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# Final Report

## Draft Regulatory Technical Standards Draft RTS on the assessment of the inherent and residual risk profile of obliged entities under Article 40(2) of Directive (EU) 2024/1640

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# 1 Executive Summary

Article 40(2) of Directive (EU) 2024/1640 (AMLD) mandates AMLA to develop draft regulatory technical standards (RTS) to define a common methodology that supervisors will use to assess the level of money laundering and terrorist financing (ML/TF) risk to which obliged entities are exposed. This methodology defines how supervisors classify inherent and residual risk profiles and determines how often these risk profiles must be reviewed.

Supervisory approaches to entity-level ML/TF risk assessment are currently fragmented, leading to divergent risk assessment outcomes and disproportionate costs for financial institutions that operate across borders. Importantly, fragmentation also undermines the effectiveness of the EU AML/CFT framework because consistent AML/CFT supervision of financial institutions may not be ensured.

To address this, the draft RTS introduces a risk-based methodology that is fully harmonised. A core set of datapoints applies to all entities and is complemented by datapoints that are specific to each sector. The frequency of reviews takes account of the nature and size of obliged entities. Once applied, this methodology will inform individual supervisors' supervisory strategies and inspection plans and create a shared understanding of the impact different risk factors have on obliged entities' overall risk exposure. A harmonised approach ensures operational efficiency, with reliable and comparable outcomes going forward.

## Next steps

The draft RTS applies to supervisors that are responsible for the AML/CFT supervision of financial sector obliged entities. It reflects the feedback received during a three-month public consultation on a version of the draft RTS, which took place between March and June 2025.

The draft RTS will be submitted to the European Commission for adoption before being published in the Official Journal of the European Union.

# 2 Background and rationale

**Article 40(2) of Directive (EU) 2024/1640 (AMLD) requires AMLA to develop a methodology that all supervisors will use to assess the level of money laundering and terrorist financing (ML/TF) risk to which obliged entities are exposed.** Specifically, Article 40(2) of the AMLD mandates AMLA to set out, in draft Regulatory Technical Standards (RTS), how supervisors will assess and classify the inherent and residual risk profile of each obliged entity and how often this risk profile must be reviewed.

## 2.1 Rationale

**Supervisors' approaches to assessing ML/TF risks associated with obliged entities currently diverge.** This means that under the current EU AML/CFT regime, entity-level ML/TF risk assessment outcomes are not comparable.

**Divergent approaches to assessing entity-level ML/TF risk can have a significant, adverse effect on supervisory outcomes, the functioning of the supervisory system established by Regulation (EU) 2024/1620 (AMLAR) and on the integrity of the EU's financial system.** It also creates costs for obliged entities that operate on a cross-border basis and distorts competition, as the number of datapoints supervisors collect varies significantly.

To address this, the risk assessment methodology under Article 40(2) of the AMLD should be

- Fully harmonised, with comparable outcomes;
- Effective, to reliably inform supervisors' strategies and inspection plans by targeting their resources on those entities that present the highest ML/TF risks; and
- Proportionate, so that the cost of compliance with the new requirements does not exceed what is necessary to achieve meaningful results.

## 2.2 Approach

**The draft RTS puts in place a common methodology that supervisors will use to assess entity-level ML/TF risk in a consistent, comparable and effective way.** It is based on a common set of datapoints that reflects the specificities of each sector and adjusts the frequency of reviews on a risk-sensitive basis. Once applied, it will inform individual supervisors' supervisory strategies and inspection plans and create a shared understanding of the impact different risk factors have on obliged entities' overall risk exposure.

### 2.2.1 A COMMON SET OF DATAPOINTS

**The draft RTS introduces a common set of datapoints that will inform the assessment of inherent risks and the quality of controls.** Using the same datapoints in all Member States creates operational efficiency for cross-border entities. It also ensures that entity-level risk assessments are comparable.

**The draft RTS limits data requests to those that are strictly necessary for entity-level ML/TF risk assessment purposes.** A core set of datapoints that apply to all entities is complemented by datapoints that are specific to each sector. This ensures that risk assessments are targeted and meaningful. It also means that most entities will not need to provide more than 100-150 datapoints, which is significantly below the number most supervisors request currently. Limiting data points for ML/TF risk assessment purposes in this way does not affect supervisors' right to obtain data for on-site and offsite AML/CFT supervision purposes.

**The draft RTS do not specify the source of different data points.** This means that supervisors can decide to draw on information that already exists. For example, supervisors may be able to obtain information from the local FIU, or from external auditors. In those cases, the reporting burden on obliged entities could be reduced.

**Quantitative data is used where possible.** The assessment will be based on objective criteria, or evidence-based supervisory judgement that is underpinned by a common supervisory methodology. It will not rely on self-assessments, by obliged entities, of the level of ML/TF risks to which they are exposed.

### 2.2.2 A ROBUST METHODOLOGY

**The risk assessment methodology comprises three steps.** In line with international AML/CFT standards, the assessments of an obliged entity's inherent risk profile and the effectiveness of its AML/CFT controls environment combine to form a residual risk score. Residual risk is the risk that remains after the quality of the entity's AML/CFT systems and controls has been considered.

**Inherent risk scores are computed automatically, but supervisors will assess controls scores in two steps.** Automated scores ensure operational efficiency, in particular where the population of obliged entities is very large. At the same time, the quality of an entity's controls environment cannot be assessed reliably based on automated scores alone. This is why the methodology envisages that the automated controls score be complemented by evidence-based professional judgement where this is available.

**To ensure a consistent approach and comparable outcomes, adjustments are limited to one risk category per inherent risk or controls score.** Adjustments are possible only in duly justified circumstances, for example where this is necessary to reflect specific national risks, or where information acquired in the context of AML/CFT supervision suggests that the automated score is insufficiently reliable.

**Because risks vary and evolve, thresholds and weights are not included in the draft RTS.** Instead, AMLA will define these for each review cycle and to monitor their effective application by supervisors in all Member States.

### 2.2.3 A RISK-BASED AND PROPORTIONATE APPROACH

**The frequency of entity-level risk assessments is proportionate to the nature and size of obliged entities.** To ensure supervisors' understanding is up-to-date, obliged entities' inherent and residual risk profiles should be reviewed once per year in line with most national supervisors' current practices. However, if an obliged entity is very small or carries out activities that carry a very low ML/TF risk, a review once every three years would normally be sufficient.

**Ad hoc assessments are necessary should risks crystallise or material new information emerge.** This could be the case, for example, where an entity's ownership or business model changes. It could also be the case where AML/CFT controls failures suggest that the inherent risk may have increased.

### 2.2.4 APPLICATION TO NON-FINANCIAL SECTOR OBLIGED ENTITIES

**The mandate in Article 40(2) of the AMLD applies to obliged entities in the financial sector as it does to those in the non-financial sector.** At the same time, divergent business models and different levels of convergence between the financial and non-financial sectors justify a phased approach.

