



# Public Hearing on the draft Guidelines on ongoing monitoring of a business relationship (Article 26.5 AMLR)

02 July 2026

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Presenter: Policy on Private Sector Standards Unit

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# Agenda



## Welcome

Rikke-Louise Ørum Petersen - *Board Member Private Sector Standards Unit*



## Introduction

Introduction to AMLA



## Presentation on the draft GLs



## Exchange of views

Floor opened for views from the audience

# Welcome remarks by Rikke-Louise Ørum Petersen - Board Member Private Sector Standards Unit

# Housekeeping

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# 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

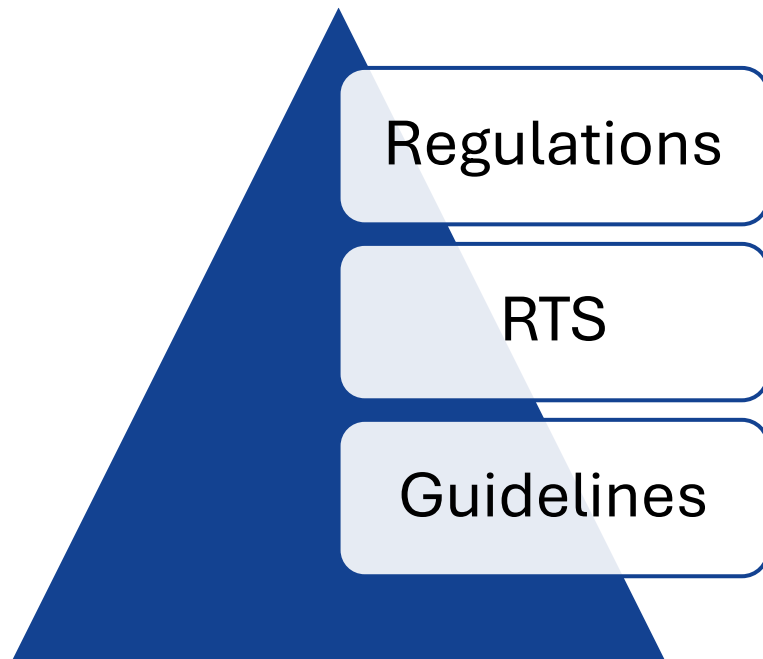
Supporting **cooperation** and facilitating joint analyses by national FIUs

## Regulator

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

# What are Guidelines?

- Guidelines:
  - set supervisory expectations
  - ensure common, uniform and consistent application of EU law.
- GLs key features:
  - Cannot change the AMLR
  - Align with RTS
  - Non-legally binding but comply or explain
  - Adopted by AMLA



