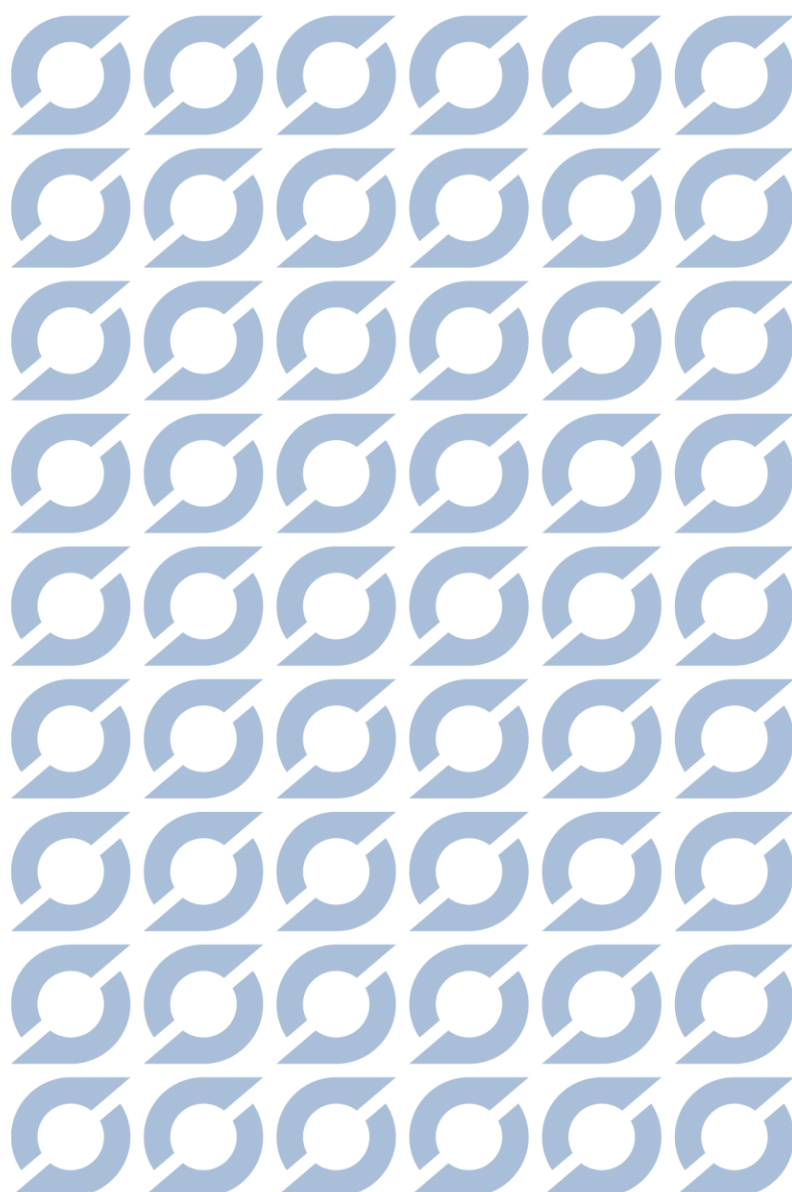


Interpretative Note

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

2026



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1 Interpretative Note eligibility information

1.1 General instructions

1.1.1 PURPOSE AND STATUS OF THIS INTERPRETATIVE NOTE

The selection process of eligible obliged entities that will fall under direct supervision by AMLA begins with the identification of obliged entities that meet the eligibility criteria set out in Article 12(1) AMLAR. Eligible obliged entities are [credit institutions](#), [financial institutions](#), and [groups](#) thereof operating in at least six Member States – including their home Member State –, either through [establishments](#) or through the provision of relevant services under the freedom to provide services above the materiality thresholds set out in Article 1 of the draft RTS under Article 12(7) AMLAR.

NCA's will collect eligibility information from relevant obliged entities based on the specifications contained in a reporting package designed by AMLA, containing two documents :

- (1) **“Template_identification_eligible_obliged_entities_Art_153_AMLAR.xlsx” (the template) and**
- (2) **this Interpretative Note.**

This Interpretative Note is addressed to obliged entities and provides clarifications regarding their reporting obligations relating to the collection of [eligibility information](#) under the draft ITS under Article 15(3) [AMLAR](#). **It is a companion document to the template** that provides interpretive guidance on the data points in the template. It is to be read together with the template. **Please note that some sheets in the template may apply only under certain conditions and may thus not be applicable to you.**

Reporting obliged entities are expected to adhere to the explanations in the Interpretative Note to ensure consistency of the dataset and the eligibility assessment.

1.1.2 LEGAL BASIS & STATUS

This Interpretative Note does not create, amend or override any legally binding requirement. In the event of any inconsistency, the applicable Union legal acts shall prevail. Public Q&As issued by the competent EU institutions may also be relevant for interpretative purposes.

These instructions refer, where relevant, to the definitions set out in the [AMLR](#) to support consistent reporting. However, as the reference year precedes the entering into force of AMLR, the definitions and requirements of [AMLD IV/V](#) as transposed into national law for the relevant reference period should prevail in case of conflicts or gaps.

Relevant definitions, regulatory references, and abbreviations are consolidated in the appendix to this note, with each entry numbered for clarity.

1.1.3 REPORTING SCOPE: “REPORTING OBLIGED ENTITY” VS “DESIGNATED REPORTING OBLIGED ENTITY”

❖ *Reporting scope:*

Credit institutions and financial institutions that are NOT part of a group but meet the eligibility criteria set out above must report on a **solo basis**.

Where reporting obligations apply to a group (see [Definition 13](#)), the parent undertaking (see [Definition 15](#)) or the *designated reporting obliged entity* (see [Definition 7](#)) must report eligibility data on a consolidated basis, covering all credit institutions and financial institutions within the group while excluding other types of obliged entities.

❖ *“Reporting Obligated Entity” and exceptional group reporting arrangements:*

It is possible that, for the first selection exercise, [financial supervisors](#) may not yet have a complete view of the structure of all groups acting in the Union. As a result, more than one entity in a given group may be requested to report eligibility data. The structure of the template and of this interpretative note reflects this eventuality by distinguishing between the entity that submits the template (the “[reporting obliged entity](#)”) and, where relevant, the entity designated to submit consolidated information on behalf of the relevant group (the “[designated reporting obliged entity](#)”). This distinction is intended solely to facilitate the reporting process and to avoid requesting the same information from several entities in a group.

- The “**reporting obliged entity**” is the entity filling the template and submitting it to its competent financial supervisor. In most cases, this entity will also report eligibility data points under sheets AMD.01 to AMD.04 either on a solo basis or, where applicable, on behalf of the respective group.
- The “**designated reporting obliged entity**” is a reporting obliged entity designated for the purposes of submitting eligibility datapoints under sheets AMD.01 to AMD.04 on a consolidated basis on behalf of a group in the specific case where several entities within this group have been requested separately to report eligibility data.

