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KYC / KYB / AML

2026 EDITION

EUROPEAN UNION

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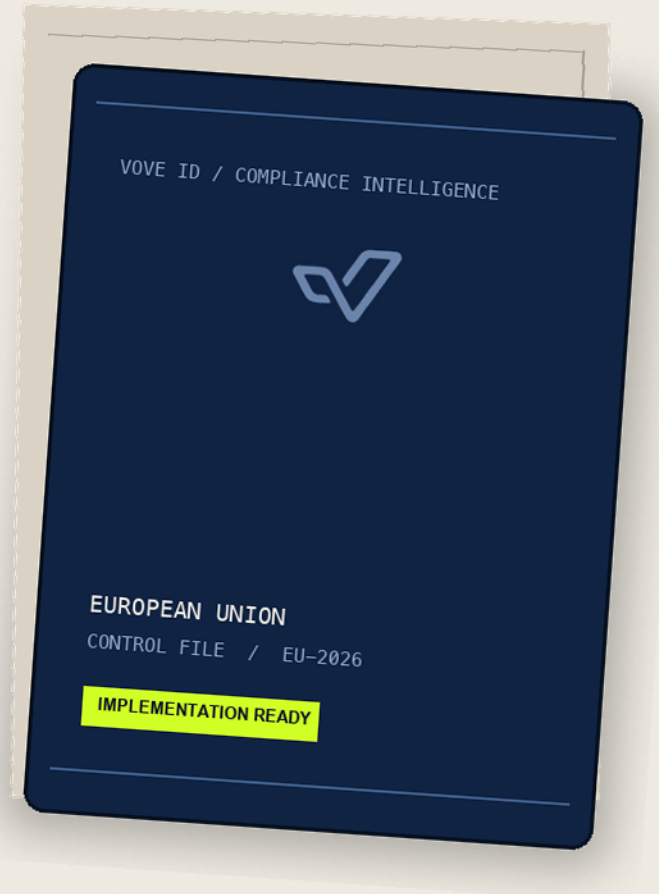

KYC / KYB / AML

COMPLIANCE CHECKLIST

2026 EDITION

IMPLEMENTATION CHECKLIST / NOT LEGAL ADVICE

READ THIS FIRST

European Union KYC, KYB & AML Compliance Checklist

A consolidated implementation checklist for operations across all 27 European Union Member States. It separates directly applicable EU rules from directives implemented through national law, and maps the national FIU, supervisory, registry, sanctions and reporting layer that must be resolved before launch in each Member State.

Current preventive framework	**Directive (EU) 2015/849, as amended, implemented through each Member State's national law until 10 July 2027**
Future single rulebook	**Regulation (EU) 2024/1624 generally applies from 10 July 2027; football agents and professional football clubs from 10 July 2029**
EU-level authority	**AMLA assumed EU-level AML/CFT tasks on 1 January 2026; national authorities and FIUs retain their statutory roles**
Current general CDD floor	**Business relationships always; occasional transactions EUR 15,000 or more; lower and sector-specific national triggers may apply**
Current sector triggers	**Transfers exceeding EUR 1,000; cash goods transactions EUR 10,000 or more; gambling transactions EUR 2,000 or more**
Suspicious reporting	**No EU monetary threshold; report promptly to the FIU designated by the applicable Member State using its national channel**
Beneficial ownership	**Current national transposition generally uses more than 25% ownership plus control and senior-manager fallback; verify the national act and register**
Core AML retention	**EU baseline five years after the relationship ends or occasional transaction; national extension and deletion rules vary**
Transfers and crypto	**Regulation (EU) 2023/1113 has applied since 30 December 2024 to covered funds and crypto-asset transfers**
Financial sanctions	**EU regulations bind operators, but licensing, reporting, investigation and enforcement are handled by national competent authorities**
Privacy	**GDPR applies across the EU, with national laws, supervisory authorities and permitted Member-State specifications**
FATF public lists	**Bulgaria was the only EU Member State named on the FATF increased-monitoring list reviewed 31 July 2026; no EU Member State was on the call-for-action list**

Scope and legal framework

Directive (EU) 2015/849, as amended, operates through national law until 10 July 2027; Regulation (EU) 2024/1624 and Directive (EU) 2024/1640 form the future single rulebook from 10 July 2027; AMLA's EU-level work coexists with national FIUs and supervisors; Regulations (EU) 2023/1113 and 2023/1114 directly govern covered transfers and crypto-asset services; EU sanctions regulations and the GDPR apply directly with programme-specific and national enforcement

FATF context

The European Commission is a FATF member; Member States are assessed individually through FATF or MONEYVAL. On the public lists reviewed 31 July 2026, Bulgaria was the only EU Member State under increased monitoring, with substantial action-plan completion subject to an on-site assessment; no EU Member State faced a call for action. A listing is a risk input, not an instruction to de-risk customer classes.

IMPORTANT	General regulatory information, not legal advice, an authorization decision or a substitute for operative national law. Reviewed 31 July 2026. EU directives require national implementation, while directly applicable regulations still use national authorities. Confirm entity, activity, customer, transaction, thresholds, reporting channel, sanctions route, register access, privacy role and later developments with qualified counsel and the relevant authorities.

HOW TO USE THIS GUIDE

Turn each requirement into owned evidence

For every row, assign an owner, confirm whether the control applies, link the evidence, record gaps, and set a remediation date. A checked box is not evidence by itself.

01 / SCOPE	02 / DESIGN	03 / EVIDENCE	04 / REVIEW
Confirm institution, supervisor, product, customer and risk scope.	Map each obligation to a policy, system control or human review.	Retain the document, decision, timestamp, owner and rationale.	Test the control and update it when rules or risks change.

Checklist legend

CONTROL tells you what outcome to cover. IMPLEMENTATION ACTION translates that outcome into operational work. EVIDENCE suggests what an auditor or reviewer should be able to inspect. SOURCE points back to the primary rule or regulator guidance.

Minimum review record

Keep a compact decision record for each checklist row so a later reviewer can reconstruct what applied, who decided, and what evidence was inspected.