# Introduction to guidelines on ongoing monitoring of a business relationship

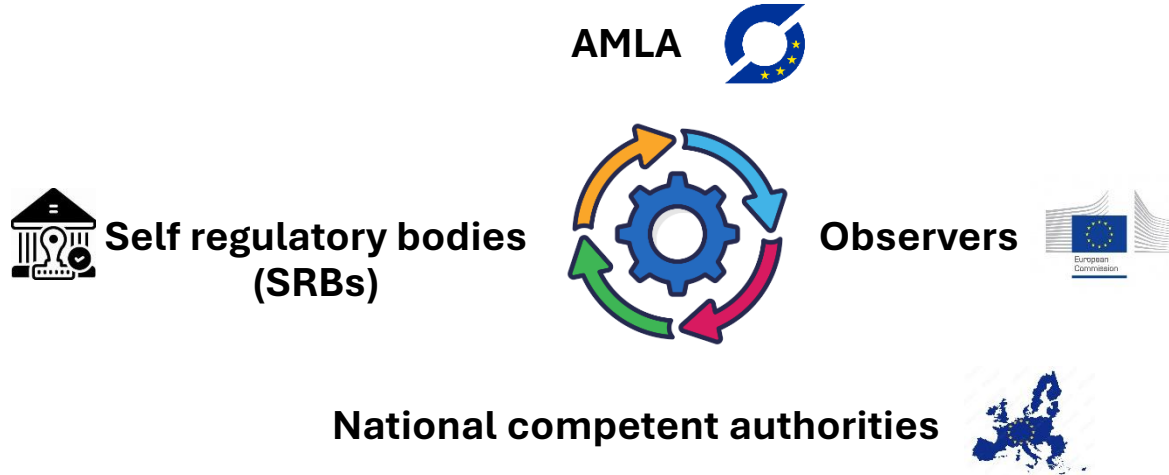
# Introduction

## Art 26(5) AMLR

- Article 26(5) AMLR requires AMLA to issue guidelines on:
  - i. ongoing monitoring of business relationships (keeping customer information updated), and
  - ii. transaction and activity monitoring during such relationships

Identified as one of AMLA's **super priorities**: keeping customer information up-to-date and monitoring transactions and activities are essential parts of the AML/CFT framework.

# Draft GLs: stakeholders and AMLA's approach



## Guiding principles

- Risk based and proportionate approach
- Technology-neutral
- Horizontal applicability to all sectors
- Effective outcomes that are workable for the financial and for the non-financial sector.

# Key elements of the draft GLs

## General principles part

- Applies for both Guideline 1 + Guideline 2
- Strong focus on training, documentation, and effective monitoring
- Proportionate design aligned with risk, complexity, and size

## Guideline 1: Keeping customer documents, data or information up to date

### Customer information reviews

- Customer information updates: depth, intensity and frequency depends on customer risk profile
- OEs should assess the reliability and independence of the sources they use
- Recollection of expired identity documents subject to risk, no automatic re-collection necessary
- Non continuous business relationship: reduced depth allowed for low-risk, inactive relationships
- OEs should consider updating identity, beneficial ownership, purpose of relationship, source of funds, PEP status

# Key elements of the draft GLs –GL1

## Guideline 1: Keeping customer documents, data or information up to date

### Event-driven reviews

- required when risk-relevant changes occur such as change in ownership, changes in customer profile, new PEP status, deviation from expected customer profile etc.
- OEs should identify trigger events through an effective and proportionate monitoring framework
- OEs should:
  - assess the impact on risk
  - update customer information accordingly and without undue delay
  - reassess customer's risk profile, where warranted

# Key elements of the draft GLs – GL1

## Guideline 1: Keeping customer documents, data or information up to date

### **Use of suspension or restriction measures in cases of customer non-responsiveness**

- Possible temporary suspension or restriction subject to certain criteria
- Termination required if information cannot ultimately be obtained
- Lack of transactions does not remove ML/TF risk

# Key elements of the draft GLs – GL2

## Guideline 2: Transaction and activity monitoring framework

### General Principles

- Use relevant data and existing controls across products, services and activities to avoid monitoring blind spots.
- Detect material deviations, patterns and linkages, including visible TFS evasion signals, for timely assessment.
- Where transaction or activity data is limited, adapt the monitoring method.
- Keep accountability clear when agents, intermediaries, group entities or networks support monitoring.
- Target enhanced scrutiny to the material risk drivers and test the framework so it remains effective over time.

# Key elements of the draft GLs – GL2

## Guideline 2: Transaction and activity monitoring framework

### **Monitoring framework using manual, automated or semi-automated processes and controls**

- Choose the monitoring method that fits the risk, business model, volume, speed and complexity.
- Keep the framework responsive to new risks, typologies and red flags, and document whether changes are needed.
- Detect risks that emerge over time by connecting relevant signals, not only reviewing activity in isolation.
- Ensure clear governance, explainability, proportionate documentation and escalation.
- Manual controls must be structured and effective where used. Automated tools must be defined, tested and calibrated. Default settings are not a risk-based design.

# Key elements of the draft GLs – GL2

## Guideline 2: Transaction and activity monitoring framework

### Link between customer due diligence and the ongoing monitoring framework

- Calibrate the monitoring to a customer-specific baseline.
- CDD and monitoring should operate in an integrated and coordinated manner.
- Peer or reference groups may support monitoring, but must not replace individual customer understanding.
- Material deviations should trigger reassessment of the customer information and risk profile.

