities of the Member States competent under applicable national law are to report to the EPPO without undue delay any criminal conduct in respect of which it could exercise its competence.

(4) Pursuant to Article 41 of the AMLA Regulation, AMLA should report to the EPPO, without undue delay, the results of joint analyses indicating suspected criminal activity within the EPPO's competence, develop in consultation with the EPPO technical standards for such reporting, and may exchange

[2] PE/35/2024/INIT, OJ L, 2024/1620, 19.6.2024.

[3] Directive (EU) 2015/849 of the European Parliament and of the Council of 20 May 2015 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, amending Regulation (EU) No 648/2012 of the European Parliament and of the Council, and repealing Directive 2005/60/EC of the European Parliament and of the Council and Commission Directive 2006/70/EC, OJ L 141, 5.6.2015, p. 73.

[4] Directive (EU) 2017/1371 of the European Parliament and of the Council of 5 July 2017 on the fight against fraud to the Union's financial interests by means of criminal law, OJ L 198, 28.7.2017, p. 29.

strategic and other non-operational information with the EPPO under conditions set out in a Working Arrangement.

(5) In accordance with Article 32(6) of Directive (EU) 2024/1640 of the European Parliament and of the Council[5] (the "AML Directive"), the EPPO may be invited to take part in a joint analysis where relevant for the purpose of the joint analysis and where such participation falls within its mandate.

(6) Pursuant to Article 69 of the AML Directive, AMLA should, in cooperation with the EPPO and other Union bodies, issue guidelines on cooperation between competent authorities in the field of anti-money laundering and countering the financing of terrorism ('AML/CFT').

(7) Pursuant to Article 57(4) of the AMLA Regulation, the General Board of AMLA, in its Financial Intelligence Unit (FIU) composition, may admit the EPPO as an observer to its meetings where matters within the scope of the EPPO's mandate are discussed, and the conditions governing such participation should be laid down in the Rules of Procedure for the General Board of AMLA and reflect an agreement reached between AMLA and the EPPO.

(8) Article 94(2) and (3) of the AMLA Regulation as well as Article 99(1) and (3) of the EPPO Regulation call for a close relationship of AMLA and the EPPO, for the purpose of sincere cooperation and swift information exchange between them.

(9) It is in the mutual interest of AMLA and the EPPO to establish and maintain a close and structured relationship, with a view to enabling the effective exchange of strategic and operational information and emerging trends in relation to money laundering risks affecting the Union, in particular where such laundering involves assets derived from criminal offences falling within the EPPO competence. This cooperation aims to ensure that the fight against money laundering affecting the European Union's financial interests

[5] Directive (EU) 2024/1640 of the European Parliament and of the Council of 31 May 2024 on 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 or terrorist financing, amending Directive (EU) 2019/1937, and amending and repealing Directive (EU) 2015/849, OJ L, 2024/1640, 19.6.2024.

is as effective and coordinated as possible, while avoiding any duplication of effort.

(10) It is in the common interest of the Parties to facilitate their cooperation, in an effort to make the fight against money laundering and its associated predicate offences adversely affecting the European Union's financial interests as efficient as possible,

HAVE AGREED AS FOLLOWS:

Part I
General provisions

Article 1 – Purpose and legal nature

This Working Arrangement is of a technical, strategic and operational nature, and it aims, in particular, to facilitate cooperation and the exchange of information between the Parties. It does not form the basis for allowing the exchange of personal data nor has legally binding effects on the Union or its Member States.

Article 2 – Areas of Crime

The cooperation as established in this Working Arrangement shall relate to the relevant areas of crime within the respective mandates of the Parties, including specifically where money laundering or its predicate offences affect the financial interests of the Union.

Part II
Operational cooperation

Article 3 – General areas of operational cooperation

The operational cooperation between the Parties shall cover areas of mutual interest within their respective competence. It will include, *inter alia*:

a) the exchange of operational information spontaneously or upon request, including such information and data relevant to the EPPO's or AMLA's competence including case-related financial intelligence, transaction data and investigative findings;
b) the reporting and transmission by AMLA of the results of joint analyses and any additional relevant information pursuant to Article 41(1) of the AMLA Regulation;
c) requests from the EPPO to AMLA to assess whether to initiate joint analyses, based on investigations conducted by the EPPO and in line with the Parties' respective legal frameworks;
d) the participation of the EPPO in joint analyses coordinated by AMLA subject to the consent of the participating FIUs;
e) the implementation of a hit/no-hit system in accordance with Article 40(8) of the AMLA Regulation, for which the methods and procedures shall be determined in a subsequent instrument;
f) the coordination of the respective activities of both Parties in individual cases, where required;
g) precautionary measures, as provided for in Article 6 of this Working Arrangement;
h) requests for lifting privileges and immunities, as provided for in Article 8 of this Working Arrangement;
i) requests for lifting the inviolability of premises, buildings and archives, as provided for in Article 9 of this Working Arrangement.

