



AMLA
ANTI-MONEY LAUNDERING AUTHORITY

Work Programme 2025

From Vision to Action



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AMLA WORK PROGRAMME 2025

"2025 is the year AMLA takes shape — building trust, creating structures, and preparing to deliver on our mission to protect the Union against financial crime."

~ Bruna Szego, Chair of AMLA

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Introduction

From Vision to Action:

Establishing the European Union's United Approach Against Financial Crime

The year 2025 marks a decisive moment in the European Union's collective efforts to combat money laundering and terrorist financing. The Authority for Anti-Money Laundering and Countering the Financing of Terrorism (AMLA) was launched as a newly established European Agency. With the Chair and the Executive Board of the Agency having taken up their duties, AMLA enters its foundational phase with a clear mission: to lay the institutional, procedural, and strategic groundwork necessary to become the cornerstone in the EU's fight against money laundering and terrorist financing.

This first Work Programme reflects AMLA's start-up status and is structured around two core dimensions: the progress achieved so far in 2025, and the priorities for the remainder of the year. It translates European ambitions into actionable steps, aligning with the EU's strategic commitment to financial integrity and security.

At the core of AMLA's mandate are three deliverables, drawn from the AML Package:

- Completing the Single Rulebook, to ensure regulatory convergence and consistency across all Member States.
- Developing harmonised supervisory practices, enabling effective and coherent supervision across both financial and non-financial sectors.
- Strengthening the working methods and cooperation of Financial Intelligence Units (FIUs), ensuring robust information exchange and enhanced collaboration with law enforcement authorities.

To fulfil its mandate effectively and sustainably, AMLA has defined the following long-term strategic objectives:

- **Convergence and consistency:** Establish a robust and uniform AML framework across the EU by promoting regulatory, supervisory and FIU convergence, using best practices and methodologies while paying attention to compliance costs.
- **Cooperation and inclusiveness,** amongst the diverse group of stakeholders: Foster a shared AML/CFT culture with NCAs, FIUs, law enforcement, EU institutions, and private stakeholders to ensure cohesion and trust.
- **Spearheading technology in an evolving landscape:** Build up competencies that can be responsive to innovation and the new risk emerging with technology.
- **Credibility and accountability towards the citizens and institutions:** Build AMLA's institutional trust through transparency, communication, and sound governance.
- **Global leadership:** Position AMLA as a leading authority in the global fight against money laundering and terrorist financing, promoting high standards, and fostering cooperation.

To enable this vision and outlined strategic priorities, AMLA's short-term operational priorities are focused on three areas:

- Meeting operational needs - by recruiting staff, developing internal governance, and establishing essential IT infrastructure.
- Preparing core functions - laying the groundwork for FIU coordination and supervisory tasks, both direct and indirect.
- Building AMLA's identity and visibility - through the development of a communication strategy aimed at the broad range of stakeholders.

Progress to date: In the first half of 2025 substantial progress has been made on meeting operational needs. With a staffing program initiated, executive hires on board and the digital and physical workplace established, preparations for the core functions are ongoing. The legal and organizational foundations have been laid, preparatory planning for future supervision and coordination has begun, and AMLA's presence in Frankfurt has been established.

Looking forward: The second half of the year will focus on deepening operational readiness, finalizing internal procedures, and preparing AMLA's first strategic planning cycle. Beginning in Q3 2025, AMLA will initiate the start of a strategic framework development for AMLA's Mission and Vision and the drafting of two Single Programming Documents (SPDs), for the periods 2026–2028 and 2027–2029. This process will develop AMLA's vision, mission strategic objectives, and priority actions for the medium term.

Consistent with a risk-based approach, as an immediate priority, AMLA will have a focus on the AML/CTF aspects of the supervision of higher risk sectors and areas across the EU, including crypto-asset service providers (CASPs). Divergent national approaches to registration and authorisation can lead to supervisory fragmentation and increased risks of jurisdiction shopping by high-risk actors. AMLA will develop plans to promote high standards of AML/CFT controls and effectiveness in these areas through promoting convergence in national approaches. In parallel, AMLA's FIU pillar will reflect this priority by including crypto-asset related financial intelligence within the initial areas proposed for joint analyses, targeting cross-border typologies and emerging risks in this fast-evolving domain.

While this first Work Programme does not represent a fully developed strategic blueprint it provides an account of AMLA's ambitions for 2025; the early operational priorities and the first steps toward effective supervision and FIU coordination. This is the year in which AMLA sets its foundations for shaping its future role in strengthening Europe's collective resilience against financial crime.

“This Work Programme reflects the extraordinary spirit of a public service start-up that defines AMLA. I am proud of what we have achieved—and even more excited for what lies ahead.”

~ **Dominique Thienpont**, Interim Executive Director of AMLA

Management Summary

Establishing the European Union's United Approach Against Financial Crime

Introduction

The year 2025 marks the operational birth of The Anti-Money Laundering Authority (AMLA), the European Union's new central body aiming to prevent and fight money laundering and terrorist financing. Following the adoption of the AMLA Regulation (AMLAR) in June 2024, the first half of 2025 was dedicated to **laying down the institutional, operational, and policy foundations** necessary to get AMLA up and running by mid-year.

With AMLA officially becoming functional on 1 July 2025, the second half of the year will focus on the progressive implementation of its supervisory and coordination mandates, guided by the vision of delivering a harmonised and risk-based approach to anti-money laundering (AML) and counter-terrorist financing (CFT) across the EU. **AMLA will have as one of its first priorities a focus on promoting high standards of AML/CFT controls and effectiveness in high-risk sectors, such as crypto-asset service providers (CASPs) across the EU, through developing plans to promote supervisory convergence in national approaches.**

Milestones in the first half of 2025

In the first six months, AMLA successfully established its initial physical and administrative infrastructure. The temporary headquarters in Frankfurt became operational in February 2025, allowing the first wave of AMLA staff and Commission Task Force members to move in. The final lease agreement for **AMLA's permanent premises in the iconic Messe Tower** was signed in April, following approval by the European Parliament and Council.

AMLA has delivered institutional milestones. **Governance structures** were formally established, laying **the groundwork** for AMLA's decision-making capacity. The Chair assumed her responsibilities in mid-February. The General Board in both supervisory and FIU compositions held its meetings in March, May and June, and the Executive Board has taken up its duties on 2 of June. Rules of procedure were adopted, including a Conflict-of-Interest Policy. This information is publicly available on AMLA's website.

Simultaneously, AMLA successfully **concluded and signed Memoranda of Understanding (MoU) with the European Supervisory Authorities and the ECB** on 27 June 2025, following a series of technical and high-level discussions to formalise inter-institutional cooperation. EEA/EFTA States – Iceland, Liechtenstein, and Norway - have been welcomed as observer in AMLA's General Board from June 2025.

Operationally, AMLA made decisive strides towards establishing **its policy, supervisory, and FIU functions**. As part of its role in delivering the EU's Single Rulebook, AMLA launched several cross-functional and pillar-specific workstreams to prepare the first of the 23 level 2 and level 3 (L2/3) mandates that must be delivered before July 2026. These mandates cover supervisory processes, risk understanding and mitigating measures by Obligated

Entities (OEs), and the functioning of Financial Intelligence Units. In the first half of 2025 AMLA established the expert networks and Working Groups (WGs) across both the financial and non-financial sectors to assist with the drafting of regulatory and implementing technical standards (RTSs and ITSs) as well as guidelines. **Priority** was given to mandates on supervisory cooperation, the AMLA database, home/host supervisory coordination, and obligations related to risk identification, ongoing monitoring, and business-wide risk assessments.

For the **FIU's**, AMLA began developing the Support and Coordination Framework that will underpin its role in strengthening cross-border financial intelligence cooperation. Two workstreams were launched to (1) set up the **FIU Delegates Group** and (2) develop the operational coordination framework (SAC). These efforts will enable AMLA to begin joint analyses, facilitate mutual assistance, and progressively assume hosting of **the FIU.net platform**. AMLA has also begun preparing for formal cooperation with Europol, Eurojust, EPPO and OLAF through the development of working arrangements covering strategic and operational exchanges, technical interoperability, and liaison mechanisms.

Resources

Recruitment and human resource development have been central to AMLA's build-up. With the objective of reaching up to 120 staff members by late 2025, AMLA has already onboarded personnel in key functions including HR, IT, finance, and procurement. Agreements with the Commission ensure continued support for payroll and HR services, while AMLA is developing its own internal tools, organisational policies, and onboarding procedures to support an expanding team. The implementation of a performance management cycle and the development of a learning and development framework will be initiated in the second half of 2025.

In the **digital domain**, AMLA began building a secure, interoperable IT environment to support its mission. The digital workplace was operationalised early in 2025, providing essential tools for remote and on-site collaboration. Work began to prepare the taking over **the EuReCA** system from the EBA, which contains valuable information on AML/CFT prevention deficits of SIs and measures NCAs have taken in this respect. Planning is underway for the transfer and optimisation of the FIU.net system. In addition, AMLA initiated the design of the **Central AML/CFT Database** in line with Article 11 of its founding Regulation. These systems will ultimately support both the supervisory and FIU pillars. **Cybersecurity planning** is progressing in coordination with CERT-EU, and AMLA has completed its internal cybersecurity risk governance framework.

AMLA committed approximately €4.6 million of its €17.2 million **2025 budget** by mid-year. Expenditures have supported staff remuneration, office rent, IT procurement, and service contracts. AMLA is on track to achieve financial autonomy by January 2026 and is **preparing to transition** from Commission-managed operations to full budgetary independence, including integration into the SUMMA financial management system and the adoption of its internal financial rules.

Externally, AMLA has grown rapidly in **visibility**. Since late 2024, the Communications Team has managed AMLA's public presence, building a following of over 35,000 on LinkedIn and drawing over 62,000 website visitors in Q1 2025 alone. Chair-led visits to all EU Member States began in March, complemented by AMLA's participation in major public-private events. **An extranet** has been set up, to facilitate document sharing with the General Board, enable written procedures, and distribute relevant information. Internally, a new intranet was launched in mid-2025 to support staff communication and collaboration. AMLA is also finalising **its visual identity** and will present its new logo and corporate branding in the second half of the year.

Activities for the second half of 2025

From July onwards, AMLA will begin **exercising some of its operational powers**. Its supervisory focus will initially be on indirect supervision of financial institutions, and oversight of the non-financial sector. AMLA will collect information about risks in the non-financial sector, support NCAs through training regarding colleges of supervisors, work out plans to participate in colleges in the financial sector, organise a workshop to foster supervisory convergence and knowledge exchange among NCAs and start preparing a report on the thematic reviews conducted by NCAs. **Particular attention will be given to crypto-asset service providers**. It will also begin **developing methodologies and tools for its future direct supervision powers**, scheduled to become active in 2028.