APPLICABILITY	OWNERSHIP	TRACEABILITY
Applicable, not applicable, or pending legal confirmation, with a short rationale.	Named control owner, reviewer, approval date and next review date.	Evidence link, source version, test result, gap status and remediation ticket.

1. LEGAL LAYERS, SCOPE AND TRANSITION

Legal layers, scope and transition

Start with the date, entity, activity and Member State. A directive does not create one identical national operating rule, and a directly applicable regulation does not create one national reporting or enforcement channel.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Until 10 July 2027, Directive (EU) 2015/849 as amended remains the EU preventive baseline through 27 national transposition regimes.	Map every establishment and cross-border service to the current national act, obliged-entity perimeter, exemptions, supervisor and FIU; apply stricter national rules where valid.	Entity and branch map, national-law inventory, perimeter opinions, supervisory allocation, effective-date register and counsel approvals.	Directive (EU) 2015/849, arts. 2, 4-5 and 67; Directive (EU) 2024/1640, art. 77
Regulation (EU) 2024/1624 generally applies from 10 July 2027, with a 10 July 2029 start for football agents and professional football clubs.	Keep the AMLR as a dated change programme, not current operative customer law; map new obliged entities, the EUR 10,000 cash cap and harmonized controls to the correct commencement date.	Transition plan, legal gap assessment, product backlog, training plan, configuration tests and dated launch gates.	Regulation (EU) 2024/1624, arts. 80 and 90
Directive (EU) 2024/1640 has staged national transposition deadlines and replaces the current directive from 10 July 2027.	Track each Member State's enacted measures rather than assuming identical or timely transposition; preserve earlier deadlines for designated provisions and later timing for single FIU access points.	27-state transposition tracker, official-gazette links, legal comparison, dependencies and escalation record.	Directive (EU) 2024/1640, arts. 77-78
AMLA has held transferred EU-level AML/CFT responsibilities since 1 January 2026; its first direct supervision of selected high-risk cross-border financial entities begins in 2028.	Identify the current national financial, professional or self-regulatory supervisor; do not replace the national supervisor or FIU with AMLA, and do not treat the ECB's prudential mandate as general AML supervision.	Authority matrix, future direct-supervision assessment, current supervisory correspondence and FIU routing tests.	Regulation (EU) 2024/1620, arts. 5, 12-17 and 54; AMLA direct-supervision explainer

2. GOVERNANCE AND RISK ASSESSMENT

Governance and risk assessment

The current directives require national risk-based systems; the precise governance allocation, fit-and-proper rules, independent audit and supervisor expectations remain sector- and state-specific.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Obliged entities must identify and assess ML/TF risk using customer, country, product, transaction and delivery-channel factors and keep the assessment current.	Maintain EU group methodology plus entity- and Member-State-specific risk assessments; incorporate national and supranational risk assessments and document divergence.	Business-wide and local risk assessments, source register, methodology, approval minutes, control mapping and update log.	Directive (EU) 2015/849, arts. 6-8
Policies, controls and procedures must be proportionate and include model risk management, CDD, reporting, records, internal control, compliance management and staff screening where appropriate.	Assign accountable management, local MLRO or contact roles required by national law, independent assurance and escalation; reconcile group standards with local mandatory rules.	Governance charter, appointment records, policies, local addenda, training, testing, issues and board reporting.	Directive (EU) 2015/849, arts. 8, 45 and 46
Group-wide controls and information sharing do not override GDPR, national secrecy rules or host-state obligations.	Map controller/processor roles, permitted AML data flows, host requirements and escalation where third-country law prevents group controls.	Group policy, data-flow map, legal-basis analysis, transfer mechanism, conflicts register and regulator communications.	Directive (EU) 2015/849, arts. 45 and 46; GDPR, arts. 5, 6, 28 and 44-49

CDD triggers and natural-person KYC

The directive amounts are minimum harmonization points, not a safe universal configuration. Member States may impose lower thresholds and additional event-, sector- or risk-based triggers.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
CDD is required when establishing a business relationship, on suspicion regardless of threshold, and when prior identification data is doubtful.	Make relationship creation, suspicion and data-quality failure hard triggers in every Member State; overlay local definitions and sector rules.	Trigger matrix, onboarding rules, suspicion override, refresh logic, tests, exceptions and approvals.	Directive (EU) 2015/849, art. 11(a), (e) and (f)
The current directive sets CDD floors at EUR 15,000 for occasional transactions, more than EUR 1,000 for covered funds transfers, EUR 10,000 cash for goods traders and EUR 2,000 for gambling transactions.	Configure the lower of applicable EU and national triggers, aggregate linked operations, preserve sector scope and never describe these as universal transaction-reporting thresholds.	Country threshold table, currency-conversion method, linked-transaction logic, sector mapping, test cases and legal sign-off.	Directive (EU) 2015/849, art. 11(b)-(d)
Identify the customer and verify identity using reliable independent documents, data or information; understand purpose and intended nature and monitor the relationship.	Define risk-based evidence standards, validate authenticity and identity binding, capture purpose and expected activity, and refresh on risk or material change.	Identity evidence, validation result, customer profile, risk decision, timestamps, monitoring and refresh history.	Directive (EU) 2015/849, arts. 13-14
A representative must be authorized and identified and verified; failure to complete required CDD normally prevents the relationship or transaction and requires an STR assessment.	Validate mandates and signatory power; block activation or transaction on unresolved CDD, document national exceptions and escalate reporting without tipping off.	Mandate, representative KYC, restriction, exit record, exception analysis, STR decision and approval.	Directive (EU) 2015/849, arts. 13(1), 14 and 39