Article 4 – Exchange of operational information

1. The Parties shall share relevant operational information, spontaneously or upon request, in line with their respective legal frameworks and subject to applicable confidentiality and data protection rules.
2. Unless otherwise stipulated in this Working Arrangement, a Party shall reply to requests for information expeditiously and in any case within 20 working days.
3. When exchanging information relating to a specific case or suspicion of criminal activity that may fall within the EPPO's competence, the Parties shall ensure that all marking, classification, and handling requirements and, in accordance with relevant Union law and national law, possible restrictions of use are respected. To the extent possible, secure and encrypted communication channels shall be used.

Article 5 – Reporting to EPPO and subsequent exchanges

1. AMLA shall without undue delay report to the EPPO any criminal conduct in respect of which the EPPO could exercise its competence in accordance with Article 24(1) of the EPPO Regulation.
2. AMLA shall report the results of joint analyses in accordance with the respective implementing technical standards on the format of reporting developed in consultation with the EPPO under Article 41(2) of the AMLA Regulation.
3. Where the EPPO receives a report or other relevant information from AMLA, it shall inform AMLA, in accordance with applicable law, of the steps taken in relation to the information provided and any relevant outcomes, to the extent permissible under its legal framework.
4. All reporting and transmission under this Article shall be carried out using secure and encrypted communication channels, and in compliance with all applicable confidentiality, data protection, and classification requirements.

Article 6 – Precautionary measures

1. The EPPO shall without delay provide sufficient information to AMLA to allow it to take appropriate measures in accordance with Article 103(2) of the EPPO Regulation.
2. Where AMLA has reported information to the EPPO pursuant to Article 24(1) of the EPPO Regulation, but the EPPO has not yet taken a decision on whether to open an investigation, AMLA shall, where appropriate, avoid undertaking any activities that may compromise potential evidence and shall consult the EPPO before taking any precautionary measures, unless immediate action is required. In each case, this is without prejudice to the duties and obligations foreseen in the AMLA Regulation.

Article 7 – Parallel or related investigations

1. Where either Party intends to take, or has taken, action in respect of facts that are the subject of an ongoing proceeding of the other Party, it shall, to the extent it is aware of such overlap, consider informing the other Party without undue delay.
2. The Parties shall, where appropriate, consult each other with a view of coordinating their respective actions in relation to the same facts. Such consultation shall aim, in particular, to avoid unnecessary duplication of proceedings, ensure respect for the principle of *ne bis in idem*, and safeguard the effective protection of the financial interests of the European Union, without prejudice to the independent exercise of the powers and mandates of each Party.

Article 8 – Lifting privileges or immunities

1. The reasoned written request of the European Chief Prosecutor shall be addressed to the Chair of AMLA. Where the investigation involves the Chair of AMLA, the request shall be submitted to the Vice-Chair of AMLA.
2. Where the EPPO considers that the person whose immunity is requested to be waived cannot, in accordance with applicable case-law, be informed and heard on the request to waive the immunity, the written and reasoned request will contain the detailed grounds for not hearing the person concerned.
3. The EPPO will preferably use the template in Annex I when submitting requests pursuant to this Article.
4. AMLA will provide a written and reasoned reply within the shortest possible timeframe according to the principle of mutual sincere cooperation. AMLA may request additional information from the EPPO in accordance with this paragraph, without prejudice to the proper conduct and confidentiality of the EPPO's investigations. The reply will in principle be provided within 30 working days after reception of the request in cases where the person concerned is heard, and within 20 working days in cases where the person is not heard.
5. Where AMLA is unable to respect the deadline indicated in the reasoned written request of the European Chief Prosecutor, it will inform the EPPO as soon as practicable and give an indication of the time within which it expects to be able to respond.

Article 9 – Inviolability of premises, buildings and archives

1. Where the investigations of the EPPO require to gain access to AMLA premises, buildings and/or AMLA archives in order to conduct an EPPO investigative measure, the EPPO will address a reasoned written request to the Chair of AMLA.

