

Webinar with sampled entities

AML: Development of Risk Assessment & Selection
Methodologies

Friday, 13 March 2026



Outline

1 Welcome and Institutional Context

2 Policy Background and Objectives

3 Scope of the Exercise

4 Practical Guidance on the Reporting Process and Templates

5 FAQ

6 Conclusion and Next Steps

1. Welcome and Institutional Context

Dervile ROWLAND, Executive Board Member, AMLA

Welcome Remarks by Mrs. Derville Rowland, AMLA Executive Board Member

Collecting data to support the future EU AML/CFT supervisory framework

New EU AML/CFT Framework

EU AML Package 2024

Creation of AMLA

Risk Assessment and Selection Methodology

Harmonized Methodology to Assess ML/TF risk exposure in the EU

Build a robust and evidence-based methodology to select institutions for direct supervision

Data Collection Exercise until 22 April 2026

ca. 5 000 institutions

Diverse sector coverage

Methodological exercise – not supervisory

2. Policy Background and Objectives

Michelangelo MENGOLI, Acting Head of Risk Models and Selection Unit, AMLA

The new EU AML supervisory architecture



A new EU-level system is being established for AML/CFT supervision



AMLA will contribute to a more integrated and harmonised supervisory framework across Member States



A common risk assessment methodology is essential to ensure consistency, comparability and transparency



Data collection from sampled entities is necessary to build and test that methodology

Why is AMLA carrying out this data collection



The EU AML/CFT framework is entering a new phase with AMLA at its centre



A key objective is to support a more harmonised and consistent assessment of ML/TF risks across the Union



This exercise is a testing and calibration exercise, not a supervisory inspection of individual entities

Policy objective

Develop a harmonised ML/TF risk assessment methodology applicable across the EU

01 Improve comparability of risk assessments across sectors and jurisdictions

02 Ensure the future framework is operational, proportionate, and based on meaningful data

03 Support a more robust and transparent supervisory architecture at EU level

How the results will be used



Calibration of the Risk Scoring Model

Article 40(2) AMLD

Methodology for assessing the inherent and residual ML/TF risk profile of obliged entities



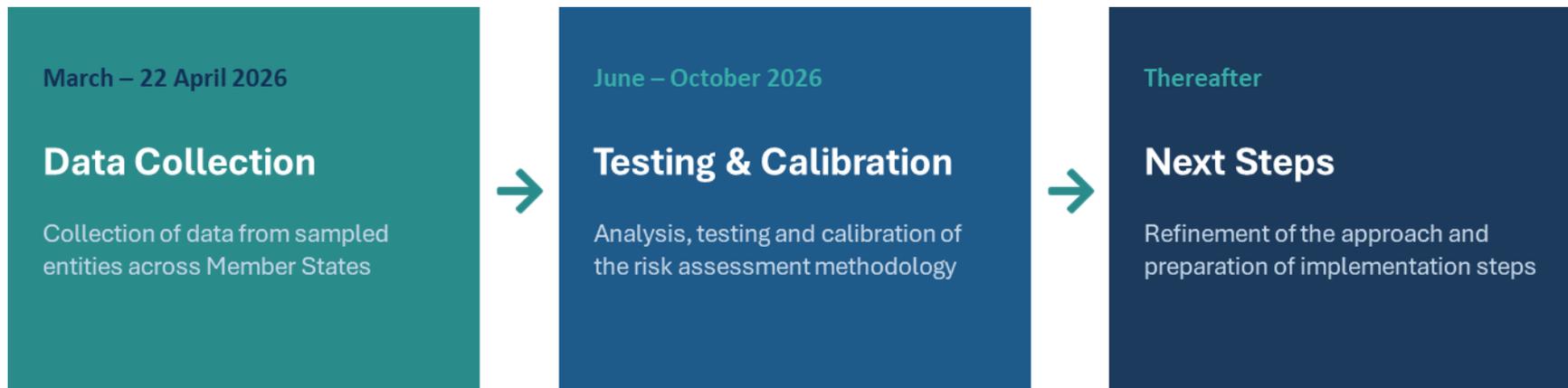
Calibration of the Selection Model

Article 12(7) AMLAR

Methodology for selecting institutions for direct AMLA supervision

The results will help refine data points, scoring logic, thresholds and the overall robustness of the methodology

