



# Single Programming Document 2026-2028

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# FOREWORD OF AMLA EXECUTIVE DIRECTOR

The establishment of the Authority for Anti-Money Laundering and Countering the Financing of Terrorism (AMLA) represents a historic step in strengthening the integrity and resilience of the EU's financial system. In 2025, AMLA transitioned from a legislative concept to an operational authority, entrusted with a mission that is vital to the economic stability of the Union.

AMLA is built on an integrated structure: a central authority in Frankfurt and a network of national supervising authorities and Financial Intelligence Units (FIUs) across the Member States. At the central level, the Chair, the Executive Board, and the staff have laid the foundations for its operational phase, in close cooperation with the General Board in both supervisory and FIU composition. Recruitment, IT infrastructure, and governance frameworks have been prioritized to ensure that AMLA can deliver on its ambitious objectives.

AMLA will lead the direction to ensure a consistent application of AML/CFT rules and, from 2028 onwards, directly supervise 40 EU financial institutions. This ambitious approach will replace the fragmented system we knew until recently, providing a unified and robust defense against financial crime. At the same time, AMLA will aim to be agile and forward-looking, leveraging secure and innovative digital tools to stay ahead of emerging risks.

The implementation of the new AML/CFT framework coincides with a period of profound economic and technological transformation in Europe. Greater flexibility and innovation in financial services bring opportunities but also new vulnerabilities. AMLA's role is to ensure that these developments do not compromise the integrity of the EU's financial system. This includes extending EU oversight to non-financial sectors, which will require close cooperation with national authorities and stakeholders.

From 2026, with the onboarding of additional staff, AMLA will set up its first office floors in a well-known skyscraper in Frankfurt. This modern environment will provide the infrastructure needed to support a dynamic, collaborative, and digitally advanced authority.

Our first objective is to become fully operational and effective. This Single Programming Document sets out the strategic priorities, resource allocation, and performance objectives that will guide AMLA in its initial years. Protecting the EU's financial system from abuse is not only a legal obligation, but also a cornerstone of the rule of law and a prerequisite for sustainable growth and public trust in the European project. Together, we will build an authority that embodies excellence, independence, and innovation in the fight against financial crime.

Nicolas Vasse

Executive Director

# FOREWORD OF AMLA CHAIR

AMLA marks a new chapter in Europe's fight against money laundering and terrorism financing, transitioning from fragmented national responses to a unified, risk-based system tailored to the complexity of today's criminal networks. The governance role entrusted to the Executive and General Boards has been instrumental in this foundational phase, ensuring AMLA is built on a framework that embodies urgency, accountability, and robust supervisory and financial intelligence standards.

Together, these governance bodies have built a foundation grounded in transparency, ethical rigor, and inclusive representation among Member States. This supports AMLA's commitment to delivering consistent and effective supervision and high-quality financial intelligence across the Union.

AMLA's strategic priorities advance this commitment. The EU AML/CFT Single Rulebook lays the foundations for a consistent system of checks across the EU, closing loopholes that criminals have long exploited. AMLA will strive to complete it, bearing in mind the need to reduce compliance burdens on businesses that act as gatekeepers of our financial system. The creation of a comprehensive data ecosystem, inclusive of the central AML/CFT Database and the FIU.net system will strengthen AML/CFT capabilities through increased data sharing and analytics. Direct supervision of the Union's financial institutions with the largest geographical footprint and highest risk profile by 2028 marks a historic enhancement of Europe's defenses.

AMLA's structure, comprising direct supervision, indirect oversight, and the coordination of Financial Intelligence Units, creates a more coherent and capable system for preventing and fighting money laundering and terrorist financing across the Union. It enhances consistency, accountability, and cooperation, thus leading to effective and lasting results.

Looking ahead, AMLA's progress will depend on achieving supervisory convergence across the Union and effective financial intelligence that serves the purposes of law enforcement, supported by close coordination with national authorities and meaningful engagement with stakeholders. This Single Programming Document charts the course for that journey—safeguarding the integrity of the EU's financial system and the trust of EU citizens.

The challenges ahead—from crypto-asset supervision to cross-border criminal innovation—require an Authority that is both technically excellent and anchored in sound governance. AMLA is well prepared to meet both demands.

Bruna Szego

Chair

## LIST OF ACRONYMS

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
CA	Contract agent
CASP	Crypto-Assets Service Provider
CDD	Customer due diligence
CERT-EU	Computer Emergency Response Team for EU Institutions
DAP4AMLA	Data Analytical Platform for AMLA
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
DPO	Data Protection Officer
EBA	European Banking Authority
ECB	European Central Bank
ECON	Committee on Economic and Monetary Affairs
EIOPA	European Insurance and Occupational Pensions Authority (ESA)
EP	European Parliament
EPPO	European Public Prosecutor's Office
ESA	European supervisory authority (ESA)

<b>ESMA</b>	European Securities and Markets Authority (ESA)
<b>EU</b>	European Union
<b>EuReCa</b>	EBA's AML/CFT database
<b>Eurojust</b>	European Union Agency for Criminal Justice Cooperation
<b>Europol</b>	European Union Agency for Law Enforcement Cooperation
<b>FFR</b>	Framework Financial Regulation
<b>FIU</b>	Financial Intelligence Unit
<b>FWC</b>	Framework Contract
<b>GL</b>	Guidelines
<b>HR</b>	Human resources
<b>ICT</b>	Information and communication technology
<b>IT</b>	Information technology
<b>ITS</b>	Implementing technical standards
<b>JST</b>	Joint Supervisory Team
<b>L&amp;D</b>	Learning and development
<b>LEA</b>	Law enforcement agency
<b>LIBE</b>	Committee on Civil Liberties, Justice and Home Affairs
<b>MICA-R</b>	Markets in Crypto-Assets-Regulation
<b>ML/TF</b>	Money laundering/Terrorism financing
<b>MoU</b>	Memorandum of Understanding
<b>MVP</b>	Minimum Viable Product
<b>OE<sub>s</sub></b>	Obliged entities
<b>OIB</b>	Office for Infrastructure and Logistics
<b>OLAF</b>	European Anti-Fraud Office
<b>PfIs</b>	Partnerships for Information Sharing
<b>RTS</b>	Regulatory technical standards

<b>SAC</b>	Support and Coordination Framework
<b>SCIC</b>	Service for Conference Interpretation
<b>SLA</b>	Service level agreement
<b>SNE</b>	Seconded national expert
<b>SPD</b>	Single Programming Document
<b>STR</b>	Suspicious Transaction Report
<b>TA</b>	Temporary agent
<b>TSI</b>	Technical Support Instrument
<b>WG</b>	Working Group
<b>XBR/D</b>	Cross-Border Reporting and Dissemination

# TERMINOLOGY

**Activity:** a coherent area of action with objectives and resources.

**Objective:** describes what the agency wants to achieve either in the short or long term.

**Baseline:** is the point of reference against which achievement or progress towards objectives is measured.

**Milestone:** is an intermediate target set, expressed in quantitative or qualitative terms, measuring progress towards the achievement of long-term objectives.

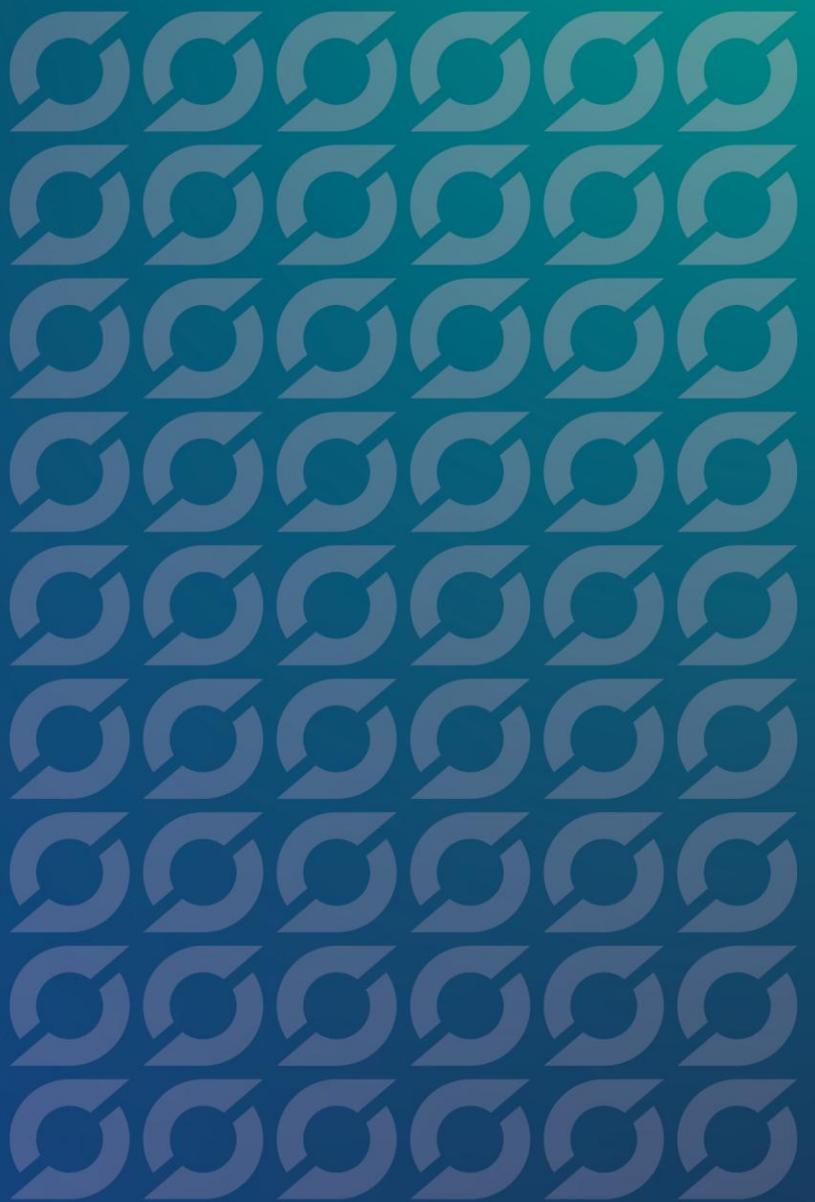
**Inputs:** are the human and financial resources used, and the time required to produce outputs.

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

**Outputs:** are what is directly produced or supplied through the EU/Commission/agency intervention. They often relate to the expected deliverables of the intervention and are identified based on its operational objectives.

**Results:** are the direct effects of intervention(s) on the target groups.

**Impacts:** are the indirect or long-term effects of an intervention on the EU or global society that are, at least partly, expected to be influenced by AMLA's interventions.



# SECTION I: GENERAL CONTEXT

## INTRODUCTION

The year 2025 marks a decisive moment in the European Union's collective efforts to prevent and combat money laundering and terrorist financing. The Authority for Anti-Money Laundering and Countering the Financing of Terrorism (AMLA) was launched as a newly established European Agency. With the Chair, the Executive Board of the Authority and the Executive Director having taken up their duties, AMLA enters its foundational phase with a clear mandate: to lay the institutional, procedural, and strategic groundwork necessary to become the cornerstone in the EU's fight against money laundering and terrorist financing.

The first Work Programme (2025) reflected AMLA's start-up status and was structured around two core dimensions: the progress achieved so far in 2025, and the priorities for the remainder of the year. It translated European ambitions into actionable steps, aligning with the EU's strategic commitment to financial integrity and security.

In this SPD we build further on that foundation and bring AMLA into the core of its mandate.

At the core of AMLA's mandate are three deliverables, drawn from the AML Package:

- completing the Single Rulebook, to ensure regulatory convergence and consistency across all Member States;
- developing harmonized supervisory practices to facilitate effective and coherent supervision across both financial and non-financial sectors; and
- strengthening the working methods and cooperation of Financial Intelligence Units (FIUs), to ensure robust information exchange, fruitful Joint Analyses exercises and enhanced collaboration with law enforcement authorities.

## MISSION

AMLA has been established to safeguard the integrity of the Union's financial system and internal market. Its mission is to deliver a unified, risk-based, and technologically advanced approach to preventing money laundering and terrorist financing. AMLA acts as a central authority for supervision, intelligence coordination, and as a regulator it intends to undertake extensive stakeholder engagement, ensuring trust, transparency, and operational excellence across Member States. In fulfilling this mission, AMLA will strengthen the resilience of the EU financial system and enhance confidence among citizens, institutions, and markets.

## **VISION**

AMLA envisions a Europe where financial crime is not only detected and punished, but proactively anticipated, effectively deterred, and decisively disrupted. This vision is built upon seamless co-operation between Member States, the deployment of cutting-edge technology, the consistent application of harmonized supervisory practices and highly operational financial intelligence. As a Centre of excellence, AMLA aims to be a global leader in the fight against financial crime by setting high standards, enabling innovation, and empowering national authorities and stakeholders.

## **OBJECTIVES AND STRATEGIC OUTLOOK**

To translate its mission and vision into concrete action, AMLA has articulated ambitious long-term objectives which define its strategic direction.

- to complete and support the establishment of a robust and uniform AML/CFT framework across the Union,
- to strengthen cooperation and inclusiveness,
- to spearhead the use of technology in an evolving landscape,
- to ensure credibility and accountability,
- and to contribute to consolidating the EU's role as a global leader in financial crime prevention.

In order to deliver on these ambitious objectives, AMLA has established a strategic outlook with five long-term goals, outlining practical focus areas for action and guiding resource allocation.

**1. Convergence, Consistency and Proportionality** will remain at the core of AMLA's work. Completing and supporting the establishment of a uniform AML/CFT framework, supported by high standards, best practices, and common methodologies and tools will ensure coherence across Member States and address the fragmentation of the past. In doing this, AMLA will take a proportionate and risk-based approach, maintaining effectiveness paying attention to compliance costs and without imposing unnecessary burdens.

**2. Cooperation and Inclusiveness** are equally essential. AMLA will foster a culture of joint responsibility and mutual trust, embedding collaboration among supervisory authorities and FIUs, as well as with prudential authorities and law enforcement, EU institutions and agencies and private stakeholders. Structured stakeholder engagement will ensure a meaningful involvement of all relevant actors in the development and implementation of policies. At the same time, AMLA will deepen cooperation with EU institutions and bodies, and actively contribute to the Union's role in international fora.

**3. Technology and Innovation** will be a defining feature of AMLA's mandate. By investing in advanced analytical tools, blockchain capabilities, and secure platforms for information exchange

such as the Central AML/CFT Database and FIU.net, AMLA will enable both supervisors and FIUs to operate more effectively. Criminals increasingly exploit technological innovation to conceal illicit financial flows; Europe must respond with equal innovation. AMLA will guide the private sector in the responsible use of AI and will promote a shared understanding of emerging ML/TF risks.

**4. Credibility and Accountability** will underpin AMLA's legitimacy. A strong governance model, ethical safeguards, and transparent communication with stakeholders—including EU citizens—will ensure that AMLA acts with integrity and maintains public trust. Strong conflict-of-interest policies, accountability mechanisms, and adherence to the highest standards of financial management, data protection and legal compliance will guarantee the integrity of its work.

**5. AMLA will develop its Global Leadership** by promoting the Union's standards abroad and by ensuring that Europe remains a reference point in the fight against financial crime. Supporting the Commission in representing the Union in global fora, and contributing actively to FATF and Egmont Group initiatives, AMLA will contribute to position Europe as a global reference point in AML/CFT. Leadership will be exercised not only through regulatory excellence but also through innovation, supervision, and intelligence coordination.

## PROGRAM OF ACTIVITIES

AMLA is delivering on this strategic outlook through the following programme of activities.