In the area of policy, AMLA will **intensify work on prioritised L2/3 mandates**. These include finalising the RTS on the AMLA Database, the ITS on supervisory cooperation, and guidelines on risk-based monitoring and internal controls, working towards public consultation for some of the mandates by the end of the year. AMLA will also continue to observe and prepare to **take over work** currently conducted by the EBA and EC, with an enhanced focus on EBA's work on the risk model. In parallel, AMLA will have **substantial work regarding the non-financial sector**, where regulatory harmonisation is still limited and where AMLA's role is expected to have significant impact in facilitating the fulfilment of their duties.

For the FIU's, AMLA will finalise **the designation of FIU Delegates**, the first will arrive as of September 2025, complete **the Support and Coordination Framework**, and initiate preparatory work for a pilot Joint Analyses and the peer review process. **Two (pilot) thematic peer review processes will be conducted during 2025-2027** and will be complemented by **a comprehensive mapping** of the organisational setup, powers, and operational capabilities of all Financial Intelligence Units (FIUs) in the EU. The mapping and the peer review process are mutually reinforcing, while the mapping provides a broad comparative overview, the thematic peer reviews will allow for a more in-depth exploration of selected functional areas.

Cooperation with law enforcement and EU institutions will be formalised, and AMLA will begin establishing the technical and procedural foundations for secure cross-border financial intelligence exchange.

The second half of 2025 marks the beginning of a new phase for AMLA: the transition from initial foundational development to structured foundational and strategic planning. To steer its long-term trajectory, AMLA will start a strategic framework development for AMLA's Mission and Vision and begin drafting **its first Single Programming Documents (SPDs) for the periods 2026–2028 and 2027–2029**. This process will define AMLA's strategic vision, operational priorities, performance indicators and resource planning. The preparation will be based on broad internal consultation, engagement with Member States and EU institutions, and insights gained from the first months of operations. The first SPD is scheduled for adoption by the EB by 30 November 2025.

Throughout this process, AMLA remains aware of **the risks inherent** to its early development stage. AMLA is actively managing challenges related to recruitment, it takes time to recruit and onboard staff, legal and procedural uncertainties, dependence on external timelines, and IT and cybersecurity risks. Risk mitigation measures have been put in place, including prioritised hiring, legal review of internal procedures, accelerated IT security planning, and proactive stakeholder communication to ensure transparency and trust. AMLA will proactively monitor the progress in the work on the different mandates: the delivery dates for specific mandates may need to be extended in order to secure high quality products and sufficient stakeholder involvement. AMLA will need to design risk and supervisory models **based on the initial work from other authorities and the EC**. This complex work on models will have to be factored into AMLA's own plans and will require further planning to develop. AMLA's ability to deliver on its mandate will also critically depend on the successful recruitment and retention of highly qualified staff and the quality of the preparatory work delivered by others.

Conclusion

The achievements of the first half of 2025—across policy, governance, infrastructure, human capital, technology, and external engagement—**have positioned AMLA to begin delivering on its mandate**. The second half of the year will focus on, **shaping the EU AML/CFT framework, maturing its supervisory and FIU functions, and building lasting strategic capacity**.

AMLA stands ready to become **a cornerstone of the EU's efforts** to prevent and disrupt financial crime.

List of abbreviations

AML/CFT	Anti-money laundering/countering the financing of terrorism
AMLA	Anti-money laundering Authority
AMLAR	Regulation (EU) 2024/1620 establishing the Authority for Anti-Money Laundering and Countering the Financing of Terrorism
AMLD	Directive (EU) 2024/1640 on the mechanisms to be put in place by Member States for the prevention of the use of the financial system for the purpose of money laundering or terrorist financing
AMLR	Regulation (EU) 2024/1624 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing
CA	Contract agent
CASP	Crypto-Assets Service Provider
CDD	Customer due diligence
CERT-EU	Computer Emergency Response Team for the EU Institutions
DAP4AMLA	Data Analytical Platform for AMLA
DG FISMA	Directorate General for Financial Stability, Financial Services and Capital Markets Union
DG HR	Directorate General for Human Resources
DG BUDG	Directorate General for Budget
DPO	Data Protection Officer
EBA	European Banking Authority
ECB	European Central Bank
ECON	Committee on Economic and Monetary Affairs
EIOPA	European Insurance and Occupational Pensions Authority (ESA)
EP	European Parliament
EPPO	European Public Prosecutor's Office
ESA	European supervisory authority (ESA)
ESMA	European Securities and Markets Authority (ESA)
EU	European Union
EuReCa	EBA's AML/CFT database
Eurojust	European Union Agency for Criminal Justice Cooperation
Europol	European Union Agency for Law Enforcement Cooperation

FFR	Framework Financial Regulation
FIU	Financial Intelligence Unit
FWC	Framework Contract
GL	Guidelines
HR	Human resources
ICT	Information and communication technology
IT	Information technology
ITS	Implementing technical standards
L&D	Learning and development
LEA	Law enforcement Agency
LIBE	Committee on Civil Liberties, Justice, and Home Affairs
MICA-R	Markets in Crypto-Assets-Regulation
ML/TF	Money laundering/Terrorism financing
MoU	Memorandum of Understanding
NCAs	National Competent Authorities
OEs	Obligated entities
OIB	Office for Infrastructure and Logistics
OLAF	European Anti-Fraud Office
RAUL	Risk assessment at union level
RTS	Regulatory technical standards
SAC	Support and Coordination Framework
SCIC	Service for Conference Interpretation
SLA	Service level agreement
SNE	Seconded national expert
SPD	Single programming document
STR	Suspicious Transaction Report
TA	Temporary agent
TSI	Technical Support Instrument
WG	Working Group
XBR/D	Cross-Border Reporting and Dissemination

1. Milestones in the first half of 2025

Laying down the foundation

During the first half of 2025, AMLA focused on establishing the foundations required for AMLA to become operational by mid-year. In line with its legal mandate and the tight implementation timeline following the adoption of the AMLA Regulation (AMLAR) in June 2024, several key milestones were achieved, including AMLA establishing its office in Frankfurt, appointing the Chair and Executive Board and the first recruiting of staff members. The first Working Groups (WGs) in both pillars are established and the MOUs with the ECB and ESAs are signed.

AMLA has been entrusted by the legislator with a broad range of policy, institutional, and operational responsibilities to fulfil its mandate in three key areas: (i) creation of an AML/CFT supervisory system (ii) completion of the rulebook for Obligated Entities (OEs) and (iii) supporting and coordinating the work of Financial Intelligence Units (FIU).

1.1 Establishment in Frankfurt

In 2025, AMLA's Building and Logistics function focused on ensuring the timely delivery and full operational readiness of AMLA's headquarters in Frankfurt in the iconic Messe Tower. This included managing the transition from the temporary facilities to the final premises, supervising fit-out works, setting up facility management services, and guaranteeing a functional and secure working environment for AMLA staff adapted to their operational needs.

Since early 2025, significant milestones have been achieved to secure AMLA's operational environment and support progressive establishment.

AMLA staff successfully moved into the temporary floor on 20 February 2025, following the preparation and equipment of the space to accommodate the first wave of AMLA staff and the Directorate-General for Financial Stability, Financial Services and Capital Markets Union (DG FISMA) Task Force members. Close collaboration was also established with Office First,- the real estate asset manager of the Messe Tower - enabling AMLA to integrate smoothly as a new tenant and become familiar with building operations.

The final lease agreement was approved by both the European Parliament and the Council at the end of March 2025¹, allowing for the formal signing of the contract between AMLA and Messe Tower on 9 April 2025. This milestone concluded several months of negotiations and sets the basis for AMLA's long-term establishment in Frankfurt.

Basic facility management services, were successfully launched and secured through dedicated procurement processes, ensuring that both, the temporary and the long-term premis-

¹ following the requirement from Art 272(3) of EU Financial Regulation

es are fully operational and that staff needs are adequately met from the beginning of AMLA's activities.

The decision on materials for the permanent fit-out was approved by the AMLA Chair and interim Executive Director and formally signed in mid-April 2025, following a series of technical workshops conducted with Office First and Aukett + Heese Architekten.

1.2 Establishment of governance structures

During this period, AMLA established its core governance architecture.

In AMLA's first year of operation, a system of governance needs to be put in place so that decision-making processes are clear to all EU AML/TF supervisors and FIUs, as well as external stakeholders, as well as an ethical framework to deal with potential conflicts of interest. Also, in accordance with AMLAR (Article 84), AMLA shall be fully accountable to the European Parliament (EP), and the Council of the EU.

In 2025, AMLA expects to meet key governance and accountability milestones, including having well-established decision-making bodies, namely the General Board and the Executive Board, with dedicated rules of procedure, as well as rules on ethics applicable to all participants in both settings.

As part of putting in place AMLA's governance structure, the following has already been achieved:

- Appointment of the Chair.
- Establishment of the General Board in both supervisory and FIU compositions through the following steps: (i) identifying and reaching out to members in financial and non-financial sectors (more than a hundred authorities on the supervisory side alone) as well as observers foreseen in AMLAR (EBA, EIOPA, ESMA, ECB, Europol, Eurojust, OLAF, and EPPO), (ii) adoption on 6 March 2025 of dedicated Rules of procedure including a Conflict of Interest Policy for Non-Staff, (iii) first meetings held in both (or joint) compositions on 13 March 2025 and 13-14 May 2025 in Frankfurt (hosted by EIOPA) and 17-18 June online, and (iv) deployment of AMLA extranet to all member institutions.
- Establishment of the Executive Board with (i) finalisation of selection process for four members in May, and (ii) first meeting in June including adoption of dedicated rules of procedure and the appointment of the Vice Chair.
- Finally, and linked to the implementation of its accountability framework, AMLA has started providing the European Parliament with a comprehensive and meaningful record of the proceedings of its General Board meetings.

1.3 Recruitment and onboarding of staff

The Human Resource (HR) function is critical to the successful evolution of AMLA as an independent EU Agency during 2025 and 2026. By the end of 2025, AMLA should reach its staffing targets, around 120 staff.

In the first months of its start-up phase, AMLA has targeted its HR efforts and will continue to focus its attention on (1) creating awareness on its operations as well as the career opportunities available, particularly for its core profiles, (2) recruiting intensively for urgently needed core and corporate profiles, paying particular attention to gender and geographical balance as well as skills diversity, and (3) putting in place the HR tools, systems, policies and agreements in order to support its organisational setup as well as the smooth onboarding and integration of AMLA staff.