1.1.4 INTRODUCTION TO REPORTING TEMPLATES, INSTRUCTIONS AND HARMONISED REPORTING

The datapoints included in this document are structured in a manner consistent with established reporting practices followed by EU authorities and bodies.¹² Where necessary, the Interpretative Note provides:

- explanations of relevant concepts,
- legal references
- and cross references to the relevant parts of the reporting template.

¹ As published <https://www.eba.europa.eu/publications-and-media/press-releases/eba-updates-supervisory-reporting-framework>.

² As published https://www.ecb.europa.eu/stats/financial_corporations/insurance_corporations/html/data_reporting.es.html.

1.1.5 REPORTING PERIOD, CURRENCY AND CURRENCY CONVERSION

The reference date (cut-off date) is **31 December 2025**. The reference year is the 2025 calendar year, running from **1 January 2025 to 31 December 2025** inclusive.

All monetary amounts must be reported in EUR. Where currency conversion is required for reported data, reporting obliged entities should use the official exchange rate applicable on the date of the relevant [transaction](#). If no official rate is available on that date, they should use the rate published on the most recent preceding date.

1.1.6 EXCEL STRUCTURE AND DATA QUALITY EXPECTATIONS

The template is protected in order to prevent unintended structural modifications and to preserve the integrity of data processing.

Any alteration of the template (excel workbook) including worksheet names, cell formats, formulas or validations, or other protected features, as well as removing the protection of the workbook and/or single sheets may prevent correct data processing by national financial supervisors and/or AMLA and lead to the submission being considered incomplete or invalid.

In case of wrong or missing reported information in the template, blocking validations, i.e., 'Error', messages are generated by the validation formulas automatically. These error messages are generally not expected to appear when the data is complete and consistent. Blocking validations are intended to highlight omissions or inconsistencies that must be corrected before submission. Where an unjustified blocking error appears, despite the entry of complete and accurate data, reporting obliged entities should consult the AMLA webpage to check whether the issue is already documented for the specific formula. If it is not listed, the reporting obliged entities should contact their national financial supervisor.

All data points must be complete and reflect reality according to the specified requirements. Where a gap exists or where data quality cannot be ensured for a justified reason, the submission must include an explanation of the situation, using the AML.00.03 'Comments' sheet to reference the sheet/column concerned and provide a clear justification as explained in the template.

Where significant revisions are necessary, resubmissions will be requested. Reporting obliged entities should therefore maintain internal controls and documentation that allow prompt correction and traceable resubmission when requested.

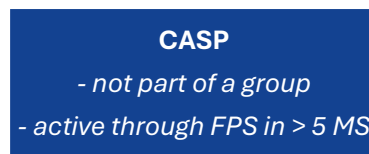
AMD.00.01 Identification of the reporting obliged entity

Entity Identification – Who should complete this template?

All credit and financial institutions who received this reporting template should fill in this sheet.

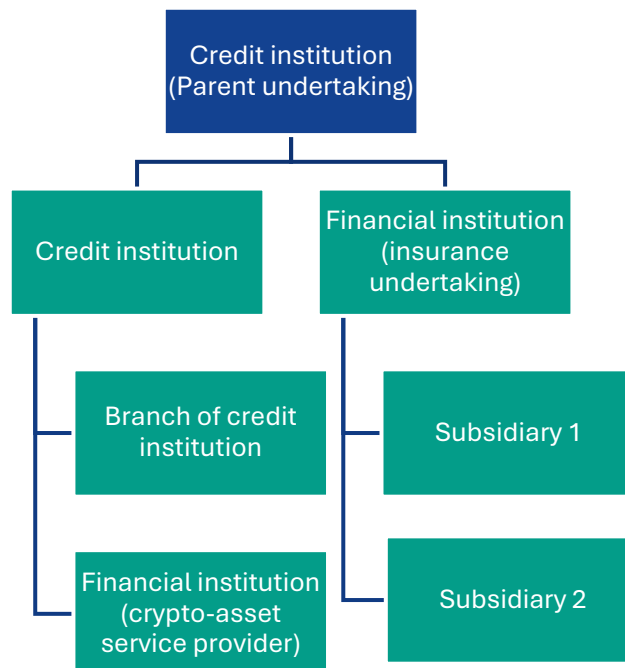
Consider the following three examples clarifying reporting obligations:

Example 1: Reporting obliged entity – solo basis example



⇒ In this example, the CASP - which is not part of a group – has been requested to fill the reporting template by the competent financial supervisor. As such, it is a *reporting obliged entity*. Since it is not part of a group and no other obliged entity will report data on its behalf, it should fill the AMD.00.01 sheet and proceed to report solo level eligibility information in sheets AMD.01 to AMD.04.

Example 2: Reporting obliged entity – practical case of a group

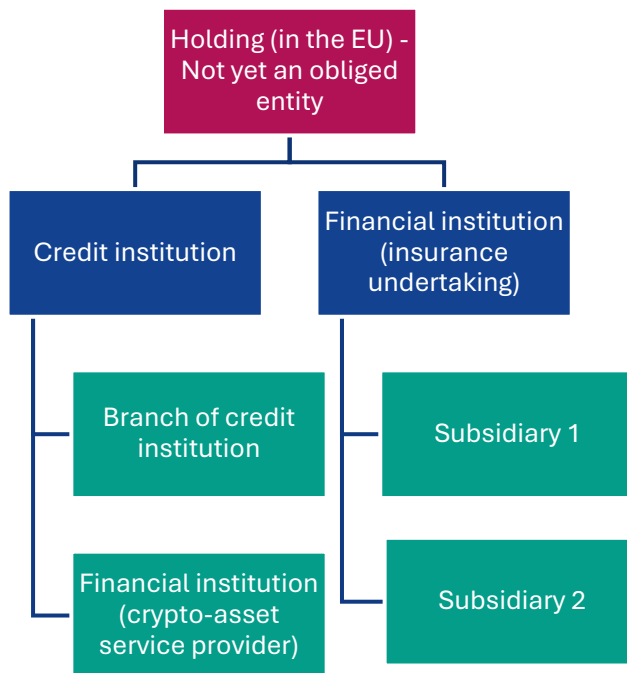


⇒ In this case the Parent undertaking in **blue** ([Definition 15](#)) has been requested to fill the reporting template by the competent financial supervisor. As such, it is a *reporting obliged entity*. Since no other obliged entity will report data on behalf of the group, it should fill the AMD.00.01 sheet and proceed to report consolidated level eligibility information for the entire group in sheets AMD.01 to AMD.04.

Example 3: Reporting obliged entity – practical case of a holding

As AMLR will apply as from 10 July 2027, holdings listed under Article 2(1)(6) AMLR are not yet obliged entities at the time of this data collection.

Consequently, if a group’s parent undertaking is a holding set to become an obliged entity as from 10 July 2027, it cannot serve as the reporting obliged entity for the purpose of this collection. In such cases, the group must instead designate another entity within the same group that is an obliged entity to act as the *reporting obliged entity* for this exercise.



The holding company in **red** is not an obliged entity under the current AMLD IV/V framework and cannot be requested to report eligibility data.