KYB, ownership and registers

Corporate CDD, the entity's own national filing duty and access to a national beneficial-ownership register are separate controls. Register access and content differ following EU case law and national legislation.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
For legal persons, understand ownership and control and take reasonable measures to verify beneficial owners, using senior-management fallback only after all possible means are exhausted and no suspicion remains.	Trace each ownership layer to natural persons, test control through other means, record every unsuccessful step before fallback and apply the operative national definition.	Registry extracts, constitutional documents, ownership calculations, control analysis, exhaustion log and reviewer approval.	Directive (EU) 2015/849, arts. 3(6), 13 and 30
The current directive's indicative corporate ownership threshold is more than 25%, but ownership percentage does not displace control through other means and national law can be stricter.	Do not encode 25% as the sole test; identify lower national or sector thresholds and verify direct, indirect, voting, contractual and de facto control.	Country rule table, cap table, indirect ownership calculation, voting agreements, control memo and sign-off.	Directive (EU) 2015/849, art. 3(6)(a)
Member States maintain national central beneficial-ownership registers and BORIS interconnects available national information, but authorization, authentication, fees, covered arrangements and access conditions vary.	Use the correct national company and BO register, evidence lawful access, obtain current extracts and corroborate them; do not treat missing public access or an extract as proof of no beneficial owner.	National register query, BORIS result, access basis, source documents, discrepancy decision and refresh schedule.	Directive (EU) 2015/849, arts. 30-31; European e-Justice Portal, BORIS directory
Obliged entities must report discrepancies found between CDD and register information under the applicable national process.	Define the national recipient, materiality or scope, filing route and timing; retain comparison and resolution evidence without delaying necessary CDD remediation.	Register-to-CDD reconciliation, discrepancy classification, report, acknowledgement, correction and closure record.	Directive (EU) 2015/849, arts. 30(4) and 31(5)

PEPs, EDD and remote onboarding

EDD is risk- and trigger-based. National PEP lists, domestic treatment, high-risk-country measures and acceptable digital identity evidence must be mapped locally.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
For a PEP, family member or known close associate, obtain senior-management approval, establish source of wealth and source of funds, and conduct enhanced ongoing monitoring.	Screen customers, representatives and beneficial owners; adjudicate matches, distinguish the national PEP definition and document relationship-specific approval and evidence.	Screening results, role and relationship analysis, wealth narrative, funds evidence, approval and monitoring plan.	Directive (EU) 2015/849, arts. 20-23
EDD applies to high-risk situations and relationships or transactions involving third countries identified under the EU process, with national additional measures possible.	Maintain separate EU, FATF and national lists, record the legal consequence of each and apply proportionate measures rather than automatic blanket rejection.	List versions, trigger mapping, risk decision, additional evidence, approvals, monitoring and review.	Directive (EU) 2015/849, arts. 18a and 18b; FATF public-list statements
Remote or electronic identification must meet the applicable national assurance, reliability and risk requirements; use of a vendor does not transfer the obliged entity's responsibility.	Assess eIDAS or notified schemes where relevant, document fraud and impersonation controls, accessibility, fallback, vendor assurance and ongoing performance.	Digital-identity assessment, assurance evidence, biometric and liveness tests, exceptions, monitoring and vendor governance.	Directive (EU) 2015/849, art. 13(1)(a); Regulation (EU) No 910/2014 as amended

Monitoring, STRs and tipping off

There is no single EU STR portal or monetary suspicion threshold. Each Member State designates its FIU, national channel, form, language, timing formulation and additional reporting regimes.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Conduct ongoing monitoring, including scrutiny of transactions for consistency with customer knowledge, risk and source of funds where necessary, and keep CDD information current.	Set Member-State and sector scenarios, investigate unusual activity, refresh profiles and document disposition, escalation and model performance.	Monitoring inventory, alert files, customer refresh, source-of-funds evidence, tuning, testing and governance.	Directive (EU) 2015/849, art. 13(1)(d) and (4)
Where an obliged entity knows, suspects or has reasonable grounds to suspect ML/TF or criminal proceeds, it must inform the applicable national FIU promptly, including attempted transactions where national law so requires.	Route the report to the establishment's designated FIU through the live national portal, preserve urgency, language and form requirements and document why each state nexus was selected.	FIU routing matrix, report, timestamps, acknowledgement, attempted-transaction flag, rationale and follow-up correspondence.	Directive (EU) 2015/849, arts. 32-35 and 37
Do not execute a suspicious transaction before informing the FIU where national law permits the required restraint; if restraint is impossible or could frustrate pursuit, report immediately afterwards.	Implement jurisdiction-specific stop, consent, moratorium and emergency rules; obtain legal escalation before moving funds or disclosing the report.	Hold decision, FIU instruction, legal advice, transaction timestamp, exception rationale and release approval.	Directive (EU) 2015/849, art. 35
Protect FIU reports and related information from prohibited disclosure, subject to defined group, professional and authority exceptions in national law.	Restrict access, train staff, control customer communications and document the legal basis for any permitted information sharing.	Access log, confidentiality labels, scripts, training, sharing assessment and incident record.	Directive (EU) 2015/849, arts. 38-39

Threshold reports, payments and crypto-assets

CDD thresholds, cash-payment limits, declarations and threshold reports are different concepts. National objective or systematic reports must not be inferred from the EU CDD amounts.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
The current EU framework does not create one universal cash-transaction report for all obliged entities.	For each Member State, distinguish CDD triggers, legal cash-payment caps, customs cash declarations, sector-specific notifications and automatic or systematic FIU reports from suspicion-based STRs.	Country reporting matrix, statutory basis, form, portal, frequency, aggregation rule, tests and filing receipts.	Directive (EU) 2015/849, arts. 11 and 33; Regulation (EU) 2018/1672
Regulation (EU) 2023/1113 requires prescribed originator and beneficiary information and risk-based handling of missing information for covered funds and crypto-asset transfers.	Map payer/payee and originator/beneficiary data by role and transfer type, validate completeness, reject or suspend where required and monitor repeated failures.	Message schema, transfer samples, missing-data rules, rejections, counterparty monitoring and quality metrics.	Regulation (EU) 2023/1113, arts. 4-22
Covered payment service providers and crypto-asset service providers need controls for Union and national restrictive measures when performing transfers.	Screen transfer parties and ownership/control using current EU legal acts and national requirements; connect alerts to freeze, reject, licence and reporting workflows.	Screening configuration, list provenance, alert files, ownership analysis, freeze or rejection, licence and report.	Regulation (EU) 2023/1113, art. 23
MiCA's maximum grandfathering period ended on 1 July 2026; an in-scope provider serving EU clients after that date needs MiCA authorization or another valid status.	Confirm scope, home-state competent authority, authorization and passport status; stop in-scope service where no valid authorization or exclusion exists.	Service classification, authorization, ESMA register extract, passport notice, exclusion analysis and launch gate.	Regulation (EU) 2023/1114, arts. 59-65 and 143; ESMA, end of MiCA transitional period