In **supervision**, AMLA will establish direct oversight of the forty most impactful credit and financial institutions in the EU, supported by robust methodologies and tools. Indirect supervision will be carried out through harmonized approaches, close cooperation with supervisory authorities, supervisory colleges, and regular peer reviews. Key regulatory mandates—such as Regulatory and Implementing Technical Standards and Guidelines—will be developed and delivered in line with stakeholder needs.

In the **coordination and support framework of FIUs**, joint analyses, peer reviews, and mediation mechanisms will strengthen cross-border intelligence exchange. By 2027, the full transfer and optimization of FIU.net will be completed, enabling secure and real-time data exchange across the Union.

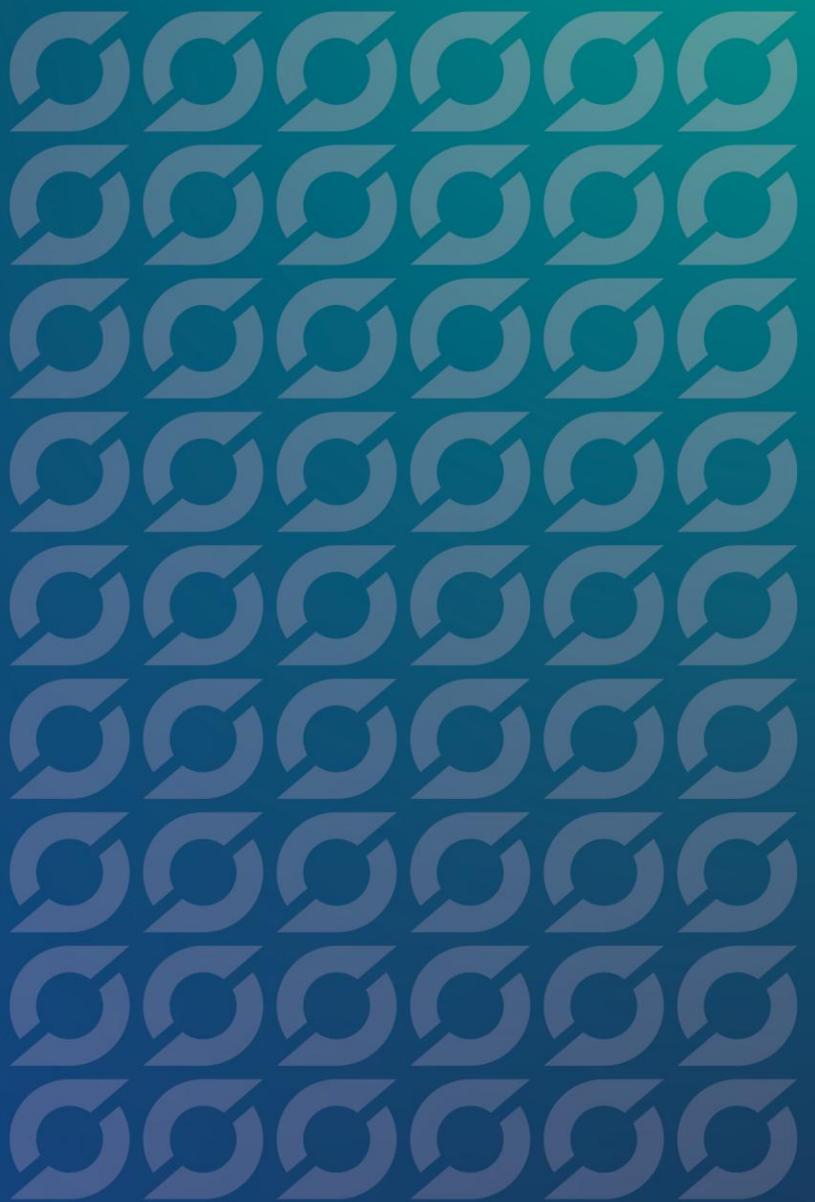
**Stakeholder engagement** will be enhanced through a comprehensive strategy built on the principles of **informing, consulting, involving, and collaborating**. Regular consultations, roadshows, and exchanges with public and private stakeholders will anchor AMLA's work in practice. Transparent and timely communication will ensure that citizens and stakeholders understand AMLA's role and impact.

Finally, **organizational development** will provide the foundation for AMLA's success. Recruitment of a diverse and highly skilled workforce, including the onboarding of the FIU Delegates as a key element to facilitate and improve cooperation between FIUs and the Authority, the establishment

of a secure and agile IT system, and the consolidation of internal governance structures—including the Executive Board, General Board, and internal committees—will enable AMLA to evolve from an initial start-up authority into a fully professionalized institution.

## **IMPACT**

These efforts are expected to lead to a measurable reduction of illicit financial flows across the Union, demonstrated by increased volumes of illicit funds detected and blocked, improvements in AML compliance rates among obliged entities, and efficiency gains from harmonized supervision, as well as highly operational financial intelligence. This will, in turn, lead to increased trust in the EU’s financial system and the recognition of AMLA as a global leader in financial crime prevention.



# **SECTION II A: MULTI-ANNUAL PROGRAMMING (2026-2028)**

## **INTRODUCTION**

This section contains the broad lines of AMLA's work for 2026–2028. AMLA will focus its efforts on five interlinked activities, which are further elaborated in the SPD. First, delivering on mandates most critical for the industry, notably Customer Due Diligence and the business-wide risk assessment,. Second, fostering the convergence of supervisory practices and advancing direct supervision by developing the supervisory model, refining the selection process and initiating the supervisory manual (see SPD, Section III Building Direct Supervision). Third, operationalizing the FIU framework through concrete steps in support and coordination initiatives for FIUs and joint analysis (see SPD, Section III FIU – Financial Intelligence Units). Fourth, laying the foundations for indirect supervision of the financial sector and for oversight of the non-financial sector by developing for each sector separately a strategy and a framework of supervision or oversight , clarifying how and when to apply the respective instruments of supervision or oversight (see SPD, Section III Indirect Supervision & Oversight). Finally, building AMLA's micro- and macro-risk frameworks, which will form the analytical backbone for both supervisory and FIU activities (see SPD, Section III Risk Analysis).

## **EU AML/CFT SINGLE RULEBOOK**

The EU AML/CFT Single Rulebook is the principal instrument in the harmonization of the EU AML/CFT framework throughout the EU. Different interpretation of rules by OEs in the private sector and by public authorities can lead to loopholes in the EU AML/CFT framework which can be exploited by criminals. Different interpretations can also lead to unnecessary burdens for OEs which operate across borders. To ensure a robust EU AML/CFT framework, AMLA's main priority will be the further development of the EU AML/CFT Single Rulebook.

The Single Rulebook aims to harmonize the set of rules applicable to the supervisors, FIUs and private sector. OEs from the private sector are at the forefront of the prevention and detection of financial crime. A harmonized and strong approach by the private sector to their AML/CFT obligation is therefore essential for a robust EU AML/CFT framework. In 2026-2028 AMLA will therefore focus heavily on the further development of the regulatory framework by drafting RTS, ITS and GL, together with public authorities and in consultation with the private sector. In drafting these instruments AMLA will center its efforts on ensuring an effective and robust EU AML/CFT framework, with particular attention paid to the risk-based approach. The instruments will not only concentrate on the actions to be designed and implemented when the risks are high but also provide guidance on how the framework can be simplified in cases where the risks are low. Additionally, considering the private sector's central position in the EU AML/CFT framework, one of AMLA's

priorities is to build an AML/CFT community with OEs from both the financial and the non-financial sectors. This community will be a tool for an ongoing dialogue between AMLA and the private sector.

The Single Rulebook further serves to foster convergence of supervisory approaches across the Union. AMLA is required to develop and maintain a common AML/CFT supervisory methodology in close cooperation with supervisory authorities, as mandated under Article 8 of the AMLAR. This methodology will provide the basis for consistent, risk-based supervision across the EU, tailored to the type, scale, and residual risk profile of different categories of obliged entities. . Work on the development of this methodology will be conducted from 2026.

In parallel to the work on the methodology, AMLA will be putting in place the tools necessary to support robust and efficient supervisory processes going forward. This includes, for example, the creation of a central AML/CFT data base, drafting rules on the cooperation between AML/CFT supervisors and the adoption of a common enforcement framework.

## **INITIATING AML DIGITAL LEADERSHIP**

AMLA intends to become a key partner of digital transformation to the benefit of its stakeholders. Leveraging fast-evolving state-of-the-art technology, such as AI, AMLA seeks to drive operational efficiency and effectiveness of the AML/CFT processes across the international network of partner-authorities, fostering digital collaboration. As a Centre-of-Excellence, AMLA will provide a secure eco-system encompassing training, awareness of innovative solutions, tools, data, and analytical AI/ML-capabilities in full compliance with the applicable regulation.

AMLA's digital roadmap 2026-2028 will roll out the foundations of this eco-system, aligned to the legal obligations and business priorities.

The roadmap is anchored in three priorities: building top of the art digital solutions, taking over and modernizing mission-critical systems such as EuReCA and FIU.net, and positioning AMLA as a leader in data analytics and innovation. Innovation will be a cornerstone of this transformation, providing advanced tools for real-time monitoring, risk assessment, and predictive analytics to strengthen AMLA's supervisory capabilities across the EU.

While ensuring business continuity, systems such as EuReCA and FIU.net will benefit from strategic investments. AMLA aims to systematically integrate AI in the development of all its operations, accelerating delivery cycles, and improving service quality. Innovative capabilities will be introduced, enabling automated data collection, anomaly detection, and advanced analytics to support supervisory decision-making. Together with AI development, AMLA will set up the appropriate safe AI governance to maintain a strong control framework and reduce AI risks e.g. model drift and bias.

Two central pillars of the strategy are the creation of the AML/CFT database and cutting-edge data analytics platform. These capabilities will leverage AI and machine learning to detect patterns, assess risks, and provide actionable insights, reinforcing AMLA's role as a hub for intelligence and supervision. Innovative tools will be integrated into this platform, offering dashboards, predictive models, and scenario simulations to enhance the effectiveness of AML/CFT measures.

Underlying these initiatives is a strong governance and service management framework, supported by a skilled IT team and strategic sourcing partnerships. Cybersecurity remains a top priority, with robust identity management, continuous monitoring, and resilience planning forming the backbone of AMLA's digital environment.

By 2028, AMLA's digital transformation will have delivered a secure, collaborative, and machine learning-integrated data-driven ecosystem, enabling the Authority to operate with agility, transparency, and technological excellence.

## **RISK ANALYSIS: DEVELOPING AMLA'S RISK ANALYSIS & RISK ASSESSMENT FRAMEWORK**

To build a robust EU AML/CFT system and a consistent legal framework, it is essential to identify, understand and assess ML/TF risks and then to mitigate those risks. The risk-based approach allows countries and institutions to tailor their measures and allocate resources in line with the faced risks. Risk is, therefore, transversal to the work of AMLA and its mandate to create an integrated system of AML/CFT supervision and to coordinate and support the financial analysis work.

To this end, AMLA will develop its own risk analysis and assessment framework –which is critically linked with the development of its own data ecosystem. It should then be followed by a clear system of continuous monitoring and assessment of ML/TF risks impacting the EU. This includes developing its own risk assessments (including, but not limited to, sectoral and topical risk assessments) and other publications (such as periodic Opinions on ML/TF risks). These will complement and take advantage of materials already developed by other EU agencies (e.g., Europol, EBA, Europol, EPPO) on the identification of trends, typologies, threats, and vulnerabilities across the EU.

Risk is transversal within AMLA. This recommends a strong link to both the FIU and supervision, by incorporating the information and data gathered and disseminating on the risks assessed on a tridimensional scope in order to support the development of a common understanding of ML/TF risks among obliged entities, supervisors, FIUs as well as other AML/CFT competent authorities and non-AML/CFT authorities. The transversality of risk in AMLA is reflected in several future outputs throughout the organization, namely, in the contribution to the development of the risk methodology for the selection of obliged entities for direct supervision, in the support to risk-based

supervision of obliged entities in the financial and non-financial sector at national level as well as contribution to joint analysis supported by the FIU.

AMLA will support the systematic integration of a risk-based approach throughout the EU supervision and financial intelligence, particularly in identification, understanding and assessing ML/TF risks.

## **CREATING AMLA'S DATA ECOSYSTEM**

To pursue its mandate, including supporting supervisory convergency, highly operational financial intelligence and effective understanding of risks, AMLA will need to map, prepare, and develop its own sources of data as well as leveraging existing sources, whether those are open-source information or sources developed through working arrangements with other institutions.

The first step for the creation of its data ecosystem is to map all possible sources emanating from its mandate. This includes the AML/CFT Central Database, when operational, the information received by supervisory authorities on an *ad hoc* basis as well as information contained in EuReCA (until its end of lifecycle). The central AML/CFT database is a cornerstone for AMLA's direct and indirect supervision across the Union. By collecting structured data from supervisory authorities, it will improve risk identification, monitoring, and enforcement, while fostering supervisory convergence and cross-border insights. The database will include information on obliged entities, supervisory measures, risk assessments, sanctions, authorization withdrawals, and 'fit and proper' outcomes, with scope to add further data relevant to supervisory functions. Access will be granted on a confidential, need-to-know basis to supervisory and other authorities where necessary. In 2026 AMLA will prepare to roll-out the AML/CFT Central Database and finalize the related draft RTS, while in 2027 the database should be fully operational. While, in a wider sense, AMLA will operate within a broader EU data universe and will ultimately need to cater for both the supervisory and the FIU pillars, the Central Database is deliberately limited to supervisory authorities. Within the wider AMLA data ecosystem and due to AMLA's role in both the supervisory pillar and FIU pillar, it is important to also leverage the information gathered by FIUs and shared with AMLA, particularly strategic information and aggregated data that allow a better understanding of the threats across the EU. As part of the EU AML/CFT system, AMLA must benefit and foster interinstitutional cooperation, in particular with OLAF, Europol, Eurojust, the EPPO, EBA and other relevant agencies and bodies that can support the development of the data ecosystem mentioned above.

Secondly, AMLA will have to structure how it should collect the mapped data and prepare the infrastructure to gather – in cooperation with IT – and analyze that data. Finally, the data ecosystem should also comprise internal procedures on how to collect and manage the data gathered while providing an advanced infrastructure for data analysis, especially at IT level (data analytics

software). The creation of this data ecosystem intends to support and feed the activities of the remaining areas of AMLA – for instance, supervision and FIU, on a circular basis – but mostly to contribute to the different risk assessments (and other related risk reports).

## **BUILDING AMLA’S DIRECT SUPERVISION: ROADMAP TO 2028**

The establishment of AMLA’s direct supervision function is a central element of its mandate to ensure a robust, harmonized, and risk-based AML/CFT framework across the EU. Work in this area is organized as a coordinated set of projects and activities that will be developed in phases, with the aim of reaching full operational readiness for the first supervisory cycle by mid 2028. This programme balances the need for legal certainty, operational effectiveness, and consistency with the EU framework, while also leveraging preparatory work from national supervisory authorities and the EBA.

The first component is the development of the supervisory strategy, which sets out the vision, priorities, and operational principles guiding AMLA’s direct supervision.

An important part of this is the risk analysis and selection methodology, which defines how obliged entities will be identified for direct supervision. This work will build on the work undertaken by the EBA and the draft RTS it has developed, and it includes consolidation of relevant data points, design of algorithms, and calibration of results. The process began in the second half of 2025 and is expected to be concluded in 2026, providing the analytical foundation for all subsequent supervisory work.

In parallel, AMLA will define procedures for the transfer of supervisory information and documentation from national authorities. The work includes identifying the minimum documentation set, establishing secure transfer channels, and ensuring compliance with data protection requirements. These arrangements are to be finalized by the end of 2026 to allow smooth transition once direct supervision commences.

