ANNUAL REPORT 2025

AMLA
Anti-Money Laundering Authority

Contents

Foreword of AMLA Chair

I am pleased to present AMLA's first official Annual Report, covering a year in which the Authority moved from legal establishment towards operational reality.

When I took up my duties as Chair in February 2025, one of my first responsibilities was to help put in place the governance and leadership framework that would allow AMLA to act with credibility, independence and purpose. In June, I welcomed the first members of the Executive Board, whose expertise and commitment have been essential in helping steering the Authority through its initial decisions. In September, Nicolas Vasse joined as Executive Director, completing a decisive step in AMLA's transition towards a fully operational governance and management structure.

This first year was also a year of listening. From the beginning, I considered it essential that AMLA should not build its priorities from Frankfurt alone, but in close contact with those who carry the daily responsibility for fighting money laundering and terrorist financing across the Union. Between March and December 2025, I visited all 27 Member States and met national supervisors, FIUs and representatives from the private sector, including financial institutions, crypto-asset providers and non-financial professions. The findings of this Roadshow have been brought together in a dedicated report, which reflects the main messages heard across Europe.

The Roadshow confirmed both the diversity of national contexts and the strength of shared concerns. Across Member States, stakeholders pointed to a rapidly evolving ML/TF risk landscape, uneven starting points across sectors and jurisdictions, resource pressures, technological challenges, and high expectations towards AMLA. They also expressed broad support for the new EU AML/CFT framework and for AMLA's role in promoting greater convergence, cooperation and consistency.

These messages are important. They remind us of that AMLA's mandate is not abstract. It responds to real operational challenges faced by supervisors, FIUs and obliged entities. They also underline that AMLA's success will depend on trust: trust with national authorities, trust with FIUs, trust with Union partners, and constructive engagement with the private sector.

In 2025, AMLA laid the first foundations for that trust. Its governance bodies became operational, key cooperation arrangements were concluded with the European Central Bank and the European Supervisory Authorities, and preparatory work began for cooperation with law enforcement and judicial partners. At the same time, AMLA started delivering on its core mandate through work on the Single Rulebook, supervisory convergence, risk analysis, indirect supervision, and the FIU framework.

The years ahead will be demanding. AMLA will need to turn expectations into delivery while remaining proportionate, accountable and attentive to operational realities. The Roadshow has given us a clear message: Europe needs a more coherent, risk-based and effective AML/CFT system, but that system can only be built collectively.

I would like to thank the members of the General Board and Executive Board, the Executive Director, AMLA staff, the European Commission AMLA Task Force, and all national authorities, FIUs and stakeholders who contributed to AMLA's first year. Their commitment has made this first chapter possible.

AMLA's task is now to build on these foundations — with ambition, discipline and cooperation — and to help strengthen the integrity of the Union's financial system in the years ahead.

Bruna Szego

Chair

Foreword of AMLA Executive Director

I arrived in Frankfurt in September 2025, at a moment when AMLA was moving from project to reality.

What I found was a true start-up authority: ambitious, fast-moving, and still under construction. Much had already been achieved by the AMLA Task Force, which had prepared the ground for AMLA's governance, premises, recruitment, administrative arrangements and first digital foundations.

When I joined, AMLA had around thirty colleagues. By the end of the year, we were more than one hundred. This rapid growth captured the spirit of 2025: an organisation being built while already being asked to deliver.

Almost everything had to be created — systems, processes, safeguards, working methods and a common culture. That culture began to take shape around the values that colleagues identified together: accountability, cooperation, courage, integrity and respect. Yet, in a very short time, AMLA established its governance, secured its long-term presence in Frankfurt, recruited rapidly, began building its corporate functions, and prepared for financial and administrative autonomy from 2026.

AMLA prepared its first regulatory instruments, started to think about its future direct supervision powers, began work on indirect supervision and oversight, started operationalizing the cooperation and tasks of the FIU including welcoming the first FIU Delegates, and took over important risk-related capabilities such as EuReCA - European Reporting System for Material AML/CFT Weaknesses.

What impressed me most was not only the work delivered, but the spirit behind it. From the beginning, colleagues understood that AMLA must become a coherent institution — one where supervision, financial intelligence, policy, risk analysis, technology, and governance reinforce one another. This coherence will be essential if AMLA is to deliver on its purpose: helping Europe build a more consistent, risk-based and effective AML/CFT system.

I want to thank all AMLA colleagues for their commitment, resilience and professionalism during this first year, as well as the Chair and the members of the Executive Board for their guidance and support in steering the Authority through this decisive start-up phase.

The years ahead, framed by the Single Programming Document, will mark the transition from institution-building to delivery. This transition will be reflected in the completion of the Single Rulebook, the launch of direct supervision, the operationalisation of AMLA's indirect supervision of the financial sector and oversight of the non-financial sector, stronger FIU cooperation, development of common supervisory methods, creation of integrated risk analysis and intelligence sharing framework, and advanced technology used in support of effectiveness and trust.

As the Chair underlines, AMLA's success will depend on cooperation. We will fulfil our mandate only by working with national supervisors, FIUs, Union bodies, law enforcement authorities and the private sector.

For me, 2025 was the year in which AMLA moved from promise to presence. Much remains to be built, but the foundations are in place, the direction is clear, and the work has begun.

Nicolas Vasse

Executive Director

Executive Summary

The year 2025 marked AMLA's first year of operational build-up. Following the adoption of AMLAR, the reporting year focused on putting in place the institutional, administrative and operational foundations required for AMLA to start functioning and prepare for the progressive implementation of its mandate.

AMLA was established as the European Union (EU) authority responsible for strengthening the consistency and effectiveness of the EU anti-money laundering/countering the financing of terrorism (AML/CFT) framework. Its mandate combines regulatory, supervisory, FIU-related and analytical responsibilities, covering the development of the Single Rulebook, supervisory convergence, future direct and indirect supervision in the financial sector, oversight of supervision in the non-financial sector, support to cooperation among FIUs, and the development of risk, data and technology capabilities. AMLA is accountable to the European Parliament and to the Council of the European Union and operates through the General Board, in supervisory and FIU compositions, the Executive Board, the Chair and the Executive Director.

The year was shaped by AMLA's transitional status. In accordance with Article 107 AMLAR, the European Commission remained responsible for AMLA's establishment and initial operation until 31 December 2025. The Union funds made available to AMLA in 2025 were therefore implemented by the European Commission through DG FISMA, while AMLA prepared to assume financial autonomy from 1 January 2026.

This transitional context also determines the scope of the present Annual Report. As AMLA had not yet entered the full management, audit and assurance cycle applicable to a financially autonomous Union authority, certain report sections are not applicable for the reporting year.

The operating context in 2025 was characterised by a compressed implementation timeline, rapid organisational growth and the need to establish internal rules, governance processes, premises, systems and support functions. AMLA also started its work in a Union AML/CFT environment marked by diverse supervisory arrangements, different FIU practices and varying levels of maturity across sectors and Member States. These conditions required AMLA to focus in 2025 on setting up structures, methodologies and cooperation channels that could support implementation in the following years.

During 2025, AMLA concentrated on three main priorities: establishing the organisation, preparing its supervisory and FIU related functions, and building cooperation arrangements within the EU AML/CFT framework.

AMLA's governance and management structures became operational, with the General Board meeting in supervisory and FIU compositions, the Executive Board taking key organisational and administrative decisions, and the Executive Director taking up duties in September 2025. AMLA also established its presence in Frankfurt, signed the lease for its permanent premises, relocated staff to long-term office floors, and progressively developed core corporate functions, including human resources (HR), finance, procurement, information technology (IT), security, building and facilities.

The first planning cycle was also initiated during the year. The Work Programme 2025 structured AMLA's immediate priorities for its foundational year, including governance, recruitment, digital infrastructure, operational readiness and preparatory supervisory and FIU work. The SPD 2026–2028 and the draft SPD 2027–2029 set out the medium-term and longer-term orientation for AMLA's development, including the progression from institutional establishment towards a more mature phase of operational delivery

Substantive work also started across AMLA's core mandate. AMLA began work on the Single Rulebook and supervisory convergence, sent two regulatory instruments to the European Commission for adoption and launched its first public consultation in December 2025. It also started planning work in relation to indirect supervision and oversight, including in relation to Crypto-Asset Service Providers (CASPs), supervisory colleges, thematic reviews and the non-financial sector.

The two regulatory technical standards sent to the European Commission concerned the first common methodology for assessing ML/TF risks in the financial sector and the methodology for determining which entities AMLA will select for direct supervision. In parallel, AMLA launched a public consultation on the draft implementing technical standard setting out cooperation between AMLA and national financial supervisors during the selection process and the transfer of supervisory powers. These instruments supported the preparation of AMLA's future direct supervisory role.

In indirect supervision, AMLA began using and preparing tools intended to foster convergence among national AML/CFT supervisors. This included work on high-risk areas, in particular CASPs, participation in eight selected supervisory colleges from November 2025, cooperation with national supervisors on specific high-risk cases, the collection of information on thematic reviews planned for 2026, and the development of AMLA's future approach for indirect supervision.

In the non-financial sector, AMLA sent a dedicated questionnaire to national supervisors at the end of June 2025 to gather information on sectoral risks and threats, methodologies used to assess obliged-entity risks, and challenges encountered in implementing the AML package. Responses from more than 120 national supervisors were analysed and compiled into a report intended to inform AMLA's work in 2026–2028.

In the FIU pillar, AMLA established its initial organisational structure, welcomed the first FIU Delegates and launched workstreams dedicated to preparing joint analyses, FIU.net, FIU data collection and peer reviews. AMLA also set up FIU-related working groups and initiated preparatory engagement with European Union Agency for Law Enforcement Cooperation (Europol), Eurojust (European Union Agency for Criminal Justice Cooperation), European Anti-Fraud Office (OLAF) and the European Public Prosecutor's Office (EPPO).

Cooperation with institutional partners was another important element of the year. AMLA concluded Memoranda of Understanding (MoU) with the European Supervisory Authorities (ESAs) and the European Central Bank (ECB) and took over AML/CFT-related mandates and functions from the European Banking Authority (EBA), including relevant tools and expertise. The EBA transition included EuReCA, supervisory insights and risk-related expertise, while existing EBA AML/CFT guidelines and standards remain in force until replaced by AMLA, supporting continuity during the transition.

AMLA also put in place core digital and cybersecurity arrangements, including a functional digital workplace, preparatory work on EuReCA, FIU.net and the future Central AML/CFT Database, and its initial cybersecurity framework and Cybersecurity Plan.

AMLA's workforce expanded significantly during the year. By 31 December 2025, AMLA employed 119 staff members, including 103 statutory staff and 16 seconded national experts, representing 24 Member States. The overall gender balance stood at 51% female and 49% male. This rapid growth was supported by the frontloading of 30 posts from the 2026 establishment plan, increasing the authorised posts for 2025 from 120 to 150.

Additional figures further illustrate the scale of AMLA's first year of activity:

- Five General Board meetings, held in supervisory composition and FIU composition and 27 decisions adopted.
- Seven Executive Board meetings and 22 Executive Board decisions adopted.
- Six Executive Director decisions adopted.
- 1,385 submissions to the European Reporting System for Material AML/CFT Weaknesses (EuReCA), reported by 45 authorities and covering 213 entities.
- Responses from more than 120 national supervisors to AMLA's questionnaire on the non-financial sector.
- 119 staff members at year-end.
- EUR 12,898,943 in total expenditure.

For management assurance, the 2025 assessment reflected AMLA's transitional operating arrangements and the Commission's implementation of AMLA's budget[1]. The readiness

[1] See
Part III: Management assurance

assessment concluded that AMLA met the key requirements for financial autonomy from 1 January 2026. No reservations were reported for 2025, no significant weaknesses requiring a formal reservation were identified, and no quantifiable financial exposure requiring disclosure was reported.

Overall, 2025 was a year of establishment, transition and preparation. AMLA put in place the first governance, staffing, financial, digital, security and cooperation arrangements required to move from Commission-supported set-up towards autonomous operation. These achievements provide the basis for AMLA's further consolidation and operational delivery from 2026 onwards.

Part I: Achievements of the Year

1. Governance, Planning and Strategy

AMLA's first year required the rapid establishment of the institutional, governance and planning arrangements necessary for the Authority to begin operating and to prepare for the progressive implementation of its mandate. In 2025, this included the transition from the AMLA Task Force, the establishment of AMLA's governance bodies, the appointment of its senior leadership, the preparation for AMLA's financial and administrative autonomy, and the launch of the Authority's first strategic planning cycle.

1.1. LEGAL ESTABLISHMENT

During the first half of 2025, AMLA focused on establishing the foundations required for AMLA to become operational, in line with its legal mandate and the tight implementation timeline following the adoption of the AMLA Regulation (AMLAR) in June 2024. These efforts paved the way for AMLA to become a legal entity on 1 July 2025.

Key achievements included:

- Institutional and governance establishment: AMLA established its office in Frankfurt, appointed the Chair, the Executive Board members, the Executive Director, recruited its first staff members, and formally put in place its core governance architecture.
- Headquarters and operational readiness: AMLA focused on ensuring the timely delivery and full operational readiness of its headquarters, including the transition from temporary facilities to the final premises, the supervision of fit-out works, and the provision of a functional and secure working environment for staff. The final lease agreement was approved by the European Parliament and the Council at the end of March 2025, enabling the formal signing of the contract between AMLA and lessor on 9 April 2025. This milestone concluded several months of negotiations and laid the basis for AMLA's long-term establishment in Frankfurt.
- Institutional cooperation framework: The first Working Groups and Task Forces were established. MoUs were signed with the European Central Bank (ECB) and the European Supervisory Authorities (ESAs).
- AMLA advanced preparations to deliver in three key areas, namely:
    - the creation of an AML/CFT supervisory system
    - the completion of the Single Rulebook for obliged entities
    - support for, and coordination of, Financial Intelligence Units (FIUs).

1.2. GOVERNANCE FRAMEWORK

In AMLA's first year of operation, a governance system needed to be put in place in order to ensure that decision-making processes were clear to all EU AML/CFT supervisors and FIUs, as well as to external stakeholders, and that a framework was available to address potential conflicts of interest. In accordance with Article 84 AMLAR, AMLA is fully accountable to the European Parliament and to the Council of the European Union.

1.2.1. Transition from AMLA Task Force

The establishment of AMLA was prepared by the AMLA Task Force, which operated within the European Commission's Directorate-General for Financial Stability, Financial Services and Capital Markets Union (DG FISMA). The AMLA Task Force was created in Q1 2023 and was composed of experts from DG FISMA, seconded national experts, and an expert from the ECB. At its peak the AMLA Task Force was comprised of 14 staff members.

The AMLA Task Force led the establishment of AMLA in the context of the AML package proposed by the European Commission in 2021 and approved by the European Parliament and the Council of the European Union in 2024.