Indicative timeline and next steps



This process will also help identify technical issues, clarify interpretations and improve data quality arrangements

3. Scope of the Exercise

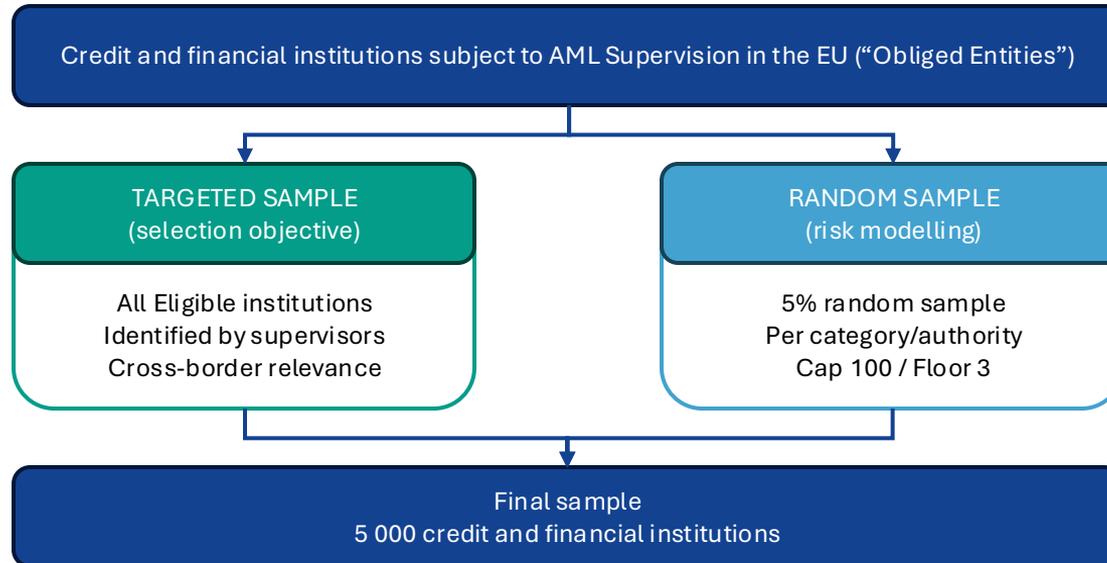
Pierre BROCHARD, Risk Models and Selection, AMLA

Scope of entities subject to the future risk assessment methodology



Sampling methodology

Two complementary samples approach



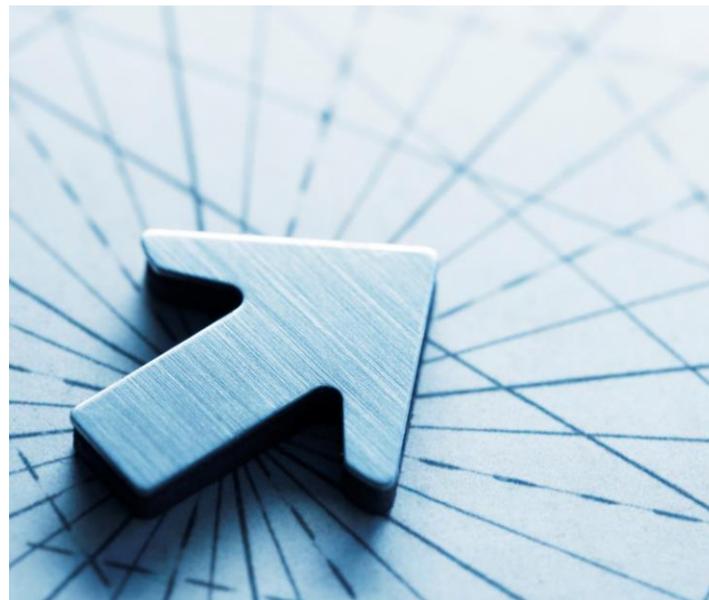
4. Practical Guidance on the Reporting Process and Templates