The design of AMLA’s direct supervision framework is a core element of the programme. This work covers methodologies, governance structures, and supervisory tools. It includes the preparation of a supervisory methodology, the definition of the Joint Supervisory Teams (JST) model, the design of both on-site and off-site supervisory procedures, and the establishment of governance and legal safeguards. Implementation is rolled out between 2026 and 2028, combining methodological consolidation, validation, operational readiness, pilot activities, and the eventual launch of supervision.

To enable continuous monitoring, AMLA will develop off-site supervision tools. These include JST dashboards, data quality checks, integration of risk indicators, and structured procedures for

following up on on-site inspections. Development takes place from 2026 to 2028 to ensure that JSTs can rely on consistent, data-driven oversight processes from the first supervisory cycle onwards.

Provisions under Article 14 AMLAR require AMLA to be prepared for exceptional transfers of supervision from national supervisory authorities. For this purpose, a dedicated framework will be designed, covering objective trigger criteria, decision-making procedures, evidence requirements, legal safeguards, and resource planning. The framework is scheduled to reach full readiness in 2027. In parallel, AMLA will engage in structured discussions with the European Commission on the arrangements for supervisory fees, to ensure clarity, alignment and timely preparation ahead of the first supervisory cycle.

By 2028, AMLA will have established a comprehensive and risk-based direct supervision function. The framework will ensure harmonized and effective supervision, supported by clear strategies, robust methodologies, and secure operational processes. This will allow AMLA to fulfil its mandate and contribute to strengthening the EU's overall AML/CFT system.

A distinct component of AMLA's mandate is the design and implementation of a credible enforcement framework. This will ensure that supervisory decisions are underpinned by effective, proportionate, and transparent sanctioning powers, while maintaining a clear separation of duties from the supervisory design activities. In the next years, AMLA will continue by consolidating the principles of enforcement, mapping relevant legal provisions, and establishing procedures to guarantee consistency and predictability of sanctioning decisions across the Union.

The framework will also define the governance arrangements for enforcement, including separation from day-to-day supervisory tasks, and will set out safeguards to ensure accountability and due process. By 2028, AMLA will have in place a fully developed

enforcement function, aligned with EU and international standards, capable of ensuring that breaches of AML/CFT requirements are addressed in a harmonized and proportionate manner throughout the Union, supported by dedicated training for staff and consultations with stakeholders.

## **IMPLEMENT AMLA'S INDIRECT SUPERVISION**

AMLA will strengthen the AML/CFT supervision of the financial sector across Europe by developing a risk-based and proportional approach on indirect supervision which is based on reliable data and effective analysis. To prepare its activities in indirect supervision AMLA will assess available information on the ML/TF risks in the sector, in particular regarding the compliance of OEs with their AML/CFT requirements as well as how national supervisors conduct their supervision and regarding measures and sanctions they impose. This will assist AMLA in monitoring

supervisors' compliance with supervisory requirements, to ensure effective implementation of policy standards under the current AML/CFT framework until end of June 2027. After that date AMLA will monitor implementation of the forthcoming AML/CFT framework and identify vulnerabilities in competent authorities' approaches to AML/CFT supervision, including the implementation of AMLA's regulatory technical standards and guidelines. AMLA will support supervisors in a risk-based and tailored approach, ensuring the European Supervisory System is built and maintained through continuous dialogue and close collaboration. To organize this approach to indirect supervision, AMLA will devise a strategy and a framework with methodologies, procedures, and action plans for enhancing convergence through indirect supervision. This toolkit, to be used according to risks identified, will closely reflect the harmonized supervisory methodology that national supervisors will have to use according to article 40 of the AMLD. Initially AMLA will be mapping the capabilities of all AML/CFT supervisors, for example in the field of crypto assets service providers and blockchain-analysis capacities, and build a regular dialogue to understand how national supervisors use the risk assessment methodology. AMLA will also focus on the information to be transmitted by national supervisors to properly apply the supervisory tools it has received for indirect supervision.

AMLA will prepare a calendar of the first round of supervisory convergence reviews through 2026-2028. The first cycle of reviews is expected to take seven years. AMLA will also provide mutual assistance plus sectoral and cross-sectoral training programmes for the exchange of supervisory best practices. Training in 2026 will inter alia address the information needs of the financial sector regarding colleges, and the exchange of best practices will initially focus on crypto asset trading. AMLA will use videoconferencing for this purpose to avoid stressing resources of the supervisors. AMLA will at the same time be ready to act in case of exceptional circumstances following indications of serious, repeated or systematic breaches of AML/CFT requirements by obliged entities under Art. 32 AMLAR or in cases where AMLA detects that supervisors have not adequately applied supervisory measures in a way that affects multiple obliged entities and undermines the effectiveness of the AML/CFT system (Art. 34 AMLAR).

## **OVERSIGHT OF THE NON-FINANCIAL SECTOR**

AMLA will work to establish effective AML/CFT oversight of the non-financial sector across Europe based on reliable data and effective analysis. In 2026 AMLA will continue work on oversight in the non-financial sector by conducting a comprehensive mapping of supervisory practices across the large number of different non-financial sectors building on information already available on the sector and updating this information where necessary. It will integrate supervisory and FIU findings to create a common risk picture across the different categories of obliged entities in the non-financial sector. AMLA will also develop support to raise awareness of non-financial supervisors about their AML/CFT supervisory requirements. At the same time AMLA will work on plans for peer reviews and for participation in colleges of supervisors of obliged entities. It will also prepare

for requests to act in exceptional circumstances or in cases where AMLA detects that supervisors have not adequately applied supervisory measures (Article 37 AMLAR).

AMLA will further operationalize oversight in 2027 by effectively conducting peer reviews and assisting in the setting up and functioning of supervisory colleges in the non-financial sector, including by organising training sessions. It will take stock in 2028 by analyzing the outcome of activities conducted in 2027 and review the effective application of the AML/CFT risk assessment methodology and risk model across the Union.

As a result, AMLA will progressively enhance its understanding of implementation gaps and the needs of non-financial supervisors and be able to oversee that the AML/CFT risk assessment methodology and the risk model is applied by supervisors. This will be supported by first peer reviews and increasing support in the functioning of supervisory colleges based on a risk-oriented approach. The awareness of the sector of AML/CFT requirements will be fostered by trainings and supervisory guidance for supervisors focusing on capacity building, so supervisors and obliged entities can perform effectively.

## **OPERATIONALIZING THE FIU PILLAR**

The FIU Pillar will play a central role in AMLA's mandate to strengthen cooperation, consistency, and effectiveness among EU Financial Intelligence Units. In the period 2026–2028, the Authority will move from the initial build-up of the Support and Coordination Framework towards its full operationalization. The focus will be on operationalizing mechanisms for joint analyses, embedding harmonized technical standards, and ensuring that FIUs across the Union can rely on a coherent and robust framework for information exchange and cooperation. Through these developments, AMLA will advance its strategic objectives.

A priority will be to strengthen operational cooperation between FIUs. AMLA will progressively establish a cycle of joint analyses that will address both cross-border typologies and emerging risks, as for example developments in the crypto-asset market or novel payment channels. The operational workflow will ensure that priority cases are selected transparently and consistently, and that outputs are routed in a structured manner to national authorities, and the EPPO, OLAF, Europol and Eurojust where relevant. By embedding this approach, AMLA will foster trust-based cooperation and enhance the timeliness and quality of financial intelligence at the European level.

In 2026, the team of 27 FIU delegates within AMLA will be complete, marking an important milestone in the establishment of AMLA's FIU operational function. During this period, the operationalization of their joint activities will further take shape, enabling enhanced coordination, information exchange, and analytical cooperation across the EU's financial intelligence landscape.

In parallel, AMLA will pursue the development and application of standards and formats in the FIU domain. This includes finalizing and implementing the technical standards on the format to be used for the reporting of suspicions and for the provision of transaction records, the standard format for FIU-to-FIU exchanges, and the regulatory technical standards specifying the criteria for determining cross-border relevance of STRs. These instruments will establish a comprehensive framework for reporting and information exchange, reducing fragmentation and increasing efficiency across the Union. By July 2027, AMLA will also issue guidelines on indicators of suspicious activities or behaviors, providing a common reference point for FIUs and obliged entities. Moreover, formal working arrangements with Europol, Eurojust, OLAF and the EPPO will be concluded, enabling both strategic and operational cooperation.

A third priority will be the full establishment of the Support and Coordination Framework. This will include the launch of a dedicated helpdesk in the next years, the provision of training programs and knowledge-sharing initiatives, and the progressive expansion of peer reviews and mediation procedures. FIU.net will be hosted, maintained, and further developed by AMLA, ensuring its interoperability with national systems and its capacity to handle the growing volume and complexity of information exchange. Peer reviews will be a regular exercise, starting in 2026, designed to identify strengths, challenges and best practices, supported by an extensive mapping of all EU FIU's on topics like FIU's independence and autonomy, IT tooling and numbers of STRs. Meanwhile mediation procedures will be available to resolve disputes between FIUs in a neutral and constructive manner.

Finally, the FIU Pillar will align with AMLA's analytical and innovation capacity, as set out in this document as per the long-term goal on technology and innovation.

The expected results of these activities are a significant increase in the quality, timeliness, and effectiveness of joint analyses; a harmonized and robust EU framework for information exchange between FIUs; and a sustainable mechanism for support and coordination that reinforces trust and convergence among national authorities. AMLA aims to be recognized in the future not only as the operational hub of FIU cooperation in the Union but also as a global leader in financial intelligence coordination.

## **PARTNERSHIPS FOR INFORMATION SHARING**

AMLA considers the sharing of information key in an effective fight against ML/TF. The AML package contains a new framework for the setup of partnerships for information sharing (PfIS). To pave the way for the setup of these partnerships, AMLA will engage with the private sector and public authorities to identify and take the necessary steps to facilitate the successful setting up of these partnerships.

## **INTERNATIONAL STAKEHOLDER ENGAGEMENT**

Money laundering and terrorism financing are inherently cross-border phenomena, since criminals seek to exploit gaps between jurisdictions not only within the EU, but worldwide. As an effective AML/CFT approach cannot be bound to the EU borders, active collaboration with international stakeholders is paramount. In the coming years, AMLA is committed to engage with international stakeholders to strengthen collective resilience against evolving threats, establish effective international cooperation agreements, enabling access to relevant data. Engagement within the global ML/TF watchdog and international standard setter, Financial Action Task Force, is essential to ensure that the EU AML/CFT framework is effective not only within the EU, but also globally. Additionally, meaningful engagement with third countries counterparts will raise barriers for criminals trying to exploit the gaps between jurisdictions.

## **DELIVERING OPERATIONAL EXCELLENCE**

As of 1 July 2025, AMLA became operational. By 2026, it will achieve its financial autonomy. Over the following years, leading up to 2028, AMLA will focus on building its financial and human resources necessary to fulfil its mandate and deliver effectively on its objectives. Throughout the 2026-2028 period, AMLA will reach its full operational capacity, dedicating substantial effort to finalizing, consolidating, and enhancing its digitalization, governance, communication and other cross-functional activities.

To meet the horizontal objective of establishing a fully operational, digital, and future-ready organization (HO1), AMLA will continue to develop the capabilities and expertise required to provide high-quality services to its stakeholders. Furthermore, the Authority will continue its communication endeavors to raise awareness of its mission and enhance the visibility of its activities.

AMLA will be expected to support the European Commission in the upcoming review cycle of the Transfer of Funds Regulation (TFR). The Commission intends to bundle the reporting obligations under Articles 37(2) and 37(3) into a single deliverable, for which AMLA will receive a call for advice by end-2026, with delivery expected by end-2027. These inputs will directly inform potential amendments to the TFR. In parallel, the Commission is preparing for a possible reopening of the Regulation to align with recent and forthcoming changes to FATF Recommendation 16 on Payment Transparency. AMLA should therefore anticipate a role not only in providing substantive advice on risk and enforcement issues, but also in supporting the Commission's broader legislative review once the FATF process concludes in 2027.

## **STAKEHOLDER ENGAGEMENT AND OUTREACH ACTIVITIES**

The primary goal of AMLA's stakeholder engagements efforts for 2026-2028 will concentrate on enhancing cooperation, inclusiveness, bolster credibility, and global leadership through clear, consistent, and impactful messaging. By implementing a comprehensive communication strategy focused on stakeholder outreach, internal communication, and crisis preparedness, AMLA aims to build trust and transparency while ensuring readiness to respond effectively in high-pressure situations. The communications activities will enhance AMLA's visibility, reinforce accountability, and foster strong relationships with institutional and external stakeholders. At the same time, AMLA will adapt to the evolving media landscape, embed crisis-readiness into daily operations, and refine its tools, policies, and systems to ensure timely, accurate, and reliable communication in line with its multi-annual objectives and legal mandates.

## **POLICIES AND CONTROL MECHANISMS TO ENSURE COMPLIANCE**

AMLA's objective in this area is to continue operating in full compliance with the legal framework set out in the AMLA founding regulation and other applicable regulations. The application of internal workflows and standard procedures will be monitored, further calibrated and, if necessary, revised to achieve a system that clearly describes applicable procedures and the relevant actors and their responsibilities. The Authority's policies will continue to support managerial oversight of its decision-making process and to ensure an appropriate information flow and enhance control structures and compliance with the regulatory framework of the Authority. The focus for the calibrating of internal workflows and procedures will result from ongoing internal risk assessment and identified areas of potential internal control deficiencies as well as from the audit findings and recommendations from the Internal Audit Service and the European Court of Auditors.

The internal control function will support the process by ensuring that an appropriate internal control system is in place to deliver on risk management, sound financial management, fraud prevention and compliance. AMLA will aim to follow the state-of-the-art developments in all policy areas of its operation as well as in horizontal activities, policies, and strategies, including contingency planning.

In line with the EU Whistleblowing Directive (EU) 2019/1937 and with Article 90 of the AMLA Regulation, AMLA will develop an internet-accessible system to establish a confidential communication channel for employees of credit and financial institutions, or groups thereof, as well as of supervisory authorities, self-regulatory bodies and FIUs. This channel will enable the secure reporting of irregularities related to AML/CFT requirements, while ensuring the protection of whistleblowers' identities. The system will be designed to meet the highest standards of data security and confidentiality and will be supported by internal control mechanisms to ensure its integrity and effectiveness.

A Fundamental Rights Officer (FRO) will be appointed in 2026 to ensure all AMLA activities respect the EU Charter of Fundamental Rights. The FRO will be for example, reviewing supervisory methodologies for fairness, checking data processing for privacy and flagging risks of discrimination in enforcement actions.

Furthermore, AMLA will ensure that the processing of personal data complies with Regulation (EU) 2018/725. AMLA's Data Protection Officer (DPO) will carry out its assurance, advisory awareness, and investigation activities to ensure the independent application of that Regulation at AMLA. In 2026 AMLA will implement the Conflict-of-Interest Frameworks for Staff and non-staff and adopt and implement an Anti-fraud strategy.

## **ENVIRONMENT AND SUSTAINABILITY POLICIES AND INITIATIVES**

AMLA will consider the environmental and climate impact of its decisions across all sectors, taking due account of the footprint of missions, power consumption, waste products and the materials consumed. To that end, AMLA will ensure the implementation and, where necessary, the updating of its environmental strategy.

Considering its ambition to be a global leader, AMLA will go beyond compliance and actively promote sustainable practices within the organization. This includes adopting energy-efficient technologies, conscious business travel, maximize using of digital tools, reducing waste and single-use materials, and prioritizing sustainable procurement. AMLA will also develop monitoring and reporting mechanisms to measure progress against clear sustainability objectives.

Through these measures, AMLA aims not only to reduce its own environmental footprint but also to set an example among EU institutions and agencies, demonstrating that operational excellence and environmental responsibility can go hand in hand.