As a result, either the credit institution or the financial institution (insurance undertaking) in **blue** should be selected by the group as the *designated reporting obliged entity* for the entire group in **blue** and **green** above. The entity selected by the group as *designated reporting obliged entity* should fill the AMD.00.01 sheet and proceed to report consolidated level eligibility information **for the entire group** in sheets AMD.01 to AMD.04.

It is up to the group to determine which entity in **blue** will be the designated reporting obliged entity for the purposes of this collection. However, it might happen that both **blue** entities will be contacted by their national supervisors. In this case, one of them can use the sheet (AMD.00.02) to indicate that the other entity is providing consolidated information on behalf of the whole group in sheets AMD.01.01 to AMD.04.01.

The holding in pink should not be the (designated) group reporting obliged entity and should neither be reported in AMD.00.02 nor AMD.03.01 as it is not an obliged entity as of 31 December 2025. **However**, it should be identified in AMD.02.01 (in case it is located in the EU) or in AMD.02.02 (in case it is located outside the EU).

| Column code | Legal references and instructions |
|----------------|--|
| AMD.00.01.C010 | <p><u>Legal Entity Identifier (LEI)</u></p> <p>Legal Entity Identifier (LEI) of the reporting obliged entity, assigned in accordance with ISO 17442, where available.</p> <p>If the entity does not have an LEI, the field should be left blank.</p> |
| AMD.00.01.C020 | <p><u>National Code Attributed by the Financial Supervisor</u></p> <p>National or supervisory identifier assigned to the reporting obliged entity by the financial supervisor where the entity is registered or authorised.</p> <p>This field is only mandatory if the LEI (AMD.00.01.C010) is not available.</p> |
| AMD.00.01.C030 | <p><u>Legal Name of the reporting obliged entity</u></p> <p>Official legal name of the reporting obliged entity as registered in the relevant public or supervisory register (<i>i.e.</i> not to be translated to English).</p> <p>The name should be reported without abbreviations, unless they form part of the official legal name.</p> |
| AMD.00.01.C040 | <p><u>Legal Name of the reporting obliged entity in Latin Characters</u></p> <p>Name of the reporting obliged entity, in Latin characters, if different from the official legal name in AMD.00.01.C030.</p> <p>This field is optional and may be used to facilitate identification (<i>e.g.</i> where the official legal name is not in Latin characters or is difficult to interpret).</p> |
| AMD.00.01.C050 | <p><u>Category of the Entity</u></p> <p>Classification of the reporting obliged entity according to its main regulated or supervised activity. Select the category that best reflects its business model.</p> |
| AMD.00.01.C060 | <p><u>Category of the Entity (Other)</u></p> <p>If AMD.00.01.C050 was other, type the most appropriate category applicable to the reporting obliged entity.</p> |
| AMD.00.01.C070 | <p><u>Member State of the Entity</u></p> <p>Member State (EU country) where the reporting obliged entity is legally established.</p> |
| AMD.00.01.C080 | <p><u>Financial Supervisor of the Entity</u></p> <p>Financial supervisor primarily in charge of the AML/CFT supervision the reporting obliged entity.</p> <p>Please select “other” if the financial supervisor is not in the predefined list and specify the name of the financial supervisor in AMD.00.01.C090.</p> |

| | |
|----------------|---|
| AMD.00.01.C090 | <p><u>Financial Supervisor of the Entity (Other)</u></p> <p>The name of the financial supervisor in case in AMD.00.01.C080 “Other” was selected.</p> |
| AMD.00.01.C100 | <p><u>Additional Financial Supervisor</u></p> <p>Additional financial supervisor exercising AML/CFT supervision over the reporting obliged entity in the Member State where it is established.</p> <p>Please select “other” if the additional financial supervisor is not in the predefined list and specify the name of the financial supervisor in AMD.00.01.C110.</p> |
| AMD.00.01.C110 | <p><u>Additional Financial Supervisor (Other)</u></p> <p>The name of the additional financial supervisor in case in AMD.00.01.C100 “Other” was selected.</p> |
| AMD.00.01.C120 | <p><u>Designated Reporting Obligated Entity (Y/N)</u></p> <p>Indicate whether another entity within the same group has been designated to report the eligibility data points in sheets AMD.01 to AMD.04 on behalf of the reporting obliged entity as the “designated reporting obliged entity”. In this case, select YES and proceed to AMD.00.02 where the reporting obliged entity should provide the details of that other entity.</p> <p>If the reporting obliged entity is a) not part of a group, or b) reporting consolidated data on behalf of an entire group, select NO and move on directly to AMD.01.01.</p> <p>Refer to the general remarks for more information.</p> |

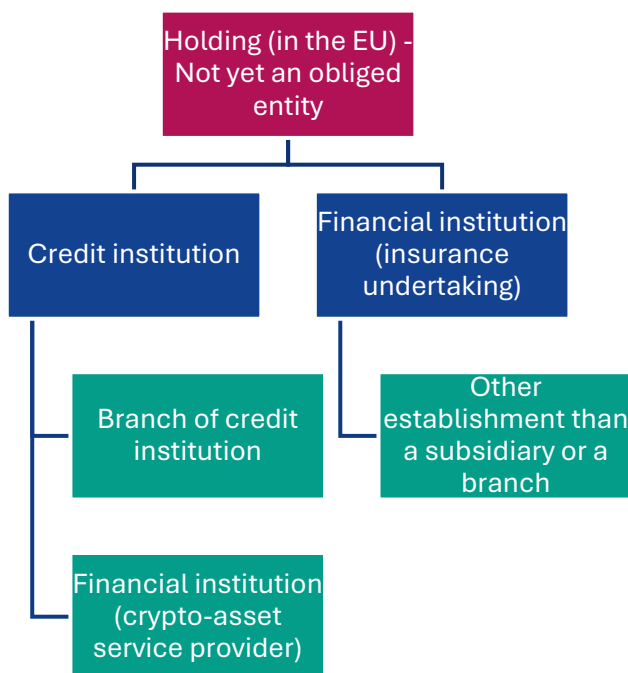
AMD.00.02 Designated Reporting Obligated Entity

Designated Reporting obliged entity - Who should complete this template?

The template should be completed only if the answer to AMD.00.01.C120 is YES, and therefore another entity in the group should be identified as the designated reporting obliged entity for the purposes of the eligibility collection. **In this case no data should be reported in sheets AMD.01 to AMD.04. These sheets should instead be completed only by the designated reporting obliged entity in its own template.**

This will allow the Financial regulators and AMLA to identify groups of entities and their single designated reporting obliged entity for each such group. The same applies where the parent undertaking is not yet an obliged entity and therefore can't be a designated reporting obliged entity for the group yet.

Example: Designated reporting obliged entity – Practical case of a group with two reporting obliged entities



In the Figure above, either the credit institution or the financial institution (insurance undertaking) in **blue** must be selected by the group as the *designated reporting obliged entity* for the entire group in **blue** and **green**. The entity selected by the group as *designated reporting obliged entity* should fill the AMD.00.01 sheet and proceed to report consolidated level eligibility information **for the entire group** in sheets AMD.01 to AMD.04.