**Under a phased approach, AMLA will issue two RTSs, one for the financial sector, and one for the non-financial sector.** A phased approach allows the financial sector and its AML/CFT supervisors to progress swiftly under the new framework and strengthen the EU's AML/CFT defenses. It will also give AMLA more time to consult and define datapoints for non-financial obliged entities on a sound evidence-basis.

**This draft RTS therefore applies to financial sector obliged entities and their supervisors only.**

## 2.3 Impact Assessment and public consultation

**On 12 March 2024, the European Banking Authority (EBA) received a Call for Advice (CfA) from the European Commission (EC) on certain draft regulatory technical standards (RTS) under the new EU AML/CFT framework.** This CfA included the mandate under Article 40(2) AMLD on the methodology for assessing the inherent and residual risk profile of obliged entities. The European Commission emphasised that the drafting work requested from EBA would *"be instrumental for ensuring that the regulatory technical standards can be submitted by AMLA to the Commission for adoption in due time"*.

**The EBA publicly consulted on a version of this RTS between 6 March and 6 June 2025**. It also assessed the impact its proposals would have if they were adopted.

**The EBA submitted its response to the European Commission on 30 October 2025**. This response reflected the public consultation feedback the EBA had received.

**AMLA assessed the EBA proposals, and the extent to which these proposals align with AMLA's own objectives and approach**. AMLA also considered legal certainty, interactions with other mandates, and timeliness. AMLA is satisfied that the EBA's proposals are proportionate and conducive to effective outcomes and adopts them as its own. Since AMLA decided to opt for a phased approach, minor amendments were brought to the draft RTS to reflect the adjustment in scope, and to introduce an application date. Minor clarifications were also brought to the draft RTS to ensure a consistent application of the methodology set out in the draft RTS. These clarifications do alter the substance of the EBA's proposals.

**Since the substance of the EBA's proposals remain unchanged, and since the EBA carried out a public consultation and reflected the feedback in its proposals, compliance with the public consultation requirement set out in the third paragraph of Article 49(1) of AMLAR is ensured, without a need for initiating a repeated public consultation by AMLA.**

# 3 Draft regulatory technical standards

**COMMISSION DELEGATED REGULATION (EU)**
**No …/..**

**of XXX**

**supplementing Directive (EU) 2024/1640 of the European Parliament and of the Council with regards to regulatory technical standards setting out the benchmarks and methodology for assessing and classifying the inherent and residual risk profile of credit institutions and financial institutions, as well as the frequency at which it shall be reviewed**

**(Text with EEA relevance)**

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Directive (EU) 2024/1640 of the European Parliament and of the Council of 31 May 2024, on the mechanisms to be put in place by Member States for the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, and in particular Article 40, paragraph 2, thereof,

Whereas:

(1) Directive (EU) 2024/1640 sets out the obligation for Member States to ensure that competent authorities apply a risk-based approach to supervision. As part of this, competent authorities should identify and assess the ML/TF risks to which obliged entities are exposed, as a result of the characteristics of their customers, the types of products, services or transactions they offer, the jurisdictions in which they operate and the distribution channels that they use.

(2) Pursuant to Article 40(2) of Directive (EU) 2024/1640, AMLA is mandated to develop benchmarks and a methodology to ensure that the inherent and residual risk profiles of individual obliged entities can be assessed and classified in a consistent manner by all competent authorities.

(3) This Regulation sets out benchmarks and a methodology for assessing and classifying the inherent and residual risk profile of credit institutions and financial institutions, as well as the frequency at which such risk profile shall be reviewed.

(4) To ensure that the risk profile of credit institutions and financial institutions is assessed and classified in a consistent manner across the Union, the assessment and classification of the inherent and residual risk profile of credit institutions

and financial institutions should be conducted on the basis of the same information in all Member States.

(5) This Regulation does not specify how competent authorities should obtain the information on which the assessment should be based. Supervisors may collect relevant data from different sources, either from the credit institutions and financial institutions themselves, from external auditors, or from AML/CFT authorities, prudential supervisors, FIUs or other public bodies in the context of cooperation or ongoing exchanges. Supervisors should use these data to establish a set of harmonised indicators. These indicators should be scored using the same methodology and combined using the same weighting system to determine the inherent and residual risk profile of credit institutions and financial institutions.

(6) Article 40, paragraph 2, of Directive (EU) 2024/1640 requires supervisors to assess and classify both the inherent and residual risk profiles of credit institutions and financial institutions. Consequently, supervisors should adopt a three-step approach. Firstly, supervisors should assess and classify the inherent risk profile of credit institutions and financial institutions based on a set of indicators aimed at reflecting the level of ML/TF risks to which they are exposed. Secondly, supervisors should assess the quality of the AML/CFT controls put in place by credit institutions and financial institutions to mitigate the inherent ML/TF risks to which they are exposed. Lastly, supervisors should assess and classify the residual risk profile of credit institutions and financial institutions which should reflect the level of ML/TF risk to which credit institutions and financial institutions remain exposed after their controls have been applied.

(7) Inherent ML/TF risks can stem from different types of risk factors, namely factors relating to the nature of customers, factors relating to the nature of the services, products or types of transactions offered, factors relating to the distribution channels used, and factors relating to the geographical areas in which credit institutions and financial institutions are operating. To structure the assessment of inherent risks, the inherent risk indicators should therefore each be divided into four categories reflecting the different types of risk factors and controls mentioned above. Moreover, within certain categories, some indicators relate to the same topic and should therefore be grouped into sub-categories. Similarly, different types of AML/CFT controls can be identified. To structure the assessment of the quality of controls, these different indicators should also be classified into different categories corresponding to these different types of controls.

(8) Indicators comprising a sub-category or category will generally not have the same level of significance. Consequently, indicators should be given different weights in the determination of the combined score attributed to this sub-category or category. Equally, the sub-categories comprising a category may have different levels of significance and should also be given different weights in the determination of the combined score per category.

(9) Some sectors have specificities that affect the level of ML/TF risks to which the

credit institutions and financial institutions operating in these sectors are exposed. These specificities should be reflected in the methodology by adjusting the list of applicable indicators and the weights given to these indicators, depending on the sector(s) to which the assessed credit institutions and financial institutions belong. The assessment of the risks of money laundering and terrorist financing and of non-implementation and evasion of targeted financial sanctions affecting the internal market and relating to cross-border activities conducted by the Commission pursuant to Article 7 of Directive (EU) 2024/1640 should be used as a source of information to determine the extent to which adjustments are needed for the different sectors.

(10) Similarly, supervisors may possess relevant information suggesting that the credit institution or financial institution's inherent risk score does not reflect the level of inherent ML/TF risks to which it is exposed, for instance due to national specificities of their Member States. This information should be reflected in the methodology by introducing a mechanism whereby supervisors can adjust the inherent risk score of the relevant credit institutions and financial institutions, based on duly justified considerations.

(11) ML/TF risks affecting the internal market are constantly evolving. It is therefore important that the methodology can be adjusted on an ongoing and timely basis to capture these evolutions. To ensure that this is possible, the precise values and thresholds to be applied to score each indicator and the precise weights to be given to each indicator, sub-category and category in the determination of the inherent and residual risk profile of credit institutions and financial institutions should not be specified in this Regulation. It will be the role of AMLA to develop and keep up to date the necessary guidance to ensure that each competent authority applies the same thresholds and weights.