## SECTION II B: HUMAN AND FINANCIAL RESOURCES / OUTLOOK 2026-2028

### OVERVIEW OF THE PAST AND CURRENT SITUATION

The Authority's human and financial resources will reach their planned capacity by 2028.

	2025	2026	2027	2028
Number of staff (at 31/12)	120	233	432	432
Budget (EUR)	13,592,016	43,060,950	66,947,881	96,041,000

AMLA will achieve financial autonomy on 1 January 2026. While the necessary systems and procedures are being established, the 2025 budget has been implemented by the European Commission on behalf of AMLA. The tables presented in the annexes provide a detailed overview of the evolution of resources as planned by in the Legislative Financial Statement, including the gender and geographical balance of staff. As indicated in Annexes III-V, the evolution of the staff population and budget reflects the growth of the Authority and the resources needed to deliver on all the tasks assigned to the Authority.

### FINANCIAL RESOURCES

By end of 2025, it is estimated that approximately EUR 13,6 million of the available EUR 14,2 million will be committed to cover Authority's personnel, mission, and rental costs, other costs associated with the premises and IT costs. These budgetary commitments had been intended to honor the legal commitments that have been concluded so far (e.g., SLAs for the provision by the European Commission of HR, payroll, IT and other services; lease agreement, and contracts for the purchase of supplies and services). AMLA might not be able to use EUR 600 000 of the Union contribution made available to the Authority for 2025 due to the slower than initially foreseen onboarding of newly recruited staff. Subsequently, the European Commission proposed to the Budgetary Authority to reduce AMLA 2025 budget by EUR 600 000 thus establishing it at EUR 13,6 million.

In addition, AMLA received a financial contribution of EUR 5 million from the host member state (Germany) for 2024 and 2025 in total. While EUR 0,3 million of that contribution was used in 2024, the remaining 4,7 million are available to cover any set-up costs deemed necessary up until the end of 2028. Some of these funds might be used only after the 2025 Union contribution has been

fully spent. It has been decided to outsource the treasury service to DG BUDG from 1 January 2026, subject to the conclusion of the necessary contractual arrangements.

Onboarding to other EU tools that would allow AMLA to launch and manage procurement procedures shall be completed by 1 January 2026.

The AMLA's revenue projections stemming from the EU subsidy are set in the 2021-27 multi-annual Financial Framework (MFF), and in the 2028-34 multi-annual Financial Framework (MFF) adopted by the European Commission earlier this year.

The German government contribution as part of the German bid to host the AMLA in Frankfurt (i.e., a total of EUR 20 million spread over the period 2024-2028) shall be fully utilized by the end of 2028 as set out in the financial contribution agreement.

From 2028 the costs related to direct and indirect supervision of the financial sector will be funded by fees. These are expected to account for approximately 70% of the Authority's revenue. A Commission delegated act will establish the methodology for the calculation of individual fees, considering several objective criteria set out in AMLA Regulation. By the end of 2027, the process of selection of entities for direct supervision, and determination of fees, will be completed (the list of entities subject to fees will be larger than those subject to direct supervision). To that end, in 2026-2027 AMLA shall set up its systems for Activity Based Budgeting and Activity Based Costing that shall allow for the timely establishment and collection of fees.

#### AMLA REVENUE

Heading	2025 budget	2026 budget	2027 budget	2028 budget
Revenues from Fees and Charges	0	0	0	65,155,000
Contributions from the European Union	13,592,016	37,060,950	57,187,248	26,886,000
Other Contributions <sup>1</sup>	0	6,000,000	9,760,633	4,000,000
<b>Total Revenue</b>	<b>13,592,016</b>	<b>43,060,950</b>	<b>66,947,881</b>	<b>96,041,000</b>

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<sup>1</sup> The amount of German Contribution that will be used in 2025 is yet unknown.

## AMLA EXPENDITURES

Heading	2025 budget <sup>2</sup>	2026 budget	2027 budget	2028 budget
Staff Expenditure	5,140,000	21,974,315	42,083,080	71,979,027
Administrative Expenditure	8,452,016	9,454,698	8,017,400	7,074,670
Operational Expenditure	0	11,631,937	16,847,401	16,987,303
<b>Total Expenditure</b>	<b>13,592,016</b>	<b>43,060,950</b>	<b>66,947,881</b>	<b>96,041,000</b>

## HUMAN RESOURCES

The overall objective of the Human Resource (HR) function is to enable the processes and policies which successfully onboard, integrate and support AMLA staff members throughout the entire employee lifecycle, with the goal to foster a people-centric AMLA culture aligned with the Authority's strategic objectives.

The HR function has remained critical to the successful evolution of AMLA as an independent EU Agency during 2025 and 2026. By the end of 2025, AMLA will have reached its staffing targets, around 120 staff. Around a further 113 staff, including a mix of managers, policy officers and administrative staff, shall be recruited in 2026. As external recruitment takes on average five to six months, and not all procedures could be launched at once, it is estimated that about one third of the newly recruited staff would only take up posts towards the end of 2026.

In the first months of its start-up phase, AMLA has targeted its HR efforts on (1) creating awareness on its operations as well as the career opportunities available, particularly for its core profiles, (2) recruiting intensively for urgently needed core and corporate profiles, paying particular attention to gender and geographical balance as well as skills diversity, and (3) putting in place the HR tools, systems, policies and agreements in order to support its organizational setup as well as the smooth onboarding and integration of AMLA staff.

Building an inclusive and respectful workplace for the period 2026–2028, AMLA will implement a comprehensive human resource (HR) and workplace policy, contributing to the fulfilment of the Authority's horizontal objectives. Attracting, selecting, training, developing, and retaining the right staff is essential for establishing a high-performing organization fit for the future. AMLA will reach its full capacity of 432 staff members by the end of 2027. To achieve this, the Authority will recruit

<sup>2</sup> Indicative figures based on September 2025 Budget Forecast exercise - actual budget execution might differ.

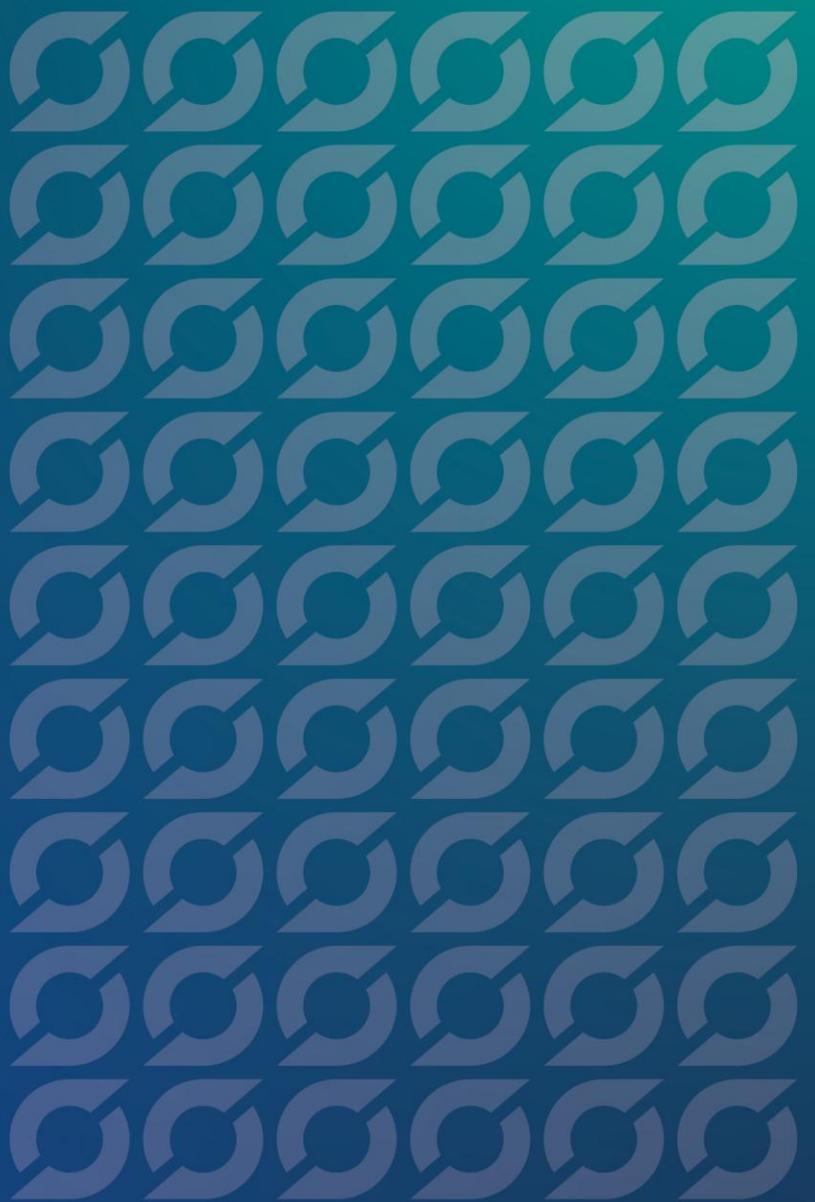
intensively, while at the same time consolidating its onboarding programme through learning and development initiatives, social measures, and other actions that support the full integration of AMLA staff. Strategic initiatives will also focus on ensuring a wide variety of skills, as well as geographical and gender balance, alongside equal opportunities, diversity, and broader attractiveness measures. Beyond recruitment, AMLA will ensure a respectful, safe, and inclusive working environment by embedding diversity and equality principles into both operational and horizontal activities.

Additional activities will strengthen AMLA's attractiveness as an employer, including maintaining excellent working conditions, supporting staff well-being, and fostering a healthy, engaged, and resilient workforce. Over 2026–2028, AMLA will also complete the development of HR digital tools (e.g., e-HR (Sysper), HR digital transformation) and fully implement HR policies, processes, and procedures aligned with AMLA's values and culture. Learning and development activities will be offered to ensure AMLA staff have the know-how and capacity to deliver on the Authority's ambitious mandate effectively and efficiently. Together, these actions will enhance organizational agility, support adaptation, and ensure that AMLA is fit for the future.

## **STRATEGY FOR ACHIEVING EFFICIENCY GAINS**

The Authority is committed to striving for continuous improvement, agility, efficiency and effectiveness, and will continue to consolidate its operations, by streamlining and simplifying processes, optimizing cross-unit collaboration and the engagement of its staff, and ensuring optimal use of its resources in compliance with sound financial management, regularity and legality.

The Authority will continue to strive for improved productivity by modernizing its administrative systems through digital transformation, maximizing its use of European Commission systems as well as e-procurement and e-signature, avoiding the use of paper and simplifying workflows. The Authority will continue to use digital tools to streamline its work processes and workflows, building on experience gained, such as collaboration and automation solutions or e-learning tools. AMLA is already making considerable use of virtual meetings and online collaboration tools. The Authority will explore the possibility of developing an efficiency strategy to consolidate all actions in place, examining the ambition, resource constraints, scope and possible future actions for efficiency gains.



# SECTION III: ANNUAL WORK PROGRAMME

## 2026

### POLICY ON PRIVATE SECTOR STANDARDS

#### PSS-1 UNIFIED REGULATORY FRAMEWORK FOR THE PRIVATE SECTOR

<b>Contributing to Strategic Priority #</b>	1: Convergence and Consistency 2: Cooperation and Inclusiveness 3: Technology and Innovation 4: Credibility and Accountability
<b>Overview of the Activity</b>	<p>Convergence and consistency of the EU AML/CFT framework is one of AMLA's priorities. The development of the legal instruments for the private sector is one of the main tools to reach this goal. In 2026, AMLA's main priority is to deliver on six of these instruments. These instruments were prioritized because they are most relevant for the private sector and because they form the building blocks for some of AMLA's future mandates. The AML package contains different mandates for AMLA to operationalize the framework via the creation of RTS, ITS, or GL. OEs in the private sector are the addressees of most of the mandates in the AML Regulation. In 2026 and onwards, AMLA will have a strong focus on developing these instruments to ensure that the private sector has all the necessary tools to implement AML/CFT obligations consistently and effectively.</p> <p>Some of these mandates, for example the GL on the ongoing monitoring of a business relationship, also provide a possibility to steer the private sector use of advanced technology in AML/CFT. This might lead to more effective and efficient outcomes.</p> <p>Lastly, the mandates will be drafted in close cooperation with supervisory authorities, and public consultations will be organized to obtain direct input from the private sector, to ensure transparency.</p>
<b>Objectives</b>	The OEs in the private sector, as gatekeepers, are at the forefront of the prevention and detection of financial crime. Therefore, it is essential for AMLA to work with the private sector to ensure that

	<p>the private sector has a good understanding of the AML/CFT risks it faces, takes proper mitigating measures and provides the FIUs with valuable information on ML/TF suspicious activity.</p> <p>In drafting these instrument AMLA will focus on ensuring an effective and robust AML/CFT framework, with a focus on a risk-based approach. This means that in the first place, the private sector should identify, assess and understand its risks properly. Then, specific measures should be applied to mitigate those risks: more measures if the risks are high and less measures if the risks are low. Therefore, the instruments will not only focus on the actions to be designed and implemented when the risks are high, but also provide guidance on how the framework can be simplified in cases where the risks are low.</p>
<p><b>Main Output /Expected result</b></p>	<p>AMLA aims to achieve further harmonization of the EU AML/CFT framework by setting out clear expectations on OEs and providing guidance on the application of the risk-based approach. The resulting consistency in the implementation of AML/CFT obligations across the Union will ultimately lead to a more effective fight against ML/TF.</p> <p>More specifically, AMLA aims to submit the following RTSs to the European Commission in 2026:</p> <ul style="list-style-type: none"> <li>• RTS on CDD (Article 28(1) AMLR);</li> <li>• RTS on lower thresholds for CDD (Article 19(9) AMLR);</li> <li>• RTS on minimum requirements group-wide policies and controls (Article 16(4) AMLR);</li> <li>• RTS on additional measures non-compliant third countries (Article 17(3) AMLR).</li> </ul> <p>Additionally, AMLA aims to publish the GL on the business-wide risk assessment (Article 10(4) AMLR), the GL on risk variables and factors when entering into business relationships or carrying out occasional transactions (Article 20(3) AMLR) and the GL on the ongoing monitoring of a business relationship (Article 26(5) AMLR).</p>

## PSS-2 PARTNERSHIPS FOR INFORMATION SHARING (PfIS)

<b>Contributing to Strategic Priority #</b>	1: Convergence and Consistency 2: Cooperation and Inclusiveness 3: Technology and Innovation 5: Global Leadership
<b>Overview of the Activity</b>	<p>The sharing of information is key in an effective fight against ML/TF. PfIS can provide an effective vessel to this end. Article 75 AMLR – which will become applicable on 10 July 2027 – provides a framework for the OEs in the private sector to set up these partnerships. Additionally, the AMLAR provides AMLA with the possibility to set up cross-border partnerships, in line with the framework in article 75 AMLR.</p> <p>To pave the way for the setup of PfIS from 2027 onwards, AMLA will engage with the private sector and public authorities to identify and take the necessary steps to facilitate the successful setting up of PfIS.</p>
<b>Objectives</b>	<p>The OEs in the private sector, as gatekeepers to the financial system, are at the forefront of the prevention and detection of financial crime. Facilitating the successful setting up of PfIS can improve the information sharing between OEs in the private sector and between the private sector and public authorities. This can be a positive impulse for the prevention and detection of financial crime.</p>
<b>Main Output /Expected result</b>	<p>By facilitating the successful setting up of PfIS, AMLA aims to ensure an effective approach within the EU regarding these partnerships and paves the way for their creation. More specifically, AMLA shall set up a specific and dedicated team to engage with the private sector via events and workshops. The main goal for 2026 is to get a clear picture of the current state of play and an analysis of the necessary steps to facilitate the successful setting up of PfIS.</p>