However, it might happen that both **blue** entities will be contacted by their national supervisors. In this case, one of them must use this sheet (AMD.00.02) to indicate that the other entity is providing consolidated information on behalf of the whole group in sheets AMD.01.01 to AMD.04.01.

The holding in **pink** should not be the reporting obliged entity and should not be reported in neither AMD.00.01 nor AMD.03.01 as it is not an obliged entity as of 31 December 2025. **However,** it should be identified in AMD.02.01 (in case it is located in the EU) or in AMD.02.02 (in case it is located outside the EU).

| Column code | Legal references and instructions |
|----------------|--|
| AMD.00.02.C010 | <p><u>Legal Entity Identifier (LEI) of the Designated Reporting Obligated Entity</u></p> <p>Please indicate the Legal Entity Identifier (LEI) of the designated reporting obliged entity, assigned in accordance with ISO 17442, where available.</p> <p>If the entity does not have an LEI, the field should be left blank.</p> |
| AMD.00.02.C020 | <p><u>National Code Attributed by the Financial Supervisor for Designated Reporting Obligated Entity</u></p> <p>Please indicate the national or supervisory identifier assigned to the designated reporting obliged entity by the financial supervisor where the designated reporting obliged entity is registered or authorised.</p> <p>This field is only mandatory if the LEI (AMD.00.02.C010) is not available.</p> |
| AMD.00.02.C030 | <p><u>Legal Name of the Designated Reporting Obligated Entity</u></p> <p>Please indicate the legal name of the designated reporting obliged entity.</p> |
| AMD.00.02.C040 | <p><u>Financial Supervisor of the Designated Reporting Obligated Entity</u></p> <p>Financial supervisor primarily in charge of the AML/CFT supervision of the designated reporting obliged entity as reported in AMD.00.02.C030.</p> <p>Please select “other” if the financial supervisor is not in the predefined list and specify the name of the financial supervisor in AMD.00.02.C050.</p> |
| AMD.00.02.C050 | <p><u>Financial Supervisor of the Designated Reporting Obligated Entity (Other)</u></p> <p>The name of the financial supervisor in case in AMD.00.02.C040 “Other” was selected.</p> |
| AMD.00.02.C060 | <p><u>Country of the Designated Reporting Obligated Entity</u></p> <p>Country where the Designated Reporting Obligated Entity is legally established.</p> |

AMD.00.03 Comments

This template is applicable –yet optional – to all entities. Use this template to report comments related to this exercise, while making sure that the comments do not change or reinterpret any of the reported data.

| Column code | Legal references and instructions |
|----------------|---|
| AMD.00.03.C010 | <u>Template Reference</u> Select the specific template the comment relates to. If the comment refers to the whole reporting obligation, leave it blank. |
| AMD.00.03.C020 | <u>Column Reference</u> Select the specific column where the comments relate to. If the comment refers to the whole reporting template, leave it blank. |
| AMD.00.03.C030 | <u>Comment Content</u> Text for the comment to be submitted. While any official EU language is permitted, please include the comment in English whenever possible. |

AMD.01.01 Preliminary Filters

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

| Column code | Legal references and instructions |
|----------------|---|
| AMD.01.01.C010 | <p><u>Is there an EU parent undertaking above the reporting obliged entity? (Y/N)</u></p> <p>Indicate whether there is an entity in the EU above the reporting obliged entity that falls within the definition of a parent undertaking under Art. 2(1)(42) AMLR. If so, the answer must be 'Yes'.</p> <p>If the EU parent undertaking is itself not (yet) an obliged entity (such as a holding, see general remarks above), the answer must still be 'Yes'.</p> <p>If the reporting obliged entity is an EU parent undertaking itself, or a solo entity, or there is no obliged entity above it in the EU, the answer must be 'No'.</p> |
| AMD.01.01.C020 | <p><u>Does the reporting obliged entity have a head office outside the EU? (Y/N)</u></p> <p>Indicate whether the reporting obliged entity has a Head office outside the EU. If so, the answer must be 'Yes'. If there is no such Head office outside the EU, the answer must be 'No'.</p> |
| AMD.01.01.C030 | <p><u>Does the reporting obliged entity have establishments or sister undertakings in the EU? (Y/N)</u></p> <p>'Yes' should be selected in cases where the reporting obliged entity either:</p> <ul style="list-style-type: none"> Operates in at least one other Member State through other establishments, including but not limited to subsidiaries, branches or other types of establishments for example a network of agents if they qualify as an establishment. Has sister undertakings that are credit institutions or financial institutions within the meaning of Art. 2(1)(5) and (6) AMLR. |
| AMD.01.01.C040 | <p><u>Does the reporting obliged entity operate through Freedom to Provide Services in other EU Member States? (Y/N)</u></p> <p>The reporting obliged entity should select 'Yes' if it operates under the freedom to provide services. This does not include obliged entities from the financial sector within the group other than the reporting obliged entity (if applicable) that operate under the freedom to provide services.</p> |

| Column code | Legal references and instructions |
|----------------|--|
| AMD.01.01.C050 | <p><u>Number of EU Member States in which the reporting obliged entity operates through Freedom to Provide Services.</u></p> <p>Number of Member States (EU countries) where the reporting obliged entity operates under the freedom to provide services. This does not include the Member States (EU countries) in which obliged entities from the financial sector within the group other than the reporting obliged entity (if applicable) operate under the freedom to provide services. This field should only be filled in cases where ‘Yes’ is reported in AMD.01.01.C040.</p> |

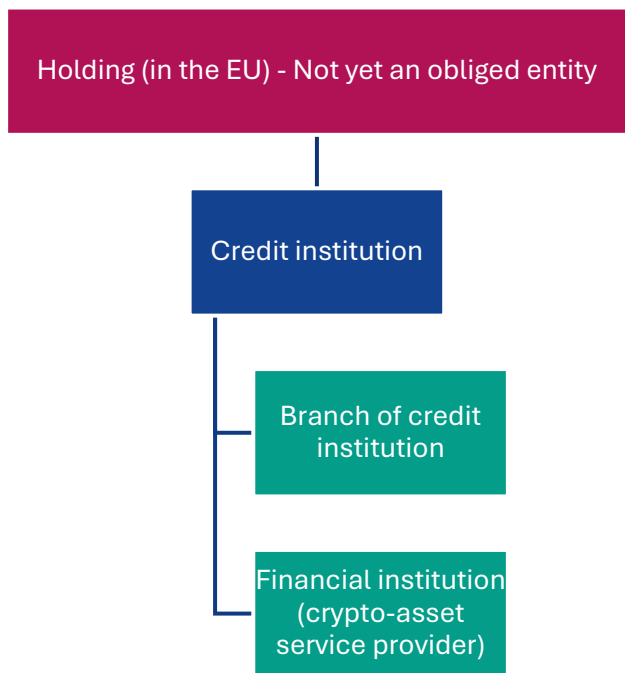
AMD.02.01 EU Parent Undertaking

When should this template be completed?