(12) To ensure that supervisors' understanding of the ML/TF risks to which credit institutions and financial institutions are exposed, the inherent and residual risk profile of credit institutions and financial institutions should be reviewed at least once per year. Where the size of the business of a credit institution or financial institution is very small, or where the nature of the business exposes the entity to a low level of risk or does not justify reviewing the inherent and residual risk profile of the credit institution or financial institution every year, supervisors should be able to review such profile only once every three years, provided that no major event or development in the management and operations of the relevant credit institution or financial institution occurs during the three years preceding the assessment.

(13) Major events or developments in the management and operations of credit institutions and financial institutions can significantly affect the ML/TF risks to which the relevant credit institutions and financial institutions are exposed, in a way that justifies a rapid supervisory reaction. Where such events or developments occur, supervisors should conduct an ad hoc assessment of the impact of those events or developments on the inherent and residual risk profile of the relevant credit institutions and financial institutions in a timely fashion.

(14) This Regulation is based on the draft regulatory technical standards submitted

by AMLA to the Commission.

HAS ADOPTED THIS REGULATION:

*Article 1 – Definitions*

1. For the purposes of this Regulation, the following definitions shall apply:

   (a) 'inherent risk' means the risk of money laundering and terrorist financing to which a credit institution or financial institution is exposed, because of the products, services and type of transactions it offers, the customers it serves, the jurisdictions in which it operates and the distribution channels it uses to serve its customers, before any mitigating measures have been applied by that credit institution or financial institution;

   (b) 'residual risk' means the risk of money laundering and terrorist financing to which a credit institution or financial institution remains exposed, after it has put in place policies, procedures, systems and controls to mitigate inherent risk.

*Article 2 – Assessment and classification of the inherent risk profile of credit institutions and financial institutions*

1. Supervisors shall assess and classify the inherent risk profile of each credit institution or financial institution under their supervision that has commenced its activities no later than during the year prior to the year that the assessment and classification takes place.

2. For the purposes of the assessment and classification mentioned in paragraph 1, supervisors shall apply the following sequential steps:

   (a) identify all the inherent risk indicators that apply to the credit institution or financial institution and allocate a score to each of these indicators, in accordance with paragraph 3;

   (b) identify all the sub-categories of indicators listed in Section A of Annex I, within the 'products and services' category, that apply to the credit institution or financial institution, and calculate a combined score for each of those sub-categories, in accordance with paragraph 4;

   (c) calculate combined scores for all categories of indicators listed in Section A of Annex I, in accordance with paragraph 5;

   (d) calculate the inherent risk score of the credit institution or financial institution, in accordance with paragraph 6;

   (e) where the inherent risk score does not adequately reflect the level of ML/TF risks to which the credit institution or financial institution is exposed, adjust the inherent risk score, in accordance with paragraph 7;

(f) classify the inherent risk profile of the credit institution or financial institution in accordance with paragraph 8.

3. Each score allocated to an inherent risk indicator shall be a numerical value without decimal places ranging from 1, that corresponds to the lowest level of risk, to 4, that corresponds to the highest level of risk. The inherent risk indicators shall be established based on the data points listed in Section A of Annex I. The scores shall be calculated based on pre-determined thresholds.

4. A sub-category shall apply only if at least one of its indicators applies to the credit institution or financial institution. Each combined score per sub-category shall be a numerical value with two decimal places ranging from 1, that corresponds to the lowest level of risk, to 4, that corresponds to the highest level of risk. Each combined score per sub-category shall be calculated from the scores allocated to its inherent risk indicators, in accordance with paragraph 3. For this purpose, supervisors shall use a weighted arithmetic average method. The weight applied to each indicator shall be based on its risk significance. The weights shall be expressed as a numerical value without decimal places ranging from 1, that corresponds to the lowest level of risk significance, to 5, that corresponds to the highest level of risk significance.

5. Each combined score per category shall be a numerical value with two decimal places ranging from 1, that corresponds to the lowest level of risk, to 4, that corresponds to the highest level of risk. Each combined score per category shall be calculated from the scores allocated to its inherent risk indicators, in accordance with paragraph 3. By way of derogation, the combined score of the 'products and services' category shall be calculated from the combined scores attributed to its sub-categories, in accordance with paragraph 4. For this purpose, supervisors shall use a weighted arithmetic average method. The weight applied to each indicator or sub-category shall be based on its risk significance. The weights shall be expressed as a numerical value without decimal places ranging from 1, that corresponds to the lowest level of risk significance, to 5, that corresponds to the highest level of risk significance.

6. The inherent risk score shall be a numerical value with two decimal places ranging from 1, that corresponds to the lowest level of risk, to 4, that corresponds to the highest level of risk. The inherent risk score shall be calculated from the combined scores per category determined in accordance with paragraph 5. For this purpose, supervisors shall use a weighted arithmetic average method. The weight applied to each category shall be dependent on the score it received. Categories that received a higher risk score shall have a greater weight than categories that received a lower risk score.

7. The adjustment shall be based on either national specificities or any other circumstances identified by supervisors in the course of their supervisory activities. The adjusted score shall not lead to an increase or decrease by more than one level in accordance with paragraph 8. Where the risk is increased by one level, the adjusted score shall be set at the minimum value of the corresponding level. Where the risk is decreased by one level, the adjusted score shall be set at the maximum value of the corresponding level. The adjustment shall be duly justified and

recorded.

8. The classification shall be based on the inherent risk score attributed to the credit institution or financial institution in accordance with paragraphs 7 and 8. Supervisors shall classify the inherent risk profile of the credit institution or financial institution, in accordance with the following conversion rules:

$$\text{Score} < 1.75\text{: Low risk (1)}$$

$$1.75 \leq \text{Score} < 2.5\text{: Medium risk (2)}$$

$$2.5 \leq \text{Score} < 3.25\text{: Substantial risk (3)}$$

$$\text{Score} \geq 3.25\text{: High risk (4)}$$

*Article 3 – Assessment and classification of the quality of AML/CFT controls put in place by credit institutions and financial institutions*

1. Supervisors shall assess and classify the quality of the AML/CFT controls put in place by each credit institution or financial institution under their supervision that has commenced its activities no later than during the year prior the year that the assessment and classification takes place.

2. For the purposes of the assessment and classification mentioned in paragraph 1, supervisors shall apply the following sequential steps:

   (a) identify all the controls quality indicators that apply to the credit institution or financial institution and allocate a score to each of these indicators, in accordance with paragraph 3;

   (b) calculate combined scores for all applicable categories of indicators listed in Section B of Annex I, in accordance with paragraph 4;

   (c) where supervisors have assessed that a combined score per category does not adequately reflect the level of quality of the controls falling within that category, the score shall be adjusted accordingly, in accordance with paragraph 5;

   (d) calculate the controls quality score of the credit institution or financial institution, in accordance with paragraph 6;

   (e) classify the credit institution or financial institution in accordance with paragraph 7.