8. TARGETED FINANCIAL SANCTIONS

Targeted financial sanctions

EU restrictive-measures regulations are directly applicable, but the operative regulation, ownership/control analysis, licences, reporting and penalties remain programme- and Member-State-specific.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Operators must comply with asset-freeze, non-availability and other prohibitions in the exact EU restrictive-measures regulation that applies.	Screen the current EU consolidated data as an aid, verify matches and obligations against the Official Journal act, assess ownership/control and block prohibited dealings.	Legal-act version, list snapshot, match decision, ownership analysis, freeze or rejection, approval and audit trail.	Applicable Council Decision and Council Regulation; Commission sanctions resources
Licensing, derogations, frozen-asset reporting and suspected-breach routes are administered by the national competent authority or authorities identified for the relevant Member State and programme.	Use the Commission national-authority directory to select the correct authority; do not treat the Commission whistleblower tool as a substitute for mandatory national reporting.	Authority selection, licence application, frozen-asset report, acknowledgement, legal advice and renewal calendar.	Commission, Contacts on EU sanctions and national competent-authority directory
Directive (EU) 2024/1226 establishes minimum criminal-law rules for sanctions violations, but national transposition, enforcement bodies and Denmark's treaty position must be checked.	Map applicable national offences, attempts, circumvention, liability and penalties; escalate potential violations to the competent national investigative or enforcement authority.	National transposition, offence analysis, incident file, escalation, report and remediation.	Directive (EU) 2024/1226, arts. 3-15 and 20

9. RECORDS AND AUTHORITY ACCESS

Records and authority access

The five-year EU baseline is implemented through national law and can coexist with longer lawful periods, regulatory holds, sector records and GDPR deletion duties.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Keep CDD documents and information and transaction records for five years after the business relationship ends or the occasional transaction, subject to national extension within EU limits.	Define each record trigger, national extension, legal hold and deletion event; prevent indefinite retention justified only by generic AML need.	Retention schedule, trigger fields, national-law mapping, deletion jobs, holds, test results and exceptions.	Directive (EU) 2015/849, art. 40
Records must allow reconstruction and be available to the competent FIU and authorities in accordance with national law and secure-channel requirements.	Index identity, ownership, transaction, monitoring and report evidence; authenticate authority requests and deliver complete records through approved channels.	Evidence index, request log, authority verification, production record, access controls and chain of custody.	Directive (EU) 2015/849, arts. 32, 40 and 44
Regulation (EU) 2023/1113 sets a five-year retention period for required transfer information, with national law able to permit or require a further period not exceeding five years after assessment.	Separate transfer-rule records from other AML records, document any national extension and delete personal data when the lawful period expires.	Transfer record class, national extension assessment, retention controls, deletion log and sampled reconstruction.	Regulation (EU) 2023/1113, art. 26

GDPR, biometrics and transfers

AML duties do not displace data-protection principles. KYC processing needs a purpose-specific lawful basis, minimization, security, retention and rights analysis in every operating model.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Process KYC personal data lawfully, fairly and transparently for specified purposes, minimize it, keep it accurate, limit retention and secure it with demonstrable accountability.	Document controller roles and Article 6 bases, notices, purpose limits, data minimization, accuracy, retention and technical and organizational measures.	Record of processing, lawful-basis assessment, notices, data map, retention schedule, security controls and DPIA decisions.	GDPR, arts. 5, 6, 24, 25, 30 and 32
Biometric data used to uniquely identify a person is special-category data and requires both an Article 6 basis and an Article 9 condition, including any national-law condition relied on.	Prove necessity and proportionality, document the condition, limit templates and raw media, offer appropriate fallback and assess accuracy and bias.	Biometric assessment, legal basis and condition, DPIA, vendor tests, fallback records, deletion and incident controls.	GDPR, arts. 4(14), 6 and 9
Complete a DPIA before likely high-risk processing; notify the supervisory authority of a qualifying breach without undue delay and, where feasible, within 72 hours.	Screen each KYC use case for high risk, consult where residual high risk remains, operate 24-hour incident escalation and apply individual-notification rules.	DPIA screen and assessment, consultation, breach log, risk analysis, authority notice, individual notice and lessons learned.	GDPR, arts. 33-36
Transfers outside the EEA require a valid Chapter V route and, where necessary, supplementary measures; processor and onward-transfer controls remain separate.	Map destinations and remote access, select adequacy, SCCs, BCRs or a narrow derogation, assess destination law and control onward transfers.	Transfer map, mechanism, transfer impact assessment, SCC module, supplementary controls, approvals and reassessment.	GDPR, arts. 44-49; Commission Implementing Decision (EU) 2021/914