### PSS-3 BUILDING AN AML/CFT COMMUNITY

<b>Contributing to Strategic Priority #</b>	1: Convergence and Consistency 2: Cooperation and Inclusiveness
<b>Overview of the Activity</b>	<p>One of AMLA's main priorities as a new Agency is to engage with all relevant stakeholders. In particular, engagement with the private sector is key, considering the central position it has in the EU AML/CFT framework.</p> <p>AMLA aims to build an AML/CFT community with OEs from both the financial and the non-financial sector. This community will be a tool for an ongoing dialogue between AMLA and the private sector. This community will go beyond channeling the public consultations for the instruments AMLA is working on. It will be a forum for sharing experiences, best practices and the challenges in implementing the EU AML/CFT framework. It will also be a tool to foster synergies between the financial and the non-financial sector. The setup of the community will be aligned with AMLA's broader Stakeholder Engagement Strategy.</p> <p>In that respect, it should be underlined that AMLA is the first EU Agency with an AML/CFT mandate that includes OEs in the non-financial sector. Whilst OEs from the financial sector have had experience with engagement with EU institutions in the past, this form of engagement might be relatively new to OEs in the non-financial sector. To ensure a unified AML/CFT framework, AMLA will purposely focus on engagement with OEs in the non-financial sector.</p>
<b>Objectives</b>	<p>The objective is to set up a structure around how AMLA will work with the private sector, share experiences, new ideas and challenges ahead to ensure a good understanding of the risks and the right design of mitigating measures. It may also provide the FIU community with valuable information on ML/FT suspicious activity.</p>
<b>Main Output /Expected result</b>	<p>The AML/CFT community will be a tool for an ongoing dialogue between AMLA and the private sector on the implementation of the EU AML/CFT framework. This will increase convergence and consistency throughout the EU and foster cooperation, inclusiveness,</p>

	trust and engagement. In 2026, AMLA aims to create an approach for the setup of the community and to take the first steps in the implementation of this approach.
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## POLICY ON SUPERVISORY CONVERGENCE

### PSC-1 DEVELOPING AN RTS ON A CENTRAL AML/CFT DATABASE (ART. 11.6 AMLAR)

Contributing to Strategic Priority #	1: Convergence and Consistency 2: Cooperation and Inclusiveness 3: Credibility and Accountability
Overview of the Activity	Prepare regulatory technical standard for a central AML/CFT Database containing structured information on obliged entities, risk assessments, supervisory measures and sanctions from supervisory authorities across the Union.
Objectives	Information from this Database will inform AMLA's work. It will also be made available, on a confidential and need-to-know basis, to supervisory authorities and non-AML/CFT authorities to support effective, data-driven supervision at the national level.
Main Output /Expected result	Final RTS submitted to the European Commission. The database will be implemented and rolled out for financial sector authorities from 2026 , and for supervisory authorities from the non-financial sector in 2028 .

### PSC-2 DEVELOPING AN ITS ON THE COOPERATION WITHIN THE SUPERVISORY SYSTEM REGARDING DIRECT SUPERVISION (ART. 15.3. AMLAR)

Contributing to Strategic Priority #	1: Convergence and Consistency 2: Cooperation and Inclusiveness 3: Credibility and Accountability
Overview of the Activity	Develop an Implementing Technical Standard specifying the circumstances under which financial supervisors will assist AMLA in

	its tasks related to supervisory reviews and assessments of selected obliged entities for direct supervision. It will also address the procedures for conducting periodic assessments, the arrangements for the transfer of supervisory tasks and powers between AMLA and national authorities, the preparation of protocols for selection decisions and provisions for the composition and operation of joint supervisory teams.
<b>Objectives</b>	The ITS will ensure consistent cooperation of national supervisory authorities with AMLA in a credible process for selection of obliged entities for direct supervision and for the procedures following a selection decision.
<b>Main Output /Expected result</b>	Submission of final ITS to the European Commission in April 2026: The ITS will allow the first procedure for selection of obliged entities for direct supervision to begin timely in 2027 and direct supervision in 2028.

### **PSC-3 BUILDING EFFECTIVE SUPERVISORY PROCESSES**

<b>Contributing to Strategic Priority #</b>	1: Convergence and Consistency 2: Cooperation and Inclusiveness 3: Credibility and Accountability
<b>Overview of the Activity</b>	Develop the L2 and L3 standards that are essential for the effective and efficient functioning of the supervisory system. . This includes: <ol style="list-style-type: none"> <li>1. the mandate on the cooperation between home and host supervisor in groups for which a college is not set up (RTS according to Art. 46.4 AML-D6);</li> <li>2. the mandates on pecuniary sanctions and administrative measures under Art. 53.10 and 53.11 AMLD, .;</li> <li>3. RTS on the methodology for assessing and classifying the inherent and residual risk profile of obliged entities, as well as the frequency at which such risk profile shall be reviewed (Article 40(2) AMLD).</li> </ol> AMLA may phase the delivery of some of these mandates to account for differences in the financial sector and non-financial sector's business models, risk profiles and convergence needs.

<b>Objectives</b>	In drafting these instrument AMLA will focus on building a robust EU-AML/CFT framework that focuses on effective outcomes and fosters operational efficiency.
<b>Main Output /Expected result</b>	Four RTSs and one set of guidelines

#### **PSC-4 PUTTING IN PLACE A COMMON SUPERVISORY METHODOLOGY (ART 8 AMLAR)**

<b>Con- trib- uting to Strate- gic Pri- ority #</b>	1: Convergence and Consistency 2: Cooperation and Inclusiveness 3: Credibility and Accountability
<b>Over- view of the Activ- ity</b>	A multi-year project to put in place and implement a common AML/CFT supervisory methodology in line with Article 8 of the AMLAR.
<b>Objec- tives</b>	A common AML/CFT supervisory methodology that operationalise the risk-based approach to AML/CFT supervision across the financial and non-financial sectors in a consistent and effective way, with comparable outcomes.
<b>Main Out- put /Ex- pected result</b>	In 2026, AMLA will define the overall approach and prioritise the development of those components that form the basis of a common approach to effective AML/CFT supervision.

## RISK ANALYSIS

### RAU-1 DEVELOPMENT OF A RISK ANALYSIS FRAMEWORK

<b>Contributing to Strategic Priority #</b>	1: Convergence and Consistency 2: Cooperation and Inclusiveness 5: Global Leadership
<b>Overview of the Activity</b>	AMLA has started to build its risk analysis framework and will continue to do so in the course of next year. This encompasses mapping available (and expected) sources of data, creating the infrastructure to collect data – both at procedures and IT level – engaging in the collection of data from the diversified sources at its disposal, list and fine tune methodologies and further align its risk publications with AMLA's priorities, with the information integrated from FIU analysis and from supervisory activities as well as emanating from other EU relevant authorities and MS.
<b>Objectives</b>	AMLA aims at establishing its own risk analysis framework, including internal policies and procedures for the performance of risk analysis.
<b>Main Output /Expected result</b>	Creating and structuring AMLA's risk analysis framework to further disseminate and publish risk-related documents (including, but not limited to, risk assessments).

### RAU-2 TRANSFER AND MANAGEMENT OF EURECA AND CONTINUOUS DEVELOPMENT OF THE CENTRAL AML/CFT DATABASE

<b>Contributing to Strategic Priority #</b>	1: Convergence and Consistency 2: Cooperation and Inclusiveness 4: Credibility and Accountability
<b>Overview of the Activity</b>	AMLA will be in charge of the EuReCA after its transfer from EBA. In parallel there will be a continuous development, for further operationalization, of the AML/CFT Database (AMLA-R Art. 11). The data contained in EuReCA, namely on material weaknesses (e.g., deficiencies in individual financial institutions, potential breaches) will contribute to AMLA's analysis (e.g. risk assessments, policy

	development). Additionally, AMLA should take charge of the requests for information submitted by supervisors and respond to those on a confidential and need-to-know basis.
<b>Objectives</b>	Manage EuReCa and continue to prepare the operationalization of the AML/CFT Central Database (AMLA-R Art. 11). EuReCa will ideally contribute to the production of different internal reports and publications.
<b>Main Output /Expected result</b>	The data available and collected through EuReCA will support the production of different publications and internal reports, before the AML/CFT Central Database is finalized and operational.

### **RAU-3 TESTING AND VALIDATION OF RISK MODELS/METHODOLOGIES FOR SUPERVISION**

<b>Contributing to Strategic Priority #</b>	1: Convergence and Consistency 2: Cooperation and Inclusiveness 3: Technology and Innovation 4: Credibility and Accountability
<b>Overview of the Activity</b>	In the course of 2026, the Risk Analysis Unit will continue to contribute, and based on previous work by EBA, to the relevant risk methodologies that will be the basis for AMLA's role as supervisor.
<b>Objectives</b>	<ul style="list-style-type: none"> <li>• Test, validate and calibrate the Risk methodology for the purpose of selection for direct supervision (cf. Art. 12(7) AMLAR)</li> </ul> <p>Test, validate and calibrate the Risk methodology for the purpose of supervision of the financial sector (cf. Art. 40(2) AMLD)</p>
<b>Main Output /Expected result</b>	Risk Methodology for the selection of entities for direct supervision and for the purpose of supervision of the financial sector. The Methodologies are linked to the production of the draft RTSs on risk methodologies and AMLA selection of directly supervised entities (AMLD Article 40(2) and AMLAR Article 12(7)).

	The different Risk Methodologies mentioned above will allow AMLA to select the relevant entities that will be under direct supervision and to fulfill its mandate of supervision of the financial sector.
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#### RAU-4 – DEVELOPING AMLA’S CRISIS MANAGEMENT FRAMEWORK

<b>Contributing to Strategic Priority #</b>	2: Cooperation and Inclusiveness 4: Credibility and Accountability
<b>Overview of the Activity</b>	AMLA will have a policy and a workplan to further develop AMLA’s Crisis Management Early Warning system.
<b>Objectives</b>	For 2026 AMLA aims to prepare a strategy for the development of a Crisis Management Early Warning system and to finalize its internal procedures.
<b>Main Output /Expected result</b>	The development of procedures and structuring of the early warning system aim at contributing to identifying and addressing potential AML/CFT crisis in the sector.

#### BUILDING DIRECT SUPERVISION

##### DSU-1 OPERATIONALIZATION OF SELECTION MODEL FOR DIRECT SUPERVISION

<b>Contributing to Strategic Priority #</b>	1: Convergence and Consistency 2: Cooperation and Inclusiveness 3: Technology and Innovation 4: Credibility and Accountability
<b>Overview of the Activity</b>	This activity will operationalize AMLA’s risk-based selection model for direct supervision. Building on the EBA methodology and the draft RTS under Article 12(7) AMLAR already being prepared, AMLA will in 2026 carry out testing and exploratory calibration work, preparing the RTS under Article 40(2) AMLD on risk assessment standards. The work will be led by the agile programme to build direct supervision.

<b>Objectives</b>	In 2026 AMLA will test and fine tune the model to evaluate its functioning, thresholds, and indicators. The agile programme to build direct supervision will lead the testing and drafting to ensure methodological consistency. Engagement with national supervisors will ensure feasibility and convergence with national practices, while targeted consultations with stakeholders will provide transparency and inclusiveness. A possible targeted data collection may be launched to support the testing and calibration, subject to governance approval.
<b>Main Output /Expected result</b>	The main output will be the Risk-Based Selection Framework Package, consisting of the RTS under Art. 12(7) AMLAR and Art. 40(2) AMLD, a calibration note based on 2026 testing, and a summary of engagement with national supervisors and stakeholders. This package will establish the methodological and legal foundation for AMLA's first supervisory cycle. The expected result is that AMLA will enter 2027 with a tested, transparent, and legally binding methodology for selecting directly supervised entities. This will reinforce convergence with national supervisors, provide predictability for obliged entities, and anchor AMLA's supervisory decisions in an evidence-based and European Commission-endorsed framework.

## DSU-2 DEVELOPMENT OF STRATEGY AND FIRST DELIVERABLES FOR AMLA'S DIRECT SUPERVISION

<b>Contributing to Strategic Priority #</b>	1: Convergence and Consistency 2: Cooperation and Inclusiveness 3: Credibility and Accountability
<b>Overview of the Activity</b>	AMLA will be prepared to lay the foundations for its direct supervision by adopting its first Supervisory Strategy Paper, which will form the cornerstone of its approach. The Paper will clarify AMLA's supervisory objectives, the scope of direct supervision and the guiding principles for resource allocation. It will also provide the overarching framework for the subsequent development of the supervisory cycle and of off-site supervisory tools. Alongside the strategy, AMLA will start preparatory work on the supervisory

	architecture and on tools for continuous monitoring, ensuring that initial building blocks are in place to support operationalization.
<b>Objectives</b>	In 2026 AMLA will complete preparatory risk mapping and benchmarking exercises, carry out internal consultations across all relevant units, and engage with national supervisors to ensure convergence and inclusiveness. On this basis, AMLA will draft and finalise its first Supervisory Strategy Paper, which will be submitted for approval by the Executive Board and presented to the General Board for information. In parallel, AMLA will start developing the architecture of its supervisory cycle, taking initial steps to clarify the main stages from the selection of entities to the conclusion of supervisory measures. Draft procedures for off-site monitoring, on-site inspections and follow-up actions may be prepared for pilot use, together with exploratory work on reporting templates and analytical dashboards to support off-site supervision.
<b>Main Output /Expected result</b>	The main output will be AMLA's first Supervisory Strategy Paper, approved by the Executive Board and presented to the General Board for information. This will provide a clear strategic framework guiding AMLA's direct supervision, ensuring internal coherence and offering external stakeholders a transparent view of AMLA's mandate. The expected result is that AMLA will be prepared with a credible and evidence-based strategy, while also initiating work on its supervisory cycle and off-site supervision tools. These preparatory steps will allow AMLA to gradually build the processes, methodologies and instruments needed to operationalise direct supervision in the following years.