# Key elements of the draft GLs – GL2

## Guideline 2: Transaction and activity monitoring framework

### Implementation of the monitoring framework

- Continuous where possible, lifecycle-based where necessary: monitoring should run throughout the relationship, or at risk-relevant stages where continuous monitoring is not feasible.
- Pre-transaction / pre-activity: apply checks before acting where the OE can assess or intervene before a transaction, service or activity is completed.
- Real-time monitoring: relevant where feasible and justified.
- Post-transaction / post-activity: detect patterns, links and cumulative risks that may only become visible after execution.
- Monitoring outputs: assess, prioritise, escalate or close outputs through a controlled, documented and risk-based process.

# Key elements of the draft GLs – GL2

## Guideline 2: Transaction and activity monitoring framework

### Internal controls and ongoing review

- Test regularly and review whether the monitoring framework remains effective and aligned with the risks identified in the BWRA and, where relevant, national or Union-level priorities.
- Focus on meaningful outputs, not alert volumes alone.
- Know what the monitoring framework is intended to achieve.
- Keep data accurate, validated and protected.
- Validate material changes to tools, rules or models.
- A weak legacy system is not the benchmark for effectiveness.
- Assign ownership and remediate deficiencies without undue delay.

# Key elements of the draft GLs – GL2

## Guideline 2: Transaction and activity monitoring framework

### Use of technology

- Technology use is encouraged when it improves effectiveness.
- Effectiveness should be assessed by monitoring outcomes, not by the tool's label, sophistication, or use of AI
- Manual monitoring is acceptable where it remains effective at the entity's scale and risk
- Outputs must be explainable enough to review and challenge.
- Safeguards should be proportionate to the tool's role and risk impact
- Explainability should enable review, challenge, and supervisory assessment, without requiring full technical interpretability of the model

# Have your say

- Provide your written feedback by **3 September** for it to be duly considered.

[Consultation on the draft Guidelines on ongoing monitoring of a business relationship - Authority for Anti-Money Laundering and Countering the Financing of Terrorism](#)

- Please ensure you read the **background and rationale section** - it provides valuable context for the Guidelines approach
- Please follow the instructions when providing your comments :
  - Clearly specify the provision concerned with clear reference to the number of the paragraph referred to.
  - Provide clear rationale for your suggestion

STATUS: OPEN

Consultation on the draft Guidelines on ongoing monitoring of a business relationship

Opening date

3 June 2026

Deadline

3 September 2026, 23:59 (CEST)

# Next steps

- 3 September: End of public consultation
- Assessment of responses and update of the cost-benefit analysis
- Q4: publication of guidelines by AMLA
- Q1 2027: National authorities will indicate whether they intend to comply with the GLs



# Floor open from views from the audience

# Floor open for views from the audience

- If you wish to take the floor:
  - Please **raise your hand** via the dedicated tool – 5 questions per round
  - Once the host gives you the floor, make sure you have enabled microphone in Webex parameters. **Unmute** yourself.
  - Before providing your views, please **introduce** yourself (name, sector, Member State).
  - Please limit your intervention to **2 min** maximum.
  - Exchange of views will take place first for GL1 and then for GL2
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# Floor open for views from the audience

## **Floor open for questions on General Principles and Guideline 1 – Keeping customer documents, data or information up to date**

- 2.1 General Principles
- 2.2 Update of customer documents, data or information and ongoing monitoring
- 2.3 Periodic customer information reviews
- 2.4 Event driven reviews
- 2.5 Use of suspension or restriction measures where the obliged entity does not receive updated information from the customer

# Floor open for views from the audience

## Floor open for questions on Guideline 2 – Transaction and activity monitoring framework

- 2.6 General Principles
- 2.7 Monitoring framework using manual, automated or semi-automated processes and controls
- 2.8 Link between customer due diligence and the ongoing monitoring framework
- 2.9 Implementation of the monitoring framework
- 2.10 Internal controls and ongoing review
- 2.11 Use of technology