To date, AMLA has concentrated on:

- Recruiting and onboarding staff, mainly in key horizontal functions (e.g., IT, HR, Finance and Procurement).
- Introducing recruitment tools for the purpose of carrying out large selection procedures.
- Concluding service level agreements with the European Commission, namely Directorate General on Human Resources (DG HR), on informatics and the Pay Master Office (PMO) to provide full employee services and implementing the basic modules of HR management tools (e.g., leave and time management, work patterns, organisational chart, and certificates).
- The first large selection procedure for AML experts to drive the mandate work.

1.4 Start building a future-ready digital infrastructure

Next to AMLA's staff, IT is a critical driver in AMLA's endeavours to accomplish its mission. As such, IT focuses on facilitating collaboration across Member States in the area of AML/CFT and turning data into information and strategic insights.

The initial focus was twofold: firstly, AMLA needs to roll out its foundational IT services and infrastructure, thus helping AMLA to achieve its autonomy. Deliverables include a modern digital workplace environment, networking facilities, user services and support for administrative processes such as financial management and HR-management.

"We are designing the digital ecosystem to support AMLA's mission. Technology must empower supervision, collaboration, and secure data exchange across Europe."

~ Simonas Krėpšta, Executive Board Member, Digital & ICT Strategy, Risk analysis

IT's second priority consists in supporting the operation business needs. In view of facilitating the transfer of the EuReCA system from EBA to AMLA, IT is collaborating with the business in collecting requirements and preparing the technical environment for the future hosting of EuReCA at AMLA, in full compliance with the Regulation and design principles such as security-by, data protection and data integrity.

The conceptual design of the ecosystem also embraces the business needs of the FIU-pillar where FIU.net is expected to become a key component of AMLA's architecture, integrated with state-of-the-art technologies supporting data analysis to the benefit of AMLA and the competent authorities. The first version of this overarching IT strategy is expected to be adopted by end of year.

AMLA's IT function is highly motivated to collaborate with their Member State counterparts in view of seeking synergies, common standards and best practices and providing quick wins. The Art.11 Central AML/CFT database here provides a lead example.

1.5 AMLA's financial management

The overall objective of AMLA's financial management is to ensure the financial resources made available to AMLA for the activities outlined in this work programme are used in line with the principles of economy, efficiency, effectiveness, and sound financial management.

As 2025 is the first year of AMLA's operations, the available funding will be mainly used for the setting up of AMLA and building its capacity. Spendings will be associated with the acquisition of goods and purchase of services (e.g., related to AMLA's premises in Frankfurt, IT equipment, furniture, rent, utilities) as well as personnel's remuneration and related costs.

Currently, the funds made available for AMLA are managed under the responsibility of its Interim Executive Director with the support of DG FISMA which processes financial operations on AMLA's behalf. As AMLA shall become financially autonomous on 1 January 2026, the 2025 funds implementation will be an integral part of the European Commission's financial (budgetary and accounting) reporting.

In 2025, AMLA shall:

- Prepare and put in place systems and procedures in view of acquiring its financial autonomy.
- Establish and implement its Annual Procurement Plan.
- Join various interinstitutional Framework Contracts (FWC) and enter into service level agreements (SLAs) with European Commission as deemed appropriate.

Since the beginning of the year, € 4,6 million of the available € 14,2 million made available from the European Union budget has been committed to cover AMLA's personnel, mission, and rental costs, other costs associated with the premises, IT costs, etc. These budgetary commitments had been intended to honour the legal commitments that have been concluded so far (e.g. SLAs for the provision by the European Commission of HR, payroll, IT and other services, lease agreement, and contracts for the purchase of goods and services).

The Federal Republic of Germany has transferred the 2025 contribution (€ 3 million) as per the Contribution agreement concluded in 2024. This contribution is in addition to the € 14,2 million made available to the Authority for 2025 from the European Union budget.

The process for the onboarding to SUMMA, the European Commission's Corporate Financial System, has also started. SUMMA will enable AMLA to implement its budget, prepare annual accounts, and process financial transactions. It has been decided to outsource the treasury service to the European Commission's Directorate General for Budget (DG BUDG) and contacts have taken place to this end.

1.6 Institutional work: Memoranda of Understanding with ESAs and ECB

AMLA organized meetings with all ESAs to discuss the outlines of a MoU and a timeline. Similarly, AMLA organized meetings with ECB staff to advance an MoU. In addition, two high-level meetings between AMLA Chair Bruna Szego and ECB Banking Supervision leadership took place on 9 and 29 April to exchange views on general issues within the scope of this MOU. Further drafting occurred in April and May. Afterwards drafts of the MOUs were presented to the managing bodies of the Authorities in June and were signed as planned on 27 June 2025.

1.7 Visibility of AMLA

The Communications Team supports the establishment and visibility of AMLA through a strategic, coherent, and engaging public presence. The aim is to build trust, ensure transparency, and foster effective internal and external communication channels as AMLA takes shape and begins its work.

Since November 2024, AMLA's external presence has been actively managed, including a growing LinkedIn audience (currently ~35,000 followers) and a website that attracted 62,000 visitors in Q1 2025. AMLA launched media and event engagement activities in March 2025, with participation of the Chair in key events across the public and private sectors such as the EuroFi conference in Warsaw, the EAFCS in Dublin and an interview with the Hessian public broadcaster. The Chair's visits to all Member States also began in March 2025, marking high-level engagement in all EU Member State capitals. Additionally, AMLA's Intranet for staff has been launched in May 2025.

1.8 Policy mandates in preparation for AML/CFT Supervision

As the first steps for the AML/CFT Supervision preparatory work in 2025, AMLA analysed the respective level 1 texts and identified the key elements to be addressed in RTSs and ITSS. In this context AMLA also considered other relevant legal provisions to ensure that any new provisions drafted by AMLA are consistent with such existing provisions under EU-law. In doing so AMLA prioritized the work based on the significance of the outcome of the mandates and informed by the deadlines of the respective mandates.

To involve the Member States in the process of development of L2/L3 standards AMLA has set up two WGs: 1) the WG on Supervision and 2) the WG on Cooperation. While the first has worked on AMLA's database, the second worked on cooperation among supervisors for direct supervision, and on home/host cooperation.

These WGs are composed of representatives of NCAs and organized by AMLA staff. Additionally, AMLA has established the AMLA AML/CFT Experts' Network for the financial and non-financial sector. The experts listed in this network are representatives of national AML/CFT supervisors, self-regulatory bodies or FIUs that oversee the various categories of OEs. They support the drafting process, particularly where sector-specific considerations are essential.

1.9 Commencing initial work on 'Risk and Measure' mandates

A key area to be addressed by some of the L2/3 mandates is rules and guidance to the OEs (financial and non-financial) to help them better identify the risks and design the measures to mitigate them.

In this regard AMLA has initiated preparatory works on three prioritized mandates based on an analysis of the L1 text (AMLR) identifying the key elements to be addressed in the Regulatory Technical Standards (RTS) and Guidelines whilst also considering relevant Guidelines and legal texts that already exist.

To further pinpoint the relevant measures to be taken and the necessary alignment to be made specific questionnaires have been distributed to the relevant national supervisory authorities. The aim is to take stock of the specific regulations and guidance issued at the national level. A complete view of the content and the different approaches taken by Member States on the issues under discussion is key for AMLA. The aim is to ensure that pertinent proposals are put forward that seeks to align different practices and make sure that coherent and uniform interpretation is applied throughout the union.

Two WGs have been set up for the preparation of the three prioritized mandates. The WG on Risks work is focused on drafting RTS on lower thresholds and criteria to identify business relationships, and the Guidelines for business-wide risk assessment. The WG on Obligations will deal with the Guidelines on ongoing monitoring of business relationships.

These WG will be composed of representatives of NCAs and organized by AMLA staff. As the content of the L2/3 instruments should be consider the relevant features of different business beyond the financial sector, the Experts Network will help to ensure that specific knowledge from all the categories of OE is available. WGs can draw expertise from this network as needed, according to the type of topics included in the agenda of each meeting.

1.10 Jointly building up a robust FIU Support & Coordination Framework

In the first half of 2025, AMLA's FIU Pillar started as the facilitator of cross-border financial crime fighting, committed to building a strong, connected, and future-proof EU framework for financial intelligence. AMLA aims to establish a robust Support & Coordination Framework, install an effective and operationally FIU Delegates Group, enhance information exchange, joint analyses, and strategic threat assessments, ensure legal and operational clarity for FIUs across the Union and drive innovation and collaborative impact.

AMLA started the operational activities by drafting the FIU Pillar Workplan to define roles, responsibilities, and integration within AMLA. In March AMLA together with the FIU's established the WG "Building up AMLA" with two workstreams, one on the FIU delegates and one on setting up the Support and Coordination Framework.

The first workstream focused on the FIU Delegates Group, with the primary objective of organizing the necessary documents for the designation process for FIU Delegates Group. This WG has been responsible for drafting, reviewing, and refining all relevant documents before they are formally submitted to the General Board for approval, particularly in the context of FIU composition. By centralizing these discussions within a dedicated workstream, the aim was to streamline the selection process and ensure a consistent and transparent approach. The workstream has been chaired by AMLA and consisted of AMLA Staff (3) and FIUs representatives (11).

The second workstream is tasked with the development of the coordination framework, a crucial element for the effective integration of AMLA's operational coordination structure. This workstream will take the lead in setting up the framework to ensure timely and efficient coordination. This workstream is chaired by AMLA and consists of AMLA Staff (3) and FIUs staff (16).

1.11 Building AMLA's dual mandate

AMLA's dual mandate—combining AML/CFT supervision with support and coordination of Financial Intelligence Units (FIUs)—is foundational to its mission and a central strength of the EU's new anti-money laundering architecture.

By integrating supervisory oversight with intelligence-led analysis, AMLA can ensure that insights gained from supervising high-risk cross-border entities directly inform FIU activities, while FIUs' detection of emerging illicit finance trends feeds back into supervisory priorities and regulatory standards.

This creates a feedback loop that strengthens enforcement and enhances the EU's capacity to detect, prevent, and respond to ML/TF risks.

Ultimately, this synergy underpins AMLA's vision: a unified, harmonised, risk-based approach that drives both supervisory convergence and more effective, intelligence-informed action against financial crime.

1.12 Conclusion

This successful first phase has ensured that AMLA is structurally and operationally prepared to begin implementing its mandate from 1 July 2025 onwards. The achievements of this foundational semester form the basis for the next stage of operational development, which will focus on policy output, supervisory readiness, and the early phases of FIU coordination.