Aitor AZCOAGA, Nadine BIHRER, Risk Models and Selection, AMLA

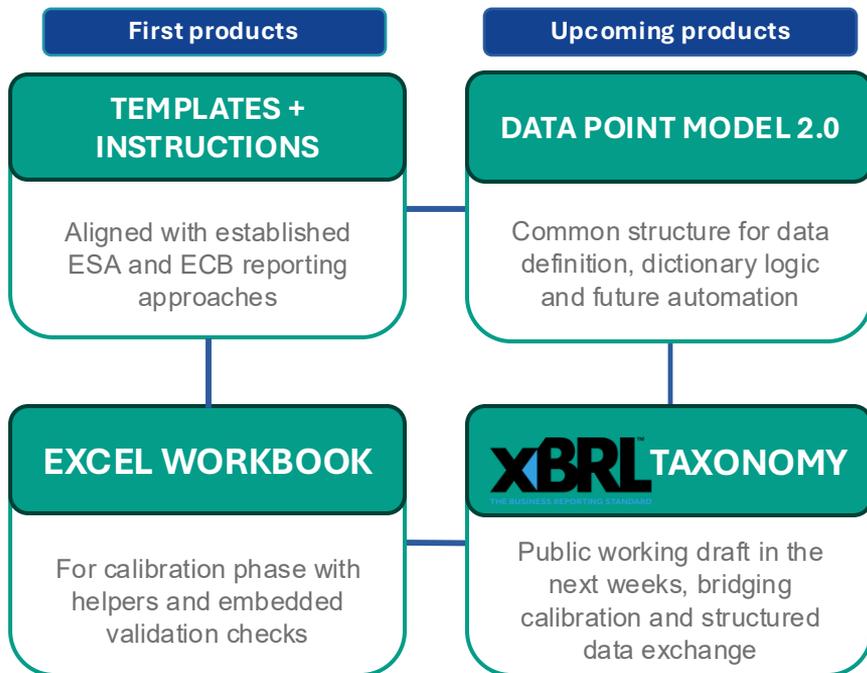
What to expect from this section

This section will guide you through:

- Data standardization and reporting architecture
- Submission process for the calibration exercise
- Next steps in data standardization
- Workbook and template structure
- Which templates and datapoints are applicable to your entity
- Data validations and when a workbook can be submitted
- Practical hints for filling out the templates

