

The New EU AML/CTF Package

What Firms Should Know



The New EU AML/CTF Package:

What Firms Should Know

Almost three years to the day after first being tabled, the European Parliament passed a new AML/CTF rule package on 24 April, with the final legal acts published in the Official Journal of the EU on 19 June.

Aimed at strengthening the AML/CTF systems and promoting a harmonised approach to tackling financial crime across the EU, the package is comprised of:

- [Regulation \(EU\) 2024/1624](#) on preventing the use of the financial system for the purposes of money laundering or terrorist financing [AMLR]
- [Directive \(EU\) 2024/1640](#) on the mechanisms to be implemented by Member States to prevent the use of the financial system for the purposes of money laundering or terrorist financing [6MLD]
- [Regulation \(EU\) 2024/1620](#) establishing the Authority for Anti-Money Laundering and Countering the Financing of Terrorism [AMLA]



This article provides key details on the new legal acts affecting EU-regulated firms and the impact assessments or operational changes which may be required. Firms can begin preparing for the phased implementation of these regulations.

AMLR

The new AMLR regulation is designed to harmonise the fight against ML/TF across EU member given its provisions are directly applicable in Member States. AMLR took effect on 9 July and will apply to member states from 10 July 2027 onwards, with the exception of provisions related to certain obliged entities¹ which will apply two years later.

The AMLR will:

- Expand the scope of obliged entities to address new risks and apply rules to new technologies. The list will include most crypto-asset service providers [CASPs]², crowdfunding platforms, Virtual IBANs, and numerous designated non-financial businesses and professions [DNFBPs], including precious metals and stones dealers, alongside traders of luxury cars, aeroplanes, and yachts.
- Extend the applicability of AML/CTF requirements to football agents and professional clubs including conducting customer due diligence [CDD] on investors, sponsors, including advertisers, and other partners and counterparties with whom they transact. If deemed low risk, member states will be able to exempt certain professional football clubs from the requirements.

¹ Entities for whom certain provisions will apply from 10th July 2029 are listed in Article 3, points (3)(n) and (o) of AMLR

² The 5th Money Laundering Directive (5MLD) previously included two types of CASPs as obliged entities: those engaged in exchange services between virtual currencies and fiat currencies, and custodial wallet providers

- Introduce an EU-wide limit on large cash payments above €10,000. Member states will be able to lower the maximum limit based on national risk assessments.
- Require CASPs to apply CDD on occasional transactions of €1000 or more.
- Set new specific enhanced due diligence [EDD] requirements. CASPs will be required to conduct EDD on cross-border correspondent relationships. Credit and financial institutions will need to conduct EDD on relationships with high net-worth individuals, with a total wealth above €50,000,000, involving the handling of assets under management above €5,000,000. All obliged entities will have EDD obligations on occasional transactions and business relationships involving high-risk third countries, based on assessments they conduct with regard to Financial Action Task Force [FATF] 'grey' and 'black' lists.
- Establish the beneficial ownership threshold for corporate entities at 25%, with all shareholdings at every level of ownership to be considered. For corporate entities assessed as having higher ML/TF risk exposure, member states can propose lower thresholds to the EU Commission, no less than 15%.

6MLD

The Sixth AML Directive introduces new measures for member states to implement in strengthening their national AML/CTF systems and transpose into law by 10 July 2025. It will remain important for firms to be aware of the growing powers of the Financial Intelligence Units [FIUs] of their operating jurisdictions, as to ensure full communication and compliance with any supervisory expectations and requests.

6MLD will:

- Require member states to store all beneficial ownership information in a central register and make it available to competent authorities, obliged entities conducting CDD, and to members of the public displaying legitimate interest, as well as verifying that the information is accurate and up-to-date.
- Further empower EU FIUs: They will be able access financial, administrative and law enforcement information, and have powers to suspend the use of a bank account or payment account, crypto-asset account, or a business relationship in order to analyse suspicious behaviour and share these results with authorities.
- Encourage further cross-border communication and collaboration between FIUs to further harmonise approaches to fighting financial crime across the EU.





AMLA

Established from 1 July 2025, and headquartered in Frankfurt, the new [Anti-Money Laundering Authority](#) will act as the central hub for FIUs across the EU.

The Authority will:

- Have supervisory powers over high-risk or cross-border credit and financial institutions, with institutions selected for assessments and inspections to ensure AML/CTF compliance.
- Be empowered to implement pecuniary sanctions on selected obliged entities deemed to be in serious, systematic, or repeated breach of rules.

- Have a stronger whistleblowing mechanism.
- Be able to settle disagreements arising among financial sector colleges.
- Develop regulatory technical standards for member states and firms operating within them.
- By the end of 2025, adopt the AML/CTF mandates, powers, and resources of the [European Banking Authority](#) [EBA]. The Authority and the EBA will collaborate on developing joint guidelines and consultations to improve coordination between prudential and financial crime regulators. EU firms will still be expected to review and follow official guidance from the EBA.
- Issue guidelines for obliged entities on deciding the extent of internal policies, procedures, and controls, particularly concerning staff overseeing compliance, as required by AMLR by 10 July 2026.

Next Steps

Entities including financial and credit institutions, CASPs, high-value goods dealers, and now professional football clubs and agents can already begin to prepare for new and amended forthcoming requirements. Internal policies, procedures, and controls will require review and revision to reflect the new rules and regulations. The driving ambition of the package of instruments is to implement a common, harmonised approach to AML/CTF across the EU and the financial and non-financial sectors operating within and across them, to reflect ever-emerging risks. Authorities will look to ensure this harmonised approach is reflected at firm-level. Once each legal instrument is applied, it will be important for obliged entities to ensure that they are operating in line with the most recent legal developments. Firms should continue to be aware of the EU's supranational position on AML/CTF rules and how EU regulations will be transposed into law by individual member states.

How Plenitude Can Help

Plenitude has supported a broad range of financial and non-financial institutions to help them prepare for and comply with their regulatory obligations, by providing deep subject matter expertise, advisory, and transformation services. Plenitude can help you prepare for the forthcoming application of EU rules, from uplifting policies and standards to performing a current state assessment of your AML/CTF Framework, Systems & Controls. Appointed to the FCA's S166 Skilled Persons panel for Financial Crime, Plenitude is uniquely positioned to support firms in managing the impacts of these changes.

To discuss how we can support you, contact us at enquiries@plenitudeconsulting.com

About the Author: Imogen Cronin, Regulatory Intelligence Team