### DSU-3 TRANSFER OF SUPERVISION INFORMATION AND DOCUMENTATION

<b>Contributing to Strategic Priority #</b>	1: Convergence and Consistency 2: Cooperation and Inclusiveness 3: Technology and Innovation 4: Credibility and Accountability
<b>Overview of the Activity</b>	This activity will ensure a smooth and legally sound transfer of supervisory responsibilities from national authorities to AMLA once entities are placed under direct supervision. It covers the design of

	<p>a standardised framework for the handover of information, including the minimum set of supervisory documentation to be transferred, the procedures for managing pending cases, and the definition of secure communication channels with supervisory authorities. The work will align with existing ECB practices where relevant, adapt them to AMLA's mandate, and include a full review of data protection implications. The process also involves preparing governance arrangements at the General Board for decisions pursuant to Articles 7–10 AMLAR, thereby ensuring that the transfer is both operationally feasible and legally robust.</p>
<b>Objectives</b>	<p>In 2026 AMLA will define the roadmap for information transfer from supervisory authorities, identify the minimum set of documentation required to initiate direct supervision, and ensure that data protection requirements are met through a dedicated review by the Data Protection Officer. AMLA will also establish clear timelines, formats and channels for the transfer of information, develop standard templates for supervisory inventories, and prepare a note for the General Board setting out the governance approach. In parallel, AMLA will initiate the set-up of permanent transfer channels with supervisory authorities, ECB and ESAs, so that by the end of the year the first fully functional framework for supervisory handover will be in place.</p>
<b>Main Output /Expected result</b>	<p>The main output will be AMLA's Information Transfer Framework, consisting of a standardised supervisory inventory template, detailed transfer procedures, governance rules endorsed by the General Board, and functioning channels with national authorities. This framework will allow AMLA to receive, process and store supervisory documentation in a consistent and legally compliant way, ensuring that all directly supervised entities are handed over with a complete record of supervisory history. The expected result is that AMLA will be fully equipped to take over supervision of selected entities in a seamless and legally robust manner. The framework will guarantee that supervisory information is transferred in a harmonised way across the Union, that pending cases are handled consistently, and that AMLA gains immediate access to complete and reliable documentation.</p>

## **DSU-4 DESIGN OF TRANSFER OF DIRECT SUPERVISION TASKS AND POWERS IN EXCEPTIONAL CIRCUMSTANCES (ART. 14 AMLAR)**

<b>Contributing to Strategic Priority #</b>	1: Convergence and Consistency 2: Cooperation and Inclusiveness 4: Credibility and Accountability
<b>Overview of the Activity</b>	This activity will set out the framework and procedures for AMLA to assume direct supervision of an entity under Article 14 AMLAR, where exceptional circumstances require a temporary transfer of supervisory powers from a national authority. It involves defining objective and measurable criteria for triggering such requests, designing a robust and transparent workflow for their evaluation, and ensuring that AMLA can base its decisions on sufficient data and evidence. The work will also address legal safeguards, governance requirements and operational readiness so that transfers can be executed in a sound, timely and consistent manner. The framework will be fully aligned with Articles 7 – 10 AMLAR on transfer of supervision, while embedding specific rules for exceptional situations.
<b>Objectives</b>	In 2026 the building blocks for the Art. 14 transfer framework will be developed. This will include a basic workflow, a standard request template, and clear escalation rules to the Executive Board and General Board. Mapping of past supervisory challenges and a first set of data and evidence requirements will also be carried out. More complex elements – such as measurable thresholds for exceptional circumstances, a comprehensive decision tree, detailed legal and governance safeguards, ICT system alignment and staff training – will be phased into 2027, allowing resources to be used more efficiently while ensuring AMLA remains operationally ready from the outset.
<b>Main Output /Expected result</b>	The main output in 2026 will be an interim process for handling requests under Article 14 AMLAR, consisting of a standard request template, a basic evaluation workflow and clear escalation rules to the Executive Board and General Board. This will provide AMLA with a minimum operational capacity to manage transfers if they arise at short notice. The full Article 14 Transfer Framework – including decision tree and thresholds, detailed evidence and data

templates, legal safeguards, and operational readiness plans – will be completed in 2027. The expected result is that AMLA will combine immediate preparedness with a phased build-up of capacity, ensuring that urgent cases can already be addressed while a comprehensive and legally robust framework is finalised. This approach will provide clarity to supervisory authorities, ensure AMLA decisions are grounded in transparent procedures, and strengthen trust by demonstrating both responsiveness and long-term credibility in managing exceptional transfers.

## INDIRECT SUPERVISION

### ISU-1 DEVELOPMENT OF A STRATEGY AND A FRAMEWORK FOR AMLA'S INDIRECT SUPERVISION

Contributing to Strategic Priority #	1: Convergence and Consistency 2: Cooperation and Inclusiveness 3: Credibility and Accountability
Overview of the Activity	AMLA will prepare and adopt a Supervision Strategy paper for its indirect supervision function, which governs AMLA's further development of methodologies of and the later use of its tools for indirect supervision. The Supervisory Strategy will clarify AMLA's supervisory objectives and the principles for resource allocation. It will also ensure coherence with other regulatory instruments and supervisory activities in order to contribute to an overall consistent and credible AMLA approach. AMLA will also translate the Indirect Supervision Strategy into an operational framework. The framework focuses on risk analysis and on the criteria for selecting the most appropriate tools to implement the framework. This involves the setting up of methodologies for the use of the individual tools that AMLA has received for fostering supervisory convergence.
Objectives	In 2026 AMLA will complete the preparatory risk mapping and benchmarking exercises needed to identify supervisory priorities, consult internally across all relevant units to ensure the full integration of relevant perspectives, and organize a dedicated workshop with the Executive Board to define and then finalise the strategic direction. AMLA will also develop the architecture of its indirect

	supervision cycle and draft a Supervisory Framework with methodologies of the tools for indirect supervision that can be finalized and approved in the second half of the year.
<b>Main Output /Expected result</b>	The main output will be AMLA's Indirect Supervision Strategy Paper, a comprehensive basis for setting up the framework and methodologies and for a structured use of AMLA's indirect supervision tools. The Strategy will guide AMLA's internal planning and resource allocation but will also provide external stakeholders national supervisors, obliged entities and EU institutions with clarity and predictability about AMLA's supervisory direction. AMLA's Indirect Supervision Framework , will define supervisory processes, methodologies and supporting tools that will serve as the binding reference for AMLA staff and a transparent basis for cooperation with supervisory authorities and other EU agencies and institutions. AMLA will then be equipped with an operationally ready supervisory model that allows AMLA staff to apply the Strategy in practice. This will also ensure predictability for supervised entities, foster trust and cooperation with supervisory authorities, and strengthen AMLA's credibility.

## ISU-2 MONITORING THE USE OF COLLEGES IN THE FINANCIAL SECTOR

<b>Contributing to Strategic Priority #</b>	1: Convergence and Consistency 2: Cooperation and Inclusiveness 3: Credibility and Accountability
<b>Overview of the Activity</b>	Based on a list of colleges in the EU, AMLA will select colleges of relevant obliged entities in line with a risk-based approach and participate in these colleges. To facilitate the work of colleges AMLA will ensure availability of an IT- platform for the exchange of information among members of a college (for both financial and non-financial obliged entities).
<b>Objectives</b>	Foster the implementation of consistent and effective supervision in colleges and between Home/Host Supervisors.

<b>Main Output /Expected result</b>	<p>Providing a report on cooperation of supervisory authorities in AML colleges by end of 2026 and facilitate application of consistent measures by members. Ensure there is a protected place hosted by AMLA (or by EBA on behalf of AMLA) where college members can exchange information.</p> <p>The report of AMLA on the use of colleges will enhance the quality of cooperation in colleges by supervisory authorities which leads to more consistent supervision of obliged entities supervised by a college.</p>
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### ISU-3 ASSESSMENTS ON THE STATE OF SUPERVISORY CONVERGENCE

<b>Contributing to Strategic Priority #</b>	1: Convergence and Consistency 2: Cooperation and Inclusiveness 3: Credibility and Accountability
<b>Overview of the Activity</b>	AMLA will develop a methodology for conducting assessments of the activities of supervisors in accordance with Art. 30 AMLAR, which will guide the preparation, performance of and reporting on individual assessments conducted by AMLA. In this regard AMLA will develop methods for a consistent assessment of the activities, tools and resources of the supervisors assessed in defined areas of the European requirements for the prevention of ML/TF. To ensure that all financial supervisors will be covered in one cycle AMLA will draw up assessment cycle plans. It will work together with financial supervisors in conducting the assessments.
<b>Objectives</b>	Provide information on the state of convergence regarding particular areas of risk following a risk-based approach and foster harmonization of supervisory approaches when adequate.
<b>Main Output /Expected result</b>	AMLA will be well prepared to start its first cycle of convergence assessments and to produce reports on the results of the assessments that show where further convergence might be warranted. This will create incentives to enhance supervisory effectiveness in line with FATF standards and with EU requirements.

	The reports will support supervisory authorities in enhancing their supervisory practices and organisation.
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**ISU-4 PREPARATION FOR CASES WHERE POTENTIAL BREACHES OF UNION LAW BY THE NATIONAL SUPERVISOR(S) ARE INDICATED (A) OR WHERE COMPLIANCE OF OBLIGED ENTITIES UNDER NATIONAL SUPERVISION DETERIORATES RAPIDLY AND SIGNIFICANTLY (B)**

<b>Contributing to Strategic Priority #</b>	1: Convergence and Consistency 2: Cooperation and Inclusiveness 3: Credibility and Accountability
<b>Overview of the Activity</b>	<p>A) AMLA will develop mechanisms (governance structure and processes for issuing recommendations and warnings) to react on indications of potential breaches of Union law, where a financial supervisor has not applied measures or has applied measures in a way that appears to be a breach of Union law leading to systematic failures in its supervision, which affect multiple obliged entities and undermine the effectiveness of the AML/CFT supervisory system.</p> <p>B) AMLA will develop mechanisms to react on indications of serious, repeated or systematic breaches by non-selected obliged entities.</p>
<b>Objectives</b>	<p>Foster consistency and convergence in the application of Union law</p> <p>a) by taking action in substantiated cases of possible lack of due application of Union law;</p> <p>b) by analysing indications of severe breaches of compliance by obliged entities and taking action in substantiated cases.</p>
<b>Main Output /Expected result</b>	<p>Have procedures in place to promote quick adjustment of practices by supervisors where warranted in order to adequately implement Union law.</p> <p>The AMLA governance structure will enable AMLA to be prepared in case a Breach of Union law or a severe breach of law by an obliged entity arises.</p>

## ISU-5 ORGANISE TRAININGS FOR FINANCIAL AND NON-FINANCIAL SUPERVISORS AND SEMINARS WHERE SUPERVISORS CAN EXCHANGE INFORMATION ON BEST PRACTICES IN SUPERVISION

Contributing to Strategic Priority #	1: Convergence and Consistency 2: Cooperation and Inclusiveness 3: Credibility and Accountability
Overview of the Activity	Develop practical instruments and non-binding convergence tools to promote common supervisory approaches and best practices, particularly by organising sectoral and cross-sectoral training programmes or seminars for the exchange of supervisory best practices between supervisory authorities in AMLA premises or elsewhere.
Objectives	Exchange of information and know-how across supervisors on central topics of supervision regarding AML/CFT prevention.
Main Output /Expected result	Where AMLA identifies particular need of supervisory convergence it will organise a training session or workshop for national supervisors to provide information and help for the coordination of supervisory activity on areas of risk across the European Union. AMLA will report on activities undertaken in this respect. This will enhance the know-how of supervisory authorities, leading to higher quality and more consistent supervision.

## OVERSIGHT OF THE NON-FINANCIAL SECTOR

### ONF-1 DEVELOPMENT OF A STRATEGY AND A FRAMEWORK FOR AMLA'S OVERSIGHT OF THE NON-FINANCIAL SECTOR

Contributing to Strategic Priority #	1: Convergence and Consistency 2: Cooperation and Inclusiveness 3: Credibility and Accountability
Overview of the Activity	AMLA will prepare and adopt an Oversight strategy paper, which governs AMLA's further development of methodologies of and the later use of its tools for oversight of the non-financial sector. The

	Supervisory Strategy will clarify AMLA's objectives and the principles for resource allocation regarding its oversight activities. It will also ensure coherence with other regulatory instruments and oversight activities in order to contribute to an overall consistent and credible AMLA approach. AMLA will also translate the Oversight Strategy into an operational framework. The framework focuses on risk analysis and on the criteria for selecting the most appropriate tools to implement the framework. This involves the setting up of methodologies for the use of the individual tools that AMLA has received for fostering supervisory convergence.
<b>Objectives</b>	In 2026 AMLA will conduct the preparatory risk mapping and benchmarking exercises needed to identify oversight priorities, as also mentioned under activity RAU 4, consult internally across all relevant units to ensure the full integration of relevant perspectives, and organize a dedicated workshop with the Executive Board to define strategic direction. AMLA will also develop the architecture of its oversight cycle and draft an Oversight Framework with methodologies for the use of the tools.

### **ONF-2 Training for and public outreach to the non-financial sector**

<b>Contributing to Strategic Priority #</b>	1: Convergence and Consistency 2: Cooperation and Inclusiveness 3: Credibility and Accountability
<b>Overview of the Activity</b>	Engagement with supervisory authorities in the non-financial sector through targeted outreach and cooperation-building initiatives. This includes maintaining and updating the list of non-financial sector supervisory authorities and disseminating the results of the comprehensive survey on risks in the NF-sector conducted in 2025. It also includes developing a plan and strategy to support the effective handling of mutual assistance requests in the non-financial sector.

<b>Objectives</b>	To promote efficient cooperation and knowledge-sharing among supervisory authorities in the NFS and between AMLA and national authorities.
<b>Main Output /Expected result</b>	<p>Fostering convergence in the non-financial sector by developing a roadmap for sectoral and cross-sectoral training programmes. First trainings sessions to be conducted.</p> <p>The roadmap will support AMLA in taking convergence measures in the field of non-financial supervision.</p>

## FIU – FINANCIAL INTELLIGENCE UNITS

### FIU-1 SUPPORT AND COORDINATION FRAMEWORK IMPLEMENTATION

<b>Contributing to Strategic Priority #</b>	1: Convergence and Consistency 2: Cooperation and Inclusiveness 5: Global Leadership
<b>Overview of the Activity</b>	<p>Setting up AMLA's support and coordination activities towards FIUs regarding mutual assistance, peer reviews and mediation.</p> <p>It will contribute to objectives 1.4 (Create a common understanding and a consistent legal framework on FIUs best practices, methods, procedures and formats to be used in the operational activity), 2.1 (foster a shared AML/CFT culture among FIUs), 2.2 (Build trust-based relationships through effective involvement of supervisory authorities and FIUs and structured stakeholder engagement), 5.1 (position AMLA as a global reference point) and 5.4 (Position AMLA as the key driver of a common AML/CFT culture across Europe, through the involvement of FIUs and European Law Enforcement Authorities).</p>
<b>Objectives</b>	Effectiveness of the support and coordination activities of AMLA, by performing mediation procedures and providing mutual assistance and completing the first pilot thematic peer review.
<b>Main Output /Expected result</b>	<p>Main output:</p> <ul style="list-style-type: none"> <li>• Peer review report;</li> <li>• Where relevant, mediation non-binding opinion;</li> </ul>

	<ul style="list-style-type: none"> <li>Where relevant, assistance requested by one or more FIUs;</li> <li>Communication to the General Board, each year, of the own resources that AMLA allocates to mutual assistance.</li> </ul> <p>Effective functioning of AMLA's support and coordination activities, aimed at assisting FIUs in their requests for mediation or mutual assistance, providing them with an overview of their respective activities, and fostering consistency as well as AMLA's global leadership</p>
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## FIU-2 MAPPING EXERCISE

<b>Contributing to Strategic Priority #</b>	1: Convergence and Consistency 2: Cooperation and Inclusiveness 5: Global Leadership
<b>Overview of the Activity</b>	<p>Mapping exercise of EU FIUs' functioning (article 5(5)(a) and (b) is to support the peer reviews and more broadly to contribute to objectives 1.4 (Create a common understanding and a consistent legal framework on FIUs best practices, methods, procedures and formats to be used in the operational activity), 2.1 (foster a shared AML/CFT culture among FIUs), 5.1 (position AMLA as a global reference point) and 5.4 (Position AMLA as the key driver of a common AML/CFT culture across Europe, through the involvement of FIUs and European Law Enforcement Authorities).</p>
<b>Objectives</b>	Completion of the mapping exercise and report.
<b>Main Output /Expected result</b>	<p>Main output: Mapping report.</p> <p>Better overview and knowledge of the functioning of FIUs, and basis for peer reviews to improve the efficiency and consistency among EU as well as cooperation among FIUs and global leadership of AMLA regarding intelligence coordination.</p>

## FIU-3 PILOT PEER REVIEW PROCESS

<b>Contributing to Strategic Priority #</b>	1: Convergence and Consistency 2: Cooperation and Inclusiveness
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	5: Global Leadership
<b>Overview of the Activity</b>	Carry out the first one of the two trial peer reviews, along with a mapping exercise of EU FIUs' functioning (article 5(5)(b) and 48 AMLAR), to contribute to objectives 1.4 (Create a common understanding and a consistent legal framework on FIUs best practices, methods, procedures and formats to be used in the operational activity), 2.1 (foster a shared AML/CFT culture among FIUs), 5.1 (position AMLA as a global reference point) and 5.4 (Position AMLA as the key driver of a common AML/CFT culture across Europe, through the involvement of FIUs and European Law Enforcement Authorities).
<b>Objectives</b>	Completion of the first pilot peer review and preparation of the second one that will start on 01/01/2027.
<b>Main Output /Expected result</b>	Main output: pilot peer review report.  A better overview and knowledge of the functioning of FIUs in specific areas can be the basis of better efficiency and consistency of EU FIUs legal frameworks and functioning, by leading to changes propositions. It is also an opportunity for AMLA to strengthen its leadership within EU and towards international bodies such as EGMONT, FATF and MONEYVAL.