3. Each score allocated to a controls quality indicator shall be a numerical value without decimal places ranging from 1, that corresponds to the highest level of quality, to 4, that corresponds to the lowest level of quality. The controls quality indicators shall be established based on the data points listed in Section B of Annex I. The scores shall be calculated based on pre-determined thresholds.

4. Each combined score per category shall be a numerical value with two decimal places ranging from 1, that corresponds to the lowest level of risk, to 4 that

corresponds to the highest level of risk. Each combined score per category shall be calculated from the scores allocated to its controls quality indicators, in accordance with paragraph 3. For this purpose, supervisors shall use a weighted arithmetic average method. The weight applied to each indicator shall be based on its significance. The weights shall be expressed as a numerical value without decimal places ranging from 1, that corresponds to the lowest level of significance, to 5, that corresponds to the highest level of significance.

5. Each adjustment of a score per category shall be based on a supervisory assessment or an external auditors' assessment available to the relevant supervisor. Each adjustment shall be duly justified and recorded. For the purposes of this paragraph:

   (a) a supervisory assessment shall mean any assessment of the effectiveness, or compliance with AML/CFT legal requirements, of all or part of a credit institution or financial institution's AML/CFT governance, procedures, systems and controls carried out by a supervisor within the course of its supervisory activities. This includes, but is not limited to, full scope or targeted on-site inspections, thematic off-site reviews and other off-site analyses;

   (b) an external auditor's assessment shall mean any assessment of the effectiveness, or compliance with AML/CFT requirements, of all or part of a credit institution or financial institution's AML/CFT governance, procedures, systems and controls carried out by external auditors.

6. The controls quality score shall be a numerical value with two decimal places ranging from 1, that corresponds to the lowest level of risk, to 4, that corresponds to the highest level of risk. The controls quality score shall be calculated from the combined scores per category determined in accordance with paragraphs 4 and 5. For this purpose, supervisors shall use a weighted arithmetic average method. The weight applied to each category shall be dependent on the score it received. Categories that received a higher score that corresponds to a lower level of quality shall have a greater weight than categories that received a lower score that corresponds to a higher level of quality.

7. The classification shall be based on the controls quality score attributed to the credit institution or financial institution in accordance with paragraph 6. Supervisors shall classify the credit institution or financial institution in accordance with the following conversion rules:

$$\text{Score} < 1.75\text{: Very good quality of controls (A)}$$

$$1.75 \leq \text{Score} < 2.5\text{: Good quality of controls (B)}$$

$$2.5 \leq \text{Score} < 3.25\text{: Moderate quality of controls (C)}$$

$$\text{Score} \geq 3.25\text{: Poor quality of controls (D)}$$

*Article 4 – Assessment and classification of*

*the residual risk profile of credit institutions and financial institutions*

1. Supervisors shall assess and classify the residual risk profile of each credit institution or financial institution under their supervision that has commenced its activities no later than during the year prior to the year that the assessment and classification takes place.

2. For the purposes of the assessment and classification mentioned in paragraph 1, supervisors shall apply the following sequential steps:

   (a) determine the residual risk score of the credit institution or financial institution, based on the inherent risk score and the controls quality score attributed to the credit institution or financial institution, in accordance with Article 2 and Article 3;

   (b) supervisors shall apply the following rules to combine the inherent risk score and the controls quality score, in accordance with paragraph 1:

      (i) where the controls quality score is greater than the inherent risk score, the residual risk score shall be equal to the inherent risk score;

      (ii) where the controls quality score is lower than or equal to the inherent risk score, the residual risk score shall be equal to the arithmetic average of the inherent risk score and the controls quality score;

   (c) based on the residual risk score determined in accordance with paragraphs 1 and 2, classify the residual risk profile of the credit institution or financial institution, in accordance with the following conversion rules:

$$\text{Score} < 1.75\text{: Low risk (1)}$$

$$1.75 \leq \text{Score} < 2.5\text{: Medium risk (2)}$$

$$2.5 \leq \text{Score} < 3.25\text{: Substantial risk (3)}$$

$$\text{Score} \geq 3.25\text{: High risk (4)}$$

*Article 5 – Timelines for and updates to the assessment and classification of the inherent and residual risk profile of credit institutions and financial institutions*

1. Supervisors shall carry out the first assessment and classification of the inherent risk and residual risk profiles of credit institutions and financial institutions pursuant to Articles 2, 3 and 4 no later than nine months after the date of application of this Regulation.

2. Supervisors shall carry out any subsequent assessment and classification of the inherent risk and residual risk profile of credit institutions and financial institutions pursuant to Article 2, 3 and 4 by 30 September of the year during which the

assessment takes place.

3. By way of derogation from paragraph 2, supervisors shall carry out the assessment and classification of the inherent risk and residual risk profile of a credit institution or financial institution pursuant to Article 2, 3 and 4, at least once every three years, where the credit institution or financial institution meets any of the following criteria:

   (a) the total number of full-time equivalent employees employed by the credit institution or financial institution in the relevant Member State is less than or equal to five;

   (b) the credit institution or financial institution carries out only the following activities:

      (i) the activity of an insurance intermediary as referred to in Article 2, paragraph 1, point (6)(c), of Regulation (EU) 2024/1624;

      (ii) the activity of credit intermediary as referred to in Article 2, paragraph 1, point (6)(h), or Article 3, paragraph 3, point (k), of Regulation (EU) 2024/1624;

      (iii) the activity of an insurance undertaking as referred to in Article 2, paragraph 1, point (6)(b), of Regulation (EU) 2024/1624, provided that the financial institution does not distribute life insurance contracts or products other than: (i) contracts or products that cannot be redeemed; (ii) contracts or products that insure a lender against the death of a borrower; and (iii) contracts or products the annual premium of which does not exceed EUR 1 000 or the corresponding value in the national currency or the unique premium of which does not exceed EUR 2 500 or the corresponding value in the national currency;

      (iv) the activity of an investment firm as referred to in Article 2, paragraph 1, point (6)(d), of Regulation (EU) 2024/1624, provided that the credit institution or financial institution does not provide (i) any of the investment services listed in points (1), (2), (4), (8) and (9), in Section A of Annex I of Directive (EU) 2014/65, or (ii) any of the ancillary services listed in points (1) and (2), of Section B of Annex I of Directive (EU) 2014/65;

      (v) the activity of a creditor as referred to in Article 2, paragraph 1, point (6)(g), of Regulation (EU) 2024/1624;

      (vi) the activities listed in points (2), (3) and (6), of Annex I of Directive (EU) 2013/36, with the exception of offering credit agreements relating to immovable property;

   (c) the credit institution or financial institution is a branch set up by a collective investment undertaking within the meaning of Article 2, paragraph 1, point (6)(e), of Regulation (EU) 2024/1624 in a different Member State; or

   (d) the residual risk profile of the credit institution or financial institution has already been assessed and classified in accordance with Article 5 at least

once, and such residual risk profile was last classified as the low-risk.