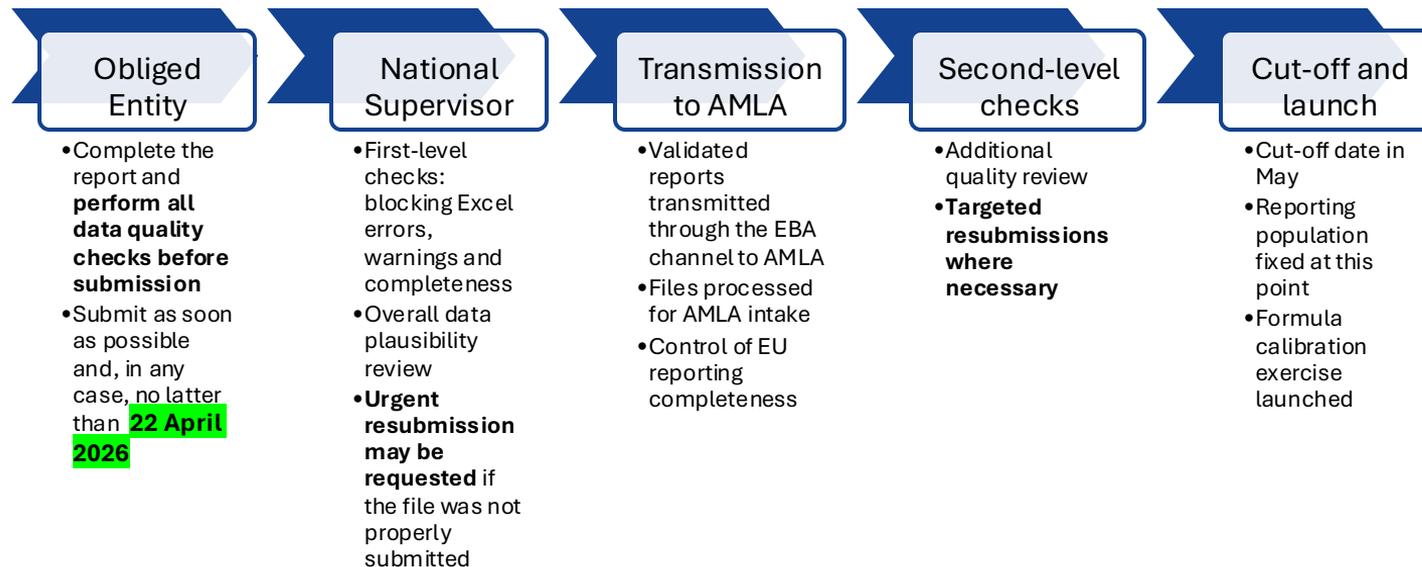


Data standardization and reporting architecture



- ✓ **First structured reporting package:** combining templates, instructions, Excel reporting and embedded quality checks.
- ✓ **Common reporting logic:** established EBA, EIOPA, SRB and ECB supervisory reporting approaches.
- ✓ **Future-ready model:** basis for an AML EU data dictionary, and future AMLA data framework.

Submission process for the calibration exercise



Workbook structure

DataQualityDashboard

- Overview about all single templates (sheets) to be filled out
- Summary of errors and warnings that need to be reviewed before submission
- Indication of overall quality status of the workbook

AML.01.01

AML.01.02

AML.02.01

- 32 single templates (sheets) to be filled out, if applicable
- Following the structure of datapoints outlined in the Interpretative Note

Lists

Validations

Auxiliary sheets containing:

- Admissible values for dropdown datapoints,
- Validation rules for automatic data quality checks embedded in the workbook.

Template structure



Mouse here for template's INSTRUCTIONS

AML.03.01 PAYMENT ACCOUNTS

Template (sheet) ID and name, as also used in the Interpretative Note

Name of the template section

Section->

Payment Accounts

Put your cursor here to view template instructions, in line with the Interpretative Note

Column Title and instructions->

Column Code->

Stock or Flow->

Data type->

Normally is applicable->

Ok or Errors?->

Type your data ->

Payment Accounts	Incoming Transactions - Value	Incoming Transactions - Number	Outgoing Transactions - Value	Outgoing Transactions - Number
C0010	C0020	C0030	C0040	C0050
Stock	Flow	Flow	Flow	Flow
Integer	Monetary	Integer	Monetary	Integer
OK	OK	OK	OK	OK

Put your cursor here to view datapoint instructions

Relevant meta data

Errors/warnings in case of failed validation rules

Editable row for your data entries

Which templates are applicable to your entity? (1/2)

1. Some templates (sheets) are applicable to **every** reporting obliged entity:

Cover page	Basic Information	AML/CFT Control	Governance/Culture and Compliance Function	Transaction Monitoring and Suspicious Activity Monitoring
	Comments		Internal Controls and outsourcing	
Customers	Customers		Risk Assessment	Group-wide AML/CFT Framework
			Customer Due Diligence and Monitoring	