This template should be completed when the answer to AMD.01.01.C010 is ‘Yes’, meaning that the reporting obliged entity would not fall under the definition of a parent undertaking pursuant to Art. 2(1)(42) AMLR, once applicable.

If the reporting obliged entity is the EU parent undertaking itself, this template is not applicable. **If the reporting obliged entity has identified another entity in the group to be the designated reporting obliged entity, this section is not applicable, and should be filled in only by the designated reporting obliged entity in their template, if applicable.**

Example: Practical case of reporting obliged entity that is not an EU parent undertaking



The reporting obliged entity is the credit institution in **blue**. However, the EU parent undertaking pursuant to Art. 2(1)(42) AMLR will be the holding in **pink**.

| Column code | Legal references and instructions |
|----------------|---|
| AMD.02.01.C010 | <p>Legal Entity Identifier (LEI) of the EU Parent Undertaking</p> <p>Legal Entity Identifier (LEI) of the EU parent undertaking of the reporting obliged entity, assigned in accordance with ISO 17442, where available.</p> <p>If the EU parent undertaking does not have a LEI, the field should be left blank.</p> |
| AMD.02.01.C020 | <p>National Code of the EU Parent Undertaking</p> <p>National or supervisory identifier assigned to the EU parent undertaking by the financial supervisor where the EU parent undertaking is registered or authorised.</p> <p>This field is only mandatory if the LEI (AMD.02.01.C010) is not available.</p> |
| AMD.02.01.C030 | <p>Legal Name of the EU Parent Undertaking</p> <p>Official legal name of the EU parent undertaking as registered in the relevant public or supervisory register (i.e. no need to be translated to English).</p> <p>The name should be reported without abbreviations, unless they form part of the official legal name.</p> |
| AMD.02.01.C040 | <p>Legal Name of the EU Parent Undertaking in Latin Characters</p> <p>Name of the EU parent undertaking, in Latin characters, if different from the official legal name reported in AMD.02.01.C030.</p> <p>This field is optional and may be used to facilitate identification (e.g. where the official legal name is not in Latin characters or is difficult to interpret).</p> |
| AMD.02.01.C050 | <p>Parent Undertaking Subject to AML/CFT Supervision in the EU</p> <p>Where the EU parent undertaking of the reporting obliged entity is subject to AML/CFT supervision within the EU (i.e. an obliged entity) as per the reporting date, 'Yes' should be reported. If not, 'No' should be reported.</p> <p>Note: If the answer to this datapoint is 'Yes', eligibility datapoints should be reported by this parent undertaking. In that case, please identify your parent undertaking in AMD.00.02 and submit the sheet.</p> |
| AMD.02.01.C060 | <p>Member State of the EU Parent Undertaking</p> <p>Select the Member State (EU country) where the EU parent undertaking is legally established.</p> |

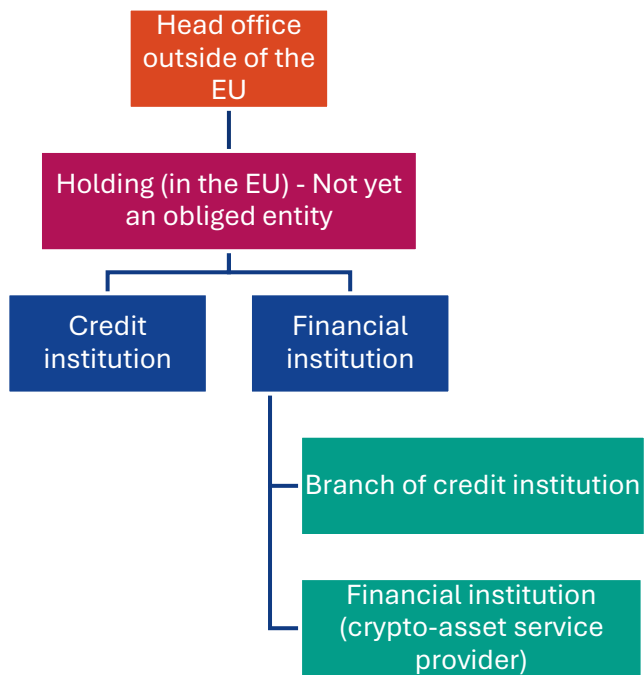
| Column code | Legal references and instructions |
|----------------|---|
| AMD.02.01.C060 | <p>Member State of the EU Parent Undertaking</p> <p>Select the Member State (EU country) where the EU parent undertaking is legally established.</p> |

AMD.02.02 Head office outside of the EU

When should this template be completed?

This template should be completed when the answer to AMD.01.01.C020 is ‘Yes’, meaning that the reporting obliged entity has a Head office outside the EU.

Example: Practical case of reporting obliged entity that has a Head office outside of the EU



The reporting obliged entity is ONE of the credit institutions in **blue**. However, the Head office outside the EU will be the holding in **orange**. However many (if any) holdings (e.g. entity in **pink**) may exist in between.

| Column code | Legal references and instructions |
|----------------|--|
| AMD.02.02.C010 | <p><u>Legal Entity Identifier (LEI) or an equivalent national code of the Head office outside of the EU</u></p> <p>Legal Entity Identifier (LEI) or equivalent national code of the Head office outside of the EU, assigned in accordance with ISO 17442, where available.</p> <p>If the parent undertaking does not have an LEI, the field should be left blank.</p> |
| AMD.02.02.C020 | <p><u>Legal Name of the Head office outside of the EU</u></p> <p>Official legal name of the Head office outside of the EU as registered in the relevant public or supervisory register (<i>i.e.</i> no need to be translated to English).</p> <p>The name should be reported without abbreviations, unless they form part of the official legal name.</p> |

| Column code | Legal references and instructions |
|----------------|--|
| AMD.02.02.C030 | <p><u>Legal name of the Head office outside of the EU Parent in Latin characters</u></p> <p>Name of the non-EU ultimate parent, in Latin Characters, if different from the official legal name reported in AMD.02.02.C020.</p> <p>This field is optional and may be used to facilitate identification (e.g. where the official legal name is not in Latin characters or is difficult to interpret).</p> |
| AMD.02.02.C040 | <p><u>Country of the Head office outside of the EU</u></p> <p>Select the country where the Head office outside of the EU is legally established.</p> |

AMD.03.01 Establishments

When should this template be completed?