National implementation - Austria to Ireland

These state rows identify the implementation route and a material operational distinction. They do not replace the operative national act, sector rule or live authority instruction. Suspicion reporting is threshold-free unless a separate national reporting regime expressly applies.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Austria - FIU Austria receives goAML reports; FMA is the principal financial AML supervisor, with OeNB involvement; Firmenbuch and WiEReG provide company and BO data; sanctions competence is split among OeNB, FMA and other authorities.	Report suspicion without undue delay through goAML. No universal CTR was verified. Reconcile five-year core retention with lawful extension; complete WiEReG annual verification and report or confirm non-exempt entities within four weeks.	FIU receipt, FMA perimeter, Firmenbuch/WiEReG extracts, annual BO review, national threshold decision and measure-specific sanctions routing.	Austrian FM-GwG; BMF WiEReG and sanctions guidance; Commission sanctions NCA directory
Belgium - CTIF-CFI is the FIU; NBB and FSMA supervise financial sectors; BCE/KBO and the FPS Finance UBO Register are distinct sources; FPS Finance Treasury leads financial-sanctions functions.	Report immediately, normally before execution. Do not confuse Belgium's generally EUR 3,000 cash-payment restriction with a CTR. Apply ten-year AML retention and the 30-day plus annual UBO filing/confirmation duties where applicable.	CTIF-CFI report, NBB/FSMA allocation, BCE and UBO extracts, cash-limit control, ten-year schedule and Treasury routing.	Belgian AML Law of 18 September 2017; CTIF-CFI, NBB and FPS Finance guidance
Bulgaria - SANS Financial Intelligence Directorate is the FIU; BNB and the Financial Supervision Commission supervise financial sectors; BO information sits in Commercial, non-profit and BULSTAT registers.	Report suspicion immediately and before execution where possible through the current SANS route. No universal CTR was verified; treat national cash-payment limits as payment controls, not FIU threshold reports. Route sanctions by measure.	SANS submission, BNB/FSC perimeter, Registry Agency extract, cash-control analysis, retention decision and sanctions authority selection.	Bulgarian Measures Against Money Laundering Act; BNB and Registry Agency official material
Croatia - the Ministry of Finance Anti-Money Laundering Office is the FIU; CNB, HANFA and the Financial Inspectorate divide supervision; FINA maintains the BO Register.	Report without delay and before execution, or by the next working day where the statutory post-execution exception applies. Report cash transactions of EUR 10,000 or more and enforce the separate EUR 10,000 cash-payment prohibition; apply ten-year retention.	AMLO report, timing rationale, cash report, payment block, CNB/HANFA mapping, FINA extract and ten-year schedule.	Croatian AML/CFT Law; Ministry of Finance and government BO Register guidance

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Cyprus - MOKAS is the FIU; CBC, CySEC and the insurance supervisor divide financial supervision; the corporate BO register and CyTBOR for trusts are separate; NSIU handles sanctions implementation and licensing.	Use MOKAS goAML and the May 2026 reporting guidance promptly. No universal CTR was verified. Query the register matching the legal arrangement, apply five-year retention and use NSIU plus the relevant sector authority.	MOKAS filing, CBC/CySEC perimeter, corporate/CyTBOR extracts, five-year schedule, NSIU licence or report and acknowledgement.	Cyprus AML Law and MOKAS guidance; CySEC CyTBOR; NSIU guidance
Czechia - FAU is the FIU and central financial-sanctions authority; CNB supervises financial institutions; the Ministry of Justice system maintains the BO Register.	File through MoneyWeb without undue delay; where circumstances require, particularly where delay is dangerous, report immediately after detection. The current Act has no five-calendar-day outer limit. No universal CTR was verified. Apply ten-year retention.	MoneyWeb receipt, urgency/timing record, CNB allocation, BO extract, ten-year schedule and FAU sanctions decision.	Czech AML Act, s. 18(1), current text effective 11 January 2026; FAU and CNB guidance
Denmark - the NSK Money Laundering Secretariat is the FIU; Finanstilsynet and the Danish Business Authority divide supervision; CVR contains company and BO information; sanctions competence is measure-specific.	Submit goAML immediately when suspicion cannot be rebutted. No universal CTR was verified; do not treat the business cash-payment ceiling as a report. Apply five-year retention and select the Business Authority, Finanstilsynet or other competent body by measure.	goAML receipt, suspicion decision, supervisory map, CVR extract, cash-limit analysis, retention and sanctions routing.	Danish AML Act; hvidvask.dk, Finanstilsynet and CVR guidance
Estonia - the Financial Intelligence Unit is the FIU and financial-sanctions authority; Finantsinspektsioon supervises licensed finance; the e-Business Register holds BO data under restricted access from 10 July 2026.	Report suspicion without delay and no later than two working days. Except for credit institutions, report within that period a cash monetary obligation over EUR 32,000, including linked payments over up to one year. For credit institutions, the category is an occasional cash FX transaction over EUR 32,000 without a business relationship.	RABIS receipt, two-day clock, entity classification, linked-payment or FX threshold report, lawful BO access and sanctions filing.	Estonian AML/CFT Act, ss. 49(3), 49(5) and 49(8), consolidated 16 February 2026
Finland - the National Bureau of Investigation FIU receives reports; FIN-FSA supervises finance; PRH maintains BO data; the Foreign Ministry, Enforcement Authority and sector bodies divide sanctions roles.	Report electronically without delay. No universal CTR was verified. Apply five-year retention, obtain PRH data under the applicable purpose/entitlement rules and route licences, freezes and investigations to the correct body.	FIU submission, FIN-FSA mapping, PRH access and extract, retention record, sanctions licence/freezing route and acknowledgement.	Finnish AML Act; Police, FIN-FSA, PRH and Foreign Ministry guidance