4. Where major events or developments in the management and operations of a credit institution or financial institution occur, the supervisor shall carry out an ad hoc review of the inherent risk and residual risk profile of the relevant credit institution or financial institution. Such assessment and classification shall take place no later than four months after the supervisor become aware of the major event or development.

5. When conducting an ad-hoc assessment pursuant to paragraph 4, the supervisor may decide not to review the scores attributed to indicators that are not affected by the occurrence of the relevant major event or development. The supervisor may also decide not to review the scores of controls categories that are not affected by the occurrence of the relevant major event or development, based on an available supervisory assessment and/or external auditor's assessment.

6. For the purposes of paragraphs 4 and 5, major events or developments in management and operations shall mean any event or development in the management and operations of a credit institution or financial institution that may lead to a material change in the credit institution or financial institution's inherent risk or residual risk profile. This includes, but is not limited to:

   (a) significant changes in the business model of the credit institution or financial institution to the extent that these changes may lead to a material change in the credit institution or financial institution's inherent risk or residual risk profile;

   (b) the identification by the supervisor of significant weaknesses in the entity's AML/CFT procedures, systems and/or controls, to the extent that these weaknesses may lead to a material change in the credit institution or financial institution's inherent risk or residual risk profile;

   (c) a credit institution or financial institution becomes a significant supervised entity within the meaning of Article 2, point (16), of Regulation (EU) 468/2014 or becomes part of a significant supervised group within the meaning of Article 2, point (22), of Regulation (EU) 468/2014, to the extent that this event may lead to a material change in the credit institution or financial institution's inherent or residual risk profile.

*Article 6 – Entry into force*

This Regulation shall enter into force on the twentieth day following that of its publication in the Official Journal of the European Union.

It shall apply from 31 December 2027.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at Brussels,

*For the Commission*
*The President*

*[For the Commission*

*On behalf of the President]*

*[Position]*

# ANNEX I – Data points, sub-categories and categories

## Section A – Inherent risk

| | | | Sectors | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Risk Category | Sub-Category | Data points | CI | CP | LI | EMI | PI | BC | IF | AMC | CASP | O |
| Customers | Customers | Total number of customers | x | x | x | x | x | x | x | x | x | x |
| | | Number of customers which are Natural Persons (NP) per country | x | x | x | x | x | x | x | x | x | x |
| | | Number of customers which are Legal Entities (LE) per country | x | x | x | x | x | x | x | x | x | x |
| | | Number of customers NP who are PEPs per country | x | x | x | x | x | x | x | x | x | x |
| | | Number of customers LE whose UBO are PEPs per country | x | x | x | x | x | x | x | x | x | x |
| | | Number of customers with at least one transaction in the previous year | x | x | | x | x | x | x | x | x | x |
| | | Number of new customers in the previous year | x | x | x | x | x | x | x | x | x | x |
| | | Number of legal entities with complex corporate structure | x | x | x | x | x | | x | x | x | x |
| | | Number of customers with high risk activities | x | x | x | x | x | x | x | x | x | x |
| | | Number of legal entities with at least 1 UBOs located in non-EEA countries (residence) | x | x | x | x | x | | x | x | x | x |
| | | Number of customers with cross border transactions involving non-EEA countries | x | x | x | x | x | x | x | x | x | x |
| | | Number of walk-in customers | x | | | x | x | x | | | x | |

| | | | Sectors | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Risk Category | Sub-Category | Data points | CI | CP | LI | EMI | PI | BC | IF | AMC | CASP | O |
| | | Number of occasional transactions carried by walk in customers | x | | | x | x | x | | | x | |
| | | Number of customers with requests from FIU | x | x | x | x | x | x | x | x | x | x |
| Products | Payment Accounts | Number of payment accounts | x | x | | x | x | | | | | x |
| | | Total Value (EUR) of incoming transactions in the previous year | x | x | | x | x | | | | | x |
| | | Number of incoming transactions in the previous year | x | x | | x | x | | | | | x |
| | | Total Value (EUR) of outgoing transactions in the previous year | x | x | | x | x | | | | | x |
| | | Number of outgoing transactions in the previous year | x | x | | x | x | | | | | x |
| | Virtual IBANs | Total Number of master accounts with linked vIBANS | x | | | x | x | | | | | |
| | | Number of transactions on Virtual IBANs (incoming) in the previous year | x | | | x | x | | | | | |
| | | Total Value (EUR) of transactions on Virtual IBANs (incoming) in the previous year | x | | | x | x | | | | | |
| | | Number of transactions on Virtual IBANs (outgoing) in the previous year | x | | | x | x | | | | | |
| | | Total Value (EUR) of transactions on Virtual IBANs (outgoing) in the previous year | x | | | x | x | | | | | |
| | | Total Number of re-issued IBANs | x | | | x | x | | | | | |

| | | | Sectors | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Risk Category | Sub-Category | Data points | CI | CP | LI | EMI | PI | BC | IF | AMC | CASP | O |
| | | Total Number of re-issued IBANs where the end-user is not a customer of the credit institution or financial institution | x | | | x | x | | | | | |
| | Prepaid Cards | Total Number of Prepaid Cards issued during the previous year | x | | | x | x | | | | x | |
| | | Total Value (EUR) of the issued prepaid cards during the previous year (turnover) | x | | | x | x | | | | x | |
| | | Total Value (EUR) outstanding on prepaid cards issued during the previous year (turnover) | x | | | x | x | | | | x | |
| | | Total number of customers using prepaid cards | x | | | x | x | | | | x | |
| | | Total number of customers using prepaid cards with more than 3 prepaid cards | x | | | x | x | | | | x | |
| | Lending | Total Number of outstanding loans | x | x | | | | | | | | |
| | | Total Value (EUR) of outstanding loans | x | x | | | | | | | | |
| | | Total Number of outstanding real estate loans | x | x | | | | | | | | |
| | | Total Number of outstanding real estate loans with third party payments in the past calendar year | x | x | | | | | | | | |
| | | Total Value (EUR) of loans granted during the previous year | x | x | | | | | | | | |
| | | Total Number of outstanding asset backed loans with cash collateral | x | x | | | | | | | | |

| | | | Sectors | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Risk Category | Sub-Category | Data points | CI | CP | LI | EMI | PI | BC | IF | AMC | CASP | O |
| | | Total Number of loan repayments during the previous year | x | x | | | | | | | | |
| | | Total Number of prematurely repaid loans during the previous year | x | x | | | | | | | | |
| | | Total Number of loan repayments from non-EEA countries during the previous year | x | x | | | | | | | | |
| | | Total Number of consumer loans granted during the previous year that are not associated to the acquisition of any product/service | x | x | | | | | | | | |
| | Factoring | Total Number of factoring contracts granted in the previous year | x | x | | | | | | | | |
| | | Total Value (EUR) of factoring contracts granted during the previous year | x | x | | | | | | | | |
| | | Total Value (EUR) of factoring contracts granted to obligors established in non-EEA countries during the previous year | x | x | | | | | | | | |
| | Life insurance contracts | total amount (EUR) of gross written premiums in the previous year (incoming) | | | x | | | | | | | |
| | | total of amount (EUR) of surrender value of the insurance contracts at the end of the previous year | | | x | | | | | | | |
| | | % of all gross written premium (amount in EUR) paid directly to the life insurance broker in the previous year | | | x | | | | | | | |