Where the investigation involves the Chair of AMLA, the request shall be submitted to the Vice-Chair of AMLA.

2. The EPPO's Central Office will preferably submit requests in application of this Article by using the template in Annex II.
3. AMLA will provide a written and reasoned reply to the EPPO's Central Office as soon as possible and based on the principle of mutual sincere cooperation. The reply will in principle be provided within 15 working days after receipt of the request.
4. Where AMLA is unable to respect the deadline indicated in the reasoned written request of the EPPO, it will inform the EPPO's Central Office as soon as possible and give an indication of the time within which it expects to be able to respond.
5. In the case that access to AMLA buildings, premises and/or archives is granted in the context of an EPPO investigation, the latter shall request assistance from the Executive Director of AMLA.

Part III
Non-operational cooperation

Article 10 – Non-Operational Cooperation, including strategic cooperation

The Parties may engage in strategic and other non-operational cooperation. It shall cover, *inter alia*:

a) The exchange of non-operational and strategic information, such as emerging trends, typologies, risk indicators and methodologies relating to money laundering, in particular where it involves or derives from predicate offences affecting the financial interests of the Union and for AMLA's assessment of priority areas for the conduct of joint analysis;

b) The participation of the EPPO in relevant AMLA working groups responsible for the drafting of implementing technical standards, regulatory technical standards and guidelines;

c) Joint or coordinated participation in training initiatives and capacity-building activities in areas of mutual interest, including secondments or staff exchanges where appropriate;
d) Cooperation in public communication, including coordination on communicating to the media in cases or matters of common concern, without prejudice to the consultation requirements set out in Article 16 and subject to the applicable confidentiality and legal constraints;
e) The participation of the EPPO as an observer in the meetings of AMLA's General Board in its Financial Intelligence Unit (FIU) composition, where matters falling within the EPPO's mandate are discussed, under the conditions set out in Article 57(4) of AMLA Regulation, as further defined in the Rules of Procedure for the General Board of AMLA and in Article 12(3) of this Working Arrangement.

Article 11 – Exchange of strategic information on trends

1. Within the limits of their respective mandates, AMLA and the EPPO may exchange strategic and other non-operational information either spontaneously or upon request.
2. Such information may include, *inter alia*:
   a) information on the operational structures of organisations involved in fraudulent or money laundering activities, including links between such organisations operating inside or outside the European Union;
   b) strategies, *modi operandi*, techniques, methods of financing and mechanisms for laundering assets used by such organisations;
   c) typologies, risk indicators, and trends in criminality related to fraud, corruption, money laundering, or other illegal activities affecting the European Union's financial interests.

3. Exchanges under this Article shall be carried out in accordance with the applicable rules on confidentiality and data protection, and shall, where appropriate, use secure and encrypted communication channels.

Part IV
Institutional Relations

Article 12 – Institutional relations and observer participation

1. Representatives of the Parties shall hold regular meetings, at the appropriate level, to discuss their priorities, identify opportunities for enhanced coordination and collaboration, as well as to update each other on relevant topics and deliverables.
2. As appropriate, the Chair of AMLA may be invited by the European Chief Prosecutor to attend a meeting of the College of the EPPO, and the European Chief Prosecutor may be invited by the Chair of AMLA to attend a meeting of the AMLA General Board, to exchange views and discuss strategic priorities, policy developments, or other relevant topics.
3. The European Chief Prosecutor shall designate representatives to participate, on behalf of the EPPO, as a non-voting observer in meetings of AMLA's General Board in its Financial Intelligence Unit (FIU) composition where matters falling within the EPPO's mandate are discussed, in accordance with Article 57(4) of the AMLA Regulation and the Rules of Procedure for the General Board of AMLA. For this purpose:
   a) AMLA shall ensure that the representatives of the EPPO receive timely invitations and access to the relevant agenda and supporting documents for such meetings;
   b) the participation of the representatives of the EPPO shall be subject to the confidentiality rules and conditions set out in the Rules of Procedure for the General Board of AMLA;

c) any additional practical arrangements for this participation shall be agreed between AMLA and the EPPO.