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
France - TRACFIN is the FIU; ACPR and AMF divide financial supervision; INPI operates the national enterprise/BO system; Treasury administers financial sanctions.	File through ERMES before execution where required, using the statutory post-execution exceptions only. File COSI independently for covered cash/e-money transfers over EUR 1,000 per operation or EUR 2,000 monthly and cash deposits/withdrawals over EUR 10,000 monthly.	ERMES report, execution decision, COSI file and receipt, ACPR/AMF allocation, INPI extract, five-year schedule and Treasury sanctions record.	French Monetary and Financial Code; TRACFIN declarative-obligations guidance
Germany - the General Customs Directorate FIU receives goAML reports; BaFin supervises most regulated finance; Handelsregister and Transparenzregister are separate; Bundesbank and BAFA split financial and trade sanctions.	Register and report in goAML without undue delay. No universal CTR exists; implement fact-pattern real-estate reports and the real-estate cash-payment prohibition where applicable. Retain five years and destroy no later than ten years absent another basis.	goAML registration/receipt, BaFin mapping, register extracts, real-estate control, retention/deletion record and Bundesbank/BAFA routing.	German Money Laundering Act and GwGMeldV; BaFin and FIU guidance
Greece - Unit A of the Hellenic AML Authority is the FIU; Bank of Greece and HCMC divide financial supervision; the Central BO Register is distinct from GEMI; Unit B handles financial sanctions.	Report electronically without delay. No universal CTR was verified. File BO data within the national 60-day rule where applicable, apply five-year retention and keep Unit A reporting separate from Unit B sanctions action.	FIU receipt, BoG/HCMC perimeter, Central BO and GEMI extracts, 60-day filing proof, retention and Unit B record.	Greek Law 4557/2018; Hellenic AML Authority and government BO Register guidance
Hungary - the NAV Financial Intelligence Unit receives reports and handles financial sanctions; MNB supervises finance; NAV maintains central BO, bank-account and safe-deposit registers.	Report immediately through the protected national route. No universal CTR was verified. Apply the national eight-year retention period and reconcile BO reliability-index or discrepancy results rather than relying on the register alone.	FIU submission, MNB allocation, BO reliability result, discrepancy action, eight-year schedule and NAV sanctions record.	Hungarian Pmt and Afad Acts; NAV FIU/register and MNB guidance
Ireland - FIU Ireland receives goAML reports and the Central Bank supervises finance; company, trust and certain financial-vehicle BO registers are separate; sanctions roles include the Central Bank and government departments.	Make both required filings as soon as practicable: goAML to FIU Ireland and ROS to Revenue. No universal CTR was verified. Apply at least five-year retention and select the correct BO register and sanctions authority.	goAML and ROS receipts, dual-filing reconciliation, Central Bank perimeter, correct BO extract, retention and sanctions report.	Criminal Justice (Money Laundering and Terrorist Financing) Act 2010, s. 42; Revenue and Central Bank guidance

National implementation - Italy to Sweden

Use the state-specific FIU, supervisor, register and sanctions authority. Cross-border groups may need more than one filing or supervisory engagement where establishments or services create multiple national nexuses.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Italy - UIF is the autonomous FIU at Banca d'Italia; Banca d'Italia, IVASS and CONSOB divide supervision; the Business Register hosts the BO filing system; MEF's Financial Security Committee coordinates financial sanctions.	File SOS through Infostat-UIF without delay and where possible before execution. Covered firms also send monthly objective communications for aggregate cash activity of at least EUR 10,000, counting individual cash operations of at least EUR 1,000. Apply ten-year retention.	SOS and objective-report receipts, supervisory map, register result with access caveat, ten-year schedule and CSF routing.	Italian Legislative Decree 231/2007; UIF SOS and objective-communications rules
Latvia - FIU Latvia receives goAML reports, supervises major sanctions functions and works with Latvijas Banka and other sector supervisors; the Enterprise Register holds BO data under access rules changed 1 July 2026.	Report suspicion and sanctions triggers immediately through goAML. Apply Cabinet Regulation 550 category thresholds rather than one generalized amount, five-year retention and the restricted-access BO model including new nationality/control fields.	goAML receipt, threshold category and filing, Latvijas Banka allocation, lawful BO extract, retention and sanctions action.	Latvian AML/CFT/PF Prevention Law; FIU and Enterprise Register guidance
Lithuania - FCIS is the FIU and a core financial-sanctions authority; Bank of Lithuania supervises finance; JAR and JADIS are distinct company and BO systems.	Report suspicion immediately through the FCIS route and report covered cash transactions of EUR 15,000 or more, including linked transactions, under current implementing instructions. Apply the national eight-year period to the correct CDD/transaction record classes.	FCIS receipts, threshold aggregation, Bank of Lithuania allocation, JAR/JADIS extracts, record-class schedule and sanctions routing.	Lithuanian AML/CFT Law; FCIS, Bank of Lithuania and Centre of Registers guidance
Luxembourg - the CRF is the FIU; CSSF and CAA divide financial supervision; LBR operates RCS and RBE; Finance and Foreign Ministries divide sanctions functions.	File STR or SAR exclusively through goAML promptly, including attempts. No universal CTR was verified. Apply five-year retention, lawful RBE access after CJEU restrictions and the ministry/sector route matching the sanction.	goAML receipt, STR/SAR classification, CSSF/CAA allocation, RCS/RBE extracts, retention and sanctions licence/report.	Luxembourg Law of 12 November 2004; CRF, CSSF, LBR and Finance Ministry guidance