2. Others may (or may not) be applicable to your entity, depending on its offered **products and services**:

Products	Payment accounts	Services	Investment services	Crypto fiat cards
	Virtual IBANs		Money remittance	Custody of crypto assets
	Prepaid cards		Wealth management	Crypto Services
	Lending and Factoring		Correspondence services	Management of UCITS/AIFS
	Life insurance contracts		Trade finance	Safe custody services
	Currency exchange (involving cash)		E-money	Crowdfunding
		TCSP services	Cash transactions	

Which templates are applicable to your entity? (2/2)

AML.01.01

In the basic information sheet, select which products and services are offered by your entity:

Payment Accounts	Virtual IBANs
C0090	C0100
LIST_AMLA_00006	LIST_AMLA_00006
OK	OK
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

DataQualityDashboard

You will see which templates are applicable, depending on the previously selected products and services – in addition to the generally applicable templates that need to be filled by all entities:

Template (sheet) ID <i>Click on link to navigate to sheet</i>	Section	Template name	Template applicable to your entity?	Rationale for template applicability	Applicable template still empty?
AML.01.01	Cover page	Basic Information	Yes	Applicable to all	No
AML.01.02		Comments	Yes	Applicable to all	Yes, but optional
AML.02.01	Customers	Customers	Yes	Applicable to all	No
AML.03.01		Payment accounts	Yes	AML.01.01.C0090	Yes, please fill
AML.03.02		Virtual IBANs	No	AML.01.01.C0100	

AML.03.02

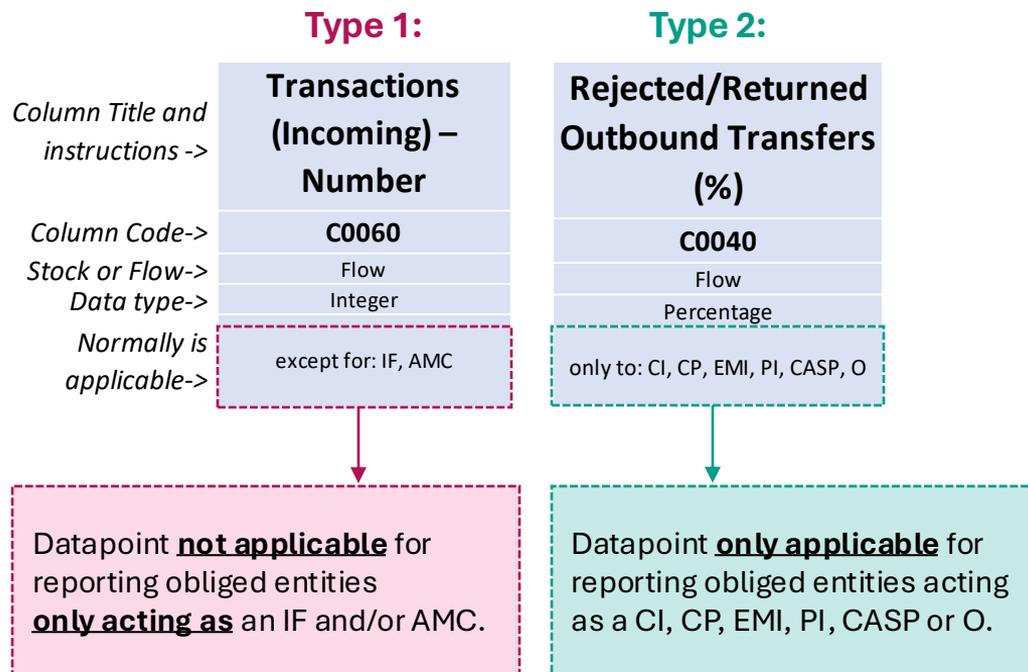
Non-applicable templates will look as follows:

AML.03.02 VIRTUAL IBANs

Template not applicable, according to your reply to data point AML.01.01.C0100

Which datapoints in a template are applicable to your entity?