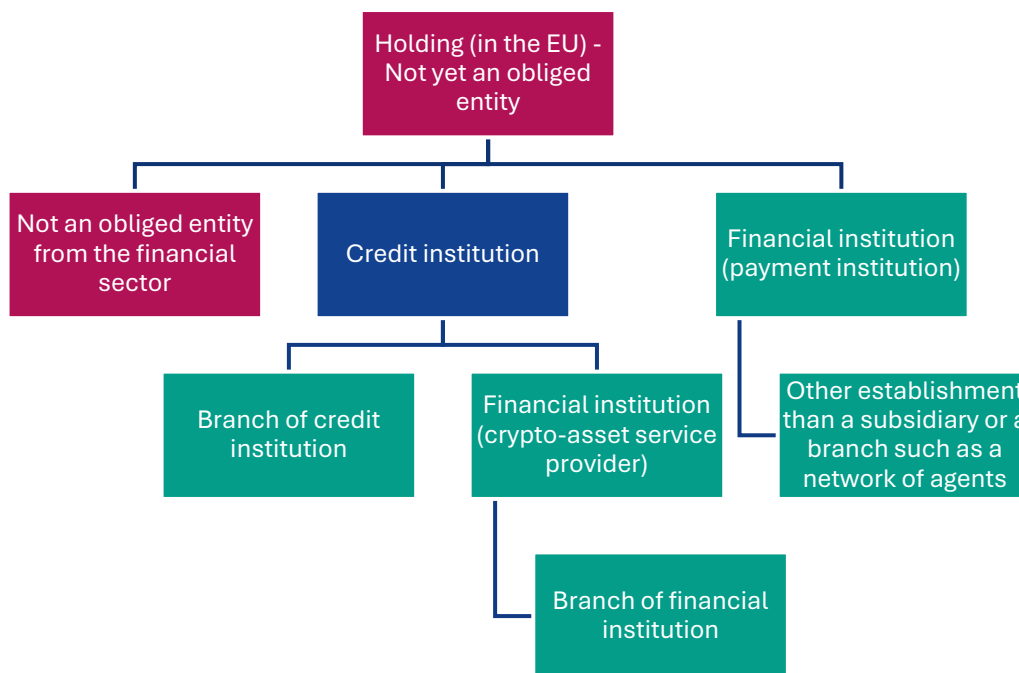
This template should be completed when the answer to AMD.01.01.C030 is ‘Yes’, meaning that either the reporting obliged entity operates in at least one other Member State through other establishments (including but not limited to subsidiaries, branches or networks of agents) OR the reporting obliged entity has sister undertaking(s) that is/are a credit institution(s) or financial institution(s) within the meaning of Art. 2(1)(5) and (6) AMLR.

How should this template be completed?

All branches and subsidiaries of credit institutions and financial institutions should be reported as well as other types of establishments such as cases where an obliged entity operates establishments in another Member State through a network of agents. Also sister undertaking(s) should be reported.

The reporting obliged entity should fill in one row per establishment/sister undertaking.

Example: Practical case of establishments to be reported



All establishments in **green** above should be reported by the reporting obliged entity in **blue**. The entities in **pink** should not be reported as they are not establishments from obliged entities of the financial sector.

| Column code | Legal references and instructions |
|----------------|--|
| AMD.03.01.C010 | <p>Legal Entity Identifier (LEI) of the Reported Establishment</p> <p>Legal Entity Identifier (LEI) of the respective establishment/sister undertaking, assigned in accordance with ISO 17442, where available.</p> |

| Column code | Legal references and instructions |
|----------------|--|
| | If the establishment does not have a LEI, the field should be left blank. |
| AMD.03.01.C020 | <p><u>National Code Attributed by the Financial Supervisor to the Reported Establishment</u></p> <p>National or supervisory identifier assigned to the reported establishment/sister undertaking by the financial supervisor where the entity is registered or authorised.</p> <p>This field is only mandatory if the LEI (AMD.03.01.C010) is not available.</p> |
| AMD.03.01.C030 | <p><u>Legal Name of the Reported Establishment</u></p> <p>Official legal name of the respective establishment/sister undertaking as registered in the relevant public or supervisory register (<i>i.e.</i> no English translation needed).</p> <p>The name should be reported in full, without abbreviations, unless these are part of the official legal name.</p> <p>Where no legal name is available for an establishment (<i>e.g.</i> for a network of agents), a short description of the type of establishment concerned and of the Member State where it operates should be added (<i>e.g.</i> 'Network of agents – Austria').</p> |
| AMD.03.01.C040 | <p><u>Reported Establishment Name in Latin Characters</u></p> <p>Name of the respective establishment/sister undertaking in Latin Characters, if different from the official legal name reported in AMD.03.01.C030.</p> <p>This field is optional and may be used to facilitate identification (<i>e.g.</i> where the official legal name is not in Latin characters or is difficult to interpret).</p> |
| AMD.03.01.C050 | <p><u>Category of Activity of the Reported Establishment</u></p> <p>Classification of the respective establishment/sister undertaking according to its regulated or supervised activity.</p> <p>Select the category that best reflects its business model.</p> |
| AMD.03.01.C060 | <p><u>Category of Reported Establishment (Other)</u></p> <p>Where 'Other' was selected in AMD.03.01.C050, the most appropriate category of the respective establishment/sister undertaking shall be specified in this field.</p> |
| AMD.03.01.C070 | <p><u>Member State of the Reported Establishment</u></p> <p>Member State (EU country) where the respective establishment/sister undertaking is legally established.</p> |
| AMD.03.01.C080 | <p><u>Financial Supervisor of the Reported Establishment</u></p> <p>Financial supervisor primarily in charge of the AML/CFT supervision of the respective establishment/sister undertaking.</p> |

| Column code | Legal references and instructions |
|----------------|--|
| | <p>In case of another establishment than a subsidiary or a branch, such as a network of agents, the financial supervisor of the credit institution or financial institution on behalf of whom the agents are carrying out activities should be reported (e.g. where a network of agents carries out activities in Austria on behalf of a payment institution located in Germany, the financial supervisor of that payment institution located in Germany should be reported).</p> <p>Please select “other” if the financial supervisor is not in the predefined list and specify the name of the financial supervisor in AMD.03.01.C090.</p> |
| AMD.03.01.C090 | <p><u>Financial Supervisor of the Reported Establishment (Other)</u></p> <p>The name of the financial supervisor in case in AMD.03.01.C080 “Other” was selected.</p> |
| AMD.03.01.C100 | <p><u>Additional Financial Supervisor of the Reported Establishment</u></p> <p>Additional financial supervisor exercising AML/CFT supervisory responsibilities over the respective establishment/sister undertaking in the Member State where it is established.</p> <p>Please select “other” if the financial supervisor is not in the predefined list and specify the name of the financial supervisor in AMD.03.01.C110.</p> |
| AMD.03.01.C110 | <p><u>Additional Financial Supervisor of the Reported Establishment (Other)</u></p> <p>The name of the financial supervisor in case in AMD.03.01.C100 “Other” was selected.</p> |
| AMD.03.01.C120 | <p><u>Type of the Reported Establishment</u></p> <p>The type of respective establishment/sister undertaking should be selected: sister undertaking, subsidiary, branch or other type of establishment such as a network of agents.</p> |
| AMD.03.01.C130 | <p><u>Type of the Reported Establishment (Other)</u></p> <p>If AMD.03.01.C120 was ‘Other type of establishment’, type the most appropriate type of establishment (e.g. network of agents).</p> |
| AMD.03.01.C140 | <p><u>Freedom to Provide Services</u></p> <p>The reporting obliged entity should select ‘Yes’ if the respective establishment/sister undertaking operates under the freedom to provide services.</p> |
| AMD.03.01.C150 | <p><u>Extent of Freedom to Provide Services</u></p> <p>Number of Member States (EU countries) where the respective establishment/sister undertaking operates under the freedom to provide services.</p> <p>This field should be only filled in cases where ‘Yes’ is reported in AMD.03.01.C140.</p> <p>This field will populate additional information to report in A4.</p> |

AMD.04.01 Freedom to provide services

When should this template be completed?