Article 13 – Professional training, staff exchange and liaison officers

1. Subject to the availability of resources, the Parties shall cooperate in the area of professional training, including through the exchange of staff for learning and capacity-building purposes. Each Party shall inform the other of, and, where appropriate, invite the other to participate in relevant seminars, workshops, conferences, and similar activities.
2. The Parties may agree on the secondment of liaison officer(s) or expert(s) to promote and facilitate cooperation. The tasks, rights, and obligations of such liaison officers or experts, as well as their number and the allocation of related costs, shall be governed by a separate instrument agreed between the Parties setting out the detailed terms and conditions.

Part V
Communication

Article 14 – Points of contact

1. AMLA and the EPPO shall designate permanent contact points to facilitate the implementation of this Working Arrangement.
2. For the operational cooperation, the permanent contact points are
   a) for the EPPO, the Head of the Operations Unit;
   b) for AMLA, the Head of the FIU Operational Unit.
3. For the non-operational cooperation, including strategic cooperation, the permanent contact points are:

a) for the EPPO, the representatives designated by the European Chief Prosecutor;
b) for AMLA, the Head of the FIU Operational Unit.

4. The designation of the contact points and their contact details shall be notified to the other Party by exchange of letters at the time of signature of this Working Arrangement. Any changes to contact details shall be communicated in writing without delay.

Article 15 – Secure communication channels

The establishment, implementation, and operation of secure communication channels for the exchange of information between AMLA and the EPPO may be agreed in a separate instrument.

Article 16 – Communication with the media

The Parties shall consult each other before communicating with the media on activities or operations in which they have both been involved. They may, where appropriate, agree on the text of a joint or coordinated press release or on complementary individual communications on the results thereof. Each Party shall respond to such consultation requests under this Article as soon as possible, and preferably within 48 hours.

Part VI
Data Protection

Article 17 – Data protection

1. Concerning personal data protection, the Parties shall apply their respectively applicable legal framework.
2. The Parties shall cooperate and inform each other appropriately in the implementation of their respective obligations. This specifically includes:
   a) informing each other in case of any personal data breach occurring in relation to personal data exchanged under this Working Arrangement;
   b) consulting each other in case of data subject requests related to personal data exchanged under this Working Arrangement, and specifically not to grant access prior to having consulted the other Party;
   c) informing each other in case there are reasons to believe that personal data received or provided under this Working Arrangement were or are inaccurate or incomplete, or should not have been transmitted, in which case the receiving party shall take the appropriate action.
3. Personal data shall be transmitted with a purpose and shall not be processed in a manner incompatible with, or stored longer than necessary for, the purpose for which it was transmitted.
4. Other than where provision of personal data was mandatory based on existing legislative reporting obligations, any restriction on the use of information exchanged, or instructions relating to deletion or destruction, including possible access restrictions in general or specific terms, shall be respected by the Parties.

Part VII
Final Provisions

Article 18 – Expenses

The Parties shall bear their own expenses arising from the implementation of this Working Arrangement, unless otherwise agreed in writing.

Article 19 – Settlement of disputes

Any disagreement between the Parties concerning the interpretation or application of this Working Arrangement or its performance is settled, if possible, in an amicable and equitable manner through direct negotiations between the relevant units and responsible persons. If a disagreement cannot be solved at that level, the European Chief Prosecutor and the Chair of AMLA endeavour to resolve the outstanding disagreement.

Article 20 – Liability

1. The Parties shall be liable for any damage caused to an individual in accordance with their respective legal frameworks. In order to avoid its liability under their respective legal frameworks vis-a-vis an injured party, neither Party may plead that the other had transmitted inaccurate information.
2. If a damage to an individual was caused as a result of information erroneously communicated or of failure on the part of the other Party to comply with their obligations, they shall be bound to repay, on request, any amounts paid as compensation under paragraph 1 above, unless the information was used by the other Party in breach of this Arrangement.

3. The Parties shall not require each other to pay for punitive or non-compensatory damages under paragraphs 1 and 2 above.

Article 21 – Amendments and supplements

1. This Working Arrangement may be amended at any time in writing by mutual consent, subject to the applicable approval procedures under the Parties' respective legal frameworks.
2. Any amendment shall enter into force on the day following the date upon which the Parties notify each other of the completion of their internal requirements or any other date as agreed between the Parties.

Article 22 – Termination

1. This Working Arrangement may be terminated in writing by either Party with 3 months' notice.
2. In case of termination, the Parties shall reach an agreement on the continued use and storage of the information that have already been communicated between them.
3. Without prejudice to paragraph 1 of this Article, the legal effects produced prior to termination of this Working Arrangement shall remain in force.
4. The termination of this Working Arrangement does not affect obligations under it relating to confidentiality of information, which continue to have effect, nor does it affect obligations regarding cooperation and exchange of information between the Parties under applicable laws.