2. Activities for the second half of 2025

from initial foundational development to structured foundational and strategic planning

As of 1 July 2025, AMLA becomes operational in line with its mandate under Regulation (EU) 2024/1620. The second half of the year will focus on further laying the groundwork for AMLA's core functions, particularly in relation to supervision and FIU coordination. AMLA will among other things have to continue EBA's work on a risk methodology which provides an objective tool to measure the residual risk of OEs, both for purposes of selection of entities for direct supervision and for risk-based supervision on the national level. These activities will serve as precursors to more comprehensive operational delivery from 2026 onwards.

As a newly established EU Agency, AMLA is faced with many tasks that must be balanced while handling the build-up of the organisation and scaling up of staff and experience. AMLA is faced with many tight implementation deadlines, and the high expectations surrounding its role in the EU AML/CFT system. AMLA's ability to deliver on its mandate will critically depend on the successful recruitment and retention of highly qualified staff and the quality of the preparatory work delivered by others.

As AMLA is in the process of becoming operational, it is of important that the 'Single Rule Book' is progressively completed. To this end, AMLA is tasked with preparing 23 L2/3 measures before July 2026. The aim of these mandates is to bring about a maximum level of harmonization on three key areas: (i) the supervisory processes within the EU (10 mandates), (ii) the understanding and implementation of risks and mitigating measures by the OEs (8 mandates), and (iii) the Financial Intelligence Units (FIU) processes (5 mandates).

While fulfilling these mandates, AMLA aims to effectively implement the AML framework in a uniform way. AMLA will also do this whilst paying attention to compliance cost, aiming at optimising effective outcomes and efficient approaches, while maintaining the robustness of the system.

In the area of AML/CFT supervision, AMLA's main objective is to commence laying down the rules, the processes and the requirements for AMLA regarding direct and indirect supervision and oversight on the one hand, and to set standards to enhance convergence of supervisory practices of NCAs based on L2/3 work already done by European Supervisory Authorities, and to strengthen cooperation among supervisors both in the financial and non-financial sector.

On institutional work AMLA must continue establishing cooperative relationships with other supervisory authorities, and in particular to conclude Memoranda of Understanding (MoU) with prudential supervisors and the European Supervisory Authorities for the cooperation and the exchange of information under MICA-Regulation (MICA-R). As of July 2025, AMLA will also start to make use of its operational powers with respect to indirect supervision of non-selected financial institutions and oversight of the non-financial sector.

2.1 Outlook: Towards the strategic framework development

The second half of 2025 marks the beginning of a new phase for AMLA: the transition from initial foundational development to structured foundational and strategic planning. This transition will culminate in a strategic framework development for AMLA's Mission and Vision as well in the drafting of the first Single Programming Documents (SPDs), which will guide AMLA's activities and evolution over the coming years.

“Our Strategic Framework will be more than a plan—it is the first articulation of AMLA’s European ambition. It will shape our identity and sharpen our direction.”

~Derville Rowland, Executive Board Member, Supervision

2.1.1 Strategic focus and planning considerations

Laying the foundation for the new authority also entails establishing AMLA's first strategy to guide AMLA's operations and priorities and define AMLA's vision and mission. The strategy will provide clear direction for the implementation of the work programs going forward.

The strategic planning process will be shaped by several key considerations:

- Alignment with AMLA's mandate under the AMLAR, including its direct supervisory role, its tasks of supporting and coordinating FIUs, and its contribution to policy convergence.
- Incorporation of insights from AMLA's initial operations, including supervisory preparations and early FIU coordination activities in 2025.
- Engagement with key stakeholders, including the European Commission, Member States, national competent authorities (NCA), FIUs, EU agencies and private sector to ensure that the strategy reflects broad expectations and practical needs.
- Building internal consensus within AMLA, based on contributions from staff, management, and governance bodies, particularly the Executive Board and General Board.

2.1.2 Launch of the SPD Process

In the third quarter of 2025, AMLA will also start the development of two consecutive Single Programming Documents (SPDs), covering the periods 2026–2028 and 2027–2029, respectively. These SPDs will be based on the developed AMLA's vision, mission, long-term priorities and will include the annual objectives. They will serve as the key strategic and operational planning instruments and be adopted in line with the Agency's governance procedures.

The SPDs will also provide a basis for performance monitoring and resource planning, as well as ensuring alignment with the European Union’s AML/CFT priorities and expectations from stakeholders.

2.1.3 Internal capacity and resource considerations

The preparation of the strategic framework development and the two overlapping SPDs will require a substantial internal effort. The process will involve extensive planning, coordination, and consultation across AMLA’s units and governance bodies. Given AMLA’s limited initial staffing levels and the simultaneous rollout of core functions, the drafting of the SPDs will place a significant demand on AMLA’s organisational capacity in the second half of 2025.

To mitigate this, AMLA will prioritise internal resource planning, establish a dedicated co-ordination structure for the SPD drafting process, and leverage temporary support where necessary. This will help ensure that AMLA can meet its strategic planning obligations without compromising the progress of other critical start-up activities.

2.1.4 Timeline and key milestones

The development of the strategic framework development and the SPDs will follow an internal project plan and involve several milestones:

- Internal consultations and planning in Q3 2025
- Drafting AMLA’s Mission and Vision Q3
- Drafting of the 2026–2028 and 2027–2029 SPDs in Q3 and early Q4 2025
- Presentation to the General Board for discussion and feedback
- Formal adoption of the SPD’s in line with legal requirements

The strategic framework development process will also provide the opportunity for AMLA to articulate a clear mission and vision statement, which are not yet included in this 2025 Work Programme due to the very recent appointment of the Executive Board on 2 June 2025.

2.2 Laying the foundation for AML/CFT Supervision

AMLA is preparing for starting its operational work in the field of indirect supervision as of July 2025. A key part of AMLA’s work in this respect will be to use its oversight role to contribute to the convergence of supervisory practices and the promotion of high supervisory standards in the area of AML/CFT.

Under the risk-based approach, AMLA will particularly focus on high-risk areas, such as the developing crypto-asset markets in the European Union. Several authorisations have already been issued under the MICA-R, including for some of the larger crypto companies, allowing CASPs to provide their services across Europe. CASPs are exposed to significant AML/CFT risks due to their technological features, cross-border operations, and anonymity-enhancing capabilities. Accordingly, this should be one area of activity for AMLA.

Another area for AMLA to focus on is the use of supervisory colleges by NCAs. Colleges of supervisors are a central element of effective supervision of cross-border active entities in the European Union. This applies both to the financial and non-financial sector. A third important area of focus is the non-financial sector. The AML/CFT risks in this sector still are to some extent a known unknown and need to be better understood by AMLA quickly.

With these considerations in mind AMLA is planning to kick off the following measures in the second half of 2025, in some cases after additional staff resources have arrived:

- Taking measures to promote high standards of AML/CFT controls and effectiveness by CASPs through developing plans to promote convergence in national approaches under MICA-R.
- Coordination and facilitation of AML/CFT Colleges under Art. 31 of the AMLAR by participating in meetings of colleges, reporting on this activity including developing best practise and recommendations where considered helpful.
- Enhancing oversight of the NF Sector in accordance with Art. 5.4. AMLAR by sending out risk questionnaires to the NCAs and analysing the results.
- Kicking off collection of information from NCAs on thematic reviews under Art. 9 AMLAR to present to the General Board a consolidated planning by end of 2025.
- Enhancing mutual assistance of NCAs by organising seminars for the exchange of supervisory practices on selected AML/CFT topics (incl. technological innovation) in line with Art. 10 AMLAR.

As regards the non-financial sector AMLA sent out a questionnaire by end of June 2025 to gather information from non-financial supervisors regarding the sectoral risks and threats as depicted in the NRAs as well as number of supervised entities, (future) compliance with legal requirements and major challenges regarding the implementation of the AML package. Additionally, the questionnaire will include questions to determine whether a risk methodology has already been implemented, and whether the non-financial supervisor would be willing to share their approach with AMLA.

The answers will be analysed by AMLA. Depending on the data that will be delivered by the NF-NCAs, the answers will provide an overview over the outcome of the NRA assessment per NF-sector. This aggregated information will serve multiple purposes in AMLA:

The collected information will:

- Serve as basis for the planning of peer reviews of NF-supervisors according to Art. 35 AMLAR.
- Support the development of the Risk Assessment at Union Level (RAUL) according to Article 7 AMLD6.
- Support the workstream (40.2 AMLD) RTS on risk assessment methodology for (non-financial) OEs, as well as other L2/L3 mandates that include the NFS.

2.3 Policy work AML/CFT supervision

Given the strategic importance for the future of direct supervision and the risk assessment approach of the NCAs, AMLA considers the following two mandates being developed by the EBA to be of high relevance for AMLA's work. They are:

- the RTS on the selection of the 40 financial institutions for direct supervision (Art. 12.7. AMLAR) and
- the RTS on the risk assessment methodology of financial and non-financial OEs (Art. 40.2. AML-D).

Both mandates address inherent and residual risks of OEs. This work will form key inputs into the risk model used by the NCAs and which AMLA will need to deliver in order to appropriately determine selection of OEs for direct supervision. To ensure the risk models are calibrated appropriately and operationally effective, a significant amount of work will need to be completed in the near term. Examples of such work may include scoping of relevant population, data acquisition, sampling and verifying the calibration and testing of the methodology prior to its application. This will require AMLA to conduct major additional work after EBA delivers drafts of the RTS to AMLA in October 2025 to ensure that the methodology developed by EBA is calibrated adequately in the selection process. This may imply investment of considerable resources by AMLA for the competent staff and IT required to collect and analyse data from a sufficiently comprehensive sample of OEs.

Regarding further mandates directly allotted to AMLA, 10 L2/3 measures have been identified that have a high relevance in the context of AML/CFT supervision (see Annex 1 for a complete list of mandates). This is the result of a strict prioritization exercise by AMLA to keep the workload of implementing the EU-package manageable. When prioritizing AMLA took several aspects into account, including the following:

- The need to respect the legal deadlines set out on L1.
- The relevance of requirements for preparing direct supervision by AMLA.
- The relevance for fostering good cooperation of - and consistent application of EU law by - NCAs across the Union.
- The need of AMLA to take over or continue work done by other relevant stakeholders, such as the EU-Commission or the ESAs.

In this spirit, AMLA further prioritized mandates among the L2/3 measures to be prepared by July 2026 and started working on the following three mandates:

- Cooperation within the AML/CFT supervisory system regarding direct supervision according to Art. 15.3. AMLAR.
- Work required to develop the AMLA database according to Art. 11.6. AMLAR.
- And standards on Home/Host Cooperation between NCAs according to Art. 46.4. AML-D.