This template should be completed when the answer to AMD.01.01.C040 or at least one row in AMD.03.01.C140 is 'Yes', meaning that the reporting obliged entity and/or at least one reported establishment operate(s) in at least one other Member State through freedom to provide services.

One row will automatically be populated for each combination of entity/establishment and per Member State in which services are provided under freedom to provide services based on the answers provided to AMD.01.01.C040 and AMD.03.01.C140.

What is the materiality threshold for operations under the freedom to provide services?

Art. 1(1) of the RTS under art. 12(7) AMLAR specifies that:

'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:

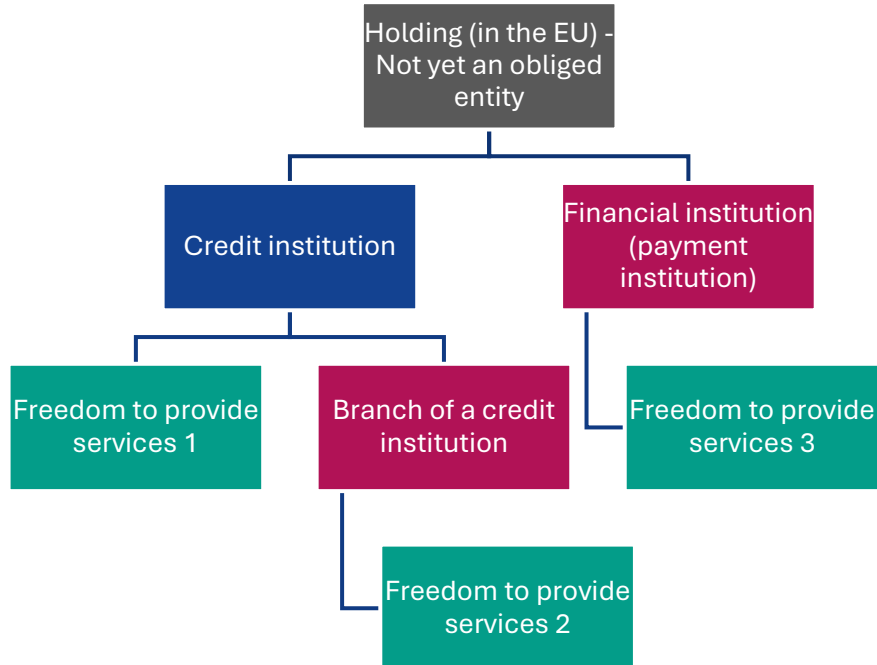
- (a) the number of its [customers](#) that are resident in that Member State exceeded 20 000 as of 31 December in the previous year; or
- (b) the total annual amount of incoming and outgoing [transactions](#) generated by customers referred to in point (a) in the previous year exceeds EUR 50 000 000, 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 should 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'.

Reporting obliged entities should however report separately (e.g. one separate row) each pairwise combination of entity/establishment and per Member State of operations through freedom to provide services. AMLA will subsequently aggregate the information at Member State level and verify whether the group meets the eligibility criteria.

Practical case of activities under freedom to provide services to be reported



All activities in **green** carried out by the entities in **pink** and **blue** above should be reported by the reporting obliged entity in **blue**.

| Column code | Legal references and instructions |
|----------------|---|
| AMD.04.01.C010 | <p><u>Entity or establishment</u></p> <p>Reporting obliged entity and/or reported establishment operating under freedom to provide services.</p> <p>This field is automatically filled in, with a number of rows corresponding to the number of entities in different Member States (EU countries) reporting information based on your answers to AMD.01.01.C040 and AMD.03.01.C140.</p> <p>If the automated population of this column does not work, it should be overwritten with the respective entity names.</p> |
| AMD.04.01.C020 | <p><u>Member State in which services are provided</u></p> <p>Please select the Member State in which the respective reporting obliged entity and/or reported establishment is operating under the freedom to provide services.</p> |
| AMD.04.01.C030 | <p><u>Customers</u></p> <p>Total number of customers resident in the reporting Member State (EU Country, as reported in AMD.04.01.C020) who entered or maintained a business relationship with, or carried out at least one occasional transaction with, the reporting obliged entity or</p> |

| Column code | Legal references and instructions |
|----------------|--|
| | its establishment operating under the freedom to provide services during the reference year. |
| AMD.04.01.C040 | <p><u>Incoming transactions</u></p> <p>Total value in EUR of incoming transactions generated by the customers reported in AMD.04.01.C030 during the reference year.</p> |
| AMD.04.01.C050 | <p><u>Outgoing transactions</u></p> <p>Total value in EUR of outgoing transactions generated by the customers reported in AMD.04.01.C030 during the reference year.</p> |

Appendix - Definitions, legal references and abbreviations

Definition 1: 'AMLD IV/V' means Directive (EU) 2015/849.

Definition 2: 'AMLD VI' means Directive (EU) 2024/1640.

Definition 3: 'AMLAR' means Regulation (EU) 2024/1620.

Definition 4: 'AMLR' means Regulation (EU) 2024/1624.

Definition 5: 'credit institution' means:

(a) a credit institution as defined in Article 4(1), point (1), of Regulation (EU) No 575/2013;

(b) a branch of a credit institution, as defined in Article 4(1), point (17), of Regulation (EU) No 575/2013, when located in the Union, whether its head office is located in a Member State or in a third country (cf. Art. 2(1)(5) AMLR).

Definition 6: 'customer' means a natural person or legal entity who maintains (or has maintained during the reference year) a business relationship with a financial institution pursuant to AMLR, or who carried out at least one occasional transaction with or through such a financial institution, including where no prior or ongoing business relationship exists.

For life insurance undertaking and life insurance intermediaries: the customer should refer to the policy holder (natural or legal person).

For asset management companies: the customer should refer to the person mentioned in the shares/units register of the Collective Investments Undertaking (CIU) for which the Asset Management Company is designated AIFM or UCITS Management Company. If a customer has multiple positions (lines in the shares/units of the CIU), please count it only once per CIU.

As a general rule, and unless specified otherwise:

- all customers should be included (active and non-active, including those holding dormant accounts);
- customers that, within one obliged entity, have more than one product or service should be counted only once (no double counting of customers per obliged entity);
- for joint accounts, each holder is regarded as a single customer.

Definition 7: 'designated reporting obliged entity' is the entity designated by a group to report eligibility datapoints on a consolidated basis

Definition 8: 'reporting obliged entity' is the entity filling the template and submitting it to its competent financial supervisor.

Definition 9: 'eligibility information' means the necessary information to assess if credit institutions, financial institutions, and groups of credit institutions and financial institutions meet the criteria set out in Article 12(1) of Regulation (EU) 2024/1620, as specified in Article 1 the draft RTS under art. 12(7) AMLAR.