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Malta - FIAU is the FIU and AML supervisor working with MFSA; MBR maintains corporate BO data; the Sanctions Monitoring Board is the central sanctions body.	Report through goAML as soon as reasonably practicable and no later than five working days after suspicion first arose unless exceptional circumstances justify otherwise. Do not delay to the outer limit. No universal CTR was verified; apply five-year retention.	goAML receipt, first-suspicion timestamp, delay exception if any, FIAU/MFSA mapping, MBR extract, retention and SMB record.	Malta PMLFTR; FIAU reporting guidance; MBR and SMB guidance
Netherlands - FIU-Nederland receives reports of unusual transactions; DNB, AFM and other designated bodies divide supervision; KVK maintains company and separate UBO registers; sanctions supervision is sector-split.	Report an unusual transaction without delay under the applicable objective or subjective indicator; do not wait until FIU declares it suspicious and do not invent one national threshold. Apply five-year retention and current restricted UBO access.	FIU report, indicator selection, DNB/AFM allocation, KVK/UBO extract, five-year schedule and measure-specific sanctions route.	Dutch Wwft and Implementing Decree; FIU-Nederland, DNB and KVK guidance
Poland - GIIF is the FIU; KNF and GIIF/other bodies divide supervision; KRS and CRBR are distinct; sanctions enforcement is divided around the Interior Ministry list and KAS/sector bodies.	Apply the two-working-day descriptive suspicion route and immediate transaction-specific route as applicable. Report Article 72 cash and specified transfers above EUR 15,000 generally within seven days. Apply five-year retention and independently verify CRBR data.	GIIF receipt and clock, threshold report, KNF allocation, KRS/CRBR extracts, retention and national-sanctions-list check.	Polish AML Act, arts. 72, 74 and 86; GIIF and CRBR guidance
Portugal - the Polícia Judiciária UIF is the FIU; Banco de Portugal, CMVM and ASF divide financial supervision; RCBE is distinct from the Commercial Register; sanctions roles are distributed.	Immediately report through Portal COS to both UIF and DCIAP, regardless of amount. Apply the periodic/systematic Article 45 typologies under Portaria 310/2018 rather than one cash threshold, and retain records for seven years.	UIF and DCIAP delivery proof, systematic report, supervisory allocation, RCBE extract, seven-year schedule and sanctions routing.	Portuguese Law 83/2017 and Portaria 310/2018; Portal BCFT and Banco de Portugal guidance
Romania - ONPCSB is the FIU and supervises specified sectors; NBR and ASF supervise finance; ONRC maintains company BO information; sanctions competence is split by measure.	Report suspicion immediately; use the statutory post-execution exception and 24-hour outer wording only where its conditions are met. Report linked cash operations and covered external account transfers at or above EUR 10,000 under the current filing deadline.	SETD receipt, execution/timing analysis, threshold aggregation/report, NBR/ASF mapping, ONRC extract, five-year schedule and sanctions route.	Romanian Law 129/2019; ONPCSB and ONRC guidance

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Slovakia - the Police Force FIU receives reports; NBS and the FIU/other bodies divide supervision; the Commercial Register BO record and RPVS public-sector-partner register have different scopes; sanctions competence is measure-specific.	Report unusual business transactions without undue delay, including attempts. No universal CTR was verified; do not treat cash ceilings as FIU reports. Apply five-year retention and never substitute RPVS for AML BO work.	FIU submission, NBS allocation, Commercial Register and RPVS results, five-year schedule, cash-limit analysis and sanctions authority selection.	Slovak Act 297/2008, consolidated 15 January 2025; FIU, NBS and Justice Ministry guidance
Slovenia - the Office for Money Laundering Prevention is the FIU; Bank of Slovenia, Securities Market Agency and Insurance Supervision Agency divide finance; AJPES maintains the BO Register.	Report before execution and immediately, documenting any statutory impossibility. File reports for cash transactions of EUR 15,000 or more and covered transfers involving designated high-risk countries of EUR 15,000 or more, generally within three working days. Retain ten years.	FIU receipt, pre-execution decision, threshold reports, supervisory map, lawful AJPES access, ten-year schedule and sanctions route.	Slovenian APMLTF-2; OMLP and AJPES guidance
Spain - SEPBLAC is the FIU and specialist AML supervisor, coordinating with Banco de Espana, CNMV and DGSFP; RCTIR is distinct from the Mercantile Registry; Treasury handles financial sanctions.	Report suspicion without delay. File monthly DMO systematic reports for applicable categories, including specified physical cash/bearer movements over EUR 30,000, remitter physical movements over EUR 1,500 and designated-country transactions over EUR 30,000; apply ten-year retention.	SEPBLAC receipt, DMO and nil reports, supervisory map, RCTIR extract, ten-year schedule and Treasury record.	Spanish Law 10/2010 and implementing rules; SEPBLAC systematic-reporting guidance
Sweden - the Police Finanspolisen is the FIU; Finansinspektionen supervises most regulated finance; Bolagsverket maintains BO data; sanctions implementation is divided among government, FI, ISP, Customs and enforcement bodies.	Report in goAML without delay when reasonable grounds exist. No universal CTR was verified. Apply five-year retention, obtain current Bolagsverket information and separate FI supervisory data collection from transaction reporting.	goAML receipt, FI perimeter, BO extract, five-year schedule, reporting-classification note and competent sanctions route.	Swedish Money Laundering Act; Police, Finansinspektionen and Bolagsverket guidance

13. PRACTICAL EVIDENCE PACK AND LAUNCH GATE

Practical evidence pack and launch gate

No EU-wide checklist row is complete until the directly applicable rule and the relevant national implementation are reconciled for the actual entity, service, customer and transaction.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain a 27-state authority and rule matrix with effective dates, FIU portals, supervisors, registers, sanctions authorities, reporting regimes, thresholds and retention.	Assign local legal owners, recheck live links and forms before launch, record conflicts and version every change.	Approved matrix, source snapshots, link checks, form samples, owners, effective dates and change tickets.	Directive (EU) 2015/849, arts. 5, 32-33, 45 and 48
For every product and country, determine applicable authorization, AML supervision, payment or e-money status, MiCA treatment, passporting and agent or distributor duties.	Gate launch on written perimeter analysis and register confirmation in the home and relevant host states.	Permission matrix, register extracts, passport notifications, agent filings, terms, approvals and launch record.	Applicable national law; PSD2; EMD2; MiCA
Test reporting and restraint workflows with the actual national FIU and sanctions-authority routes without sending test personal data to production portals.	Use documented dry runs, verify credentials and availability, maintain emergency contacts and capture evidence after each real filing.	Dry-run results, access validation, contact tree, incident exercise, receipts and post-filing review.	Directive (EU) 2015/849, arts. 33-39; applicable sanctions regulation and national law
Each row requires an explicit applicability decision, current source, owner, operating evidence and independent review before launch.	Mark applicable, not applicable or pending counsel confirmation; close blockers and obtain compliance, legal, privacy, security and product approval.	Completed checklist, rationale, source version, control test, gap ticket, reviewer sign-off and launch approval.	Directive (EU) 2015/849, arts. 8, 40, 45-46

SOURCES AND FURTHER READING

Verify against current official material

Primary law and regulator guidance control. Contextual VOVE ID reading is included to help teams operationalize the requirements and is not legal authority.