2.3.1 Cooperation within the AML/CFT supervisory system regarding direct supervision

As outlined in Article 15(3) of the AMLAR, AMLA will draft ITS to specify various aspects of the cooperation for direct supervision within the AML/CFT supervisory system. This ITS shall specify the circumstances under which financial supervisors will assist AMLA in its tasks related to supervisory reviews and assessments of selected OEs for direct supervision. It will also address the procedures for conducting periodic assessments, the arrangements for the transfer of supervisory tasks and powers between AMLA and national authorities, the preparation of protocols for selection decisions and provisions for the composition and operation of joint supervisory teams.

As AMLA will begin direct supervision of selected OEs in 2028, the draft ITS must be sent to the European Commission sufficiently early. However, AMLA expects that the drafting process requires more time than originally anticipated. AMLA accordingly plans to develop a draft ITS with the WG on Cooperation and to conduct a two-month public consultation starting late in 2025. Thereafter the draft will be finalised and sent to the European Commission.

2.3.2 AMLA Database

According to Article 11(6) of the AMLAR, this RTS will specify the procedures, formats, and timelines for the transmission of information by relevant authorities to AMLA; the scope and level of detail required for the information to be transmitted; the modalities of information sharing, including necessary consents; and the criteria for obligatory transmission, such as the required level of materiality for breaches. The deadline for AMLA to submit the draft RTS to the European Commission is 27 December 2025.

Meeting this tight deadline is more than a challenge, especially given the importance of ensuring high standards in addressing such a critical topic. The WG on Supervision will work on a draft and plans to conduct a two-month public consultation starting in 2025. The aim is for the final draft RTS to be approved by the AMLA General Board in Supervisory composition in the first half of 2026. In the course of this work AMLA is also working on taking over EuReCA, the EBA database, for information on compliance of OEs in the financial sector with AML/CFT requirements.

2.3.3 Home/Host Cooperation between supervisors

Pursuant to Article 46(4) of the AMLD, AMLA will also draft RTS to detail the duties of home and host supervisors and the modalities of cooperation between them to ensure that all parties have a clear understanding of their respective roles and responsibilities. Although the legal deadline for AMLA to submit this draft RTS to the European Commission is July 2026, AMLA anticipates that some topics may require additional time to develop due to the RTS's applicability to the non-financial sector, among others.

The plan is to develop the draft RTS with the WG in 2025, followed by a three-month public consultation, concluding in the first half of 2026. Subsequently, the received comments will be addressed, and the final draft is expected to be submitted to the AMLA General Board in Supervisory composition in June 2026.

2.3.4 Relevant work by EBA under the ‘Call for Advice’

In March 2023, the European Commission asked the EBA in a Call for Advice to support the drafting of RTSs to ensure that they can be submitted by AMLA to the Commission for adoption in due time.

AMLA has been participating in the work carried out by the EBA in two dedicated subgroups. These subgroups are working on the following mandates in the context of the Call for Advice:

- Art. 12(7) of AMLAR on the risk assessment for the purpose of selection for direct supervision.
- Art. 40(2) of AMLD6 on the methodology for assessing the inherent and residual risk profile of OEs in the financial sector.
- Art. 28(1) of AMLR on customer due diligence (CDD).
- Art. 53(10) of AMLD6 on pecuniary sanctions, administrative measures, and periodic penalty payments.
- Art. 53(11) of the AMLD6 on guidance on the base amounts for pecuniary sanctions.
- Art. 16(4) of the AMLR on the minimum requirements for group-wide policies.

On 6 June 2025, the EBA closed the public consultation on the first four draft RTSs. The EBA will consider the feedback to the consultation when preparing the draft RTSs and will submit its response to the European Commission on the Call for Advice on 31 October 2025. Until then AMLA is participating as an observer to the EBA subgroups. AMLA will submit the final draft to the EC.

As mentioned above, due to the crucial relevance of the RTSs on the selection of the 40 OEs and of the RTS on the risk assessment methodology, AMLA has been monitoring EBA’s progress on the two mandates which both deal with the methodology to determine inherent and residual risks of OEs. Notwithstanding the considerable work already done by the EBA, it’s still to be expected that once the proposed risk methodology is delivered to AMLA, a significant amount of work will need to be completed by AMLA in the near term to ensure the risk models are calibrated appropriately and operationally effective. Examples of such work may include scoping the relevant population, data acquisition, sampling, verifying the calibration of and testing the methodology prior to its application. AMLA will need to deliver a functioning methodology in order to appropriately determine selection of OEs for direct supervision. This may imply investment of considerable resources by AMLA for the competent staff and IT required to collect and analyse data from a sufficiently comprehensive sample of OEs.

2.3.5 The EU-Commission work on standards applicable to the non-financial sector

Several mandates are also applicable to the non-financial sector and require specific consideration of the different categories of OEs involved. In order to bring together representatives of the OEs in the NFS, the European Commission has established the “Informal Commission Expert Group on the Non-Financial Sector,” which is a sub-group to the Expert

Group on Money Laundering and Terrorist Financing. This Expert Group is working on the RTSs on sanctions, on risk assessment and on classification using the draft developed by the EBA under the Commission Call for Advice. AMLA has been participating in the work carried out by the group.

Until these mandates are taken over by AMLA in the September 2025, AMLA is participating as an observer to the Informal Commission Expert Group. After the transfer of the three mandates, AMLA will have to complete the work initiated by the group and make sure that the level 2 measures can be implemented by the NFS and develop an integrated risk approach.

The above-mentioned AMLA AML/CFT Experts Network is currently supporting the drafting of the mandates applicable to the non-financial sector which are not in the remit of the Commission informal group.

2.3.6 Further priorities regarding L2/L3 Standards

Once additional staff resources arrive AMLA also plans to start working on the following mandates in the context of AML/CFT supervision in 2025:

- 49(14) AMLD: RTS AML/CFT financial supervisory colleges.
- 50(13) AMLD: RTS AML/FT non-financial supervisory colleges.
- 53(11) AMLD: GL on base amounts for imposing pecuniary sanctions.
- 53(10) AMLD: RTS on gravity of AML/CFT obligation breaches.
- 41(2) AMLD: RTS AML/FT central contact points for PSPs, CASPs, EMoney.
- 8 AMLAR: AML/CFT Supervisory Methodology: (i) notches on scores.
- 8 AMLAR: AML/CFT Supervisory Methodology: (ii) intensity, (iii) priorities, and (iv) tools of supervision.

2.4 Policy work on ‘Risk and Measures’

AMLA is responsible for delivering mandates aimed at ensuring that OEs clearly understand relevant risks and effectively implement mitigating measures.

- 19(9) AMLR: RTS on lower thresholds and criteria to identify business relationships.
- 26(5) AMLR: GL on ongoing and transaction monitoring
- 10 (4) AMLR: GL on business-wide risk assessment
- 20(3) AMLR: GL Risk factors on starting business or transactions
- 9(4) AMLR: GL on the extent of internal policies & procedures of OEs
- 28(1) AMLR: RTS on information for CDD on the non-financial sector
- 17(3) AMLR: RTS Measures by OEs in third countries where EU group-wide requirements cannot apply.
- 16(4) AMLR: RTS on group-wide policies requirements on the non-financial sector

The introduction of the AML-package ushers in a new era of maximum harmonization. Getting a harmonized understanding and application of the AML/CFT obligations across the EU

is one of the goals to be reached through these mandates. Also ensuring that cross-border operations for entities can be handled smoother and more efficient. In creating these mandates, the non-financial sector will be a special point of attention. The legal framework is currently significantly less harmonized in this sector compared with the financial sector.

Additionally, special attention is needed to ensure that the new AML/CFT framework suits the variety of diverging OEs in the non-financial sector. More clarity is needed on, for example, the definition of a 'business relationship' and the practical implications of transaction monitoring in the non-financial sector. The consistent implementation of obligations in both sectors shall help to reinforce a more effective EU AML/CFT system.

"Our workstreams are defining building blocks for a unified, data-driven and resilient AML framework in Europe's fight against financial crime."

— **Rikke-Louise Petersen**, Executive Board Member, Policy Coordination

Additionally, maximum harmonization should be paired with risk-based rules when drafting proposals to complete the legal framework, with a view to simplifying and reducing the cost of compliance where feasible.

2.4.1 Prioritized mandates

To align tasks with AMLA's current capacity, priority has been given to three mandates that promote a common understanding of risks among OEs. In the prioritization exercise the existence of similar regulations on the remaining mandates has also been taken into consideration. To move these mandates forward, AMLA (i) has been delivering questionnaires to the NCAs to develop an awareness of current national regulations and practices, (ii) has been stock-taking and analysing the information sent in order to devise proposals for discussions at the WGs, (iii) has been and will continue to conduct discussions aimed at reaching consensus in the WGs as to what the instrument (RTS or Guidance) should include, and (iv) will be producing drafts for public consultation by the end of the year or beginning of 2026.

The timely progress of work on these mandates will largely depend on active participation from the WG, particularly from the non-financial sector, as well as on additional resources that AMLA is expected to receive after the summer. In November 2024, the General Board gave its support for AMLA to begin work on the following mandates in spring 2025:

2.4.1.1 RTS on lower thresholds and criteria to identify business relationships (art. 19.9 AMLR)

OEs are not required to perform customer due diligence (CDD) for occasional transactions below € 10.000, as these transactions in general are considered to have a lower risk. The mandate in Article 19(9) AMLR requires AMLA to identify which specific high-risk OEs, sectors or transactions pose a high risk for money laundering and financing of terrorism and should therefore have a lower threshold for the implementation of CDD measures. The

mandate in Article 19(9) AMLR requires AMLA to draft an RTS reflecting the following topics:

- Lower thresholds for occasional transactions for identified high risk OEs, sectors, or transactions.
- Criteria to identify business relationship.
- Criteria to identify linked transactions.

2.4.1.2 Guidelines on business-wide risk assessment (art 10.4 AMLR)

OEs are required to identify and assess the risks of money laundering and terrorist financing to which they are exposed when carrying out their business activities. To do so, they are required to draw up a business-wide risk assessment. The mandate in Article 10(4) AMLR requires AMLA to issue guidance on the minimum requirements of the content of this assessment and the additional sources that OEs should consult for information.

2.4.1.3 Guidelines on ongoing monitoring of a business relationship (art. 26.5 AMLR)

OEs are required to monitor their business relationships to ensure that the transactions are consistent with the obliged entity's knowledge of the customer. The mandate in Article 26(5) requires AMLA to draft guidelines on the monitoring of a business relationship and the monitoring of transactions.