The AMLA Task Force was responsible for initiating and coordinating the preparatory steps related to the setting-up of AMLA. It also ensured that the first decisions and actions could be taken effectively and rapidly from the date of AMLA's legal establishment on 26 June 2024 onwards. These included:

- the negotiation of a headquarters agreement
- the identification of suitable premises, equipment and services for AMLA
- the recruitment of administrative and operational staff
- support for the establishment of AMLA's governance, including the pre-selection of the Chair, Executive Board members and Executive Director
- the design and implementation of the essential IT architecture required to support AMLA's operations.

A further key task of the AMLA Task Force was to manage AMLA's budget and prepare future budgetary plans pending AMLA's attainment of financial autonomy.

The handover from the AMLA Task Force to AMLA was formalised on 11 December 2025.

1.2.2. General Board

The General Board is one of AMLA's governing bodies and forms part of AMLA's administrative and management structure. In accordance with Article 57 AMLAR, it meets in two compositions: a supervisory composition, comprising the heads of the supervisory authorities responsible for

AML/CFT supervision in the Member States, and an FIU composition, comprising the heads of the FIUs in the Member States. In both compositions, the one representative of the European Commission is also member.

The members from Member States of both compositions are published on AMLA's website[2].

The General Board adopts acts of general application in the appropriate composition, depending on the subject matter.

The first General Board meeting took place on 11 March 2025, in both supervisory and FIU compositions and was dedicated to the adoption of the General Board's Rules of Procedure and to hearings of the shortlisted candidates for the positions of AMLA Executive Board Members.

At the same time, the General Board began addressing a number of substantive matters relevant to AMLA's operational build-up in 2025[3].

1.2.3. The Chair

Pursuant to Article 69 AMLAR, the Chair represents AMLA and is responsible for preparing the work of the General Board and the Executive Board.

On 21 January 2025, the Council of the European Union appointed Ms Bruna Szego as Chair of AMLA. She took up her duties on 16 February 2025.

Since taking office, the Chair has prepared and chaired the meetings of the General Board in supervisory, FIU and joint settings, as well as the meetings of the Executive Board, thereby ensuring the orderly launch of AMLA's governance and decision-making processes. In addition, she assigned areas of responsibility to the Executive Board members within the scope of AMLA's tasks.

1.2.4. Executive Board

The Executive Board is composed of the Chair and five full-time members, including the Vice-Chair.

It takes all decisions towards individual obliged entities or individual supervisory authorities where relevant. The Executive Board also approves operational documents such as the budget, the programming document or HR rules based on a proposal from the Executive Director.

On 22 May 2025, the Council appointed four full-time members of the Executive Board for a four-year term beginning on 1 June 2025: Mr Simonas Krėpšta, Ms Rikke-Louise Ørum Petersen, Ms Derville Rowland and Mr Juan Manuel Vega Serrano. The Council decision entered into force on

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[2] General Board in Supervisory composition - Authority for Anti-Money Laundering and Countering the Financing of Terrorism;
General Board in FIU composition - Authority for Anti-Money Laundering and Countering the Financing of Terrorism

[3] For an overview of General Board meetings and most significant decisions, see Part II, Section 1 General Board Meetings and Decisions.

26 May 2025 following its publication in the Official Journal of the European Union. A fifth position remained to be filled following the withdrawal of Dr Marcus Pleyer's application on 8 May 2025, after the European Parliament confirmation stage and before the Council decision. Ms Henrica Maria Verbeek-Kusters was subsequently confirmed in a joint meeting of the ECON and LIBE Committees of the European Parliament on 15 December 2025. Following the reporting period, the Council formally appointed Ms Henrica Verbeek-Kusters as the fifth full-time member of the Executive Board by Council Implementing Decision of 23 February 2026, with effect from 1 April 2026.

The inauguration and first decision-making meeting of the Executive Board of AMLA took place on 13 June 2025, marking the start of its formal decision-making activity[4].

1.2.5. Executive Director

The Executive Director is responsible for the day-to-day management of the Authority, including the preparation and implementation of the annual work programme, the preparation and execution of the SPD and the implementation of AMLA's budget.

The AMLA Task Force was subsequently headed by Interim Executive Directors — Olivier Salles from inception until April 2025, and Dominique Thienpont from May 2025 until December 2025.

On 1 July 2025, the Executive Board appointed Nicolas Vasse as AMLA's Executive Director, following an open selection procedure. He took up his duties on 16 September 2025, at a pivotal stage in AMLA's development, as AMLA was moving from its initial phase towards structured operational and strategic planning.

The decisions taken by the Executive Director in 2025 contributed to ensuring that AMLA was prepared to assume financial and administrative autonomy from 2026[5].

[4] For an overview of Executive Board meetings and decisions, see Part II, Section 2 Executive Board Meetings and Decisions.

[5] For further details on Executive Director decisions, see Part II, Section 3 Decisions of the Executive Director.

1.3. STRATEGIC PLANNING CYCLE

AMLA's strategic direction in 2025 was framed by three programming documents that progressively set out AMLA's immediate operational priorities, its first medium-term orientation and its longer-term path towards full operational delivery. The Work Programme 2025 provided the initial operational framework for AMLA's foundational year, while the Single Programming Documents (SPD) 2026–2028 and subsequently 2027–2029 translated that first-year build-up into a broader institutional and strategic trajectory. Taken together, these documents provided the planning architecture through which AMLA began to define its mandate, priorities, operational model and resource needs.

1.3.1. Work Programme 2025

AMLA's Work Programme 2025[6], reflected AMLA's start-up status and was structured around two core dimensions: the progress achieved in 2025 and the priorities for the remainder of the year.

The Work Programme focused on laying the institutional, operational and policy foundations necessary for AMLA to become operational by mid-2025. In particular, it covered the establishment of AMLA in Frankfurt, the setting-up of governance structures, the recruitment and onboarding of staff, the deployment of the first digital infrastructure, and the preparation of financial and administrative arrangements.

In substantive terms, the Work Programme framed AMLA's mandate around three core deliverables drawn from the AML package: completing the Single Rulebook, developing harmonised supervisory practices, and strengthening the working methods and cooperation of Financial Intelligence Units (FIUs).

It also identified meeting operational needs, preparing core functions, and building AMLA's identity and visibility as short-term operational priorities. These priorities guided AMLA's first-year activities across governance, staffing, infrastructure, communications and preparatory supervisory and FIU work.

For the second half of 2025, the Work Programme also foresaw the start of AMLA's first strategic planning cycle, including the preparation of the SPDs for 2026–2028 and 2027–2029.

1.3.2. SPD 2026-2028

In accordance with Article 64(4)(a) AMLAR, the Executive Board adopted the SPD 2026–2028[7] on 28 November 2025, which established AMLA's first medium-term strategic, operational and resource framework. It confirmed AMLA's mission as safeguarding the integrity of the Union's

[6] https://www.amla.europa.eu/document/download/b78bee2f-16b9-4742-a3a1-23e7aad394ab_en?filename=AMLA_Work_Programme_July%202025_0.pdf

[7] https://www.amla.europa.eu/document/download/27549516-d110-4e91-b1ed-d3552b8f9661_en?filename=AMLA%20SPD%202026-2028.pdf

financial system and internal market through a unified, risk-based and technologically advanced approach to preventing money laundering and terrorist financing, and articulated a vision based on proactive prevention, effective deterrence and decisive disruption of financial crime through cooperation, technology and harmonised supervisory practices.

The document organised AMLA's strategic direction around five long-term goals: convergence, consistency and proportionality, cooperation and inclusiveness, technology and innovation, credibility and accountability, and global leadership. In operational terms, it translated these goals into a first medium-term programme for 2026.

1.3.3. SPD 2027-2029

AMLA also drafted its initial SPD 2027–2029 at the end of 2025, as part of its first strategic planning cycle and in view of the formal draft programming submission due by 31 January 2026. In that sense, the draft SPD 2027–2029 already belongs to the strategic framing of AMLA's first year, even though it projects the next stage of institutional development beyond the reporting period.

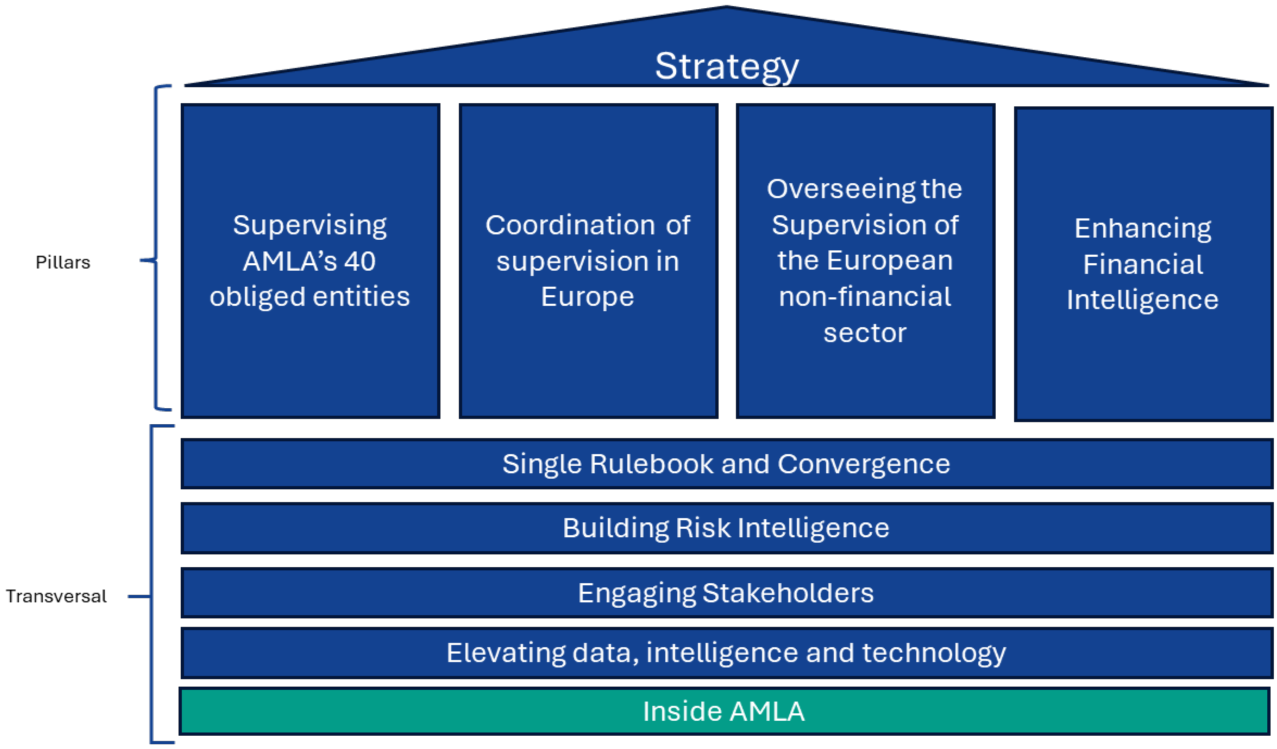
The SPD 2027–2029 frames the period ahead as a transition from foundational establishment to a more mature phase of operational delivery. It confirms AMLA's mission of delivering a unified, risk-based and technologically advanced approach to AML/CFT across the European Union and a vision centred on proactive prevention through cooperation, technological excellence and the consistent application of harmonised standards.

The draft further sets out AMLA's strategic direction through the five long-term principles defined in the SPD 2026-2028 and identifies the following four major milestones for 2027: the first Union-wide selection of entities for direct supervision, the transfer of FIU.net to AMLA, the implementation of the AMLR framework from July 2027, and full staffing and organisational maturity.

In operational terms, the draft SPD organises AMLA's work around nine interconnected activities, which are presented in the following section, The House of AMLA. In this way, the draft SPD 2027–2029 provides the longer-term strategic horizon for how the structures and capabilities initiated during AMLA's first year are intended to evolve into sustained operational delivery.

1.4. THE HOUSE OF AMLA

AMLA's first annual report presents the achievements of a foundational year in which AMLA established the initial governance, staffing, financial, digital and cooperation arrangements needed to support its future mandate. The House of AMLA shows how these first-year achievements connect to a coherent operating model built around four core operational (vertical) pillars, four horizontal enabling activities and Inside AMLA as the institutional foundation. The structure of this annual report mirrors that model, presenting AMLA's 2025 achievements through the pillars set out in the House of AMLA. Together, these elements connect supervision, financial intelligence, regulatory convergence, risk analysis, stakeholder engagement, data, technology and governance into an integrated model designed to ensure that AMLA's functions reinforce one another as AMLA moves from start-up phase towards operational delivery.



In 2025, AMLA began building the basis for a more coordinated European supervisory system through its work on high-risk areas, colleges, thematic reviews and future indirect supervision.

— Juan Manuel Vega Serrano, Vice Chair & Executive Board member

2. Coordination of Supervision in Europe

AMLA's work on coordination of supervision in Europe focused on the initial use and preparation of tools intended to foster convergence among national AML/CFT supervisors. In 2025, this work concentrated on high-risk areas, supervisory colleges, specific supervisory cases, thematic reviews and the preparation of a strategy for AMLA's future indirect supervision framework.

2.1. WORKING ON HIGH-RISK AREAS AND THE CRYPTO-ASSET MARKETS

On 1 July 2025, AMLA started its work on indirect supervision in accordance with the AMLAR. In line with its risk-based approach, AMLA focused from the outset on areas assessed as particularly pressing.

One of these priority areas was the market for Crypto-Asset Service Providers (CASPs), in view of the ongoing authorisation process under Markets in Crypto-Assets-Regulation (MiCA), the technological features of these entities, their cross-border business models and the anonymity-enhancing capabilities associated with the sector. On 16 July 2025, AMLA issued a press release signalling the AML/CFT supervisory challenges it had identified in this area.

Thereafter, AMLA worked with national supervisors and FIUs to establish a solid basis of relevant information through a comprehensive questionnaire and by preparing a plan for aligning thematic reviews and organising a supervisory workshop on the issue.

2.2. SUPERVISORY COLLEGES

The coordination and facilitation of AML/CFT supervisory colleges under Article 31 AMLAR formed a central part of AMLA's work in indirect supervision. From November 2025, AMLA staff started participating in selected supervisory colleges in the financial sector, attending eight meetings by the end of the year: six relating to credit institutions, one to an e-money institution and one to a payment institution.

Colleges of obliged entities were selected on the basis of lead supervisors' risk ratings and other risk-related criteria. AMLA's participation focused on enhancing cooperation among national supervisors where relevant. In 2026, AMLA will produce a report on the use made by national supervisors of supervisory colleges.

