



Public Hearing on the draft RTS on criteria for business relationships, occasional and linked transactions (Article 19.9 AMLR)

24 March 2026

Presenter: Policy on Private Sector Standards Unit

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Welcome

Rikke-Louise Ørum Petersen, Executive board member

Agenda

Introduction to AMLA

Presentation on RTS 19(9)

Exchange

Floor opened for views from the audience

Introduction to AMLA

AMLA's role



AML/CTF Supervision

Direct supervision some of the most impactful credit and financial institutions (40) and **indirectly supervising** the rest

Oversight and coordination of supervisory authorities in the **non-financial sector**

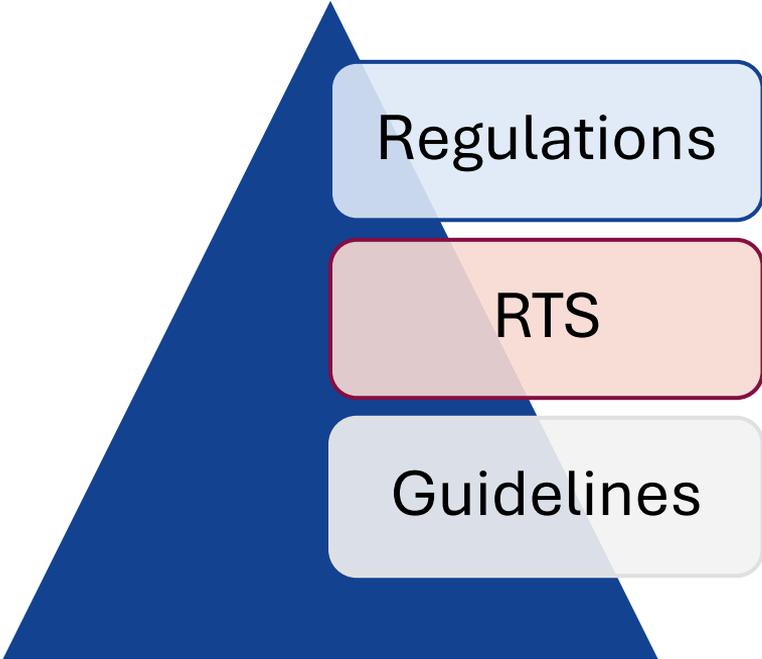
Coordination and Support of EU FIUs

Support in **cooperation** and joint analyses by national FIUs

Regulator

Technical standards (RTS / ITS) and guidelines addressed at: obliged entities, supervisors and FIUs

What are Regulatory Technical Standards (RTS)?



Regulations

RTS

Guidelines

Regulation (EU) 2024/1624 - AMLR

Purpose: ensure consistent practices and uniform application of EU law

Key features:

- Cannot change the AMLR

- Legally binding

- Adopted by European Commission

Introduction to RTS on business relationships, occasional and linked transactions

Introduction

Art 19.9 AMLR

- Article 19.9 AMLR requires AMLA to specify:
 - i. criteria for identifying **business relationships, occasional transactions and linked transactions**, and
 - ii. the obliged entities, sectors or transactions that are associated with higher risks and to which a **lower threshold** for customer due diligence should be applied

Identified as one of AMLA's **super priorities**: properly identifying business relationships, occasional transactions and linked transactions is at the heart of the AML/CFT framework

AMLR's framework : definitions

Business relationship – Art 2.1(19) AMLR

means a business, professional or commercial relationship connected with the professional activities of an obliged entity, which is set up between an obliged entity and a customer, including in the absence of a written contract and which is expected to have, at the time when the contact is established, or which subsequently acquires, an **element of repetition or duration**