Article 23 – Entry into force

This Working Arrangement shall enter into force on the date of its signature.

Done at Frankfurt on 17 November 2026, in two originals, in the English language.

For the Authority for Anti-Money Laundering and Countering the Financing of Terrorism	**For the European Public Prosecutor's Office**
[signed]	[signed]
Bruna SZEGO	**Andrés RITTER**
Chair of AMLA	**European Chief Prosecutor**

Annex I

Request by the EPPO to lift privileges or immunities

Template for requests by the European Public Prosecutor's Office (EPPO) for the waiver of immunity of a person protected by privileges or immunities under Union law

Article 8 of the Working Arrangement between the EPPO and AMLA provides that:

1. The reasoned written request of the European Chief Prosecutor shall be addressed to the Chair of AMLA. Where the investigation involves the Chair of AMLA, the request shall be submitted to the Vice-Chair of AMLA.
2. Where the EPPO considers that the person whose immunity is requested to be waived cannot, in accordance with applicable case-law, be informed and heard on the request to waive the immunity, the written and reasoned request will contain the detailed grounds for not hearing the person concerned.
3. The EPPO will preferably use the template in Annex I when submitting requests pursuant to this Article.
4. AMLA will provide a written and reasoned reply within the shortest possible timeframe according to the principle of mutual sincere cooperation. AMLA may request additional information from the EPPO in accordance with this paragraph, without prejudice to the proper conduct and confidentiality of the EPPO's investigations. The reply will in principle be provided within 30 working days after reception of the request in cases where the person concerned is heard, and within 20 working days in cases where the person is not heard.
5. Where AMLA is unable to respect the deadline indicated in the reasoned written request of the European Chief Prosecutor, it will inform the EPPO as soon as practicable and give an indication of the time within which it expects to be able to respond.

Pursuant to the above-mentioned provisions, **the EPPO herewith submits the following waiver request**:

1. **Name of the person concerned and all other identification details available (for example, nationality, personnel number, place of employment)**

2. **Detailed reasons for the request and expected timing of the procedure to which the request relates**

3. **Proposed legal basis for the waiver**

4. **In case the person concerned cannot be informed of and heard on the request to waive the immunity, the detailed grounds for not hearing the person concerned, so as to enable AMLA to make the necessary balance[6]**

To ensure confidentiality, please instruct your services to share this information only if strictly necessary and on a need-to-know basis.

[*If necessary, please add other relevant information.*]

In case of queries, please contact «Name, function», «email», «phone number».

[Name SURNAME]

[6] As per Judgment of 18 June 2020, Commission v RQ, C-831/18P, EU:C:2020:481.

Annex II

Request by the EPPO to lift Inviolability of premises, buildings and archives

Template for requests by the European Public Prosecutor's Office (the EPPO) for the waiver of inviolability of premises, buildings and archives

Article 9 of the Working Arrangement between the EPPO and AMLA provides that:

1. Where the investigations of the EPPO require to gain access to AMLA premises, buildings and/or AMLA archives in order to conduct an EPPO investigative measure, the EPPO will address a reasoned written request to the Chair of AMLA. Where the investigation involves the Chair of AMLA, the request shall be submitted to the Vice-Chair of AMLA.
2. The EPPO's Central Office will preferably submit requests in application of this Article by using the template in Annex II.
3. AMLA will provide a written and reasoned reply to the EPPO's Central Office as soon as possible and based on the principle of mutual sincere cooperation. The reply will in principle be provided within 15 working days after receipt of the request.
4. Where AMLA is unable to respect the deadline indicated in the reasoned written request of the EPPO, it will inform the EPPO's Central Office as soon as possible and give an indication of the time within which it expects to be able to respond.
5. In the case that access to AMLA buildings, premises and/or archives is granted in the context of an EPPO investigation, the latter shall request assistance from the Executive Director of AMLA.

Pursuant to the above-mentioned provisions, **the EPPO herewith submits the following waiver request**:

1. **Precise identification of the premises, buildings and archives concerned**

2. **Detailed reasons for the request and expected timing of the next steps in the procedure**

To ensure confidentiality, please instruct your services to share this information only if strictly necessary and on a need-to-know basis.
[*If necessary, please add other relevant information.*]

In case of queries, please contact «Name, function», «email», «phone number».

[Name SURNAME]