2.3. COOPERATION WITH NATIONAL SUPERVISORS ON SPECIFIC CASES

As part of its indirect supervision and in line with Article 34 AMLAR, AMLA also started in 2025 to monitor the supervisory treatment by national supervisors of cases in which obliged entities posed considerable risks of being abused for money laundering or terrorist financing. By the end of 2025, AMLA had been involved in more than five cases in which it was in contact with a national AML/CFT supervisor to ascertain that the measures laid down in the 5th AML Directive and, at a later stage, the 6th AML Directive were adequately applied. This work mainly consisted in understanding and analysing the measures national supervisors had taken or planned to take in relation to high-risk obliged entities and in cooperating with those supervisors to ensure that adequate measures were applied.

2.4. THEMATIC REVIEWS PLANNING

In accordance with Article 9 AMLAR, AMLA collected, in October and November 2025, information from national supervisors on thematic reviews planned for 2026. Based on the responses received, AMLA prepared a document consolidating the planning of thematic reviews by financial and non-financial supervisors across the Union. This document was presented to the General Board by the Chair in December 2025. On that basis, AMLA started exploring where national supervisors' plans for thematic reviews could be further aligned, including in the field of supervision of CASPs, and whether joint thematic reviews could be proposed on the basis of available analyses of risks in the internal market.

2.5. APPROACH FOR INDIRECT SUPERVISION

In 2025, AMLA also started work on its approach for indirect supervision. This approach is intended to clarify AMLA's supervisory objectives, support risk-based prioritisation and ensure that AMLA's indirect supervisory tools and related convergence activities are applied in a coordinated manner.

AMLA will translate this approach into an operational framework in 2026. The framework will focus on risk analysis, the criteria for selecting the most appropriate supervisory tools, and the methodologies for using those tools to foster supervisory convergence.

AMLA's future direct supervision must be built on a transparent, risk-based and consistent methodology. The preparatory work carried out in 2025 was essential to ensure that the first selection and supervisory cycle can rest on solid regulatory, analytical and cooperation foundations.

— Derville Rowland, Executive Board member

3. Supervising AMLA's 40 obliged entities

In 2025 important preparatory work was undertaken to lay the methodological, regulatory and cooperation foundations for AMLA's future direct supervisory role, ahead of the commencement of direct supervision of selected obliged entities by 2028.

This work focused in particular on the development of the common ML/TF risk-assessment methodology, the methodology for the selection of entities for direct supervision, and the framework for cooperation between AMLA and national financial supervisors during the future selection process and transfer of supervisory powers[8]. These preparatory steps were essential to ensure that AMLA's future direct supervision is risk-based, consistent, transparent and anchored in a common Union-wide approach.

[8] The regulatory instruments supporting the preparation for AMLA's future direct supervision are described in Part I, Section 6 Single Rulebook and Convergence.

4. Overseeing the supervision of the non-financial sector

AMLA's initial work on oversight of the non-financial sector was first informed by the dedicated questionnaire addressed to national supervisors and later complemented by the cross-sectoral thematic-review planning exercise[9]. Together, these inputs supported AMLA's understanding of the non-financial supervisory landscape and informed the preparation of its dedicated oversight strategy.

4.1. QUESTIONNAIRE AND REPORT ON THE NON-FINANCIAL SECTOR

AMLA sent out a questionnaire to national supervisors at the end of June 2025 to gather information on sectoral risks and threats, methodologies used to assess obliged entities risks, and the main challenges encountered in implementing the AML package. In the fourth quarter of 2025, AMLA received responses from more than 120 national supervisors, analysed them and compiled them into a report to be delivered to the General Board members in the first quarter of 2026. This report is intended to provide initial indications of where AMLA should focus its work in 2026–2028.

4.2. APPROACH FOR OVERSIGHT

In 2025, AMLA also started working on its approach for oversight of the non-financial sector. This work focused on AMLA's future role in monitoring and supporting national supervisors responsible for a broad and diverse range of non-financial sectors. The oversight approach is intended to help AMLA define how it will identify supervisory priorities in the non-financial sector, assess supervisory practices and understand where implementation gaps or capacity needs may arise. It will also support the development of methodologies and tools for promoting convergence, facilitating exchange of experience and providing targeted support to non-financial sector supervisors. AMLA will translate this approach into an operational framework in 2026.

[9] See Part I, Section 2.4 Thematic Reviews planning.

AMLA's FIU mandate is built on trust, cooperation and secure information exchange. The work carried out in 2025 laid the first foundations for a stronger European financial intelligence framework, capable of supporting joint analyses, peer learning and more effective responses to cross-border ML/TF risks.

— Hennie Verbeek-Kusters, Executive Board member

5. Enhancing Financial Intelligence

The year 2025 marked a foundational phase for the FIU Pillar, with the establishment of an initial organisational framework. During the year, AMLA published the call for FIU Delegates and launched the related designation procedures. In this context, AMLA also advanced work on defining the Rights and Obligations of FIU Delegates. Under Article 44 of Regulation (EU) 2024/1620, FIU Delegates are staff members delegated by Member States' FIUs to AMLA to support the Authority in carrying out its FIU-related tasks. To further operationalise cooperation with Union bodies in accordance with Article 94(2) AMLAR, preparatory engagement with relevant EU authorities was initiated[10]. The first two FIU Delegates arrived in September, and their number increased to six by the end of the year. In parallel, staff numbers in the FIU Pillar grew from three in March to 14 by the end of 2025.

The progressive build-up of the organisational structure and the designation of staff enabled the implementation of the FIU Framework, including the launch of operational workstreams, the setting-up of working groups for the development and preparation of FIU-related RTS and ITS, and the preparations for the establishment of the Standing Committee.

5.1. OPERATIONAL WORKSTREAMS

In 2025, work focused on establishing the core operational building blocks necessary for the progressive implementation of AMLA's FIU mandate. In particular, AMLA continued work towards finalising the Joint Analyses Methodology, covering the processes for the selection, prioritisation and conduct of joint analyses under Articles 40(1) and 43(1) AMLAR, and circulated the document for a final round of consultation with the FIUs.

At the same time, AMLA launched work on the transfer of FIU.net and on its short-term development, including the assessment of possible adaptations to support joint analyses and FIU data collection. Since the end of 2025, AMLA has had access to the FIU.net system with its operational node. This enabled further work on adapting and testing the system for joint analyses and other

[10] See Part I, Section 8.3 Laying the Groundwork for Working Arrangements.

operational needs of the FIU Pillar, while also fulfilling the requirement set out in Recital 52 AMLAR.

Additional operational workstreams were also launched in relation to joint analyses, covering both short-term and longer-term projects and addressing related IT, data-protection, internal-policy and security needs. In parallel, AMLA launched a call for proposals on Joint Analysis priority areas for 2026 and initiated work on the FIU data collection and mapping project. FIUs also provided substantive operational input to the development of AMLA's approach to crypto-asset service providers (CASPs) and the broader risk landscape of the virtual assets sector, contributing to the coordinated approach for CASPs under MiCAR adopted by AMLA General Board.

5.2. PEER REVIEW PILOTS

Preliminary work for the first peer review exercise was initiated in 2025. Taking into account FIU input on preferred focus themes, the Peer Review work plan for 2026 and 2027 was adopted. The first two years of the peer review exercise constitute a pilot phase with voluntary FIU participation under a transitional framework pursuant to Article 106(4) AMLAR.

The objectives of the exercise are to enhance the Union's financial intelligence capabilities, identify best practices in the functioning of FIUs and identify areas for improvement in FIU operations. For 2026, the selected focus theme is the adequacy of FIU resources, including human, technical and IT resources, to perform their functions, in line with Article 48(3)(a) AMLAR.

5.3. FIU POLICY WORK

In the area of policy, AMLA finalised and secured the adoption by the General Board of the Rules of Procedure for Mediation and the Provisional Peer Review Rules of Procedure in 2025. In addition, the Rights and Obligations of FIU Delegates and the Rules of Procedure for Mutual Assistance were presented to and discussed by the General Board, with work continuing in 2026.

In relation to the future Standing Committee under Article 58(4) AMLAR, the General Board in FIU composition discussed its set-up in 2025 and approved the way forward for its establishment. This work was taken forward through a dedicated working group.

To further operationalise and fulfil the relevant legal requirements, AMLA established six working groups with broad FIU involvement. These covered:

- the establishment of a Standing Committee and the drafting of the related rules of procedure under Article 58(4) AMLAR
- the drafting of an ITS on the format to be used for the reporting of suspicious transaction reports and for the provision of transaction records under Article 69(3) AMLR.
- the drafting of an RTS on the relevance and selection criteria for determining whether a suspicious transaction report concerns another Member State under Article 31(3) AMLD

- the drafting of an ITS on the format for the exchange of information among FIUs under Article 31(2) AMLD
- the drafting of ITS on reporting by FIUs to the EPPO under Article 81(1) AMLR and by AMLA to the EPPO under Article 41(2) AMLAR.
- the Support and Coordination Working Group with two workstreams (1) on the role of FIU Delegates and (2) on the Support and Coordination Framework.

In addition, the FIU Pillar contributed to cross-pillar coordination on selected mandates formally assigned to the supervisory and private-sector standards workstreams, where those mandates had links to FIU activities, including work under Articles 19(9) and 20(3) AMLR.

Building the Single Rulebook is not only about harmonisation, but also about simplification through clarity, proportionality and consistency. In 2025, AMLA took its first concrete steps to develop common methodologies and standards that reduce fragmentation, support supervisory convergence and avoid unnecessary complexity, while preserving the robustness of the EU AML/CFT framework.

— Rikke-Louise Ørum Petersen, Executive Board member

6. Single Rulebook and Convergence

Since launching operations in July 2025, AMLA has focused on building the Single Rulebook and laying the foundations of the future EU AML/CFT supervisory and preventive system. This work was directed at establishing a more harmonised and effective framework across the Union and at reducing fragmentation in the interpretation and application of AML/CFT requirements.

As part of this work, AMLA started to consider simplification as a design principle for the development of common instruments. This provides the link between AMLA's broader simplification approach, and the work described below on the Single Rulebook, including the preparation and phasing of Level 2 and Level 3 mandates.

6.1. SIMPLIFICATION

In 2025, AMLA began laying the foundations for a structured approach to simplification and burden reduction as part of its broader institutional and operational build-up. As a newly established authority, AMLA was in a position to embed simplification considerations from the outset, rather than address complexity retrospectively once processes and instruments had already become established. This work was closely linked to AMLA's wider efforts to build a coherent, risk-based and proportionate EU AML/CFT framework.

AMLA's approach to simplification is based on the understanding that simplification does not mean lowering standards or weakening the effectiveness of the AML/CFT framework. Rather, it means making rules, methodologies, supervisory expectations and information flows clearer, more consistent, more proportionate and easier to apply in practice. This is particularly relevant in the AML/CFT area, where differences in national supervisory practices, FIU arrangements and implementation approaches may create fragmentation, divergent interpretations and unnecessary duplication.

The AML package itself provides an important basis for simplification. By establishing a more harmonised legal and institutional framework, and by assigning AMLA a central role in the development of the Single Rulebook, supervisory convergence, FIU cooperation and risk analysis, the new framework is intended to reduce fragmentation across the Union. In this sense, simplification is not separate from AMLA's mandate, but forms part of the way in which AMLA is expected to deliver its regulatory, supervisory and coordination tasks.

During the reporting year, AMLA initiated preparatory work on a simplification roadmap setting out its initial approach to simplification and burden reduction. This work included early consideration of how AMLA's common instruments could be developed in a more streamlined manner, including through the rationalisation and, where appropriate, potential merging of related instruments. It also included consideration of how proportionality and a risk-based approach should be applied systematically across AMLA's regulatory, supervisory, FIU-related and analytical activities.

This preparatory work took place alongside AMLA's broader institutional build-up. In 2025, AMLA established governance arrangements, internal workstreams and coordination mechanisms designed to avoid fragmentation and duplication in its own activities.

It also involved internal planning for the progressive integration of supervisory, policy, risk and FIU functions through dedicated digital solutions with the aim to support a clear allocation of responsibilities, more efficient internal coordination and timely decision-making as AMLA's mandate expands.

AMLA's approach is to embed simplification by design. This means taking simplification into account at the earliest stages of drafting, planning and implementation, rather than treating it as a separate review exercise after instruments or processes have been developed. In practical terms, this requires attention to proportionality, risk sensitivity, clarity of expectations, consistency across instruments and the avoidance of unnecessary duplication in reporting or information requests. AMLA is also gathering input from the private sector through public consultations and related stakeholder engagement, including on potential simplification opportunities. Such input is intended to support AMLA's assessment of whether future requirements, guidance or reporting expectations can be made clearer, more proportionate and easier to apply in practice.

In 2025, AMLA began considering the development of internal guidance and training measures to support staff in drafting common instruments. The objective is to ensure that staff involved in policy, supervisory and convergence work apply a consistent approach when preparing standards, guidelines, methodologies or other common instruments. This includes considering at an early stage whether requirements are necessary, proportionate, coherent with related instruments and capable of being implemented effectively by supervisors, FIUs and obliged entities.

AMLA's simplification approach is relevant across the main areas of its mandate. Simplification considerations were also reflected in the planning and phasing of AMLA's regulatory work. In developing the Single Rulebook and related common instruments, AMLA began assessing how requirements can be designed to be clear, targeted and proportionate, while remaining legally robust and operationally effective. In this context, the phasing of Level 2 and Level 3 instruments, the coordination of input from national competent authorities and the future governance arrangements for common instruments are relevant elements of AMLA's broader simplification approach.

In the supervisory area, simplification is connected to the use of risk-based prioritisation and co-ordinated supervisory tools. AMLA's work on indirect supervision, thematic reviews, supervisory colleges, high-risk cases and future direct supervision is intended to support convergence without creating unnecessary operational burden.

In the FIU area, simplification is linked to clearer cooperation arrangements, standardized exchange formats and channels with EU agencies and bodies, joint analyses and the future use of FIU.net. By developing common processes for joint analyses, data collection and peer reviews, AMLA aims to support more consistent and efficient cooperation among FIUs, while recognising the diversity of national FIU models and operational practices.

Simplification is also relevant to AMLA's risk, data and technology work. In 2025, AMLA initiated preparatory work on data architecture, EuReCA, FIU.net and the future Central AML/CFT Database. These systems and analytical capabilities are expected to support better use of information, reduce duplication in data collection and enable more targeted supervisory and FIU-related activities over time.

AMLA's simplification work is also connected to cooperation with other Union bodies with arrangements supporting continuity, information exchange and avoidance of duplication in areas of shared competence.

In parallel, AMLA started to engage with the other ESAs on identifying potential simplification opportunities across the EU framework. This work is intended to support consistency, avoid unnecessary duplication and ensure that AMLA's approach benefits from relevant experience in other areas of EU financial supervision, while remaining tailored to AMLA's specific mandate and the AML/CFT framework.

The broader experience of the ESAs indicates that simplification initiatives can focus on reducing duplicative reporting, strengthening proportionality, improving the consistency of supervisory practices, streamlining instruments and ensuring that authorities continue to receive the information needed to perform their tasks effectively. AMLA's approach reflects these general principles, while adapting them to its start-up context and to the specificities of AML/CFT supervision and FIU cooperation.