Linked transactions – Art 2.1(20) AMLR

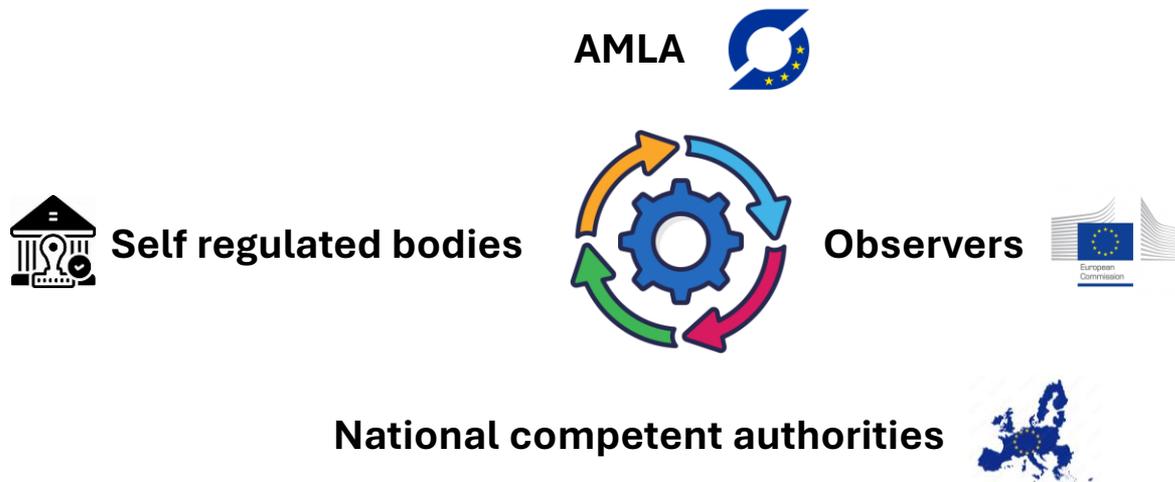
means two or more transactions with either identical or **similar origin, destination and purpose, or other relevant characteristics, over a specific period**

AMLR's framework: lower CDD thresholds

Lower thresholds – Art 19.2 to Art 19.5 AMLR

- Credit institutions and financial institutions, with exception of CASPs, shall apply CDD when initiating or executing an occasional transaction that constitutes a **transfer of funds** of at least 1.000 EUR
- **CASPs** shall:
 - apply CDD for occasional transactions of at least 1.000 EUR
 - at least identify and verify the customer for occasional transactions under 1.000 EUR
- All obliged entities shall at least identify and verify the customer for occasional transactions in **cash** of at least 3.000 EUR
- **Providers of gambling services** shall apply CDD upon the collection of winnings, the wagering of stake or both for transactions of at least 2.000 EUR

Draft RTS: stakeholders



Guiding principles

- Risk based and proportionate approach
- Maximum harmonisation
- Effective outcomes that are workable for the financial and, especially, for the non-financial sector.

Key elements of the draft RTS

definitions and criteria business relationships

Article 1 – definition occasional transaction

- Mirrors business relationship: everything that is not a business relationship, is an occasional transaction. Provision of services can also be an occasional transaction.

Article 2 – criteria business relationships

- All obliged entities: ‘use of online services through a **registration providing ongoing accesses** for the element of duration.
- Obliged entities that provide services: ‘provision of services at **different intervals**’ and ‘provision of **different services**’ for the element of repetition.
- Currency exchange and remittance: ‘**three or more transactions with the rolling period of a year**’ for the element of repetition.
- Land-based providers of gambling services: ‘**membership**’ for the element of repetition.
- Football clubs: ‘conditions applying to the transfer which trigger additional actions’ for the element of repetition.

Key elements of the draft RTS

criteria linked transactions

Article 3 – criteria linked transactions

- All obliged entities: different criteria for the elements of identical or similar origin, destination and purpose.
- Providers of gambling services: ‘**games provided by the same gambling service provider**’ for the element of identical or similar purpose.
- Currency exchange and remittance: ‘**rolling period of one month**’ for the element of specific period.

Key elements of the draft RTS

lower CDD threshold for occasional transactions

Additional lower thresholds

- No additional lower thresholds for CDD, at this point in time.
- No conclusive information that additional lower thresholds for CDD are necessary and proportionate.
- If necessary and proportionate in the future, a proposal for amendment of the RTS will be made.

Next steps

- 8 May: End of public consultation
- Assessment of responses and update of the cost-benefit analysis
- Q3 2026: Submission of the draft RTS to the European Commission
- Publication of the RTS by the European Commission
- **10 July 2027: The AMLR, including RTS, is applicable in EU member states**



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