- Being asked to fill out a template does **not necessarily imply** that all datapoints within that template must be completed.
- Always follow the **specific instructions provided for each datapoint**.
- In the template, a datapoint that is not applicable to a certain entity type will be marked as follows:



Data validation: Errors and warnings



ERRORS are blocking a submission. A template with errors must not be submitted and will be rejected.

Legal Entity Identifier (LEI)	Payment Accounts
C0010	C0090
Alphanumerical	LIST_AMLA_00006
ERROR: Invalid format: length is not 20 and/or positions 5-6 are not '00'	ERROR: C0090 is mandatory
12345	



WARNINGS are not blocking a submission, yet they need to be reviewed carefully. If the data should indeed be amended, this must be done prior to submitting the template. Otherwise, we assume that the values are verified and confirmed despite the warning.

Total Customers	Natural Persons	Legal Entities
C0010	C0020	C0030
Stock Integer	Stock Integer	Stock Integer
WARNING: C0010 is smaller than the sum of C0020, C0030	OK	OK
1000	500	501

When can the workbook be submitted?

DataQualityDashboard

Overall quality status of the workbook:

Cannot be submitted, please fix the data errors first.

Fix all **ERRORS**, e.g., missing mandatory values and invalid formats

Overall quality status of the workbook:

Please review warnings and/or empty templates and amend data or verify that all values are indeed correct.

Overall quality status of the workbook:

No errors or warnings.

Review all **WARNINGS** and empty templates and:

- Verify the accuracy of the reported values
- If the warning is justified and the data can/should be amended, update accordingly
- Ensure that applicable templates are filled

The “Comments” template

AML.01.02

- Use this template only to report comments **related to the testing exercise or the information submitted**.
- Comments **must not change or reinterpret** the reported data.
- They should only serve to clarify **methodologies** applied, **assumptions** made, or **issues** encountered during the preparation of the testing exercise information.

Comments			
Template Reference	Column Reference	Country Reference	Comment Content
C0010	C0020	C0030	C0040
LIST_AMLA_00007	LIST_AMLA_00008	LIST_AMLA_00005	Alphanumerical
OK	OK	OK	OK
AML.02.01	C0050		For this datapoint, we assumed that ...

Reporting “0” vs. blank cells (1/2)

What to report	What it indicates	Example
“0”	Value for the datapoint is zero	Report 0 for “Customers with Multiple Prepaid Cards (>3)” if the institution commercializes prepaid cards and 0 customers hold more than 3 prepaid cards.
Blank cell	(a) Datapoint not applicable to the entity, given its activities or legal status	Leave blank the datapoint “Customers with Multiple Prepaid Cards (>3)” if the institution does not commercialize prepaid cards.
	(b) Data for this datapoint exists, but the entity is unable to report it	Leave blank the datapoint “Customers with Multiple Prepaid Cards (>3)” if the institution does commercialize prepaid cards but the number of customers with more than 3 cards is unknown.



For every blank cell reported under case (b), the obliged entity must add a comment in “AML.01.02 Comments”

Reporting “0” vs. blank cells (2/2)

AML.01.02

- For blank cells due to unavailability of data (**case (b)** on the previous slide), a comment must be added in sheet “AML.01.02 Comments”.
- For every blank cell:
 - indicate the relevant table/column/row;
 - include a text beginning with **“Unable to report:”** followed by the specific reason.

Comments			
Template Reference	Column Reference	Country Reference	Comment Content
C0010	C0020	C0030	C0040
LIST_AMLA_00007	LIST_AMLA_00008	LIST_AMLA_00005	Alphanumerical
OK	OK	OK	OK
AML.03.03	C0050		Unable to report: an ongoing cybersecurity incident in one of the branches makes it impossible to calculate datapoint "Customers with Multiple Prepaid Cards (>3)" for the reporting period.