The work initiated in 2025 provides the basis for a more structured simplification and burden-reduction approach from 2026 onwards. This will include further development of AMLA's roadmap, continued consideration of the rationalisation of common instruments, the systematic application of proportionality and risk-based principles, and the preparation of internal guidance and training measures for staff involved in drafting and implementing common instruments.

AMLA will also continue cooperation with the ESAs on identifying simplification opportunities and will further assess how simplification can be reflected in its regulatory, supervisory, FIU-related, risk and data activities. The objective is to ensure that simplification becomes a consistent discipline across AMLA's work, supporting a framework that is clearer, more coherent and easier to apply, while maintaining robust AML/CFT standards and effective outcomes.

6.2. IMPLEMENTATION OF THE SINGLE RULEBOOK

The EU AML/CFT Single Rulebook is the cornerstone of harmonisation across the Union. Divergent interpretations of rules by obliged entities and public authorities can create loopholes exploitable by criminals and impose unnecessary burdens on cross-border operators. A consistent set of rules also underpins supervisory convergence across Member States.

In 2025, AMLA's priority was to establish this foundation by developing robust private sector standards, promoting convergence of FIU practices, and prepare for the strengthening of the management of ML/TF risks, particularly in the rapidly evolving crypto-assets sector.

6.3. PUBLICATION OF THE FIRST LEGAL INSTRUMENTS

In December 2025, AMLA sent two RTS to the European Commission for adoption[11] and launched a public consultation on an ITS[12], marking a major step towards a unified EU ML/TF risk-assessment methodology and a harmonised approach to direct supervision.

The two regulatory instruments sent to the European Commission for adoption are:

- The draft RTS under Article 40(2) AMLD established the first common methodology for assessing ML/TF risks in the financial sector and defined the data points and criteria that all financial-sector supervisors, including AMLA, will use when assessing their supervised entities.
- The draft RTS under Article 12(7) AMLAR built on that methodology and specified how AMLA will determine which entities it will select for direct supervision.

AMLA started preparations of a comprehensive test exercise to calibrate the methodology in time for its first application.

In parallel, AMLA launched a public consultation on the draft ITS under Article 15(3) AMLAR detailing how AMLA and national financial supervisors will cooperate during the selection process

[11] https://www.amla.europa.eu/document/download/c8782141-45bf-4ef9-9d66-33e2f90e607e_en?filename=1.1_20251216_FINAL%20REPORT%20RTS%2040%282%29%20AMLD%20financial%20only_Final.pdf

https://www.amla.europa.eu/document/download/1c8bca18-fb5e-4b5e-afee-848111754238_en?filename=2.1_20251216_Final%20report%20-%20RTS%20under%20art.%2012%287%29%20AMLAR.pdf

[12] https://www.amla.europa.eu/policy/public-consultations/consultation-draft-its-under-art-153-amlar_en

and during the transfer of supervisory powers for directly supervised entities. Stakeholders were invited to provide feedback until 27 January 2026.

6.4. PHASING OF LEVEL 2 AND LEVEL 3 COMMON INSTRUMENTS

AMLA assumed responsibility in mid-2025 for an EU AML/CFT system that remains highly fragmented. Establishing common approaches for hundreds of national supervisors, 25 sectors, and more than two million obliged entities is a complex undertaking.

In consultation with the European Commission and its General Board, AMLA adjusted the timelines for several regulatory mandates scheduled for 2026 under the AML/CFT legislative package. This additional time was needed to onboard staff and complete the analytical work necessary to ensure that forthcoming common standards and methodologies are evidence-based, proportionate, operationally sound, and aligned with existing EU reporting and cooperation frameworks.

The updated schedule was reflected in the Annex XI of AMLA's SPD 2026–2028[13].

6.5. GOVERNANCE SET-UP

The contribution and expertise of national competent authorities have been essential for initiating the development of level 2 and level 3 instruments. To support this work, AMLA established temporary internal structures in 2025 to coordinate input from national competent authorities. Expert staff from all Member States participated in these structures, while the EBA, EIOPA and the ECB attended several of them as observers.

In 2026, this temporary arrangement was replaced by a more structured, integrated approach. In particular, such internal structures were complemented by two internal committees, to which the former structures report, and namely:

- a committee on private sector standards, focusing on technical standards, guidelines and recommendations for obliged entities and on engagement with the industry
- a committee on supervisory system functioning, focusing on risks, AML/CFT supervision and common supervisory standards.

6.6. TRANSITION

In December 2025, AMLA and EBA completed the transfer of all AML/CFT mandates and functions from EBA to AMLA, concluding EBA's stand-alone AML/CFT mandate initiated in 2020. Throughout the transition phase, the two authorities worked closely to ensure a smooth handover.

Key EBA tools and expertise (including the EuReCA database, supervisory insights, and risk assessments) were transferred to AMLA. AMLA drew on EBA's technical input provided as part of the

[13] https://www.amla.europa.eu/document/download/27549516-d110-4e91-b1ed-d3552b8f9661_en?filename=AMLA%20SPD%202026-2028.pdf

European Commission’s call for advice on draft RTS under AMLD6, AMLAR and AMLR. Existing EBA AML/CFT guidelines and standards remain in force until replaced by AMLA, ensuring regulatory continuity.

To support ongoing cooperation, AMLA and ESAs established a MoU providing for regular information exchange, joint initiatives, and coordinated engagement with the private sector[14] .

[14] See Part I, Section 8.2 Memoranda of Understanding with the ECB-SSM and the ESAs

Risk intelligence is the analytical backbone of AMLA's mandate. By taking over EuReCA and beginning to structure supervisory and risk-related information, AMLA started building the capacity to transform data into insights that can guide convergence, prioritisation and the future of risk-based supervision, while also informing FIU joint analyses through the identification of emerging trends, typologies and cross-border ML/TF risks.

— Simonas Krėpšta, Executive Board member

7. Building Risk Intelligence

A sound and timely understanding of ML/TF risks is central to AMLA's ability to deliver its mandate effectively, informing future direct supervision, indirect supervision of the financial sector, oversight of the non-financial sector and support to FIU cooperation. AMLA's work on risk intelligence in 2025 focused on initiating the analytical and technical foundations necessary to support a more integrated and risk-based framework within AMLA. More specifically, in 2025, AMLA initiated work to catalogue and assess the value of different databases, reporting frameworks and information sources available at EU and national level that could support its future risk assessment and analytical capabilities. This work included preliminary efforts to assess the availability, quality, and comparability of data across those different sources, as well as to identify the specific types of analytic work to fulfil AMLA's risk monitoring mandates.

In parallel, AMLA began laying the groundwork for the 2026 strategic risk analysis capabilities by exploring methodologies for identifying country and sectoral vulnerabilities, detecting recurring compliance deficiencies and supporting the prioritisation of supervisory activities across the EU. In this context, AMLA also considered how risk analysis and intelligence can provide cross-cutting support across both the supervisory and FIU pillars. In particular, strategic and operational risk analyses can contribute to identifying emerging trends, typologies and cross-border ML/TF risks that may inform Joint Analyses conducted by FIUs and support a more coordinated Union-level response to financial crime threats. This work will contribute to the gradual development of a more structured and intelligence-led approach to AML/CFT at Union level, which will be reflected in AMLA's 2026 work.

These initial analytical efforts will contribute to enhancing the understanding, assessment and quantification of ML/TF risks across EU financial markets, particularly in sectors characterised by cross-border activity, rapid innovation and evolving risk profiles. Some of this work was already tested with regards to specific ML/TF vulnerabilities, for instance associated with crypto business[15] which AMLA already targeted in 2025.

The transfer of EuReCA – European Reporting System for Material AML/CFT Weaknesses – to AMLA was also a central element of this work and provided an initial basis for transforming supervisory data into risk insights. The EuReCA serves as the EU's central repository for information on significant AML/CFT deficiencies identified by competent authorities. Established by the EBA in 2022, it aims to enhance supervisory convergence and enable a more coordinated, risk-based response across the Union. In October 2025, responsibility for EuReCA, including data analysis, analytics and information sharing, was transferred to AMLA. From that point onwards, AMLA, in its role as the designated operational manager of EuReCA, progressively assumed responsibility for the analysis of incoming data. This involved the structured review of submissions, coordination of follow-up with submitting authorities where necessary, and the identification of emerging trends and patterns, drawing on analytical methodologies developed under the EBA framework. The system will remain operational until AMLA deploys its new AML/CFT database under Article 11 of the AMLA Regulation, with the technical migration completed on 20 March 2026. During this transitional phase, competent authorities are required to continue reporting and submitting reasoned requests in line with Article 106.

In 2025, 1,385 submissions were reported by 45 authorities, including national competent authorities and the ECB, covering 213 entities. While this was slightly lower than in 2024, it reflects a stabilisation of reporting following EuReCA's progressive integration into supervisory frameworks. Material weaknesses were identified across a broad range of institutions, not limited to large or high-risk entities, with differences influenced by sectoral and national supervisory approaches. On-site inspections, particularly full-scope inspections, remained the main tool for detecting deficiencies, most commonly in customer due diligence, especially in ongoing monitoring, risk classification and customer verification. Sectoral and national differences also significantly influenced risk classification and enforcement approaches, with credit institutions dominating in absolute terms, while e-money institutions, payment institutions and CASPs displayed distinct risk profiles requiring tailored supervisory responses.

Supervisory responses reported through EuReCA were dominated by orders to comply and corrective measures, alongside fines, although their application varied considerably across jurisdictions. In total, EUR 39.5 million in fines were imposed, mainly on credit institutions, with differences reflecting both sectoral risk profiles and national practices. While many deficiencies were addressed within a year, delays in both reporting and enforcement persisted in some cases. The analysis further highlighted recurring weaknesses linked to customer risk, high-risk transactions

[15] See, Part I, Section 2.1 Working on High-Risk Areas and the Crypto-Asset Markets.

and products, and exposure to high-risk jurisdictions, underlining the continued importance of strengthening AML/CFT controls across the Union.

The main categories of ML/TF risk were identified throughout the year. The primary risk categories associated with them are:

- Customer-related risks, affecting 69% of reported entities and including failures in identifying and verifying customers and beneficial owners, inadequate screening of politically exposed persons and insufficient risk profiling leading to the misclassification of high-risk customers.
- High-risk transaction risks, identified in 62% of entities and linked to shortcomings in transaction monitoring, including repeated small transactions below thresholds and large cash-based operations, frequently due to inadequate calibration of monitoring tools.
- High-risk products and services risks, affecting 53% of entities and associated in particular with correspondent banking, private banking and crypto-asset services, where enhanced controls were often missing.
- Geographical risks, identified in approximately 30% of entities and primarily linked to exposure to high-risk third countries and failures in complying with targeted financial sanctions.

Throughout the reporting period, AMLA staff actively analysed submissions and coordinated with reporting authorities to improve the quality, consistency and completeness of the information submitted. Where relevant, submissions were also shared on an ad hoc and case-by-case basis with key stakeholders. The data generated by EuReCA provided valuable insights into the effectiveness and consistency of supervisory practices across the Union, highlighting structural divergences and areas for improvement and establishing a basis for AMLA to prioritise targeted actions in 2026 with a view to strengthening the timeliness, proportionality and harmonisation of supervisory responses.

8. Engaging Stakeholders

8.1. COMMUNICATION AND OUTREACH

In 2025, AMLA undertook its first systematic programme of stakeholder engagement, thereby laying the foundations for the structured relationships it will continue to build in the years ahead. The centrepiece of this work was the Chair Bruna Szego's roadshow, which covered all 27 Member States. In each jurisdiction, she met with national supervisory authorities, FIUs and private-sector representatives, including associations from both the financial and the non-financial sectors. The roadshow generated the first comprehensive picture of the AML/CFT landscape across the Union and is documented in findings report published in May 2026.

Alongside the roadshow, AMLA also undertook the following stakeholder-engagement activities:

- Initial bilateral meetings with EU-level associations representing the financial sector, with a view to better understanding the needs and specificities of the different subsectors and to laying the basis for future structured engagement.
- A comprehensive survey of national supervisory authorities across all 27 Member States in order to map the supervisory landscape in the non-financial sector, including its organisation, available resources and main challenges.
- The Chair's appearance before the ECON and LIBE Committees of the European Parliament in December 2025 to present the Authority's progress.

8.2. MEMORANDA OF UNDERSTANDING WITH THE ECB-SSM AND THE ESAS

On 23 June 2025, AMLA signed a bilateral MoU with the ECB establishing a structured framework for cooperation and information exchange. Concluded pursuant to Article 92(3) of the AMLA Regulation, the agreement aims to enhance supervisory effectiveness, maximise efficiency and avoid duplication of efforts between the two institutions. It provides for close cooperation, where appropriate, in the adoption of supervisory measures related to internal controls and governance, as well as in the application of sanctions, including in cases of serious breaches of AML/CFT requirements that may require restricting or limiting an institution's activities or withdrawing authorisations. AMLA and the ECB will also strive to ensure consistency in their policy approaches and supervisory standards, particularly where actions taken by one authority may have implications for the other's mandate. Regular exchanges on matters of common interest, including participation as observers in relevant Board meetings, are likewise envisaged.

On 3 July 2025, AMLA concluded a multilateral MoU with the ESAs, namely the EBA, the EIOPA and the ESMA. Based on Article 91 of the AMLAR, the agreement formalised the framework for effective cooperation and information exchange between AMLA and the ESAs. It sets out the modalities for collaboration in the performance of their respective mandates in an efficient, effective and timely manner and aims to promote supervisory convergence across the EU financial sector, facilitate the exchange of relevant information and support cross-sectoral learning and capacity-building among supervisory authorities. The MoU also provides for regular exchanges on matters of common interest, including reciprocal participation as observers in relevant Board meetings, and forms part of the broader cooperation framework that AMLA is required to establish for the financial sector.

8.3. LAYING THE GROUNDWORK FOR WORKING ARRANGEMENTS

In accordance with Article 94(2) of the AMLA Regulation, preparatory work started in 2025 for the conclusion of working arrangements with OLAF, Europol, Eurojust and EPPO to facilitate cooperation within their respective mandates. To support the launch of this cooperation, the Chair met with the leadership of each of these EU law enforcement and judicial authorities, helping to steer the work at strategic level and prepare the ground for the technical discussions that followed. This work comprised bilateral meetings and the beginning of drafting of the corresponding working arrangements.

The objective of these working arrangements is to support the efficient and streamlined exchange of operational information on ML/TF threats within the Union, including operational support to joint analyses carried out by AMLA and FIUs and the use of such analyses in support of the mandates of the other institutions.

During 2025, the FIU Policy team held kick-off and exploratory meetings with all four authorities, namely:

- EPPO in July and November
- OLAF in September
- Europol and Eurojust in November.