Fourth Anti-Money Laundering Directive - current consolidated framework
EUR-Lex · Primary EU law
Open official source

Regulation (EU) 2024/1624 - AML single rulebook
EUR-Lex · Primary EU law - future application
Open official source

Directive (EU) 2024/1640 - national AML mechanisms
EUR-Lex · Primary EU law - staged transposition
Open official source

Regulation (EU) 2024/1620 establishing AMLA
EUR-Lex · Primary EU law
Open official source

AMLA General Board - FIU composition
AMLA · Official current authority directory
Open official source

AMLA General Board - supervisory composition
AMLA · Official current authority directory
Open official source

AMLA direct supervision timetable
AMLA · Official authority explainer
Open official source

Commission register of national AML/CFT competent authorities
European Commission · Official authority directory
Open official source

Beneficial Ownership Registers Interconnection System directory
European e-Justice Portal · Official registry directory
Open official source

Business registers in EU countries
European e-Justice Portal · Official registry directory
Open official source

Regulation (EU) 2023/1113 on information accompanying transfers
EUR-Lex · Primary EU law
Open official source

Regulation (EU) 2023/1114 on markets in crypto-assets
EUR-Lex · Primary EU law
Open official source

End of the MiCA transitional period
European Securities and Markets Authority · Official supervisor statement
Open official source

Directive (EU) 2018/1673 on combating money laundering by criminal law
EUR-Lex · Primary EU law
Open official source

Directive (EU) 2024/1226 on sanctions violations
EUR-Lex · Primary EU law
Open official source

EU sanctions overview and consolidated financial sanctions list
European Commission · Official sanctions resource
Open official source

Contacts and national competent authorities for EU sanctions
European Commission · Official sanctions authority directory
Open official source

National competent authorities for EU sanctions
European Commission · Official sanctions authority directory
Open official source

General Data Protection Regulation
EUR-Lex · Primary EU law
Open official source

Standard contractual clauses for international transfers
EUR-Lex · Primary EU implementing decision
Open official source

European data-protection supervisory authorities
European Data Protection Board · Official authority directory
Open official source

Regulation (EU) 2018/1672 on cash entering or leaving the Union
EUR-Lex · Primary EU law
Open official source

Payment Services Directive
EUR-Lex · Primary EU law
Open official source

Electronic Money Directive
EUR-Lex · Primary EU law
Open official source

eIDAS Regulation - consolidated text
EUR-Lex · Primary EU law
Open official source

Austria Financial Markets Anti-Money Laundering Act
Austrian Legal Information System · Primary national law
Open official source

Belgium AML/CFT supervisory information
National Bank of Belgium · Official national supervisor guidance
Open official source

Bulgaria AML/CFT supervision
Bulgarian National Bank · Official national supervisor guidance
Open official source

Croatia AML/CFT legislation and implementing material
Ministry of Finance of Croatia · Official national authority material
Open official source

Cyprus MOKAS reporting portal
Unit for Combating Money Laundering · Official national FIU portal
Open official source

Czech AML/CFT Act - current English text
Financial Analytical Office · Official national law reproduction
Open convenience reproduction

Denmark suspicious-reporting guidance
Danish Money Laundering Secretariat · Official national FIU guidance
Open official source

Estonia AML/CFT Act - consolidated English text
Riigi Teataja · Primary national law
Open official source

Finland AML/CFT risk and customer-due-diligence regulations and guidelines
Finnish Financial Supervisory Authority · Official national supervisor instrument
Open official source

France declarative AML obligations
TRACFIN · Official national FIU guidance
Open official source

Germany Money Laundering Act
Federal Ministry of Justice · Primary national law
Open official source

Greece AML/CFT Law 4557/2018 - English text
Hellenic Anti-Money Laundering Authority · Official national law reproduction
Open convenience reproduction

Hungary Financial Intelligence Unit
National Tax and Customs Administration · Official national FIU information
Open official source

Ireland suspicious-transaction dual reporting
Revenue Commissioners · Official national reporting guidance
Open official source

Italy suspicious-transaction reporting
Financial Intelligence Unit for Italy · Official national FIU guidance
Open official source

Latvia AML/CFT/PF Prevention Law - English text
Latvian Legal Acts · Primary national law
Open official source

Lithuania money-laundering prevention
Financial Crime Investigation Service · Official national FIU guidance
Open official source

Luxembourg goAML reporting
Financial Intelligence Unit of Luxembourg · Official national FIU guidance
Open official source

Malta suspicious-transaction reporting
Financial Intelligence Analysis Unit · Official national FIU guidance
Open official source

Netherlands unusual-transaction reporting duty
FIU-Nederland · Official national FIU guidance
Open official source

Poland above-threshold transaction reporting
General Inspector of Financial Information · Official national FIU guidance
Open official source

Portugal suspicious-operation reporting
Portuguese AML/CFT Portal · Official national reporting guidance
Open official source

Romania Law 129/2019 - current consolidated record
Romanian Legislative Portal · Primary national law
Open official source

Slovakia AML/CFT Act - English text
Ministry of Interior of Slovakia · Official national law reproduction
Open convenience reproduction

Slovenia AML/CFT Act - English text
Office for Money Laundering Prevention · Official national law reproduction
Open convenience reproduction

Spain systematic AML reporting
SEPBLAC · Official national FIU guidance
Open official source

Sweden Financial Police and suspicious reporting
Swedish Police Authority · Official national FIU guidance
Open official source

FATF members and assessment arrangements
Financial Action Task Force · Official international status
Open official source

FATF black and grey lists
Financial Action Task Force · Official current-status source
Open official source

Outcomes of the FATF Plenary, June 2026
Financial Action Task Force · Official current-status source
Open official source

MONEYVAL country and territory evaluations
Council of Europe MONEYVAL · Official international assessment
Open official source

Document control

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General regulatory information, not legal advice, an authorization decision or a substitute for operative national law. Reviewed 31 July 2026. EU directives require national implementation, while directly applicable regulations still use national authorities. Confirm entity, activity, customer, transaction, thresholds, reporting channel, sanctions route, register access, privacy role and later developments with qualified counsel and the relevant authorities.