#### **FIU-4 OPERATIONALISATION OF THE MEDIATION PROCESS**

<b>Contributing to Strategic Priority #</b>	2: Cooperation and inclusiveness  5: Global Leadership
<b>Overview of the Activity</b>	Provide assistance in mediation procedure(s) upon FIUs' potential request(s), according to article 5(5)(g) and article 46 of AMLA Regulation.  It will contribute to objective 2.1. (Foster a shared AML/CFT culture among supervisory authorities, FIUs, as well as with prudential and law enforcement agencies, and the private sector) and 5.1. (Position AMLA as a global reference point in AML/CFT by promoting EU standards internationally) and 5.4 (Position AMLA as the key

	driver of a common AML/CFT culture across Europe, through the involvement of FIUs and European Law Enforcement Authorities).
<b>Objectives</b>	Facilitate a solution in the case of a disagreement between two or more FIUs through the mediation procedure provided by article 46 of AMLA Regulation by the issuing of a non-binding opinion by the General Board in FIU composition.
<b>Main Output /Expected result</b>	<ul style="list-style-type: none"> <li>• Non-binding opinion of the General Board</li> <li>• Follow-up communication of the participating FIUs pursuant article 46(6) AMLAR.</li> </ul> <p>Facilitate a solution to disagreements between two or more FIUs regarding individual cases related to cooperation, including the exchange of information under AMLD.</p>

#### **FIU-5 JOINT ANALYSIS: DEVELOPING METHODS AND CRITERIA FOR THE SELECTION AND PRIORITIZATION OF CASES AND FOR THE CONDUCT OF JOINT ANALYSES**

<b>Contributing to Strategic Priority #</b>	1: Convergence and Consistency 2: Cooperation and Inclusiveness
<b>Overview of the Activity</b>	<p>As provided by Articles 40(1) and 43(3) AMLAR AMLA shall lay down methods and criteria for the selection and prioritization of cases relevant for the conduct of joint analyses and establish methods and procedures for the conduct of joint analyses. At the same time, at the beginning of each year, AMLA shall also draw up a list of priority areas (art. 40(2)) for the conduct of joint analysis.</p> <p>It will contribute to objectives 1.4 (Create a common understanding and a consistent legal framework on FIUs best practices, methods, procedures and formats to be used in the operational activity) and 2.1 (Foster a shared AML/CFT culture among supervisory authorities and FIUs, as well as prudential authorities and law enforcement agencies, and the private sector).</p>
<b>Objectives</b>	Establishment of the methods and criteria drafted on the basis of the document endorsed by the FIU Platform.

<b>Main Output /Expected result</b>	<ul style="list-style-type: none"> <li>• Final document of methods, criteria and procedures;</li> <li>• List of priority areas</li> </ul> <p>Methodologies and criteria will drive the selection of cases and the conduct of joint analysis, contributing to enhance an effective co-operation between FIUs.</p>
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## FIU-6 OPERATIONALISATION OF JOINT ANALYSIS

<b>Contributing to Strategic Priority #</b>	2: Cooperation and Inclusiveness
<b>Overview of the Activity</b>	<p>Setting up joint analysis exercises, in line with Article 5(5) (d)-(f), 40 and 43 of AMLA Regulation, with the active involvement of the FIU Delegates and the participation of at least 5 FIUs.</p> <p>The activity will also contribute to the application and adoption of methods and criteria, and to the organization of secured IT support and communication channels. It will contribute to objective 2.2. (Build trust-based relationships through effective involvement of supervisory authorities and FIUs and structured stakeholder engagement).</p>
<b>Objectives</b>	<p>Carrying out at least one joint analysis exercise, in addition to the strategic analysis on CASPs, by applying the methods, criteria and procedures according to articles 40(1) and 43(1) of AMLA Regulation depending on the legal and practical feasibility.</p> <p>The activity will involve the participation of AMLA staff, FIU Delegates and FIUs.</p>
<b>Main Output /Expected result</b>	<ul style="list-style-type: none"> <li>• Final report;</li> <li>• Possible reporting and transmission of the results of joint analyses to national authorities and, if relevant, to EPPO, OLAF, Eurojust and Europol.</li> </ul> <p>Conducting joint analyses with the participation of AMLA staff and the interested FIUs by using FIU.net and technological analysis tools, where available.</p>

## FIU-7 DEVELOPING RTS, ITSs AND GUIDELINES

<b>Contributing to Strategic Priority #</b>	1: Convergence and Consistency 2: Cooperation and Inclusiveness 5: Global Leadership
<b>Overview of the Activity</b>	<p>Development of the following RTS, ITSs and Guidelines:</p> <ol style="list-style-type: none"> <li>1. RTS specifying the relevance and selection criteria when determining whether a report submitted pursuant to Article 69(1) AMLR concerns another Member State (deadline 10/07/2026) as provided by Article 31(3) of AMLD. The EU FIU Platform will deliver a report and hand it over to AMLA as a basis for its work early 2026. It will contribute to objective 1.4 (Create a common understanding and a consistent legal framework on FIUs best practices, methods, procedures and formats to be used in the operational activity) and 2.1 (foster a shared AML/CFT culture among FIUs).ITS on the format to be used for the exchange of the information between FIUs as provided by Article 31(2).</li> <li>2. The EU FIU Platform worked on 'Contents and Formats for FIU-to-FIU exchanges' and delivered its final work, consisting in four templates for information exchanges and has been handed over to AMLA. It will contribute to objective 1.4 (Create a common understanding and a consistent legal framework on FIUs best practices, methods, procedures and formats to be used in the operational activity) and 2.1 (foster a shared AML/CFT culture among FIUs).</li> <li>3. ITS on the format to be used for the reporting of suspicions and for the provision of transaction records to FIUs as provided by Article 69(3) AMLR. A working group gathering FIUs' representatives, European Commission representatives and AMLA and supported by the TSI instrument of the Council of Europe is ongoing and should deliver its first mapping results in January 2026. This ITS will have implications on stakeholders and will therefore need a public consultation. It will contribute to objective 1.4 (Create a common understanding and a consistent legal framework on FIUs best practices, methods, procedures and formats to be used in the operational activity) and 2.2 (Build trust-based relationships through effective involvement of supervisory authorities and FIUs and structured stakeholder engagement).</li> </ol>

	<p>As provided by Article 69(5) AMLR, AMLA shall issue guidelines on indicators of suspicious activity or behaviour. To that aim, a working group will be set to prepare the related work. It will contribute to objectives 1.4 (Create a common understanding and a consistent legal framework on FIUs best practices, methods, procedures and formats to be used in the operational activity) and 5.4 (Position AMLA as the key driver of a common AML/CFT culture across Europe, through the involvement of FIUs and European Law Enforcement Authorities).</p>
<b>Objectives</b>	<p>Development of the RTS and ITS and submission to the European Commission</p> <p>Where relevant, complete public consultation to ensure efficient regulation. Regarding the guidelines required by Article 69(5) AMLR, establishment of a working group tasked with the preparatory work of the guidelines on indicators of suspicious activity or behaviour.</p>
<b>Main Output /Expected result</b>	<ul style="list-style-type: none"> <li>• RTS and ITSs drafts</li> <li>• Guidelines first draft</li> </ul> <p>These RTS, ITSs and guidelines will allow for consistent and efficient transmission of STRs and information sharing among EU FIUs.</p>

### **FIU-8 ITSs ON THE FORMAT FOR THE REPORTING OF INFORMATION TO THE EPPO AND ON THE FORMAT TO BE USED BY FIUS FOR REPORTING INFORMATION TO THE EPPO**

<b>Contributing to Strategic Priority #</b>	<p>1: Convergence and Consistency</p> <p>2: Cooperation and Inclusiveness</p> <p>5: Global Leadership</p>
<b>Overview of the Activity</b>	<p>As provided by Article 81(1) of AMLR, AMLA shall, in consultation with the EPPO:</p> <ul style="list-style-type: none"> <li>• - develop draft implementing technical standards on the format to be used by FIUs for reporting information to the EPPO. To that aim, a working group will be set up between AMLA, EPPO and voluntary FIUs.</li> </ul>

	<p>It will contribute to objectives 1.4 (Create a common understanding and a consistent legal framework on FIUs best practices, methods, procedures and formats to be used in the operational activity), 2.3 (Enhance cooperation with EU institutions and authorities, and international bodies) and 5.1 (Position AMLA as a global reference point in AML/CFT by promoting EU standards internationally) and 5.4 (Position AMLA as the key driver of a common AML/CFT culture across Europe, through the involvement of FIUs and European Law Enforcement Authorities).</p>
<b>Objectives</b>	Development of the two ITSs in consultation with EPPO and submission to the European Commission before the respective deadlines (27 June 2026 and 10 July 2026)
<b>Main Output /Expected result</b>	<p>The draft ITS on the format for the reporting of information to the EPPO will allow to transmit the result of joint analysis conducted by AMLA to the EPPO in a standardized and uniform manner.</p> <p>The draft ITS on the format to be used by FIUs for reporting information to the EPPO will allow to a more consistent consistency on the reporting activity among FIUs.</p>

### **FIU-9 WORKING ARRANGEMENTS WITH THE EPPO, Europol, Eurojust, OLAF**

<b>Contributing to Strategic Priority #</b>	2: Cooperation and Inclusiveness 5: Global Leadership
<b>Overview of the Activity</b>	Carry on the work started in 2025 regarding the working arrangements to conclude with the EPPO, Europol, Eurojust and OLAF, including institutional, strategic and operational cooperation and possibility to have liaison officers from both sides (article 94 AMLAR). It will contribute to objectives 2.1 (Foster a shared AML/CFT culture among supervisory authorities and FIUs, as well as with prudential authorities and LEAs), 2.3 (Enhance cooperation with EU institutions and authorities, and international bodies) and 5.4 (Position AMLA as the key driver of a common AML/CFT culture across Europe, through the involvement of FIUs and European Law Enforcement Authorities).

<b>Objectives</b>	Sign working arrangements with each of the four bodies and start effective cooperation.
<b>Main Output /Expected result</b>	<ul style="list-style-type: none"> <li>Working arrangements with each of the four bodies, as a necessary basis for concrete cooperation.</li> <li>Possible information exchanges (institutional, strategic or operational).</li> </ul> <p>Close cooperation between AMLA and the EPPO, Europol, Eurojust and OLAF, regarding operational cases as well as strategic information.</p>

## CASPs

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### CRY-1 PERFORMING STRATEGIC ANALYSIS ON CRYPTO-ASSET SERVICE PROVIDERS

<b>Contributing to Strategic Priority #</b>	5: Global Leadership
<b>Overview of the Activity</b>	<p>Conduct of a strategic analysis exercise on the CASPs sector, focusing on market developments following the adoption and implementation of MiCAR.</p> <p>This exercise will contribute to building a robust knowledge base on the state of the crypto-assets market in the EU from the AML/CFT lens and will help promote a shared understanding of emerging ML/TF risks.</p>
<b>Objectives</b>	Conduct of a strategic analysis exercise on the CASP sector, drafting of an initial draft report with conclusions.
<b>Main Output /Expected result</b>	Final report on the state of the EU CASP sector and the impact of the MiCA Regulation from the AML/CFT lens.

### CRY-2 ENHANCING INDIRECT SUPERVISION OF CRYPTO-ASSET SERVICE PROVIDERS (CASPs)

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<b>Contributing to Strategic Priority #</b>	1: Convergence and Consistency 2: Cooperation and Inclusiveness 3: Credibility and Accountability
<b>Overview of the Activity</b>	Coordinate a thematic review focused on compliance of registered and MICA-authorised CASPs with AML/CFT law, particularly regarding activities or services with higher risks, or conduct an assessment of the rate of supervisory convergence in the supervision of CASPs and participate as an observer in CASP supervisory colleges to monitor cooperation frameworks and identify areas for improvement
<b>Objectives</b>	Foster a common understanding of supervisory practices in the CASP sector; produce a report on the compliance of CASPs with AML/CFT provisions and supervisory practices in this sector.
<b>Main Output /Expected result</b>	Provide relevant information on compliance of the CASP sector and related supervisory practices that is not duplicate and helpful for financial supervisors

### **CRY-3 – BUILDING AN FIU EXPERT NETWORK on CRYPTO-ASSETS and VASPs**

<b>Contributing to Strategic Priority #</b>	1: Convergence and Consistency 2: Cooperation and Inclusiveness 5: Global Leadership
<b>Overview of the Activity</b>	As part of AMLA's mutual assistance support (Art. 45 (1) AMLAR), and in order to ensure the effective and consistent cooperation between FIUs (art. 39 AMLAR), AMLA will set up an expert network on crypto-assets and VASPs which will be made up of voluntary FIUs willing to share knowledge and exchange best practices in this field.  It will contribute to objectives 1.4 (Create a common understanding and a consistent legal framework on FIUs best practices, methods, procedures and formats to be used in the operational activity), 2.1 (foster a shared AML/CFT culture among FIUs), 5.1 (position AMLA as a global reference point), 5.3 (lead by example in intelligence coordination) and 5.4 (Position AMLA as the key driver of

	a common AML/CFT culture across Europe, through the involvement of FIUs and European Law Enforcement Authorities).
<b>Objectives</b>	Effective functioning of the expert network with assistance provided to FIUs.
<b>Main Output /Expected result</b>	Functioning expert network set up, with a focus on training, knowledge sharing and the exchange of best practices between FIUs in relation to crypto-assets; assistance provided to FIUs which express this need.

## DIGITAL, ICT AND DATABASES

### DID-1 IT MANAGEMENT AND GOVERNANCE

<b>Contributing to Strategic Priority #</b>	3: Technology and Innovation
<b>Overview of the Activity</b>	<p>In line with the achievement of financial autonomy, this activity aims at establishing sound governance and management of AMLA's IT services. This activity contributes directly to AMLA's multi-annual goals by:</p> <ul style="list-style-type: none"> <li>• Providing the foundation for all digital activities;</li> <li>• Supporting the scalability and sustainability of AMLA's ICT environment;</li> <li>• Enabling compliance with EU regulations, including financial transparency, IT governance standards, cybersecurity, and digital resilience;</li> <li>• Facilitating cross-departmental coordination and effective delivery of projects that rely on shared IT resources and infrastructures.</li> </ul>
<b>Objectives</b>	To establish and operate a comprehensive IT management and governance framework that ensures strategic alignment, operational efficiency, compliance, and accountability across AMLA's growing ICT landscape.