During these meetings, the respective mandates, potential areas of cooperation and modalities for information exchange were discussed. By the end of 2025, the four authorities had provided initial draft texts to AMLA. These drafts were reviewed by the FIU Policy team in close coordination with other AMLA units. Following internal alignment on key issues, negotiations with all four authorities were launched, with dedicated negotiation meetings scheduled for April, May and June 2026.

9. Elevating Data, Intelligence and Technology

Data, intelligence and technology were key enablers of AMLA's establishment in 2025. As a new authority with strong digital dependencies across its supervisory and FIU mandates, AMLA focused on creating a secure digital workplace, preparing the transfer and future operation of critical systems, and laying the foundations for data governance, analytical capabilities and cybersecurity.

9.1. DATA ARCHITECTURE AND GOVERNANCE FRAMEWORK

In 2025, AMLA laid the groundwork for the implementation of a formal Data Architecture and Governance framework to ensure consistent, secure, and high-quality data management across all systems, including the Central AML/CFT Database, risk analysis platforms, and supervisory tools. This activity will define and enforce data standards, metadata models, ownership roles, quality controls, and lifecycle management processes. It is foundational for achieving interoperability, traceability, and accountability in AMLA's increasingly data-driven operations.

9.2. STATISTICS AND REPORTING

AMLA's work on data management in 2025 also created the basis for future statistics and reporting capabilities. While a dedicated statistics and reporting function was still to be developed, the preparatory work on data architecture, data models and future reporting flows helped define the type of structured information that AMLA will need to support supervisory planning, risk analysis, regulatory work and institutional reporting.

This work was closely linked to the future Central AML/CFT Database and to the systems that will support AMLA's supervisory and FIU-related mandates. It also reflected the need to ensure that data collected by AMLA can be used in a consistent, traceable and secure way for operational and analytical purposes.

9.3. IT AND DIGITAL FOUNDATIONS

In 2025, the IT function played a critical enabling role in the establishment and operationalisation of AMLA. This required the rapid deployment of core digital services, user access, collaboration tools and infrastructure support to enable daily operations and prepare for AMLA's expanding operational needs.

Throughout the year, in cooperation with the AMLA Task Force, IT activities focused on three objectives aligned with the Work Programme 2025: ensuring immediate operational readiness through core digital workplace and infrastructure services; laying the technical foundations for AMLA's future supervisory and FIU systems; and embedding security, data protection and interoperability principles from the outset.

A functional digital workplace was deployed to support both remote and on-site work, including secure user access, identity and access management, collaboration and communication tools, endpoint management and first-level support. IT also supported the rollout of essential corporate systems provided through Service Level Agreements with the European Commission, notably in human resources, finance, procurement and document management.

Beyond immediate operational needs, AMLA launched work on a medium- to long-term IT architecture, including a study on a hybrid infrastructure model capable of hosting sensitive supervisory and FIU systems. Initial conceptual work also commenced on internal supervisory IT systems required to support AMLA's indirect and future direct supervisory tasks, ensuring that IT planning remained aligned with policy and supervisory developments.

9.4. CENTRAL AML/CFT DATABASE, EURECA AND FIU.NET

The year also marked an important preparatory phase for the transfer of critical AML/CFT systems to AMLA. Significant progress was achieved in relation to EuReCA[16], AMLA negotiated and concluded a bilateral agreement with the EBA and jointly defined a detailed project plan covering governance, technical migration, security, data integrity and continuity of service. This preparatory work created the conditions for AMLA to take over EuReCA hosting and operations in 2026 without disruption to stakeholders.

In parallel, initial steps were taken to lay the foundations for AMLA's data management and analytical capabilities. A preliminary high-level data model for the Central AML/CFT Database under Article 11 AMLAR was developed, closely linked to policy work on the relevant regulatory and implementing technical standards. This iterative approach ensured that technical design evolved in tandem with regulatory requirements and avoided premature or misaligned investments.

In 2025 preparatory activities were launched for the future transfer of FIU.net. IT engaged with the FIU pillar, national FIUs and relevant EU bodies to initiate technical scoping, identify dependencies and assess options for the modernisation and optimisation of the platform.

This work contributed to AMLA's preparation for secure financial intelligence exchange and for future FIU-related operational needs, including the technical requirements linked to joint analyses and cooperation among FIUs

9.5. ANALYTICAL TOOLS & AI

Feasibility assessments were initiated in 2025 to explore advanced data analytics and secure AI supporting tools aimed at enhancing analytical capacity and staff productivity. While no operational deployment took place in 2025, these assessments constituted an important preparatory step towards a more data driven and intelligence led supervisory framework in future years.

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[16] See Part I, Section 7 Building Risk Intelligence.

9.6. CYBERSECURITY AND TECHNICAL RESILIENCE

In view of the sensitivity of AMLA's future data holdings and operational role, cybersecurity was treated as a priority area. In 2025, the IT function contributed to AMLA's secure establishment by executing technical security controls and operational measures in line with the security framework, governance and priorities defined by the Security function.

IT activities focused on the practical implementation of security requirements, secure configuration and operation of systems, and the technical enablement of monitoring and incident-response arrangements. These activities were carried out in close coordination with the Security function, CERT-EU and other institutional partners, ensuring a clear separation between security governance and IT execution responsibilities.

AMLA also established its initial cybersecurity framework in compliance with Regulation (EU) 2023/2841, performed its first cybersecurity maturity assessment and conducted an initial cybersecurity risk assessment. On that basis, AMLA developed its first Cybersecurity Plan, defining governance arrangements, strategic objectives and a phased roadmap for capability development.

Close cooperation with DIGIT and CERT-EU supported the establishment and enforcement of cybersecurity baselines. AMLA's IT environment is monitored by CERT-EU, and an extended SLA with CERT-EU granted access to services in security monitoring and incident response.

10. Inside AMLA

Inside AMLA brings together the institutional and corporate foundations that enabled AMLA to operate during its first year and to prepare for autonomy from 2026. In 2025, this included rapid organisational growth, the establishment of HR, finance, procurement, facilities and security arrangements, the preparation of financial circuits and internal rules, and the development of a working environment capable of supporting AMLA's expanding mandate.

10.1. CORPORATE SERVICES

10.1.1. Building and Facilities

During 2025, the Building and Facilities function supported AMLA's progressive establishment in Frankfurt by focusing on the timely delivery of permanent operational premises and the readiness of the working environment for a growing Authority. The main workstreams covered the supervision of fit-out works, preparation for handover and relocation, procurement of long-term furniture and services, development of facility-management arrangements, and preparation of internal rules to support open-space working methods.

AMLA first operated from temporary premises, prepared and equipped for the first wave of AMLA staff and AMLA Task Force members. The final lease agreement for AMLA's permanent premises was signed on 9 April 2025, establishing the basis for AMLA's long-term presence in Frankfurt. Initial internal building and facilities management arrangements were put in place, and the preparation and supervision of fit-out works progressed throughout the year, with particular attention to technical, operational, security and IT/AV requirements.

AMLA also significantly advanced the planning of its physical working environment. AMLA defined its technical requirements for the permanent premises, including networking, audiovisual systems, secure meeting facilities and conferencing capabilities, with particular attention to the needs of AMLA's governance bodies and future co-tenancy arrangements.

The first handover of permanent office space was completed in November 2025 following technical approval of building, security and IT/AV components. The first relocation phase took place in December 2025, allowing AMLA staff to move from temporary premises to long-term office space equipped with the necessary furniture, IT and security infrastructure to ensure operational readiness.

Further progress was made on workplace readiness through procurement and facility-management services. AMLA advanced the procurement and planning of long-term furniture and benefited from cooperation with the ECB, through which furniture no longer required by the ECB was reused by AMLA. This generated both operational and environmental benefits.

AMLA also developed its approach to flexible open-space working arrangements, shared spaces and booking arrangements.

10.1.2. Physical Security

In 2025, AMLA focused on establishing the physical security and access-control arrangements required to support a safe, secure and resilient working environment from the earliest phase of its build-up. Priority was given to the design, implementation and operation of controlled access to office areas, zoning, visitor management and integration with building and facility-management processes.

These arrangements were implemented for AMLA's first occupied office spaces, providing a secure and consistent foundation for daily operations and a reference for future roll-out as AMLA's premises expand. AMLA also worked closely with the European Commission's Security Directorate and engaged with other EU agencies, including the ESAs, to align its security arrangements with institutional standards and benefit from existing expertise and shared services.

Recognising the importance of staff awareness, AMLA initiated security onboarding and awareness activities covering the handling of sensitive information, physical security and access-control procedures, cybersecurity risks and good practices. Phishing simulation campaigns were also organised to assess and strengthen resilience against social-engineering threats. These activities supported the development of a security-aware culture from the beginning of AMLA's operations.

AMLA defined core security objectives and priorities for the build-up phase, supporting a phased approach towards stable and mature secure operations.

10.1.3. Human resources

In 2025, AMLA operated in an accelerated start-up phase, requiring a rapid scaling-up of human resources to meet its core priorities. The initial total number of posts in AMLA's 2025 establishment plan was 120. To address urgent operational needs, 30 posts from the 2026 establishment plan were frontloaded into 2025, without requiring additional budgetary resources. As a result, the total number of posts increased from 120 to 150.

Within this reinforced framework, AMLA recruited 118 additional staff members by the end of 2025, from 24 different Member States, across all categories of staff, including FIU Delegates, the first of whom commenced operations in Q3 2025. Despite the constraints of large recruitment procedures in the EU context, AMLA completed several major external recruitment procedures during the year. AMLA also facilitated the inter-agency mobility of relevant EBA staff responsible for tasks transferred to AMLA, ensuring continuity of expertise and operational capacity. In total, AMLA recruited 77 AD staff members in 2025, 19 more than initially planned.

AMLA also adopted a secondment programme allowing for the recruitment of FIU Delegates and standard Seconded national experts (SNEs), with the objective of strengthening knowledge exchange between AMLA and national authorities. The majority of SNE posts are allocated to FIU Delegates and are planned to be filled by the end of 2026. The scale of staff intake required the development of an onboarding and integration programme, partly developed in cooperation with local authorities, including the City of Frankfurt and the Finance Ministry of Hessen.

During 2025, and continuing into early 2026, AMLA adopted the main implementing rules to the Staff Regulations, including rules on TA and CA staff, middle management, working time and hybrid working, performance assessment and related matters. On that basis, AMLA strengthened its HR legal framework. HR will continue to develop policies, processes and procedures in 2026, including the first full performance management cycle, appraisal and reclassification exercises. With the adoption of implementing rules on posts and job titles, AMLA also initiated the preparation of guidelines and templates on job profiles, levels, objectives and reporting lines, to be finalised in 2026.

In learning and development, AMLA strengthened cooperation with sister agencies, including ESMA, EBA and EIOPA, to access their training catalogues, while preparing its own contract for learning activities. Mandatory courses and key leadership-development activities were organised through Commission framework contracts available to AMLA.

Regarding social measures, AMLA worked in 2025 on the development of an attraction package for staff, to be finalised in 2026, covering childcare, public transport, well-being initiatives and schooling support. As a new organisation, AMLA also began developing its corporate culture. In November 2025, an all-staff workshop defined AMLA's core values as accountability, cooperation, courage, integrity and respect. Further efforts will be made in 2026 to integrate these values into day-to-day management and HR processes.

10.1.4. Finance and Procurement

During 2025, AMLA operated under the transitional arrangements provided for in Article 107 AMLAR, under which the European Commission remained responsible for AMLA's establishment and operation until 31 December 2025. Budgetary and financial management of the funds allocated to AMLA for 2025 was therefore ensured by the European Commission, through DG FISMA, while AMLA prepared to acquire financial autonomy from 1 January 2026.

These arrangements supported the establishment of AMLA's administrative and management structure, governance bodies, support functions and staff recruitment, enabling AMLA to start certain operations from 1 July 2025. The readiness assessment concluded that AMLA met the key requirements for financial autonomy, covering governance bodies, SLAs, financial systems and tools, human resources and competences, budget, internal control framework and the transfer of files from the European Commission to AMLA.

During the year, the Finance and Procurement team was progressively established, covering finance, budget, procurement and contract-management functions. As AMLA had not yet acquired financial autonomy and did not yet have its own procurement tools in place, no procurement procedures were launched directly by the Authority in 2025. The team therefore worked in close cooperation with the DG FISMA AMLA Task Force, relying mainly on existing Framework Contracts and Commission tools, including ARES and SUMMA, to procure services and supplies and ensure business continuity.

By the end of 2025, the Finance and Procurement team had established in particular:

- 12 direct contracts, including purchase orders for catering, training and event services
- 30 specific contracts under existing Framework Contracts, covering office supplies, IT equipment, office furniture and HR assessment centres
- participation as a contracting authority in approximately 30 existing Framework Contracts
- expressions of interest in around 10 new interinstitutional calls for tenders.

The team also contributed to AMLA's Financial Rules, approved by the Executive Board in November 2025, prepared onboarding to the European Commission's eProcurement suite and SUMMA, the financial management tool of the EU institutions, from 1 January 2026.

By the end of 2025, the team had also prepared and submitted for approval and signature several key Executive Director Decisions linked to AMLA's forthcoming financial autonomy, including:

- the decision on the financial circuits
- the decision on the appointment of actors within the financial circuits
- the decision on the delegation of authority to Authorising Officers for budget implementation and management.

On that basis, the first comprehensive workflows reflecting the approved financial circuits were established, to be incorporated into ARES as predefined e-signatory lists. These workflows were intended to enable staff to process legal and budgetary commitments from the first working days of 2026, thereby ensuring business continuity during the transition to financial autonomy[17].

[17] For further details on budgetary and financial management, see Part II, Section 5 Budgetary and Financial Management.

Part II: Management

1. General Board Meetings and Decisions

This section summarises the most significant decisions taken and discussions held by the General Board during 2025.

In 2025, the General Board met five times, in supervisory composition, FIU composition and, where relevant, joint composition:

- 11 March 2025 – joint supervisory and FIU composition, on-site in Frankfurt
- 13 and 14 May 2025 – FIU composition, joint composition and supervisory composition, on-site in Frankfurt
- 17 and 18 June 2025 – supervisory composition and FIU composition, by videoconference
- 13 and 14 October 2025 – supervisory composition, joint composition and FIU composition, on-site in Frankfurt
- 9 and 10 December 2025 – FIU composition, joint composition and supervisory composition, by videoconference.

In all meetings held in 2025, the General Board included, in supervisory composition, representatives of the 27 Member States (heads of the supervisory authorities of obliged entities), together with the Chair and a non-voting member of the European Commission. In FIU composition, the General Board included representatives of the 27 Member States (heads of FIUs), together with the Chair and a non-voting member of the European Commission.

From the meetings held on 17 and 18 June 2025 onwards, observers from relevant EU institutions and bodies also participated, namely the ESAs and the ECB in supervisory composition, and OLAF, Europol, Eurojust and the EPPO in FIU composition. In addition, following decisions taken by the General Board in May 2025, representatives of the EEA/EFTA States were admitted as observers and participated from June 2025 onwards.