Some additional practical hints... (1/2)

- **Non-applicable templates** are not to be filled out.
- Row 7 of each sheet indicates whether the datapoint refers to a **stock or flow**.
- If a validation in the workbook does not seem to work properly and produce false errors/warnings, please **inform your responsible NCA**. The matter will then be assessed in due course.
- Additional **data quality and plausibility checks** will be conducted by your responsible NCA as well as AMLA. In case of **follow-up requests** for clarification or resubmission, you will be informed.



Please **do not modify** parts of the workbook, other than the cells that are intended for your data entry. **Modified workbooks will be rejected.**

Some additional practical hints... (2/2)

For a more efficient population of templates **AML.05.01** “Countries” and **AML.06.01** “Distribution channels”:

1. **Lists** Copy the list of admissible countries to an external Excel file

LIST_AMLA_00005_Label	LIST_AMLA_00005_Dropdown
AF	Afghanistan
AL	Albania
DZ	Algeria
AS	American Samoa
AD	Andorra
AO	Angola
AI	Anguilla
AQ	Antarctica
AG	Antigua and Barbuda
AR	Argentina
AM	Armenia
AW	Aruba
AU	Australia
AT	Austria

2. Remove the countries that your entity is not active in

Albania
Austria
Greece
Sweden
Switzerland

3. Insert (paste as values) the relevant countries in column B of the two sheets

Column Title and instructions ->

Country

Column Code->

C0010

Data type->

LIST_AMLA_00005

Normally is applicable->

Ok or Errors?->

OK

Type your data ->

Albania

Type your data ->

Australia

Type your data ->

Greece

Type your data ->

Sweden

Type your data ->

Switzerland

Type your data ->



5. FAQ

Simon COQUET-BEHAR, Risk Models and Selection, AMLA

Legal basis

**Mandatory participation
of all sampled entities**

Eligible Obligated Entities

Art. 12(1) AMLAR

“ For the purposes of carrying out the tasks listed in Article 5(2), the Authority, in collaboration with financial supervisors, shall carry out a periodic assessment of credit institutions and financial institutions, and groups of credit institutions and financial institutions, where they operate, whether through establishments or under the freedom to provide services, in at least six Member States, including the home Member State, regardless of whether the activities are carried out through infrastructure on the territory concerned or remotely.”

In conjunction with art. 5(2) and art. 12(7) AMLAR, art. 12(1) provides the relevant legal basis for AMLA to request mandatory participation of eligible obliged entity in the data collection for the purpose of establishing the methodology under art. 12(7) AMLAR.

**Non-Eligible Obligated
Entities (random sample)**

Article 7(3) AMLAR

“At the request of the Authority, supervisory authorities shall provide the Authority with all information concerning obliged entities that remain directly supervised at national level which is necessary for the fulfilment of Authority’s tasks pursuant to Article 5(1), (3) and (4), where the supervisory authorities have legal access to such information.”

In conjunction with article 5(1) AMLAR and art. 40(2) AMLD6, art. 7(3) AMLAR provides the relevant legal basis for AMLA to request mandatory participation of non-eligible entities in the data collection for the purpose of establishing the methodology under Article 40(2) AMLD6.

Scope of Reporting by Establishment



Reporting is required at solo level for each separate establishment, and never at consolidated level.

- When reporting to their national financial supervisor, **all obliged entities must report solo-level data only** — **excluding data from any cross-border branches or subsidiaries.**
- **Subsidiaries** and **branches** must report **solo level data to the national financial supervisor of their country of establishment.**
 - ➔ These rules are **applicable to all reporting entities**, whether eligible for direct supervision or not.

Scope of Reporting by Establishment

Example

Credit institution « X » is established in Italy. It has a branch « Y » established in Belgium, and a subsidiary « Z » established in Ireland.