| Risk Category | Sub-Category | Data points | Sectors | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | CI | CP | LI | EMI | PI | BC | IF | AMC | CASP | O |
| | | Number of insurance contracts that are not used for low risk contracts | | | x | | | | | | | |
| | Currency Exchange (involving cash) | Number of currency exchange transactions carried out during the previous year (sell) | x | | | x | x | x | | | | |
| | | Number of currency exchange transactions carried out during the previous year (buy) | x | | | x | x | x | | | | |
| | | Number of currency exchange transactions carried out during the previous year, where the transaction is above EUR 1 000 (sell) | x | | | x | x | x | | | | |
| | | Number of currency exchange transactions carried out during the previous year, where the transaction is above EUR 1 000 (buy) | x | | | x | x | x | | | | |
| | | Total Value (EUR) of currency exchange transactions carried out during the previous year (sell) | x | | | x | x | x | | | | |
| | | Total Value (EUR) of currency exchange transactions carried out during the previous year (buy) | x | | | x | x | x | | | | |
| | | Value (EUR) of currency exchange transactions cash-to-cash carried out during the previous year | x | | | x | x | x | | | | |
| | Custody of crypto assets | Number of customers owning crypto-assets | x | | | x | x | | | | x | |
| | | Total value (EUR) of crypto assets held on customer custody wallets in the previous year | x | | | x | x | | | | x | |

| | | | Sectors | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Risk Category | Sub-Category | Data points | CI | CP | LI | EMI | PI | BC | IF | AMC | CASP | O |
| Services | Invest. Services and Activities - reception and transmission of orders | number of retail clients | x | | | | | | x | x | | |
| | | number of professional clients | x | | | | | | x | x | | |
| | | Number of AML/CFT regulated customers outside the EEA | x | | | | | | x | x | | |
| | Invest. Services and Activities - custody account keeping | number of retail clients | x | | | | | | x | | | |
| | | number of professional clients | x | | | | | | x | | | |
| | | % of assets under custody for which the credit institution or financial institution does not have a direct business relationship with the final investor | x | | | | | | x | | | |
| | | Number of AML/CFT regulated customers outside the EEA | x | | | | | | x | | | |
| | Invest. Services and Activities - Portfolio manangement | number of retail clients | x | | | | | | x | x | | |
| | | number of professional clients | x | | | | | | x | x | | |
| | | total assets under management | x | | | | | | x | x | | |
| | | Number of customers for which customer holding total assets with a value of at least EUR 5 000 000 | x | | | | | | x | x | | |
| | Money Remittance | Total Number of money remittance payments in the previous year (incoming) | x | | | x | x | | | | | |
| | | Total Number of money remittance payments in the previous year (outgoing) | x | | | x | x | | | | | |

| | | | Sectors | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Risk Category | Sub-Category | Data points | CI | CP | LI | EMI | PI | BC | IF | AMC | CASP | O |
| | | Total Value (EUR) of remittance payments in the previous year (incoming) | x | | | x | x | | | | | |
| | | Total Value (EUR) of remittance payments in the previous year (outgoing) | x | | | x | x | | | | | |
| | | Total Number of money remittance transactions above 1 000 euro in the previous year (incoming) | x | | | x | x | | | | | |
| | | Total Number of money remittance transactions above 1 000 euro in the previous year (outgoing) | x | | | x | x | | | | | |
| | Wealth Management | Total Number of customers (NP) with total assets under management over a value of at least EUR 5 000 000 AND with total assets over a value of at least EUR 50 000 000 | x | | x | | | | x | | x | |
| | | Total Number of customers (NP) that fall under the definition of private banking (EBA Risk Factor Guidelines) | x | | x | | | | x | | x | |
| | Correspondent services | Total Value (EUR) of transactions executed on behalf of the respondent client in the previous year (incoming) | x | | | | x | | | | x | |
| | | Total Value (EUR) of transactions executed on behalf of the respondent client in the previous year (outgoing) | x | | | | x | | | | x | |
| | | Total Value (EUR) of transactions going through payable through accounts in the previous year (incoming) | x | | | | x | | | | x | |

| | | | Sectors | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Risk Category | Sub-Category | Data points | CI | CP | LI | EMI | PI | BC | IF | AMC | CASP | O |
| | | Total Value (EUR) of transactions going through payable through accounts in the previous year (outgoing) | x | | | | x | | | | x | |
| | | Total Value (EUR) of transactions going trough nested accounts in the previous year (incoming) | x | | | | x | | | | x | |
| | | Total Value (EUR) of transactions going trough nested accounts in the previous year (outgoing) | x | | | | x | | | | x | |
| | Trade finance | Total Number of trade finance customers | x | x | | | | | | | | |
| | | Total Number of trade finance transactions in the previous year (incoming) | x | x | | | | | | | | |
| | | Total Number of trade finance transactions in the previous year (outgoing) | x | x | | | | | | | | |
| | | Total Value (EUR) of trade finance transactions in the previous year (incoming) | x | x | | | | | | | | |
| | | Total Value (EUR) of trade finance transactions in the previous year (outgoing) | x | x | | | | | | | | |
| | E-Money | Number of e-money payment transactions in the previous year (incoming) | x | | | x | | | | | | |
| | | Number of e-money payment transactions in the previous year (outgoing) | x | | | x | | | | | | |
| | | Total Value (EUR) of e-money payment transactions in the previous year (incoming) | x | | | x | | | | | | |

| | | | Sectors | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Risk Category | Sub-Category | Data points | CI | CP | LI | EMI | PI | BC | IF | AMC | CASP | O |
| | | Total Value (EUR) of e-money payment transactions in the previous year (outgoing) | x | | | x | | | | | | |
| | | Value (EUR) of e-money payment transactions by non-identified customers in the previous year | x | | | x | | | | | | |
| | TCSP services | Total Number of legal entity customers using TCSP services in the previous year | x | | | | | | x | | | |
| | Crypto cash cards | Number of non-EEA crypto companies for which the credit institution or financial institution acts as a BIN-sponsor | x | | | x | x | | | | | |
| | Exchange crypto for funds | Total amount (EUR) crypto-funds in the previous year | x | | | x | x | | x | | x | |
| | | Total number of transactions crypto-funds in the previous year | x | | | x | x | | x | | x | |
| | | number of customers using this type of service in the previous year | x | | | x | x | | x | | x | |
| | | Total number of transactions crypto-funds from unhosted wallets in the previous year | x | | | x | x | | x | | x | |
| | Exchange funds for crypto | Total amount (EUR) funds-crypto in the previous year | x | | | x | x | | x | | x | |
| | | Total number of transactions funds-crypto in the previous year | x | | | x | x | | x | | x | |
| | | number of customers using this type of service in the previous year | x | | | x | x | | x | | x | |