During 2025, the General Board adopted a total of 27 decisions, of which:

- 11 were adopted in supervisory composition
- 16 were adopted in FIU composition.

The decisions and discussions of the General Board reflected AMLA's start-up phase and focused on establishing AMLA's governance framework, supporting the progressive operationalisation of its supervisory and FIU mandates, and preparing the first regulatory, supervisory and cooperation instruments required under the AML package.

The most significant items approved or discussed by the General Board in 2025 included:

- The adoption of the Rules of Procedure of the General Board, including arrangements related to conflicts of interest.
- The approval of the proposal to the European Parliament for the appointment of the first Executive Board members, as well as a further proposal concerning the appointment of an Executive Board member later in the year.
- Decisions concerning the admission of representatives of the EEA/EFTA States as observers in the General Board and its sub-structures, both in supervisory and FIU compositions,
- Decisions and discussions relating to the FIU Delegates framework.
- Discussions on the set-up of the Standing Committee for the FIU Pillar under Article 58(4) AMLAR and approval of the way forward for its establishment.
- Approval of the Provisional Rules of Procedure for FIU peer reviews and the Rules of Procedure for mediation between FIUs, and discussions on the mutual assistance and the peer review work plan.
- Discussions and decisions supporting the development of AMLA's risk-assessment methodology, including the approval of the draft RTS under Article 40(2) AMLD and Article 12(7) AMLAR and the endorsement of a working group on testing and calibration.
- Discussions on the transition of AML/CFT mandates and tools from the EBA to AMLA, including EuReCA, supervisory insights and relevant technical input.
- Discussions on AMLA's strategic and programming documents, including Work Programme 2025 and the draft SPD 2026-2028, the phasing of Level 2 and Level 3 mandates, resource constraints and the need to balance timely delivery with quality, consultation and proportionality.

In 2025 records of the proceedings of the General Board meetings were transmitted to the European Parliament. Public summaries of the meetings are published on AMLA's website[18].

[18] General Board Meetings - Authority for Anti-Money Laundering and Countering the Financing of Terrorism

2. Executive Board Meetings and Decisions

The Executive Board of AMLA met seven times in 2025 and adopted 22 decisions. Its work during the reporting year focused on establishing the governance, administrative, financial and organisational arrangements.

The main items approved or decided by the Executive Board in 2025 included:

- Selection of Juan Manuel Vega Serrano as Vice-Chair of AMLA
- Adoption of the Rules of Procedure of the Executive Board
- Approval of AMLA's Headquarters Agreement
- Appointments of AMLA's:
  - Data Protection Officer
  - Executive Director
  - Accounting Officer
- Decision to establish a Staff Committee
- Adoption of AMLA's:
  - Public Statement on Public Consultation
  - Crisis Management Policy
  - Internal Control Framework
- Decisions on AMLA's Financial autonomy
- Adoption of AMLA's Financial Rules
- Assessment and approval of AMLA's:
  - Work Programme 2025
  - Single Programming Document 2026–2028
- Adoption of several HR implementing rules for the Authority.

These decisions formed an essential part of AMLA's first-year governance framework and supported AMLA's readiness to operate independently from 2026.

3. Decisions of the Executive Director

Following his appointment, the Executive Director contributed to AMLA's operational consolidation by taking six decisions in 2025.

The main items decided by the Executive Director in 2025 included:

- Appointment of financial actors within AMLA's financial circuits
- Delegation and designation of authorising officers for budget implementation purposes
- Decisions related to the re-assignment of AMLA staff
- Extension of reserve lists

His first months in office also coincided with AMLA's first strategic planning cycle, including the preparation of the SPD for 2026–2028 and 2027–2029, and with the final preparatory steps for the transition from Commission-managed operations to full budgetary and administrative autonomy.

4. Major Developments

The reporting year was marked by a number of major internal and external developments which had a direct impact on AMLA's establishment and first phase of operations.

The most significant developments were the following:

- AMLA entered into its foundational phase as a newly established Union agency, with a mandate to lay the institutional, procedural and strategic groundwork necessary to become operational and to prepare for the progressive implementation of its supervisory and FIU-related tasks.
- The establishment of AMLA in Frankfurt progressed significantly during the year. This included the signature of the final lease agreement for AMLA's permanent premises on 9 April 2025, the continued fit-out of the long-term premises, and the completion of the first relocation phase in December 2025, when AMLA staff moved from the temporary floor to the permanent floors.
- AMLA's governance framework was put in place during 2025. The General Board and the Executive Board were established and started operating, thereby providing the decision-making structure required for AMLA's institutional and operational development.
- The appointment of AMLA's first Executive Director marked an important step in AMLA's transition from the start-up phase, supported by interim arrangements, towards a more stable executive and administrative structure. On 1 July 2025, the Executive Board appointed the Executive Director, who joined AMLA on 16 September 2025. In this capacity, the Executive Director assumed responsibility for the day-to-day management of AMLA, including the implementation of the budget, the oversight of human resources and the execution of operational activities.
- AMLA experienced very rapid organisational growth in the course of the year. Staff numbers increased from one staff member at the end of 2024 to 119 staff members at the end

of 2025. At the same time, AMLA remained in start-up conditions, with a large proportion of new colleagues joining only in the final months of the year, which had a direct impact on delivery capacity and the pace at which functions could be fully operationalised.

- AMLA operated in 2025 without financial autonomy, with the European Commission remaining responsible for the establishment and initial operation of AMLA in accordance with Article 107 of the AMLA Founding Regulation. This had a direct impact on budget implementation, internal control arrangements and the organisation of finance and procurement during the reporting year.
- The transition of AML/CFT mandates and functions from EBA to AMLA was completed in December 2025. This included the transfer of key tools and expertise, such as EuReCA, and constituted an important institutional milestone in AMLA's assumption of its role within the Union AML/CFT framework.
- Technology and digital infrastructure represented both a major enabler and a major challenge during the reporting year. As a newly established agency without legacy systems, AMLA had to build its digital environment from the ground up while at the same time preparing for the future transfer and operation of critical systems, including EuReCA and FIU.net.
- The challenge of convergence across the Union became clear from the outset. AMLA's work in 2025 confirmed that supervisory and FIU practices across Member States remain highly diverse and that aligning them into a common, robust and risk-based European framework will require sustained effort over time.
- AMLA also initiated its first structured cooperation framework with key institutional stakeholders. In particular, MoUs were concluded with the ESAs and the ECB, while preparatory work started on Working Arrangements with OLAF, Europol, Eurojust and the EPPO.
- The second half of 2025 also marked the beginning of AMLA's first strategic planning cycle. This included the launch of work on AMLA's medium-term programming documents and the first articulation of a more structured transition from institutional establishment towards sustained operational deployment. In this sense, 2025 was not only a year of set-up, but also the year in which AMLA began to define the path from start-up agency to a more mature operational institution.

Taken together, these developments shaped AMLA's first year of activity and defined the context in which AMLA began to build its governance, operational capacity, institutional partnerships and future supervisory and FIU framework.

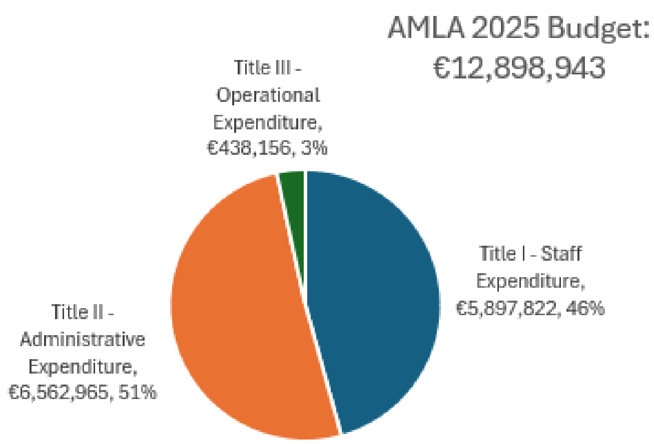
5. Budgetary and Financial Management

The budgetary and financial management of the funds allocated to AMLA in 2025 was carried out by the European Commission's DG FISMA, AMLA's partner Directorate. This arrangement reflected AMLA's establishment phase and remained in place until AMLA acquired financial autonomy at the beginning of 2026.

No late payments to suppliers were recorded in 2025 and, consequently, no interest was charged. As AMLA's financial transactions were managed by the European Commission under a single budget line during the transitional period, budgetary transfers were not applicable.

In 2025, total expenditure amounted to EUR 12,898,943, of which EUR 12,863,932 funded by the European Union and EUR 35,011 stemming from the ad hoc contribution by the host country.

In line with the standard budgetary presentation for decentralised agencies, these costs can be grouped under the following budgetary titles:



5.1. TITLE I AND II – STAFF AND ADMINISTRATIVE EXPENDITURE

In 2025, staff and administrative expenditure amounted to EUR 12,460,787, consisting of EUR 5,897,822 in staff-related expenditure and EUR 6,562,965 in administrative expenditure. Staff-related expenditure included salaries and allowances, as well as recruitment and training-related costs. Administrative expenditure covered in particular:

- rent, amounting to EUR 676,413
- IT costs, amounting to EUR 873,342
- furniture, premises outfitting and audio-visual and conference equipment, amounting to EUR 4,993,252.

The remaining administrative expenditure was allocated to office supplies and other minor administrative costs.

5.2. TITLE III – OPERATIONAL AND IT EXPENDITURE

In 2025, operational IT expenditure amounted to EUR 223,726, while EUR 214,430 was spent on operational missions and meetings.

5.3. YEAR-END CUT-OFF AND TRANSFER OF OPEN COMMITMENTS

At year-end, a total amount of EUR 4,695,823 related to commitments established in 2025 in order to honour legal obligations entered into in 2025, but for which payment would fall due in 2026. Following the Executive Board's decision to grant AMLA financial autonomy as of 1 January 2026, these commitments were transferred to AMLA and recorded as originating from 2025.

Most of these transferred commitments related to:

- premises outfitting works, amounting to EUR 2.9 million
- furniture acquisition, amounting to EUR 0.49 million
- audio-visual and conference equipment, amounting to EUR 1.18 million.

Taken together, these arrangements reflect the specific budgetary and financial context of AMLA's first year of activity, in which budget implementation was ensured through Commission support while AMLA prepared for full financial autonomy from 2026 onwards.

5.4. SERVICE LEVEL AGREEMENTS

Key SLAs with the European Commission in 2025:

- HR and Security Services by DG HR
- Calculation of remuneration and entitlements by PMO
- IT and CERT-EU services by DG DIGIT
- SUMMA and Treasury Management by DG BUDG
- Translation services by CdT
- Shared Support Office Services by EUAN.

In addition to the above, AMLA concluded a number of SLAs and cooperation arrangements with other EU institutions and bodies. These included:

- SLA with EBA on access to, financing and joint management of the EuReCA
- secondment t agreement between the European Union Aviation Safety Agency and AMLA
- secondment agreement between AMLA and EIOPA.

Furthermore, AMLA entered into arrangements generating income in 2025:

- the Agreement between AMLA and the Federal Republic of Germany on the host country financial contribution to the establishment and start-up costs of the Authority, under which AMLA received EUR 3 million in 2025[19].
- SLA with the European Union Agency for the Operational Management of Large-Scale IT Systems (eu-LISA) for the shared accounting officer, under which AMLA received EUR 17 124,45 in 2025.

[19] External assigned revenue which could be carried over up to 2028, in accordance with the agreement's provisions

6. Delegation and Sub-Delegation

Pursuant to Article 79 AMLAR, the Executive Director is responsible for implementing AMLA's budget in accordance with the principles of economy, efficiency, effectiveness and sound financial management. AMLA's financial governance is further framed by its Financial Rules, adopted in alignment with Commission Delegated Regulation (EU) 2019/715 on the framework financial regulation for Union bodies.

In 2025, however, the framework for delegation and sub-delegation of budget-implementation powers remained preparatory in nature. In accordance with Article 107 AMLAR, the European Commission was responsible for the establishment and initial operation of AMLA until 31 December 2025. During that period, the interim Executive Director could authorise payments covered by appropriations entered in AMLA's budget and conclude contracts, including staff contracts, following the adoption of AMLA's establishment plan.

As a result, no delegation or sub-delegation of the powers of budget implementation to AMLA staff was operational in 2025. No budget lines were covered by sub-delegations granted by AMLA to another authorising officer by delegation during the reporting year. Assurance on the implementation of the 2025 budget was therefore obtained through the arrangements under which the Commission implemented AMLA's budget on its behalf.

Preparatory work conducted in 2025 focused on putting in place the legal, procedural and organisational conditions necessary for AMLA to assume those responsibilities from 1 January 2026. In particular, this included:

- The preparation and finalisation of AMLA's Financial Rules, approved by the Executive Board in November 2025.
- Executive Director Decisions from December 2025 on the financial circuits, the appointment of actors within those circuits, and the delegation of authority to Authorising Officers for the purposes of budget implementation and management.

In 2025, therefore, the focus of AMLA's work in this area was not on the exercise of delegated budget-implementation powers, but on establishing the framework through which such powers could be exercised in a controlled, traceable and legally sound manner from 2026 onwards.

7. Human Resources Management

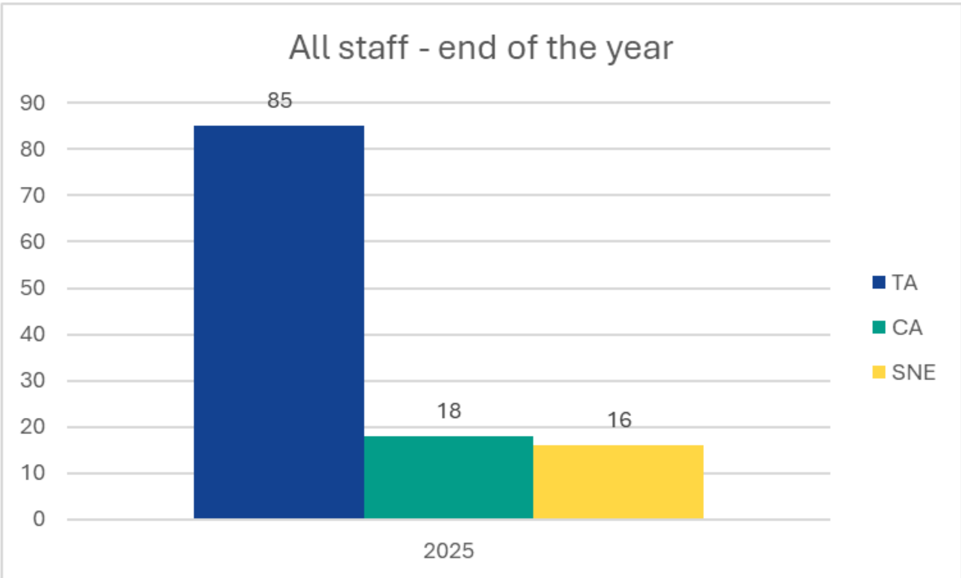
This section presents the overview of AMLA's human resources as of 31 December 2025, including staff numbers by category, as well as data on nationality and gender balance[20].