- Branch « Y » reports solo-level data to *National Bank of Belgium*.
- Subsidiary « Z » reports solo-level data to *National Bank of Ireland*.
- Credit Institution « X » reports solo-level data to *Banca d'Italia*, **excluding data from « Y » and « Z ».**

Interpretative Note - Legal Basis and Scope of Application

Legal Basis

Reporting instructions contained in the note refer to the definitions set out in the AMLR to support consistent reporting.

However, where AMLR definitions were not yet applicable during the reference year, or where they conflict with the legislation in force for that period, reporting obliged entities should instead apply the definitions and requirements of Directive (EU) 2015/849 (AMLD IV/V) as transposed into their national law for the relevant reference period.

Scope

The scope of application of the interpretative note to be published on 16/03 is strictly circumscribed to the data collection exercise to be conducted from March 2026 until April 2026 for the purpose of calibrating the risk assessment methodologies under Article 12(7) AMLAR and Article 40(2) AMLD VI.

An updated package will be issued for the 2027 reporting cycle and selection exercise, incorporating :

- insights gained from the testing and calibration period,
- technical improvements identified during implementation, and
- the final exchange and submission format to AMLA (tentatively CSV OIM XBRL-based).

Exemptions from reporting requirements

One of the primary purposes of the calibration exercise is to ensure the reliability of risk assessment outcomes and the ability of both models to accurately capture and differentiate across all real-world situations.



As a result, AMLA will not grant any exemptions from reporting requirements.

A notable exception to that rule is for **entities that** - although active through the reference year - **have ceased their operations before 22/04.**

Exemptions from reporting requirements will NOT be granted for the following reasons (non-exhaustive) :

- Low volume of activity during the reporting year.
- Entity in run-off.
- Entity exempted from reporting requirements at national level.
- Entities falling below the materiality thresholds defined in the RTS pursuant to Article 12(7) AMLAR (or below any other activity thresholds).
- Entity with low AML-CFT risk activities.
- Entity that is difficult/impossible to contact via email.

Languages

AMLA fully acknowledges the legitimate difficulties encountered by many sampled financial institutions in dealing with complex instructions in English.



AMLA is currently experimenting with generating the highest-possible-quality machine translations of the final reporting package in all EU languages.

After conducting their own review of these translations, financial supervisors will be free to circulate them to reporting entities upon request.



Such translations will be provided to reporting entities **strictly for convenience purposes**, and along with the **original English version** of the reporting package which **will remain the sole authoritative reference**.

Communication & Support

AMLA is not able to reply directly to solicitations from individual reporting entities.

AMLA is nevertheless committed to providing support to all reporting entities during the data collection process, in collaboration with national financial supervisors.

To this effect, reporting entities can either :

- **Get in touch with their national financial supervisors**, who will reroute relevant inquiries to AMLA.
- **Use the EU Survey link to be published on AMLA's website to issue questions or comments directly to AMLA** : If relevant, AMLA will address these submissions through publication of an FAQ document ahead of the submission deadline.

6. Conclusion and Next Steps

Michelangelo MENGOLI, Acting Head of Risk Models and Selection Unit, AMLA

What happens after submission?



Review of Submissions

AMLA, together with NCAs where appropriate, will review submissions for completeness, consistency and usability



Methodological Testing

The main objective is to assess whether the proposed indicators, definitions and reporting logic work in practice



Calibration & Refinement

Results will support the calibration of the methodology, improve indicators and, where necessary, the reporting instructions

Submission is not the end of the process — it is the starting point for the analytical phase

What happens after submission?



Will entities receive feedback?

No entity-specific score, rating or benchmarking output is foreseen. The exercise is methodological, not a supervisory assessment of individual entities.



Will there be bilateral follow-up?

Targeted follow-up may occur during the review phase: requests for clarification, checks on data points, or questions on interpretation — limited, focused and through appropriate supervisory channels.

Submission is the starting point for moving from a conceptual model to a more tested, robust and credible methodology



THANK YOU!