2.4.2 Follow-up on the mandates conducted by the EBA and DG FISMA

Following a Call for Advice by the European Commission in 2024, the EBA has been working on the elaboration of the RTS on information for CDD (art. 28 AMLR). A text proposal will be sent to AMLA by October this year. It will cover the provisions addressed to the financial sector.

At the same time, those provisions required by the non-financial sector are under preparation by the "Informal Commission Expert Group on the Non-Financial Sector," a sub-group to the Expert Group on ML/TF managed by DG FISMA (Unit D2). Until both the financial and the non-financial part of this draft RTS are taken over by AMLA in October 2025, the Risks & Measures Team is participating as an observer in both WGs.

2.4.3 Next priorities

To cover the remaining mandates that are due in July 2026 (see Annex 1 for details), AMLA, once additional resources arrive, will aim to initiate work on the following mandates along this year:

- 9(4) AMLR: GL on internal policies, procedures, and controls.
- 17(3) AMLR: RTS on measures in third countries.
- 20(3) AMLR: GL on risk variables and risk factors.
- 28(1) AMLR: RTS on CDD (for both the financial and the non-financial sector).

However, the extent of the work to be performed might significantly change depending on the resources to cover these tasks available in the second half of this year. Additionally, the

outcome of the dialogue between the European Parliament, the Council and the Commission on the simplification process could eventually lead to postponing some of the mandates currently underway or to be started in the second half of the year.

2.5 Operational work FIU Pillar

As of 2025, AMLA's FIU Pillar will act as the facilitator of cross-border financial crime fighting, committed to building a strong, connected, and future-proof EU framework for financial intelligence. AMLA aims to establish a robust Support & Coordination Framework, install an effective and operational FIU Delegates Group, enhance information exchange, joint analyses, and strategic threat assessments, ensure legal and operational clarity for FIUs across the Union and drive innovation and collaborative impact.

Together, AMLA will take lead in shaping the backbone of Europe's financial intelligence ecosystem, enabling more effective detection and disruption of cross-border money laundering and terrorist financing.

Considering the cross-border nature of ML/TF, the primary objective is to ensure effective detection, prevention, and analysis of financial crimes through efficient cooperation, information exchange and coordinated action between FIUs. To improve such coordination and cooperation, AMLA is entrusted with tasks and powers enabling it and FIUs to jointly constitute a robust framework for support and coordination mechanism. The success of the support and coordination mechanism for FIUs depends on AMLA and FIUs cooperating in good faith and exchanging all relevant information required to fulfil their respective tasks as well as on the cooperation with Union institutions, bodies, and relevant agencies through working arrangements. The goal is to harmonize practices and enhance the exchange of information to safeguard the stability and integrity of the financial system.

AMLA FIU Pillar will also work closely with the AMLA Supervisory Pillar in order to identify the subjects of common interest and cooperate on an ordinary basis by developing synergies and exchange of information flows in both directions (on, e.g., supervisory planning, risk assessment, FIU joint analyses results). Two (pilot) thematic peer review processes will be conducted during 2025-2027 and will be complemented by a comprehensive mapping of the organisational setup, powers, and operational capabilities of all Financial Intelligence Units (FIUs) in the EU. This effort will build on the findings of the 2016 Mapping Report by the EU FIU Platform, which provided the first structured overview of the diversity, challenges, and barriers faced by FIUs in their ability to obtain, analyse, and share financial intelligence. The mapping and the peer review process will be mutually reinforcing while the mapping will provide a broad comparative overview, the thematic peer reviews will allow for a more in-depth exploration of selected functional areas. Together, they will contribute to identifying areas of good practice, gaps, and opportunities for further convergence and mutual learning between FIUs, and feed into AMLA's broader supervisory and coordination activities.

2.5.1 Finalizing and Implementing FIU Framework

The efforts of the FIU Pillar in coordinating FIU processes demonstrate a commitment to enhancing AMLA's and the FIU's capability in combating financial crimes. By focusing on strategic short-term joint initiatives, AMLA aims to establish a cohesive and adaptive Support and Coordination FIU framework as of July 2025, that supports effective international FIU cooperation and advanced financial intelligence operations, paving the way for achieving long-term success in financial crime prevention.

To finalize and implement the FIU Framework the next steps will be taken:

- Complete the designation process of FIU Delegates.
- Complete the development of the support and coordination (SAC) framework. This will include all the relevant standard documents for a request for mutual assistance, the establishment of the operational structure of the FIU Pillar within AMLA, defining leadership and organizational roles.
- Lay down methods and criteria for the selection and prioritisation of cases relevant for the conduct of joint analyses in accordance with Article 32 of Directive (EU) 2024/1640.
- Initiate the first joint analysis exercises.
- Initiate preparatory activities related to the hosting and management of FIU.net.
- Accelerate the “onboarding” of ongoing EU FIUs Platform WGs within AMLA to fulfil the mandate of AMLA related to L2/3 measures.
- Prepare methodology and procedures for peer reviews of FIUs.
- Initiate the first Peer Review cycle.
- Set up the Standing Committee for the General Board in FIU Composition, with the related rules of procedure.

"Bringing the FIU delegates within AMLA will enhance operational effectiveness by ensuring closer cooperation and faster information exchange"

~ **Juan Manuel Vega Serrano**, Vice-Chair

2.5.2 Starting up Negotiations with EPPO, OLAF, Europol and Eurojust

To further operationalize the cooperation between AMLA and OLAF, Europol, Eurojust, and EPPO, and in accordance with art. 94(2) AMLAR, AMLA shall draft and implement working arrangements that enhance strategic, operational, and technical collaboration. The aim is to ensure an efficient and streamlined exchange of information on money laundering (ML) and terrorist financing (TF) threats within the EU. The core aspects of cooperation include: (1) negotiation and establishment of working arrangements with OLAF, Europol, Eurojust, and

EPPO, considering the specific needs and capacities of each entity; (2) exchange of operational and strategic insights, including trends and threats related to ML/TF within the EU; (3) deployment of liaison officers between AMLA and relevant partners to facilitate direct cooperation and information exchange; (4) establishment of technical agreements for secure and efficient communication channels between AMLA and its partners; (5) regular evaluation and adjustment of cooperation mechanisms to ensure they respond to evolving threats and operational needs and (6) the circumstances under which their representatives might be invited as observers to the meetings of the General Board in FIU composition.

To this aim, meetings between the AMLA Chair and EPPO, OLAF, Eurojust and Europol leadership have taken place, and preparatory work is organised to initially set up the terms of such cooperation.

AMLA shall, in accordance with article 41 of the AMLAR, share the results of joint analysis with EPPO and OLAF, when indicated that there are reasonable grounds to suspect that money laundering or other criminal activities are being or have been committed in respect of which they could exercise their competences. And upon the express consent of all FIUs participating in the joint analysis the results can be transmitted to Europol and Eurojust when there are reasonable grounds to suspect that money laundering or other criminal activities are being or have been committed in respect of which they could exercise their competences.

2.6 Policy workstreams FIU Pillar

The European Commission initiated and coordinated preliminary work on key L2/3 instruments in the FIU area by setting up WGs of the EU Financial Intelligence Units' Platform (the Commission's Expert Group on FIU matters), which prepare some of the key FIU-related mandates such as on Joint Analyses.

As for the Implementing Technical Standards (ITS) on templates and formats for STRs and transaction records as requested by article 69 AMLR, a multi-country project is set-up and supported by the European Commission's Directorate-General for Structural Reform Support (DG REFORM)'s technical support instrument (TSI) and led by the Council of Europe. The output may impact the deadline for drafting the ITS, since the project indicates that it needs 18 months to conclude starting May 2025.

3. Building up AMLA; Resources

All the preparatory work for resources has been launched then coordinated by the AMLA Task Force in the European Commission, as mentioned in chapter 1.3, in order to equip AMLA with solid and efficient administrative and operational foundations (HR, IT, budget, governance, communications). Some elements of best practices sharing and benchmarking from other EU agencies have been integrated in those workstreams. Also, several other services from the European Commission contributed to those efforts, namely providing existing IT applications and management tools (i.e., for meetings, finance transactions and alike).

In addition to the work completed in the first half year, the following resource-related activities are being developed for the second half of 2025 to further support AMLA's operational readiness and institutional growth.

3.1 Human Resources

Continue recruiting intensively

By the end of 2025, AMLA should have a total of 120 staff members, the majority of whom will not start until late 2025 or the beginning of 2026. This number comprises all categories of staff, including FIU delegates, the first of whom will commence operations by Q3 2025.

Within the fixed parameters of carrying out large recruitment procedures in the EU context, where only limited support is provided for agencies in their start-up phase, AMLA will strive to complete several large external recruitment procedures during the year.

AMLA will also organise the flexible transfer of the relevant EBA staff (currently responsible for tasks being transferred to AMLA - notably EuReCA system management) ensuring continuity of expertise and operational capacity.

Manage increasing staff levels

To integrate new colleagues successfully during 2025, AMLA will further develop its existing "on-boarding and integration" programme.

Adopt relevant HR policies and implementing rules

With the first wave of adoption of implementing rules to the Staff Regulations in 2025, (e.g. on engagement and use of TA and CA staff, middle management, working time and hybrid working, performance assessment, and others), AMLA will enhance the HR legal framework to further support integration of its staff. In addition, it will adopt a secondment programme allowing for the recruitment of FIU delegates as well as standard Seconded National Experts (SNEs), with the objective of strengthening the exchange of knowledge between AMLA and national authorities.

Introduce formal performance management

AMLA will prepare for the launch of its first full performance management cycle at the beginning of 2026, (including the appraisal and reclassification exercises). In order to prepare

for that, AMLA will put in place in 2025 the guidelines and templates to ensure a clear definition of the job profiles and levels, objectives, and reporting lines.

Develop a learning and development framework

AMLA will proceed to carry out a needs analysis in 2025/2026 and put in place an L&D programme, commencing with onboarding and mandatory courses (e.g., ethics and integrity, data protection, anti-harassment) in 2025.

Enhance attraction package for staff (social measures)

In 2025, AMLA will enhance its efforts to put together a social measures package e.g., exploring availability of kindergartens, contribution to public transport, wellbeing initiatives (contribution to home office equipment, gym memberships, meal vouchers) and schooling.

Boost organisational culture

As a new organisation, AMLA will strive to develop a corporate culture that is in line with its operational objectives and commonly agreed vision and values, once this is in place.

Implement a strategic forward plan for HR

AMLA will initiate an assessment in 2025 with the aim to adopt a strategic forward plan by mid-2026, taking into account its establishment plan and addressing strategic choices regarding staffing needs for meeting its operational priorities, internal division of responsibilities and outsourcing.