No separate Annex is included in relation to screening and benchmarking exercises, as no benchmarking exercises relevant to human resources management were carried out during 2025.

AMLA employs different categories of staff: temporary agent (TAs), contract agents (CAs), and seconded national experts (SNEs).

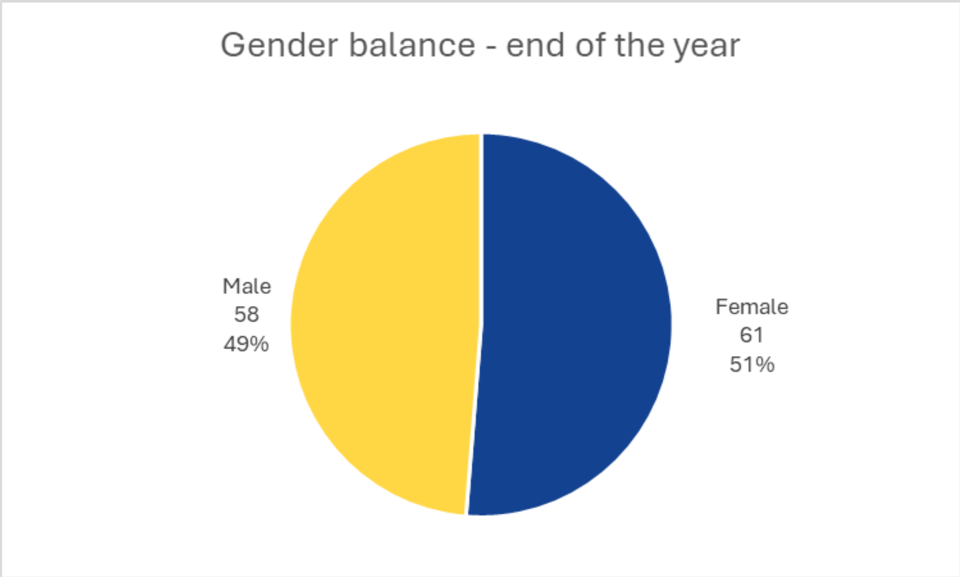
At the end of 2025 AMLA employed 103 statutory staff members: 85 TAs and 18 CAs.

In addition, AMLA employed 16 SNEs, which together brings the total number of AMLA staff to 119 (TAs, CAs and SNEs). By the end of 2024, AMLA employed only one staff member (CA).



At the end of 2025, AMLA staff (TAs, CAs and SNEs) included nationals from 24 Member States. The global gender balance at AMLA (TAs, CAs and SNEs) at the end of 2025 was 51% female and 49% male.

[20] For the main HR developments during the reporting year, see Part I, Section 10.1.3 Human resources and ANNEX III – Establishment Plan and Additional Information on Human Resources Management.



The table below shows the distribution of nationalities and gender:

Nationality	Female	Female %	Male	Male %	Total	Total %
Austrian	1	1,6%	2	3.4%	3	2.5%
Belgian	1	1.6%	2	3.4%	3	2.5%
Bulgarian	3	4.9%	0	0%	3	2.5%
Croatian	4	6.6%	1	1.7%	5	4.2%
Cypriot	2	3.3%	0	0%	2	1.7%
Danish	1	1.6%	0	0%	1	0.8%
Dutch	3	4.9%	2	3.4%	5	4.2%
French	8	13.1%	7	12.1%	15	12.6%
German	4	6.3%	8	13.8%	12	10.1%
Greek	3	4.9%	1	1.7%	4	3.4%
Hungarian	2	3.3%	1	1.7%	3	2.5%

Irish	1	1.6%	0	0%	1	0.8%
Italian	11	18.0%	11	19.0%	22	18.5%
Latvian	1	1.6%	0	0%	1	0.8%
Lithuanian	2	3.3%	1	1.7%	3	2.5%
Luxembourgish	1	1.6%	0	0%	1	0.8%
Maltese	1	1.6%	2	3.4%	3	2.5%
Polish	1	1.6%	2	3.4%	3	2.5%
Portuguese	3	4.9%	4	6.9%	7	5.9%
Romanian	1	1.6%	2	3.4%	3	2.5%
Slovak	1	1.6%	1	1.7%	2	1.7%
Slovenian	1	1.6%	1	1.7%	2	1.7%
Spanish	4	6.6%	7	12.1%	11	9.2%
Swedish	1	1.6%	2	3.4%	3	2.5%
Grand Total	61	100%	58	100%	119	100%

At the end of 2025, AMLA recorded a gender distribution of 57% female and 43% male among managerial positions.

8. Strategy for Efficiency Gains

In 2025, AMLA laid the foundations for achieving efficiency gains by embedding efficiency considerations into its organisational design, planning and initial operational set-up. As a newly established authority preparing for a rapid scale-up of staff and mandates, AMLA focused on building structures and processes that support disciplined resource management, operational effectiveness and future scalability.

Efficiency was pursued through deliberate organisational design and process set-up. During the reporting year, AMLA established governance arrangements, internal workstreams across pillars and coordination mechanisms aimed at avoiding fragmentation and duplication. The progressive integration of supervisory, policy, risk, FIU and digital functions was designed to support clear accountability, reduce coordination costs and facilitate timely decision-making as AMLA's responsibilities expand[21].

Technology and systems integration represented a key driver of efficiency from the outset. In 2025, AMLA rolled out its digital workplace and secure IT access, initiated preparatory work on core systems such as FIU.net and EuReCA, and took steps towards integration into SUMMA and other Union systems in view of financial autonomy from 1 January 2026. These actions supported streamlined workflows and prepared the ground for reducing manual processes, parallel data collection and administrative duplication in the future.

Efficiency considerations were also embedded in the development of AMLA's supervisory and analytical approach. Preparatory work on supervisory methodologies, data architecture and analytical capabilities was guided by risk-based principles, with the objective of enabling differentiated supervisory intensity and more effective off-site supervision over time. This approach is intended to support targeted allocation of resources towards higher-risk entities while limiting unnecessary operational burden.

In parallel, AMLA began laying the foundations for knowledge management, shared services and cooperation-based efficiency gains. Corporate support functions, including human resources, finance, IT and legal support, were organised with a view to serving the organisation as a whole, while cooperation arrangements with Union institutions and agencies were developed to avoid duplication and leverage existing expertise.

9. Environment Management

In 2025, AMLA progressively integrated environmental considerations into the establishment of its premises and administrative operations, reflecting the Agency's start-up context and operational priorities. The main actions focused on practical sustainability measures embedded in the set-up of the working environment, resource-efficient use of space, circular furniture solutions and digital working practices[22].

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[21] Described in more detail in Part 1 Section 6.1. Simplification

[22] For a detailed account of the actions and targets implemented to reduce the environmental impact of AMLA's administrative operations, see Annex IVANNEX IV – Environment Management

10. Assessment by Executive Director

In 2025, AMLA's management achievements need to be assessed in the specific context of AMLA's first year of operational build-up. In accordance with Article 107 of AMLAR, the European Commission remained responsible for AMLA's establishment and initial operation until 31 December 2025, while AMLA progressively put in place the governance, administrative, financial and operational arrangements required to assume financial autonomy from 1 January 2026.

On this basis, the Executive Director considers that significant progress was achieved during the reporting year. AMLA's governance bodies were established and became operational, with the General Board and Executive Board taking the key decisions required for AMLA's institutional set-up and progressive operationalisation. Following the Executive Director's taking up of duties, preparatory decisions were adopted to ensure the functioning of AMLA's financial circuits and budget implementation arrangements from 2026 onwards.

AMLA also made substantial progress in building its administrative capacity. By the end of 2025, AMLA employed 119 staff members, while core corporate functions covering human resources, finance, procurement, IT, security, building and facilities were progressively established. The budgetary and financial management of the 2025 funds was carried out by the European Commission under the transitional arrangements, while AMLA prepared the legal, procedural and organisational framework for financial autonomy. No delegation or sub-delegation of budget implementation powers to AMLA staff was operational in 2025; the focus was therefore on establishing a controlled and traceable framework for the exercise of those powers from 2026.

The Executive Director further notes the progress made in supporting operational readiness, including the establishment of permanent working premises, the deployment of foundational IT and security arrangements, the conclusion of key service level agreements, the adoption of AMLA's Financial Rules and Internal Control Framework, and the initial integration of environmental considerations into administrative operations.

Efficiency, simplification and burden reduction considerations were embedded in practical decisions relating to shared services, digital working methods, reuse of furniture and preparation for the use of Union systems.

Overall, the Executive Director concludes that, despite the constraints inherent to a newly established agency operating under transitional arrangements, AMLA successfully laid the main governance, administrative, staffing, financial and operational foundations required for the next phase of its development. The achievements of 2025 provide the basis for AMLA to operate under financial autonomy from 2026 and to further consolidate its management systems, internal controls and operational delivery capacity.

Part III: Management assurance

1. Review of the elements supporting assurance

As Executive Director and Authorising Officer, I have reviewed the elements supporting management assurance for the 2025 reporting year, taking into account the specific transitional context in which AMLA operated.

In 2025, AMLA was still in its establishment phase and operated under the transitional arrangements provided for in Article 107 AMLAR. Under these arrangements, the European Commission remained responsible for the establishment and operation of AMLA until 31 December 2025, and the budgetary and financial management of the funds allocated to AMLA for 2025 was ensured by the European Commission through DG FISMA. This transitional framework determined the scope of AMLA's own management assurance for the reporting year.

The assurance available for 2025 is therefore based on a combination of elements: the Commission's implementation of AMLA's 2025 budget under the applicable rules and controls; AMLA's governance and management structures progressively put in place during the year; the decisions and oversight of AMLA's General Board and Executive Board; the establishment of key support functions; the conclusion of relevant service-level arrangements; and the preparatory work carried out for AMLA's financial and administrative autonomy from 1 January 2026.

During the reporting year, AMLA also prepared the main elements of its own control environment. This included the adoption of AMLA's Financial Rules, the preparation of financial circuits and related Executive Director decisions, the appointment of key financial actors, the onboarding to Commission corporate systems such as SUMMA and eProcurement, and the development of internal workflows to support the processing of legal and budgetary commitments from the first working days of 2026.

The readiness assessment carried out in 2025 concluded that AMLA met the key requirements for financial autonomy, covering governance bodies, service-level arrangements, financial systems and tools, human resources and competences, budget, internal control framework and the transfer of files from the European Commission to AMLA. The only action extending beyond 31 December 2025 concerned the adoption of AMLA's Anti-Fraud Strategy, expected in 2026, which was not considered to prevent AMLA from assuming financial autonomy.

On the basis of the information available to me and taking into account the transitional arrangements applicable in 2025, I consider that the elements supporting assurance were appropriate to AMLA's stage of development and provided a reasonable basis for the management assessment of the reporting year.

2. Reservations

Reservations are made where significant weaknesses are identified that may have a material impact on the legality and regularity of transactions, the achievement of objectives, the reliability of reporting, the safeguarding of assets, or the sound financial management of AMLA. In assessing whether a weakness should lead to a reservation, consideration is given to its nature, scale, duration and potential financial, operational or reputational impact, as well as to the effectiveness of mitigating measures.

This assessment is made even where no reservation is ultimately issued.

Based on the above assessment and taking into account the specific transitional arrangements applicable to AMLA in 2025, I have no reservations to report for the reporting year.

No significant weaknesses were identified that would require a formal reservation in the context of AMLA's 2025 activities and transitional operating arrangements. The main limitations affecting the reporting year were linked to AMLA's start-up phase and to the fact that the European Commission remained responsible for AMLA's establishment and operation until 31 December 2025.

These limitations were addressed through the transitional arrangements, reliance on Commission systems and controls, the progressive establishment of AMLA's own governance and control framework, and the preparatory actions taken to ensure financial and administrative autonomy from 1 January 2026.

No quantifiable financial exposure requiring disclosure under this section has been identified. Consequently, no corrective action plan linked to a reservation is required. AMLA will nevertheless continue to strengthen its internal control, risk management, anti-fraud and assurance framework as part of its autonomous operation from 2026 onwards.

Part IV: Declaration of Assurance

Declaration of Assurance

I, the undersigned, Executive Director of the Authority for Anti-Money Laundering and Countering the Financing of Terrorism[23], declare that the information contained in this report gives a true and fair view.

I confirm that I am not aware of anything not reported which could harm the interests of the Authority.

Frankfurt am Main, 29 June 2026

Nicolas Vasse

Executive Director

The Authority for Anti-Money Laundering and Countering the Financing of Terrorism

[23] In 2025, the Union funds made available to AMLA have been implemented by DG FISMA. Therefore, the reasonable assurance that the resources assigned to the activities described in this report have been used for their intended purpose and in accordance with the principles of sound financial management, and that the control procedures put in place give the necessary guarantees concerning the legality and regularity of the underlying transactions is provided in DG FISMA's own AAR for the year 2025.

ANNEX I – Executive Board Assessment

The Executive Board takes note of the Annual Report 2025 of the Authority for Anti-Money Laundering and Countering the Financing of Terrorism (AMLA), submitted by the Executive Director, acting as Authorising Officer, in accordance with Article 48 of Commission Delegated Regulation (EU) 2019/715 and Article 64(4)(c) of Regulation (EU) 2024/1620 establishing AMLA (AMLAR).

In assessing the report, the Executive Board notes that it provides a comprehensive account of AMLA's first year of institutional build-up and operational launch. The report sets out the progress made in establishing AMLA's governance and administrative foundations, becoming a legal entity in July 2025, advancing preparatory work across the supervisory and Financial Intelligence Unit (FIU) pillars, and laying the basis for the progressive implementation of its mandate.

The Executive Board further notes that the report reflects the specific circumstances of a newly established authority, including a tight implementation timeline, progressive staff recruitment and onboarding and the transitional arrangements under which the European Commission, through its Directorate-General for Financial Stability, Financial Services and Capital Markets Union (DG FISMA), remained responsible for the establishment and initial operation of AMLA until it reached financial autonomy.

The Executive Board notes in particular the establishment of AMLA in Frankfurt, the signing of the lease for its permanent premises, the set-up of the General Board and the Executive Board, the conclusion of Memoranda of Understanding with the European Supervisory Authorities and the European Central Bank, the progressive staffing-up of the Authority, and the launch of key preparatory workstreams in the supervisory, FIU, digital and corporate domains.