| | | | Sectors | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Risk Category | Sub-Category | Data points | CI | CP | LI | EMI | PI | BC | IF | AMC | CASP | O |
| | | Total number of transactions funds-crypto to unhosted wallets in the previous year | x | | | x | x | | x | | x | |
| | Exchange crypto for crypto | Total amount (EUR) crypto-crypto in the previous year | x | | | x | x | | x | | x | |
| | | Number of customers using this type of service in the previous year | x | | | x | x | | x | | x | |
| | | Total number of transactions crypto-crypto in the previous year | x | | | x | x | | x | | x | |
| | | Total number of transactions crypto-crypto to unhosted wallets in the previous year | x | | | x | x | | x | | x | |
| | | Total number of transactions crypto-crypto from unhosted wallets in the previous year | x | | | x | x | | x | | x | |
| | Transfer crypto-assets | Total amount (EUR) that customers transferred in the previous year | x | | | x | x | | x | | x | |
| | | Number of customers using this type of service in the previous year | x | | | x | x | | x | | x | |
| | | Total number of transfers of crypto-assets in the previous year | x | | | x | x | | x | | x | |
| | | Total number of transactions to unhosted wallets in the previous year | x | | | x | x | | x | | x | |
| | | Total number of transactions from unhosted wallets in the previous year | x | | | x | x | | x | | x | |
| | Managem | Number of retail investor customers | | | | | | | | x | | |

| Risk Category | Sub-Category | Data points | Sectors | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | CI | CP | LI | EMI | PI | BC | IF | AMC | CASP | O |
| | ent of UCITS | Number of professional investor customers | | | | | | | | x | | |
| | | Total assets under management of UCITSs | | | | | | | | x | | |
| | Managem ent of AIFs | Number of retail investor customers | | | | | | | | x | | |
| | | Number of professional investor customers | | | | | | | | x | | |
| | | Number of open-ended funds | | | | | | | | x | | |
| | | Number of closed-ended funds | | | | | | | | x | | |
| | | Total assets under management | | | | | | | | x | | |
| | | Total assets under management in unlisted assets | | | | | | | | x | | |
| | Safe Custody Services | Total Number of customers using safe deposit boxes | x | | | | | | | | | |
| | Crowdfun ding | Total Value (EUR) of funding projects in the previous year | x | x | | x | x | | x | | x | |
| | | Total Number of projects being funded in the previous year | x | x | | x | x | | x | | x | |
| | | Total Number of donors from high-risk countries | x | x | | x | x | | x | | x | |
| | | Total Number of projects where the owner is from a high-risk country | x | x | | x | x | | x | | x | |
| | | Number of cash transactions in the previous year (withdrawals) | x | x | x | x | x | | | | x | |

| | | | Sectors | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Risk Category | Sub-Category | Data points | CI | CP | LI | EMI | PI | BC | IF | AMC | CASP | O |
| | Cash Transactions | Number of cash transactions in the previous year (deposits) | x | x | x | x | x | | | | x | |
| | | Total Value (EUR) of cash transactions in the previous year (withdrawals) | x | x | x | x | x | | | | x | |
| | | Total Value (EUR) of cash transactions in the previous year (deposits) | x | x | x | x | x | | | | x | |
| | | Total Number of natural persons totalling cash transactions over 20 000 EUR during the previous year | x | x | x | x | x | | | | x | |
| Geographies | Geographies | Number of incoming transactions in the previous year by country | x | x | x | x | x | x | | | x | x |
| | | Total value (EUR) of incoming transactions in the previous year by country | x | x | x | x | x | x | | | x | x |
| | | Number of outgoing transactions in the previous year by country | x | x | x | x | x | x | | | x | x |
| | | Total value (EUR) of outgoing transactions in the previous year by country | x | x | x | x | x | x | | | x | x |
| | | Total value (EUR) of entity's investment undertakings (CIUs) by country | | | | | | | | x | | |
| | | Number of investors by country | | | | | | | x | x | | |
| | | Total value (EUR) of assets under management by country | | | | | | | | x | | |
| | | Number of institutions established in foreign countries to whom you provide correspondent services (by country) | x | | | | x | | | | x | |

| | | | Sectors | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Risk Category | Sub-Category | Data points | CI | CP | LI | EMI | PI | BC | IF | AMC | CASP | O |
| | | Total value of incoming funds moved on behalf of the respondent's clients by country of respondent's establishment | x | | | | x | | | | x | |
| | | Total value of outgoing funds moved on behalf of the respondent's clients by country of respondent's establishment | x | | | | x | | | | x | |
| | | Number of branches by country | x | x | x | x | x | x | x | x | x | x |
| | | Number of subsidiaries by country | x | x | x | x | x | x | x | x | x | x |
| | | Country where the entities undertaking is located (parent company) | x | x | x | x | x | x | x | x | x | x |
| Distribution channels | Distribution channels | Number of new customers onboarded remotely in the previous year | x | x | x | x | x | | | | x | x |
| | | Number of new customers onboarded in the previous year by third parties | x | x | x | x | x | | | | x | x |
| | | Number of customers onboarded in the previous year by third parties not directly subject to AML/CFT supervision | x | x | x | x | x | | | | x | x |
| | | Number of agents by country | | | | x | x | | x | | | |
| | | Number of distributors by country | | | | x | | | | | | |
| | | Total value of gross written premiums through insurance contracts issued through brokers, broken down by country the brokers are established | | | x | | | | | | | |

| | | | Sectors | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Risk Category | Sub-Category | Data points | CI | CP | LI | EMI | PI | BC | IF | AMC | CASP | O |
| | | **Number of white labelling partners by country of establishment** | x | | | x | x | | | | x | x |

## Section B – AML/CFT Controls

| Category | Data Points | CI | CP | LI | EMI | PI | BC | IF | AMC | CASP | O |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **1 - Governance, Culture & Compliance function** (Role and responsibilities of the management body, AML/CFT risk culture, AML/CFT Compliance Function and Resources, AML/CFT training) | Date at which the procedures covering the entirety of the AML/CFT framework (including initial and ongoing CDD, transaction and business relationship monitoring, STR, and financial sanction screening) were checked as being in compliance with existing laws and regulations applicable at that date | x | x | x | x | x | x | x | x | x | x |
| | Number of dedicated AML/CFT compliance staff (in FTE) | x | x | x | x | x | x | x | x | x | x |
| | % of personnel per category who have received AML training during the last calendar year:<br>a) AML/CFT compliance staff<br>b) non-AML/CFT compliance staff (e.g. customer facing staff)<br>c) agents and distributors<br>d) Board members / non-executive directors | x | x | x | x | x | x | x | x | x | x |
| **2 - Internal Controls & Outsourcing** (Internal controls and reporting systems, Outsourcing | Frequency of reporting by the AML compliance officer to the management body (never, monthly, quarterly, half-yearly, yearly) | x | x | x | x | x | x | x | x | x | x |