Definition 10: ‘**establishment**’ means the actual pursuit by an obliged entity of an economic activity covered by Article 2 AMLR in a Member State or third country other than the country where its head office is located for an indefinite period and through a stable infrastructure, including:

(a) a branch or subsidiary;

(b) in the case of credit institutions and financial institutions, an infrastructure qualifying as an establishment under prudential regulation (cf. Art. 2(1)(18) AMLR).

Other type of establishments may include for example a network of agents if they qualify as an establishment.

Definition 11: ‘**financial institution**’ means:

(a) an undertaking other than a credit institution or an investment firm, which carries out one or more of the activities listed in points (2) to (12), (14) and (15) of Annex I to Directive 2013/36/EU of the European Parliament and of the Council, including the activities of currency exchange offices (bureaux de change), but excluding the activities referred to in point (8) of Annex I to Directive (EU) 2015/2366, or an undertaking the principal activity of which is to acquire holdings, including a financial holding company, a mixed financial holding company and a financial mixed activity holding company; (b) an insurance undertaking as defined in Article 13, point (1), of Directive 2009/138/EC of the European Parliament and of the Council, insofar as it carries out life or other investment-related assurance activities covered by that Directive, including insurance holding companies and mixed-activity insurance holding companies as defined, respectively, in Article 212(1), points (f) and (g), of Directive 2009/138/EC; (c) an insurance intermediary as defined in Article 2(1), point (3), of Directive (EU) 2016/97 where it acts with respect to life insurance and other investment-related insurance services, with the exception of an insurance intermediary that does not collect premiums or amounts intended for the customer and which acts under the responsibility of one or more insurance undertakings or intermediaries for the products which concern them respectively; (d) an investment firm as defined in Article 4(1), point (1) of Directive 2014/65/EU of the European Parliament and of the Council (e) a collective investment undertaking, in particular: (i) an undertaking for collective investment in transferable securities (UCITS) as defined in Article 1(2) of Directive 2009/65/EC and its management company as defined in Article 2(1), point (b), of that Directive or an investment company authorised in accordance with that Directive and which has not designated a management company, that makes available for purchase units of UCITS in the Union; (ii) an alternative investment fund as defined in Article 4(1), point (a), of Directive 2011/61/EU and its alternative investment fund manager as defined in Article 4(1), point (b), of that Directive that fall within the scope set out in Article 2 of that Directive;

(f) a central securities depository as defined in Article 2(1), point (1), of Regulation (EU) No 909/2014 of the European Parliament and of the Council;

(g) a creditor as defined in Article 4, point (2), of Directive 2014/17/EU of the European Parliament and of the

Council and in Article 3, point (b), of Directive 2008/48/EC of the European Parliament and of the Council;

(h) a credit intermediary as defined in Article 4, point (5), of Directive 2014/17/EU and in Article 3, point (f), of Directive 2008/48/EC, when holding the funds as defined in Article 4, point (25), of Directive (EU) 2015/2366 in connection with the credit agreement, with the exception of the credit intermediary carrying out activities under the responsibility of one or more creditors or credit intermediaries;

(i) a crypto-asset service provider;

(j) a branch of a financial institution referred to in points (a) to (i), when located in the Union, whether its head office is located in a Member State or in a third country (cf. Art. 2(1)(6) AMLR).

Definition 12: ‘**financial supervisor**’ means an AML/CFT supervisor in charge of credit institutions and financial institutions (cf. Art. 2(1) AMLD VI).

Definition 13: ‘**group**’ means a group of undertakings which consists of a parent undertaking, its subsidiaries, as well as undertakings linked to each other by a relationship within the meaning of Article 22 of Directive 2013/34/EU (cf. Art. 2(1)(41) AMLR).

Definition 14: ‘**obliged entity from the financial sector**’ means credit and financial institutions within the meaning of Art. 2(1)(5) and (6) AMLR.

Definition 15: ‘**parent undertaking**’ means:

(a) for groups whose head office is located in the Union, an obliged entity within the meaning of article 3 AMLR that is a parent undertaking as defined in Article 2, point (9), of Directive 2013/34/EU that is not itself a subsidiary of another undertaking in the Union, provided that at least one subsidiary undertaking is an obliged entity;

(b) for groups whose head office is located outside of the Union, where at least two subsidiary undertakings are obliged entities established in the Union, an undertaking within that group established in the Union that:

(i) is an obliged entity within the meaning of article 3 AMLR;

(ii) is an undertaking that is not a subsidiary of another undertaking that is an obliged entity established in the Union;

(iii) has a sufficient prominence within the group and a sufficient understanding of the operations of the group that are subject to the requirements of this Regulation; and

(iv) is given the responsibility of implementing group-wide requirements under Chapter II, Section 2 of this Regulation. (cf. Art. 2(1)(42) AMLR).

Definition 16: ‘**sister entity**’ means:

an obliged entity within the same group of entities, directly or indirectly controlled by the same parent undertaking

Definition 17: ‘**transaction**’ means:

any operation or activity generated by a customer and involving the transfer or movement of funds, crypto-assets, securities, or other assets or value. A transaction is considered customer initiated if it is triggered by a customer’s action or mandate

(‘instruction’), including instructions that lead to automated or recurring execution (e.g., standing orders, direct debits, preauthorized securities orders).

Indicative (non-exhaustive) list of operations that should typically be considered as transactions, provided they are initiated by the customer:

- Physical cash transactions (deposits/withdrawals)
- Debit/credit card transactions
- Transfer of value through account-to-account transfers, whether internal or external
- Transactions involving monetary instruments (traveller’s cheques, money orders)
- Transfer of assets under custody
- Direct debit collections
- Standing orders
- Loan repayments
- Purchase, sale, subscription, redemption, or exchange of financial instruments
- Top up, transfer, or spending of anonymous or prepaid cards
- Insurance premium payments (including one off and recurring contributions to life insurance and similar financial insurance products)
- Insurance withdrawals, partial surrenders, or policy redemptions initiated by the customer
- Operations registered on the blockchain, or executed in layer 2 environments as well as within a CASP’s internal ledgers.

Indicative (non-exhaustive) list of operations that should typically not be considered as transactions:

- Internal transfers between customer’s own accounts within the same entity
- Operations not generated by the customer (e.g. fees, commissions, interest accruals, tax adjustments, AMC initiated capital calls or distributions)
- System generated movements (e.g. auto sweeps, margin calls not triggered by customer instruction)
- Transactions executed by obliged entities when they act as agents of other entities
- Transactions not involving value transfer, or non-executed (e.g. rejected, reversed, or failed transactions).

For CASPs: As per Article 3(10) Regulation (EU) 2023/1113 ‘transfer of crypto-assets’ means any transaction with the aim of moving crypto-assets from one distributed ledger address, crypto-asset account or other device allowing the storage of crypto-assets to another, carried out by at least one crypto-asset service provider acting on behalf of either an originator or a beneficiary, irrespective of whether the originator and the beneficiary are the same person and irrespective of whether the crypto-asset service provider of the originator and that of the beneficiary are one and the same.