3.2 Information and Communication Technology

In 2025, the ICT staff, together with the AMLA Task Force, will continue to play a pivotal role in enabling AMLA's operational resilience and digital maturity.

The key objective is to build an effective, secure, interoperable, and future-ready digital infrastructure that sustain the core functions of AMLA. This workstream involves not only transferring existing AML/CFT systems but also designing and implementing new platforms with state-of-the art technologies that will enable AMLA, NCAs, FIUs and law enforcement agencies to detect, prevent and counter sophisticated money laundering schemes, ensuring central supervision and coordination across the EU.

Cooperation and exchange of experiences with other ESAs will be as well one of the driving principles.

In anticipation of the foreseen transfer of the EuReCA systems from the European Banking Authority in the first quarter of 2026, AMLA has negotiated a bilateral agreement and defined a project plan in close cooperation with EBA AML and IT units.

Preparatory work has been initiated regarding the transfer of the FIU.net system. This work will be continued in close coordination with national FIUs and other related institutions.

An initial assessment has been conducted to commence the design of the Central AML/CFT database as per Article 11 of AMLAR. For the Supervisory pillar, a high-level data model has

been initiated which will further evolve in line with the development of related L2/3 legal acts. In the domain of IT security, in cooperation with CERT-EU, AMLA has delivered the internal cybersecurity risk management, governance and control framework as per mandatory deadline defined in the EU Cybersecurity Regulation.

The prioritization and planning of the activities are conditioned by the progressive ramp-up of AMLA's IT team, which is expected to achieve full capacity by 2027.

Digital workplace and IT infrastructure

By focusing initially on establishing a digital workplace and robust IT infrastructure, AMLA ensures that the foundational elements are in place to support its expanding operations and the transfer of business systems from EBA and from European Commission. This approach allows for efficient onboarding, operational readiness, and phased implementation of key systems and advanced technologies.

On the IT infrastructure side, a hybrid data centre infrastructure will be set up to host business applications for EuReCA and FIU.net, paving the way as well for an incremental development of the Central AML/CFT Database. This infrastructure will also aim to support both supervisory processes and activities in the FIU pillar not currently covered in the FIU.net. The data model of Central AML/CFT database, together with a blueprint for supervisory risk assessment and a first concept of data analytics platform, will be iteratively evolving, based on further developments on substance in the relevant L2/3 business workgroups.

Preparatory work will begin on developing the internal core supervisory system required for the upcoming direct supervision function.

Data management and analytics

AMLA will need to build its own data management and analytics capacity. Sufficient time will be required to start these operations and become capable of carrying out the tasks envisaged by its establishing act. The feasibility assessment will be performed regarding the deployment of secure AI tools aiming to increase work productivity.

Building fit-out

As of October 2025, the first permanent floors will be fitted out, providing a digital work environment integrating state of the art printing, collaboration, and videoconference capabilities. A fully equipped conference floor in Messe Tower will be delivered at the beginning of 2026 to support the governance and business meetings, to be shared with EIOPA in co-tenancy as of 2028.

Access to EC corporate solutions

In the next months, we also plan to enable staff with the access to additional European Commission corporate solutions (Human Resources, Finance, Procurement, and document management) in order to get fully operational and financially autonomous as of January 2026.

Projects and studies

One of the cornerstone objectives of AMLA's IT strategy is to bridge the capability gap faced by less equipped national authorities across the EU. We aim to promote a more inclusive environment where every member state has access to the tools and resources necessary to effectively combat financial crime.

In order to anticipate the possible adoption of new technologies, a study called DAP4AMLA (Data Analytical Platform for AMLA) is ongoing in close collaboration with national FIUs, while another study has been launched to provide AMLA with options for the future optimisation of the FIU.net solution. The results of these studies will underpin AMLA's strategic direction by the end of 2025.

Cybersecurity

As per the Cybersecurity Regulation, AMLA will continue working on planning and implementing the cybersecurity actions as soon as new IT systems enter its domain of responsibility. The current cybersecurity risk assessment will be revised as the scope of the IT ecosystems grows.

3.3 Budget and finance

Accounting and budget management system (SUMMA)

Set-up, acceptance testing, training, transfer of open commitments, creation of a Legal Entity File for AMLA – deadline 15 December 2025.

Preparing and adoption of financial rules by the Executive Board

Pursuant to Articles 71(1)h and 64(4)l of AMLAR and Article 1 of Commission Delegated Regulation 2019/715, (the Framework Financial Regulation (FFR)) AMLA shall adopt its financial rules. A derogation from the FFR shall be requested from the Commission for AMLA to use joint procurement procedures with the European Central Bank, the Eurosystem Procurement Coordination Office and to contract with EU national competent authorities (NCAs) without having recourse to a public procurement procedure for the supply of goods or provision of services related to events taking place in the country of their location.

Adoption of financial circuits

Corresponding roles and responsibilities shall be assigned to staff - deadline 15 December 2025

2025 budget implementation

€ 14 million EU contribution and € 3 million host member state's contribution are available to cover AMLA's 2025 costs.

Adoption of 2026 Budget

Deadline 31 December 2025.

Procurement Plan

Adoption of the 2025 procurement plan in line with the operational actions described in this document and any other need stemming from AMLA's resourcing needs. Adoption of the 2026 Procurement plan and onboarding to E-procurement modules and Public Procurement management Tool (PPMT) - deadline 15 December 2025.

Accounting officer

Appointment by Q3 2025.

Treasury management

A Service Level Agreement (SLA) shall be signed with DG BUDG.

Interinstitutional Framework Contracts (FWC)

AMLA will continue analysing associations with pre-existing or upcoming interinstitutional Framework Contracts (FWC) through the signature of a Memorandum of Understanding (MoU) for its resourcing needs.

3.4 Building and logistics

The next months will be crucial to ensure the timely delivery of AMLA's permanent operational premises and the full readiness of the working environment for AMLA's growing staff.

Preparation and supervision of Fit-Out Works

Supervision of fit-out works will remain a top priority, as construction works for the Office Floor and the Management and Meeting Floor are expected to start imminently, with hand-over scheduled between 1 and 31 October 2025. Parallel intensive work is ongoing for the definition of technical requirements for the Conference Floor and the FIU Floor, to allow the start of fit-out works. Several rounds of workshops are being conducted on Security and IT/AV needs. AMLA and EIOPA are working jointly with the external consultant Macom, under the SCIC FWC, to design the Conference Floor through a phased approach: first, a high-level design; second, a detailed technical specification and delivery of a cahier des charges; and third, approval of purchase offers from Office First and verification of the final installations after the fit-out. The Conference Floor installations, together with Security installations and systems, will be delivered under the Special Tenant Requests negotiated in the Lease Agreement. Close supervision of the works remains essential to ensure compliance with all technical, security and operational requirements.

Hand-over of first AMLA Floors

The hand-over of the first AMLA permanent floors is expected between 1 and 31 October 2025, followed by the Conference Floor and the FIU Floor between 1 and 31 March 2026. Each floor will undergo close monitoring and technical verification, particularly concerning security systems and conferencing equipment. Acceptance will only be signed after successful inspections supported by AMLA's technical experts and the external consultant.

Relocation of Staff to Permanent Premises

Following the hand-over of the first two permanent floors, AMLA staff will be fully relocated from the temporary floor to the new long-term premises, around November 2025. As the lease agreement for the temporary premises will cease two weeks after the hand-over, detailed space planning for the allocation of teams across floors, coordinated with HR, will aim to minimise further moves, although a second relocation phase will likely be needed after the remaining floors are handed over in 2026–2027.

Procurement and Installation of Long-Term Furniture

In parallel, procurement and planning for the purchase of long-term furniture is underway. Due to the expiry of one of the OIB FWC, AMLA is relying only on two active FWC for chairs and tables, while exploring options for other furniture needs, including extending temporary leases. Showroom visits and testing are ongoing. Delivery is expected to take 5 to 8 weeks once orders are placed.

Development of Facility Management Services

The Facility Management set-up is advancing steadily. A dedicated mailbox is operational, regular meetings with the 'MesseTurm Facility Management' team are ongoing, and a fire safety team has been established. Procurement of essential services, such as cleaning and electricity, is also progressing.

Definition and Implementation of "Rules of Behaviour"

Internal "Rules of Behaviour" are being developed to support the transition to open-space offices. These policies will address the non-assigned workstation system, shared space use, and booking procedures, especially as staff numbers increase from September 2025 onwards.

3.5 Communications

Develop the Communications Strategy

An initial strategy will be developed in the short term, with decisions by the Executive Board expected in Q3 2025.

Logo

A visual anchor for AMLA's identity is under development, to be finalized by summer 2025.

Broader Visual Identity

To be shaped iteratively, following the logo approval. Initial deliverables such as stationery are expected in summer 2025, with full visual identity finalized by early 2026.

Media Engagement, Events and Conference Management

Ongoing efforts to position AMLA externally and establish strong ties across sectors will continue indefinitely.

Chair visits to all Member States

The campaign of Chair-led visits across Member State capitals is ongoing and scheduled to conclude in November 2025.

Website and Social Media Management

These channels continue to be managed actively to grow AMLA's digital presence and public engagement.

Intranet

Content population is internally successfully launched in May 2025 to facilitate internal communication and collaboration.

3.6 Governance

In addition to the work completed in Q1 and Q2, the following governance related activities are being developed for the second half of 2025 to further support AMLA's institutional growth.

- Adoption of an ethical framework for Executive Board members and AMLA staff (Conflict of Interest Policy for Staff).
- Implementation of the Conflict-of-Interest Policies for Staff and non-Staff, including processing the respective declarations of intention, and declarations of interest.
- Update of the Rules of procedure of the General Board to draw lessons from experience and cover additional issues such as the governance of AMLA's Committees (the latter including all relevant sub-structures, could also be addressed through a dedicated set of rules following the practice in similar agencies).
- Finalisation of AMLA's organisation chart.

As part of the implementation of its accountability framework, AMLA needs to soon prepare for the following:

- hearing(s) of the Chair on the performance of AMLA's tasks before the competent European Parliament committees (ECON & LIBE).
- replies within five weeks of receipt to questions from the European Parliament
- the first annual report of AMLA on its activities, which is foreseen at the latest mid-2026, for which preparations will be initiated in 2025.

3.7 Data Protection

A Data Protection Officer (DPO) has been appointed to assist AMLA meets its data protection obligations. To that end, AMLA will take the necessary steps to set up the role, including decision on the DPO tasks, powers, and duties. Additionally, AMLA will prepare, with the advice of the DPO, the necessary rules and texts required for the priorities, including in the supervision, operations, and administrative set up. What is planned for 2025 is the release for AMLA of the necessary data protection templates and guidelines as well as a first batch of training on data protection fundamentals.