| Category | Data Points | CI | CP | LI | EMI | PI | BC | IF | AMC | CASP | O |
|---|---|---|---|---|---|---|---|---|---|---|---|
| and reliance on third parties, Internal audit function / external expert, Record keeping) | Tasks outsourced by the credit institution or financial institution (in total or in part) to service providers:<br>CDD<br>Training<br>Transaction Monitoring<br>Suspicious Transaction Reports<br>Sanctions Screening<br>PEP detection<br>Compliance Monitoring Checks | x | x | x | x | x | x | x | x | x | x |
| | AML/CFT tasks outsourced to an external service provider located in third country that is not part of the group (Y/N) | x | x | x | x | x | x | x | x | x | x |
| | Existence of AML/CFT tasks outsourced to an external service provider located in third country that is part of the group (Y/N) | x | x | x | x | x | x | x | x | x | x |
| | Dates when the AML/CFT obligations/ controls were last assessed by an internal/external audit:<br>a. BWRA<br>b. determination of ML/TF risk profile of customers in a business relationship<br>c. AML/CFT-related awareness-raising and staff training measures<br>d. Identification and identity verification procedures<br>e. Policies and procedures for monitoring and analysing business relationships, including transaction monitoring<br>f. Policies and procedures for suspicious transaction reporting<br>g. Record keeping policies and procedures<br>h. Resources dedicated to AML/CFT<br>i. Organisation of the AML/CFT system, governance and reporting to management bodies. | x | x | x | x | x | x | x | x | x | x |
| **3 - Risk assessment** (Business Wide Risk Assessment (BWRA) and Customer ML/TF risk assessment and classification (CRA)) | Last approval date of the BWRA | x | x | x | x | x | x | x | x | x | x |
| | Senior management approved the last version of the BWRA (Y/N) | x | x | x | x | x | x | x | x | x | x |
| | Date of the last update of the CRA | x | x | x | x | x | x | x | x | x | x |

| Category | Data Points | CI | CP | LI | EMI | PI | BC | IF | AMC | CASP | O |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | Number of customers per ML/TF risk category (low risk, medium-low risk, medium-high risk, high-risk) | x | x | x | x | x | x | x | x | x | x |
| **4 - Customer due diligence & monitoring** (Customer Due Diligence and Ongoing monitoring of business relationships) | Number of customers that are legal entities /trusts whose beneficial owners have not been identified | x | x | x | x | x | x | x | x | x | x |
| | Number of customers that are legal entities /trusts whose beneficial ownership has been identified, but the identity of whom has not been verified | x | x | x | x | x | x | x | x | x | x |
| | Number of customers without identification and verification documentation/ information | x | x | x | x | x | x | x | x | x | x |
| | Number of customers whose CDD data and information is not yet in line with the requirements of Article 20 AMLR | x | x | x | x | x | x | x | x | x | x |
| | Number of customers without ML/TF risk profile (excluding customers with whom the credit institution or financial institution does not have a business relationship) | x | x | x | x | x | x | x | x | x | x |
| | Number of customers for whom updates of customer information were due in the last calendar year, in accordance with the credit institution or financial institution 's policies and procedures | x | x | x | x | x | x | x | x | x | x |
| | Number of customers for whom customer information was reviewed and updated in the last calendar year | x | x | x | x | x | x | x | x | x | x |
| **5 - Transaction monitoring and Suspicious Activity Reporting** | The credit institution or financial institution has a transaction monitoring system in place (Y/N) | x | x | x | x | x | x | x | x | x | x |
| | The transaction monitoring system is:<br>a) Not automated; or<br>b) At least partly automated | x | x | x | x | x | x | x | x | x | x |

| Category | Data Points | CI | CP | LI | EMI | PI | BC | IF | AMC | CASP | O |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | **If manual system:** Average time in days to analyse the transaction since the moment it occurred | x | x | x | x | x | x | x | x | x | x |
| | **If automated system:** The system can generate alerts in case of inconsistencies between CDD information relating to the customer and the following elements:<br>a) Number of transactions<br>b) Value of aggregated transactions<br>c) value of single transactions<br>d) counterparties<br>e) countries | x | x | x | x | x | x | x | x | x | x |
| | **If automated system:** Number of alerts not analysed at the end of the calendar year | x | x | x | x | x | x | x | x | x | x |
| | **If automated system:** Average time to analyse an alert in the last calendar year (number of days between that the alert was generated and the moment that the alert was closed) | x | x | x | x | x | x | x | x | x | x |
| | **If automated system:** Ratio between number of alerts and number of STRs | x | x | x | x | x | x | x | x | x | x |
| | The entity has implemented a tool that enables it to analyse the information available on distributed ledgers and generate alerts where unusual patterns or risk factors are identified, in relation to the transactions carried out by the customer (Y/N) | x | | | x | x | | X | | x | |
| | Average number of days between the date of identification of potential suspicious transactions (prior to the analysis of the transaction) and the date when the transaction is reported to the FIU (after the analysis of the transaction) during the last calendar year | x | x | x | x | x | x | x | x | x | x |
| | Total number of STRs submitted to the FIU during the last calendar year | x | x | x | x | x | x | x | x | x | x |
| **6 - Targeted Financial Sanctions and** | Maximum number of hours between the publication of the TFS by the | x | x | x | x | x | x | x | x | x | x |

| Category | Data Points | CI | CP | LI | EMI | PI | BC | IF | AMC | CASP | O |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **Compliance with Fund Transfers Regulation** | authorities and the implementation of these changes in the institution's screening tools | | | | | | | | | | |
| | Number of outbound transfers for which requests were received from a counterparty in the transfer chain for information that is missing, incomplete or provided using inadmissible characters in the last calendar year | x | x | | x | x | | | | x | x |
| | Total number of outbound transfers in the last calendar year | x | x | | x | x | | | | x | x |
| | % of outbound transfers rejected or returned by the counterparty in the transfer chain due to information that is missing, incomplete or provided using inadmissible characters in the last calendar year | x | x | | x | x | | | | x | x |
| **7 - Group-wide AML/CFT Framework** (AML/CFT governance structures, Group-wide ML/TF risk assessment, Group policies and procedures, including sharing of information, Group-wide AML/CFT function) | % of group entities that provided reports to the Group AML compliance on the following areas in the last calendar year (should only be answered by the parent company):<br>a) CDD<br>b) ongoing monitoring<br>c) STRs<br>d) identity and transaction level information on high risk customers<br>e) deficiencies | x | x | x | x | x | x | x | x | x | x |
| | % of jurisdictions in which the group is established covered by reviews (including access to customer and transaction level data) performed by the group AML/CFT compliance function in the last three calendar years. (applies only to groups that have been existing for more than 3 years and should only be filled in by the parent company) | x | x | x | x | x | x | x | x | x | x |
| | Number of group entities for which deficiencies were identified by competent AML/CFT supervisors in the last calendar year (should only be filled in by the parent company)<br>- EU/EEA entities<br>- Non-EU/EEA | x | x | x | x | x | x | x | x | x | x |