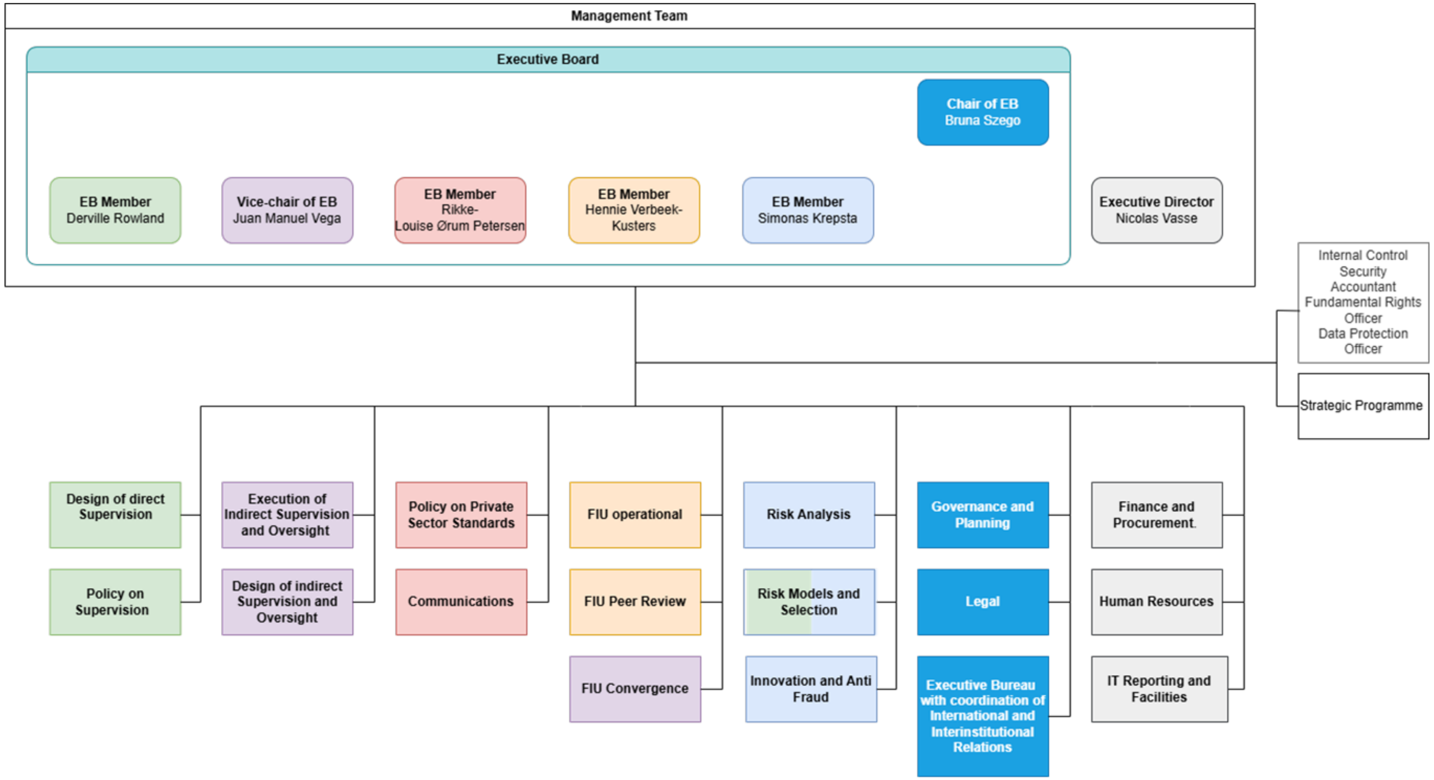
The Executive Board also notes that the management, budgetary and internal control arrangements applicable in 2025 were shaped by AMLA's transitional status and are reflected accordingly in this report.

The Executive Board hereby adopts the Annual Report 2025.

ANNEX II – Organisational Chart

AMLA's organisational structure evolved progressively during the establishment phase, in line with the growth of AMLA and the gradual operationalisation of its mandate. An initial organisational chart was adopted in February 2025, revised in September 2025 as AMLA moved towards a more structured operational set-up, and further updated at the beginning of 2026 to reflect the transition towards financial autonomy and a more mature organisational model.

The organisational chart below reflects the structure as implemented in June 2026.



ANNEX III – Establishment Plan and Additional Information on Human Resources Management

The Staff Regulations and Conditions of Employment apply to the staff of AMLA.

The first selection procedures were launched in 2024. The first staff recruitment took place in 2024: one AMLA staff member started working in 2024 and 118 other staff members started working in 2025.

The job screening / benchmarking against previous years is foreseen to be initiated in 2027, based on first analysis carried out on 2026 results.

Summary of Staff 31/12/2025

ESTABLISHMENT PLAN POSTS	Authorised Budget	Actually filled	Occupancy rate %
Administrators (AD)	88	77	87.5%
Assistants (AST)	8	8	100%
Assistants/Secretaries (AST/SC)			
TOTAL ESTABLISHMENT PLAN POSTS	96	85	88.5%
EXTERNAL STAFF	FTE corresponding to the authorised budget	Executed FTE	Execution Rate %
Contract Agents (CA)	25	18	72%
Seconded National Experts (SNE)	29	16	55.1%
TOTAL EXTERNAL STAFF	54	34	63%
TOTAL STAFF	150	119	79.3%

Detail of staff 31/12/2025

Function group and grade	Authorised Budget	Actually filled
	Temporary posts	Temporary posts
AD 16	6	5
AD 15		
AD 14	5	1
AD 13	1	0
AD 12	6	0
AD 11	4	1
AD 10	10	2

AD 9		2
AD 8	8	1
AD 7	33	55
AD 6	5	2
AD 5	10	8
AD subtotal	88	77
AST 11		
AST 10		
AST 9		
AST 8	2	
AST 7		
AST 6		2
AST 5	2	1
AST 4		1
AST 3	4	4
AST 2		
AST 1		
AST subtotal	8	8
AST/SC 6		
AST/SC 5		
AST/SC 4		
AST/SC 3		
AST/SC 2		
AST/SC 1		
AST/SC subtotal	0	0
TOTAL	96	85

Implementing rules adopted in 2025

During 2025 the following implementing rules have been adopted by AMLA:

- Model decision for agencies on the non-application of the Commission Decision on the maximum duration for the recourse to non-permanent staff in the Commission service
- Model decision laying down general implementing provisions on the procedure governing the engagement and use of temporary staff under Article 2(f) of the CEOS as regards decentralised agencies and joint undertakings
- Model decision for decentralised agencies and joint undertakings setting up a Staff Committee.

ANNEX IV – Environment Management

In 2025, AMLA progressively integrated environmental considerations into the establishment of its physical working environment and into its administrative operations. As a newly established agency, AMLA's priority during the reporting year was to ensure the operational readiness of its premises and support services in Frankfurt. Within this start-up context, environmental considerations were embedded, where feasible, in furniture solutions, facility-management arrangements, workplace practices and procurement-related choices. This approach was closely linked to the implementation of the 2025 Work Programme, in particular the workstreams relating to fit-out supervision, hand-over of permanent floors, relocation, procurement and planning of long-term furniture, development of facility-management services and the preparation of internal office etiquette for open-space offices.

Environmental-management status

In 2025, AMLA's approach to environment management concentrated on embedding practical sustainability considerations into the set-up of its premises and administrative operations. In the context of the agency's establishment phase, the emphasis was placed on operational measures and sustainable resource use, while progressively preparing the ground for a more structured environmental-management approach in the years ahead.

Circular and resource-efficient furniture solutions

A particularly positive environmental outcome in 2025 concerned furniture provisioning. In line with the Work Programme, AMLA advanced the procurement and planning of long-term furniture. A particularly successful cooperation was established with the European Central Bank (ECB), which donated furniture items no longer needed due to the reduction of its building portfolio. The items received included meeting room tables, foldable kitchen tables, mobile cupboards, wardrobes, media sideboards, coffee tables, coat hangers and other smaller furniture elements.

This arrangement enabled AMLA to equip its premises with furniture categories that were not available under the existing framework contracts, without the need to launch a separate procurement procedure at a time when resources were very limited and the operational priority was the delivery of the long-term floors. At the same time, it ensured that furniture in good condition could be reused rather than discarded, thereby reducing waste and supporting a circular and environmentally responsible approach.

The transfer and re-use of furniture received from the ECB generated tangible environmental and financial benefits for AMLA. By re-using furniture that was still in good condition and fully suitable for office use, AMLA avoided the purchase of a significant quantity of new furniture for its premises. This resulted in significant cost savings, avoided the need to launch additional procurement procedures and the associated use of internal staff resources, and reduced the environmental impact that would otherwise have arisen from the production of new items. For the main items quantified, the avoided impact is estimated at least around 8.0 tonnes of CO2 equivalent and approximately EUR 70,000 net in replacement costs. This estimate covers in particular meeting room tables, foldable kitchen tables, mobile cupboards, wardrobes, media sideboards and coffee tables. As some additional transferred items were not included in the core estimate, the overall avoided cost and environmental benefit are likely to be somewhat higher.

Efficient use of space and shared resources

AMLA also worked on the preparation of the internal "Office Etiquette" to support the transition to open-space offices and shared workplace arrangements. These guidelines are intended to address the use of non-assigned workstations, shared spaces and booking procedures. Beyond their operational value, these measures also contribute to a more efficient use of office space and shared resources in a growing agency.

Digital and paper-light working methods.

As part of its start-up model, AMLA relied extensively on digital tools and electronic workflows in its daily administrative operations. While the agency did not yet operate under a formal environmental-management system in 2025, the use of digital working methods contributed to limiting paper consumption and supported more efficient and traceable administrative processes.

Overall assessment

Overall, AMLA's environmental-management approach in 2025 reflected its start-up situation. The main achievements were not yet based on a formal EMAS or ISO 14001 framework, but rather on practical measures embedded in the physical establishment of the agency and in the development of its support services. In this context, the circular re-use of furniture through cooperation with the ECB, the efficient organisation of shared office space and the use of digital working methods constituted the main environmental-management achievements during the reporting year.

Outlook

As AMLA continues to mature institutionally, it will assess how the practical measures introduced during the establishment phase can be further consolidated into a more structured environmental-management approach, taking into account operational priorities and available resources.

ANNEX V – Sections Not Applicable to AMLA Annual Report 2025

INTRODUCTORY EXPLANATION

The sections grouped in the table of this Annex are not applicable to this report due to AMLA's specific legal and operational status during the reporting year.

In accordance with Article 107 of AMLAR, the European Commission remained responsible for the establishment and initial operation of AMLA until 31 December 2025. This transitional framework meant that AMLA was still in a foundational phase in 2025 and had not yet entered the normal cycle of financially autonomous audit, evaluation and follow-up applicable to a fully operational decentralised agency.

This institutional situation is reflected in AMLA's own planning documents. The Work Programme 2025 presents 2025 as AMLA's foundational year, focused on recruitment, governance, digital infrastructure, operational readiness and the preparation of AMLA's strategic planning cycle. The SPD 2026–2028 confirms that AMLA would achieve financial autonomy only from 1 January 2026, and that until then the 2025 budget was implemented by the Commission on AMLA's behalf.

Against that background, the sections below in table are presented as not applicable to this report.

Assessment of audit and ex-post evaluation results during the reporting year
Internal Audit Service (IAS)
Internal Audit Capability (IAC)
European Court of Auditors (ECA)
Follow-up of recommendations and action plans for audits and evaluations
Follow up of recommendations issued following investigations by the European Anti-Fraud Office (OLAF)
Follow up of observations from the Discharge authority

ANNEX VI – Acronyms and Terminology

LIST OF ACRONYMS

AD	Administrators' Function Group (as defined in Article 5 of the Staff Regulations)
AML/CFT	Anti-money laundering/countering the financing of terrorism
AMLA	The Authority for Anti-Money Laundering and Countering the Financing of Terrorism
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
ARES	Advanced Records System
CA	Contract agent
CASP	Crypto-Assets Service Provider
CERT-EU	Computer Emergency Response Team for EU Institutions
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
DIGIT	Directorate-General for Digital Services
EBA	European Banking Authority
ECB	European Central Bank

ECON	Committee on Economic and Monetary Affairs
EIOPA	European Insurance and Occupational Pensions Authority
EP	European Parliament
EPPO	European Public Prosecutor's Office
ESAs	European Supervisory Authorities
ESMA	European Securities and Markets Authority
EU	European Union
EuReCA	European Reporting System for Material AML/CFT Weaknesses
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
IT	Information technology
ITS	Implementing technical standards
L&D	Learning and development
LIBE	Committee on Civil Liberties, Justice and Home Affairs
MICA	Markets in Crypto-Assets-Regulation
ML/TF	Money laundering/Terrorism financing
MoU	Memorandum of Understanding

OIB	Office for Infrastructure and Logistics
OLAF	European Anti-Fraud Office
RTS	Regulatory technical standards
SCIC	Service for Conference Interpretation
SLA	Service level agreement
SNE	Seconded national expert
SPD	Single Programming Document
SUMMA	European Commission’s financial system
TA	Temporary agent

Terminology

Activity: A coherent area of action with defined objectives and allocated resources designed to achieve specific outcomes within AMLA's mandate.

AML Package: AMLAR, AMLR, AMLD and Transfer of Funds Regulation (EU 2023/1113).

AMLA Task Force: A preparatory task force established within the European Commission, within the Directorate-General for Financial Stability, Financial Services and Capital Markets Union, responsible for coordinating and supporting the legal, administrative, operational and logistical set-up of AMLA prior to and during its establishment phase, until AMLA reached financial autonomy.

Objective: Describes what AMLA or a specific activity seeks to achieve, either in the short term or as part of longer-term strategic direction.

Baseline: The point of reference or starting condition against which achievement or progress towards objectives is measured.

Milestone: An intermediate target set at a specific point in time, expressed in quantitative or qualitative terms, that measures progress towards the achievement of long-term objectives.

Inputs: The human and financial resources, time, and capabilities deployed to conduct activities and produce outputs.

Actions: The work carried out over a defined period, consuming resources and producing outputs in accordance with the objectives set.

Outputs: What is directly produced or supplied by AMLA's intervention. Outputs often relate to the expected deliverables of an activity and are identified based on its operational objectives. Examples include guidelines, regulatory technical standards, supervisory decisions, or analytical reports.

Results: The direct effects or consequences of AMLA's interventions on target groups, such as obliged entities, supervisory authorities, FIUs, or law enforcement partners. Results represent changes in behaviour, compliance, or effectiveness resulting from AMLA's activities.

Impact: The indirect or long-term effects of AMLA's interventions on the EU financial system or global society that are, at least partly, influenced by AMLA's actions. Impacts measure broader systemic improvements such as reduced illicit financial flows, increased financial integrity, or enhanced cooperation in financial intelligence.

Central AML/CFT Database: AMLA's centralized repository of structured information on obliged entities, supervisory measures, risk assessments, and sanctions collected from supervisory authorities across the Union to support convergence and analytical work.

Contact Information

AUTHORITY FOR ANTI-MONEY LAUNDERING AND COUNTERING THE FINANCING OF TERRORISM

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