4. Risk management and mitigation measures

As a newly established EU Agency, AMLA is exposed to specific risks related to its start-up phase, tight implementation deadlines, and the high expectations surrounding its role in the EU AML/CFT system. A structured approach to risk management is therefore essential to ensure successful operational delivery and institutional credibility.

4.1 Institutional and operational risks

The key risks identified during the initial phase of AMLA's development include:

Capacity constraints and staffing delays

Delays in recruitment and onboarding may impact AMLA's ability to deliver key milestones on time, particularly regarding supervisory readiness and the establishment of the FIU delegate system.

Dependence on external timelines and cooperation

AMLA's progress is partially dependent on the timely cooperation of other EU institutions, national competent authorities (NCAs), and external service providers (e.g., for ICT infrastructure). Misalignment in timelines may affect AMLA's ability to launch some of its core activities as scheduled.

Legal and procedural uncertainties

As a newly established authority operating under a new regulation, AMLA faces uncertainty in the interpretation and practical implementation of certain legal provisions. Internal procedures and safeguards are still under development, which may pose compliance and operational risks.

IT and data security risks

Given the sensitive nature of supervisory and FIU-related data, AMLA faces significant IT and cybersecurity risks. Infrastructure development is ongoing, and full security frameworks are not yet in place.

Reputational risks

As expectations are high, any perceived delays, lack of clarity or missteps in the early stages of AMLA's functioning could have a negative reputational impact, both at the EU level and internationally.

4.2 Mitigation measures

To address these risks, AMLA is taking the following mitigation actions:

- Prioritising critical recruitments and introducing temporary support measures (e.g., secondments, interim resources) where appropriate.
- Establishing regular coordination mechanisms with EU and national authorities to manage interdependencies and jointly anticipate bottlenecks.

- Developing clear internal rules and procedures in line with the AMLAR, with legal review by the internal legal team.
- Accelerating the procurement and implementation of secure IT systems, with support from specialised EU agencies where appropriate.
- Ensuring regular and transparent communication with stakeholders and the public to manage expectations and build trust in AMLA's role and work.

These mitigation measures will be reviewed and adjusted regularly as AMLA progresses towards full operational status.

5. Prioritized mandates / ANNEX 1

Mandate	Short description	Legal deadline	State of play by the end of 2025
12.7 AMLAR RTS on the selection of the 40 financial institutions for direct supervision	Assessment of credit institutions and financial institutions for the purposes of selection for direct supervision according to AMLAR The inherent and residual risk profiles of an obliged entity assessed shall be classified by the Authority as low, medium, substantial or high, based on the benchmarks and following the methodology set out in the RTS. Where the assessed obliged entity is part of a group of credit institutions or financial institutions, the risk profile shall be classified at group-wide level.	01/01/26	Submission of draft by EBA by 31/10/25. Review by AMLA Working Group on Cooperation. Requires Approval by AMLA General Board.
40.2 AMLD RTS on risk assessment methodology for (financial) OEs	Supervisors shall apply a risk-based approach to supervision These draft RTS shall set out the benchmarks and a methodology for assessing and classifying the inherent and residual risk profile of OEs, as well as the frequency at which such risk profile shall be reviewed. Such frequency shall take into account any major events or developments in the management and operations of the obliged entity, as well as the nature and size of the business.	10/07/26	Submission of draft by EBA by 31/10/25. Review by AMLA Working Group on Cooperation ongoing.
40.2 AMLD RTS on risk assessment methodology for (non-financial) OEs	Supervisors shall apply a risk-based approach to supervision These RTS will derive their content from the work done for the financial sector and be adapted to the NF-sector.	10/07/26	Transfer from DG FISMA to AMLA in September 2025. Review by AMLA Expert Network ongoing.
49.14 AMLD RTS AML/CFT financial supervisory colleges	RTS related to AML-colleges in the <u>financial sector</u>	10/07/26	Drafting process initiated in AMLA Working Group on Cooperation.
50.13 AMLD RTS AML/FT non-financial supervisory colleges	RTS related to AML-colleges in the <u>non-financial sector</u> These RTS may derive their content from the work done for the financial sector and will be adapted to the NF-sector.	10/07/26	Drafting process initiated in AMLA Expert Network.
53.11 AMLD GL on base amounts for imposing pecuniary sanctions	Pecuniary sanctions and administrative measures AMLA shall issue guidelines on the base amounts for the imposing of pecuniary sanctions relative to turnover, broken down per	10/07/26	Submission of policy options by EBA by 31/10/25. Review by AMLA Working Group on Supervision.

Mandate	Short description	Legal deadline	State of play by the end of 2025
	type of breach and category of OEs.		
53.10 AMLD RTS on gravity of AML/CFT obligation breaches	Pecuniary sanctions and administrative measures Those draft regulatory technical standards shall set out criteria and indicators to classify the level of gravity of breaches and the level of pecuniary sanctions.	10/07/26	Submission of draft by EBA by 31/10/25. Review by AMLA Working Group on Supervision.
41.2 AMLD RTS AML/FT central contact points for PSPs, CASPs, EMoney	These RTS shall set out the following criteria related to Central Contact Points - Circumstances in which the appointment of a central contact point is appropriate - The functions of central contact points	10/07/26	Drafting process initiated in AMLA Working Group on Supervision.
8 AMLAR AML/CFT Supervisory Methodology: (i) notches on scores	This part of the risk-based AMLA supervisory methodology shall provide criteria for manual adjustment of risk score by NCAs.	N/A	Drafting process initiated.
8 AMLAR AML/CFT Supervisory Methodology: (ii) intensity, (iii) priorities, and (iv) tools of supervision	This part of the risk-based AMLA supervisory methodology shall provide criteria for the intensity of supervision, supervisory planning and supervisory tools.	N/A	Drafting process initiated.

Mandate	Short description	Legal deadline	State of play by the end of 2025
9(4) AMLR GL on internal policies, procedures and controls	Elements that OEs need to take into account when deciding on the extent of their internal policies, procedures and controls and on the organization of the compliance function.	10/07/26	Drafting process initiated in AMLA Working Group on Obligations.

17(3) AMLR RTS on measures in third countries	RTS on additional measures that OEs should apply in third countries whose law does not permit compliance with the AMLR to ensure that branches and subsidiaries in these third countries effectively handle the risk of money laundering and terrorist financing.	10/07/26	Drafting process initiated in AMLA Working Group on Obligations.
20(3) AMLR GL on risk variables and risk factors	GL on risk variables and risk factors to be taken into account by OEs when entering into business relationships or carrying out occasional transactions.	10/07/26	Drafting process initiated in AMLA Working Group on Risks.
28(1) AMLR RTS on CDD	RTS on information for customer due diligence for the <u>financial sector</u> . The concept RTS is drafted by the EBA and transferred to AMLA in October 2025.	10/07/26	Elaborating on the draft RTS received from EBA, taking into account the synergy with the part on the non-financial sector.
28(1) AMLR RTS on CDD	RTS on information for customer due diligence for the <u>non-financial sector</u> . The work on this part of the RTS will be transferred from the European Commission to AMLA in September 2025.	10/07/26	Drafting process in AMLA Working Group on Obligations, taking into account the synergy with the part on the financial sector.

Mandate	Short description	Legal deadline	State of play by the end of 2025
41(2) AMLAR ITS Format of reporting by AMLA to EPPO	This ITS shall specify the format to be used by AMLA for the reporting of information and results of joint analyses to the EPPO.	27/06/26	- Setting up meetings with the EPPO - Drafting implementing technical standards
81(1) AMLR ITS Format to be used by	This ITS shall specify the format to be used by FIUs for reporting information to the	10/07/26	- Setting up meetings with the EPPO

Mandate	Short description	Legal dead-line	State of play by the end of 2025
FIUs for reporting information to the EPPO	EPPO.		- Drafting implementing technical standards
94(2) AMLAR Separate working arrangements with the LEAs (Europol, Eurojust, EPPO, OLAF)	4 different working arrangements must be concluded with the 4 European LEAs, setting out the details of their cooperation and aiming to ensure the exchange of operational and strategic information and trends.	No deadline	- Setting up meetings with the 4 LEAs - Drafting working arrangements
31(2) AMLD ITS on the format to be used for exchanging information among FIUs	This ITS shall specify the format to be used for the exchange of the information among FIUs, spontaneously or upon request.	10/07/26	- The FIU Platform Working Group "Contents and Formats for FIU-to-FIU exchanges" delivered four templates (requests / responses / Spontaneous disclosures / feedback) - Take over the conclusion of the WG and start the submission procedure to the EC
31(3) AMLD RTS on the relevance and selection criteria for determining whether STRs concern another Member State	This RTS shall specify the relevance and selection criteria when determining whether a STR concerns another Member State.	10/07/26	- The FIU Platform Working Group on XBR/D has been working on this policy and refining the work done by previous other working groups on cross-border reporting and disseminations. - Take over the conclusion of the WG and start the submission procedure to the EC.
5(5)e, 43(1) AMLAR Methods and procedures for the conduct of joint analyses	These documents shall establish methods and procedures for the conduct of joint analyses (set up a joint analysis team, function of the team, <i>etc.</i>).	No deadline	- The FIU Platform WG delivered a first document that needs to be approved by the participants. - Take over the conclusion of the WG and start the submission procedure to the EC
40(1) AMLAR Methods and criteria for the selection and prioritisation of cases relevant for joint analyses	These documents shall establish methods and criteria for the selection and prioritisation of cases relevant for the conduct of joint analyses in accordance with Article 32 of Directive (EU) 2024/1640, to be assisted by the Authority.	No deadline	- The FIU Platform WG delivered a first document that will be submitted to all participants for the formal approval. - Adoption of the document of the FIU Platform WG by AMLA and start the submission procedure to the EC.
40(2) AMLAR Annual list of priority		No deadline	- The FIU Platform WG delivered a first document that

Mandate	Short description	Legal dead-line	State of play by the end of 2025
areas for the conduct of joint analyses			<p>will be submitted to all participants for the formal approval.</p> <ul style="list-style-type: none"> - Adoption of the document of the FIU Platform WG by AMLA and start the submission procedure to the EC.
<p>69(3) AMLR</p> <p>ITS on the format to be used for STRs and for the provision of transaction records</p>	<p>This ITS shall specify the format to be used for the reporting of STRs, and for the provision of transaction records.</p>	<p>10/07/26</p>	<ul style="list-style-type: none"> - The WG on the template for STRs and Transaction Records submitted an application for a multi-country project. The project will likely be launched in April 2025 with a duration of 18 months. - Take over the conclusion of the WG and start the submission procedure to the EC.