<b>Main Output /Expected result</b>	<ul style="list-style-type: none"> <li>Structure and professionalise ICT operations to support AMLA's growing mandates.</li> <li>Ensure reliability, transparency, and alignment of IT services with strategic business objectives.</li> <li>Enable monitoring and optimisation of costs, risks, and performance.</li> <li>Support delivery of all ICT strategic projects by providing the necessary governance, contracts, and frameworks.</li> </ul>
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## DID-2 FIU.NET TRANSFER

<b>Contributing to Strategic Priority #</b>	2: Cooperation and Inclusiveness 3: Technology and Innovation
<b>Overview of the Activity</b>	Article 73 of Directive (EU) 2024/1640 requires the European Commission to transfer to AMLA the management of the FIU.net application by 10 July 2027. To deliver this activity, AMLA will study the technical solutions proposed by the DAP4AMLA project and the study on the optimization of FIU.net, and consider developing and onboarding strategy.
<b>Objectives</b>	Ensure legal and operational readiness by AMLA for FIU.net management
<b>Main Output /Expected result</b>	<ul style="list-style-type: none"> <li>Legal, operational and IT gap assessment</li> <li>Negotiations and MoU draft with the European Commission</li> <li>Detailed Technical Transfer plan by end 2026</li> </ul> <p>AMLA is prepared for full ownership by July 2027</p>

## DID-3 EURECA TRANSFER FROM EBA

<b>Contributing to Strategic Priority #</b>	1: Convergence and Consistency 2: Cooperation and Inclusiveness 3: Technology and Innovation
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<b>Overview of the Activity</b>	This transfer is a legal obligation under the AMLA Regulation Article 106, and ensures continuity in anti-money laundering operations as described in the EBA-AMLA bilateral service level agreement
<b>Objectives</b>	The ‘EuReCA Transfer’ project aims to migrate ownership and operations of the EuReCA system from EBA to AMLA with full operational transfer by March 2026.
<b>Main Output /Expected result</b>	<ul style="list-style-type: none"> <li>• Technical handover from EBA</li> <li>• SLA and hosting setup at AMLA</li> <li>• Staff onboarding and documentation</li> </ul> <p>Uninterrupted functioning of the EuReCA system under AMLA management</p>

#### **DID-4 DEVELOPMENT OF CENTRAL AML/CFT DATABASE (ART. 11)**

<b>Contributing to Strategic Priority #</b>	1: Convergence and Consistency 2: Cooperation and Inclusiveness 3: Technology and Innovation
<b>Overview of the Activity</b>	To design and develop the Central AML/CFT Database mandated by Article 11 of AMLAR, establishing a secure, structured, and standardised repository of data to support risk-based supervision and coordination among national and EU authorities in the fight against money laundering and terrorist financing.
<b>Objectives</b>	Design and development of the central database as per Article 11 of AMLAR and RTS
<b>Main Output /Expected result</b>	<ul style="list-style-type: none"> <li>• Data model (conceptual and logical)</li> <li>• Functional requirements and RTS compliance mapping</li> <li>• Stakeholder validation workshops</li> </ul> <p>Foundational design in place for incremental development starting in 2026</p>

## DID-5 DATA COLLECTION AND RISK ANALYSIS PLATFORM

Contributing to Strategic Priority #	1: Convergence and Consistency 3: Technology and Innovation
Overview of the Activity	To design, develop, and deploy a sustainable, secure, and scalable digital platform that automates the collection, validation, processing, and risk analysis of data from supervisory authorities and other relevant sources, in support of AMLA's direct supervision mandate under AMLAR.
Objectives	Create a stable, automated and sustainable solution for the collection of data and to run the risk assessment for the purpose of selection of obliged entities for direct supervision by AMLA.
Main Output /Expected result	<ul style="list-style-type: none"> <li>Automated data pipelines</li> <li>Risk scoring engine (beta)</li> <li>User portal with dashboards</li> </ul> <p>Reliable platform to support supervisory risk selection, aligned with AMLA's digital roadmap</p>

## COMMUNICATION AND GOVERNANCE

### CLG-1 COMMUNICATION STRATEGY AND STAKEHOLDER ENGAGEMENT

Contributing to Strategic Priority #	2: Cooperation and Inclusiveness 4: Credibility and Accountability 5: Global Leadership
Overview of the Activity	In 2026, AMLA will further develop and implement its Stakeholder Engagement and Communication Strategy with the aim of building up a AML/CFT community, with a strong focus crisis communication preparedness. The Strategy will cover three main pillars: stakeholder outreach, internal communication, and crisis response. It will include a review of existing systems, refinement of policies and procedures, and the acquisition of necessary tools and

	technologies to ensure AMLA can communicate with credibility, transparency, and impact.
<b>Objectives</b>	<ul style="list-style-type: none"> <li>• Develop and implement a Stakeholder Engagement strategy that aligns with AMLA's multi-annual objectives;</li> <li>• Strengthen AMLA's crisis communication framework, including systems, tools, and protocols.</li> <li>• Enhance internal communication practices to develop a strong working culture within the organization;</li> <li>• Build and maintain trust with institutional stakeholders through transparent and credible communication channels.</li> </ul>
<b>Main Output /Expected result</b>	<ul style="list-style-type: none"> <li>• One high-level event organized/hosted by AMLA to raise visibility;</li> <li>• Roadshow to engage key stakeholders completed;</li> <li>• Policies and procedures forming the broader communication strategy approved by the Executive Board;</li> <li>• Tools and technology required for full operational implementation of the Communication Strategy acquired.</li> </ul> <p>Increased visibility and understanding of AMLA, with clear communication of short- and long-term goals to a wide range of stakeholders.</p> <p>Full readiness to roll out the comprehensive Stakeholder Engagement and Communication Strategy, including crisis communication components, as planned.</p>

## CLG 2 - DELIVERING A ROBUST GOVERNANCE FRAMEWORK

<b>Contributing to Strategic Priority #</b>	1: Convergence and Consistency 2: Cooperation and Inclusiveness 4: Credibility and Accountability 5: Global Leadership
<b>Overview of the Activity</b>	The activity supports AMLA's governing bodies (General Board and Executive Board) in their various compositions. It concerns

	<p>accountability to the Parliament and Council, as well as AMLA's interactions with the EU and international institutions.</p> <p>It furthermore contributes to the planning of AMLA's priorities, the establishment of AMLA's work programme and the monitoring of its execution.</p>
<b>Objectives</b>	<ol style="list-style-type: none"> <li>1. Ensure AMLA operates smoothly and has legally sound decision-making process, ensuring proper involvement of all relevant stakeholders (members, observers);</li> <li>2. Enable AMLA's governing bodies, management and the organisation to plan and run its activities according to the AMLA Work Programme;</li> <li>3. Launch the establishment of the Administrative Board of Review (article 72 AMLAR);</li> <li>4. Support AMLA in discharging accountability towards the European Parliament, the Council and the European Commission.</li> </ol>
<b>Main Output /Expected result</b>	<ul style="list-style-type: none"> <li>• Preparation – including ensuring legal soundness of proposals – and follow-up – including minutes and action points – of AMLA decision-making process.</li> <li>• Onboarding AMLA staff to the European Commission document and record management system</li> <li>• 2025 Consolidated Annual Activity Report – End of Q2 2026</li> <li>• 2027-2029 SPD – Q1 2026, revised in Q4</li> <li>• Support AMLA's governing bodies</li> <li>• Ensure that all accountability channels run smoothly</li> <li>• Support AMLA's contribution to EU and international fora</li> <li>• Develop internal policies/processes to support AMLA's activities</li> <li>• Prepare and monitor the execution of the annual and multi-annual work programme</li> <li>• Manage the stakeholder engagement with EU and non-EU stakeholders.</li> <li>• Organise or participate in dialogues and exchanges with relevant authorities in EU and non-EU jurisdictions</li> </ul>

### CLG-3 – LEGAL AND COMPLIANCE

<b>Contributing to Strategic Priority #</b>	1: Convergence and Consistency 2: Cooperation and Inclusiveness 4: Credibility and Accountability 5: Global Leadership
<b>Overview of the Activity</b>	<p>The overall aim of the legal and compliance activity is to ensure that AMLA operates in accordance with its founding regulation and with all other applicable laws.</p>
<b>Objectives</b>	<p>Ensure that AMLA operates within a sound legal and ethical framework which supports staff and stakeholders in delivering AMLA objectives.</p> <p>Strengthen consistency and effectiveness in supervisory outcomes and effective enforcement of Union law through supporting oversight functions.</p> <p>Adapt institutional advice and compliance functions to ensure more effective support for new AMLA activities, in particular oversight and direct supervision activities.</p>
<b>Main Output / Expected result</b>	<ul style="list-style-type: none"> <li>• Legal advice on regulatory, supervisory, convergence, oversight and direct supervision topics and on institutional matters.</li> <li>• Identification and investigations of potential breaches of EU law</li> <li>• Representation of AMLA before the Court of Justice and in interactions with the European Ombudsman</li> <li>• Development and implementation of data protection, ethics, risk management and anti-fraud frameworks.</li> <li>• Handle access to documents requests.</li> </ul> <p>Compliance with legal requirements in line with AMLA's AML/CFT mandate.</p>

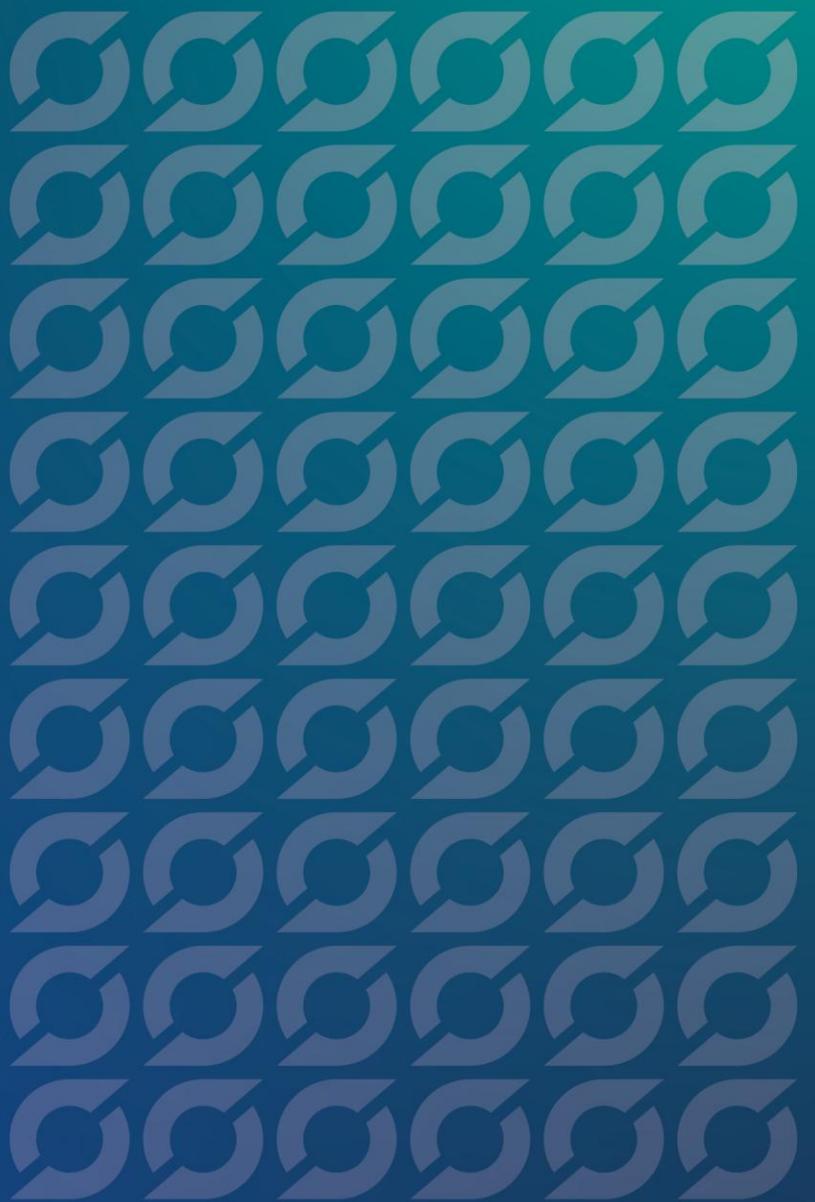
## CORPORATE SERVICES

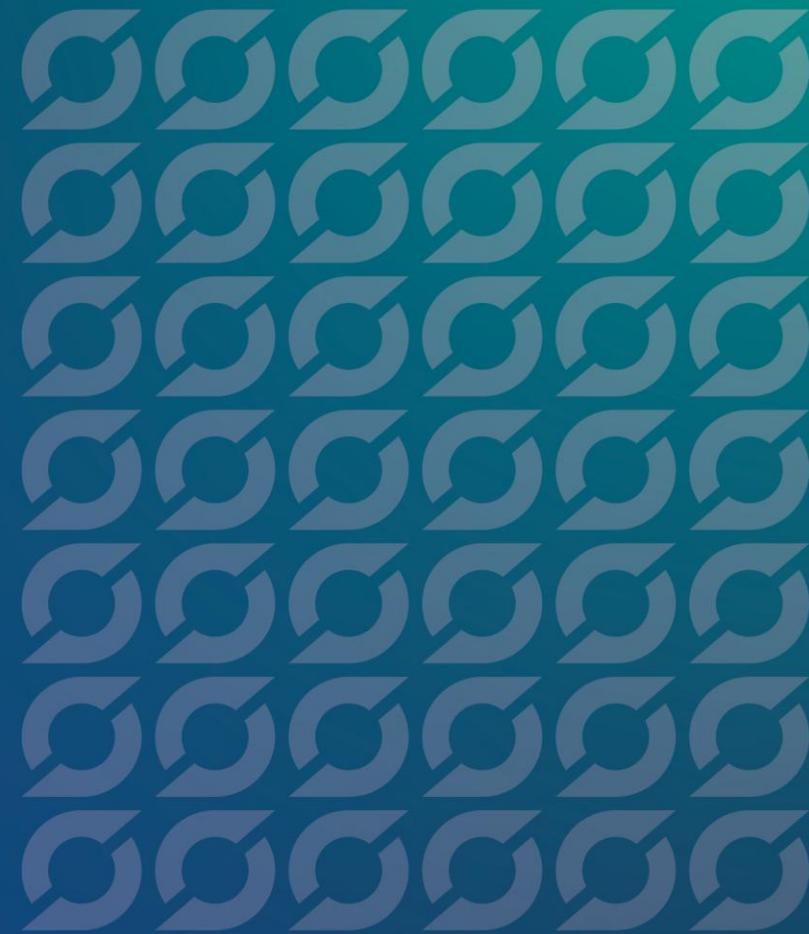
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### CSE – 1 BUILDING & FACILITIES

<b>Contributing to Strategic Priority #</b>	3. Technology and Innovation 4: Credibility and Accountability
<b>Overview of the Activity</b>	<p>The establishment of AMLA's headquarters in Frankfurt requires the progressive delivery and fit-out of seven long-term floors in the MesseTurm between 2025 and 2027. As a newly created agency, AMLA must ensure that its premises are functional, cost-efficient, accessible, sustainable and supportive of a modern, collaborative working environment. The activity covers the planning, supervision, delivery, furnishing, management and maintenance of AMLA's office floors, staff facilities, and shared areas with EIOPA, ensuring that the infrastructure keeps pace with AMLA's rapid growth towards 450 staff by 2027.</p>
<b>Objectives</b>	<ul style="list-style-type: none"><li>• Ensure the fit-out, handover and operational readiness of long-term floors: 53 FIU, 10 Conferencing, 52 Office and 55 Office by end 2026, with staff relocation.</li><li>• Plan and monitor subsequent floor fit-outs and deliveries (2026–2027) to match organizational growth.</li></ul> <p>Provide staff with a safe, functional, sustainable and collaborative working environment, including multipurpose and social spaces.</p>
<b>Main Output /Expected result</b>	<ul style="list-style-type: none"><li>• Progressive fit-out and hand-over of AMLA's long-term premises in MesseTurm.</li><li>• Operational floors: furnished, installed IT/AV and security components and maintenance contracts concluded and in force (cleaning, electricity, internet, etc.).</li><li>• Implementation of the office space concept (8:10 desk ratio, open space, hot-desking).</li><li>• Establishment of staff well-being areas (multipurpose room, lounge, social corners, showers, co-working corner).</li></ul>

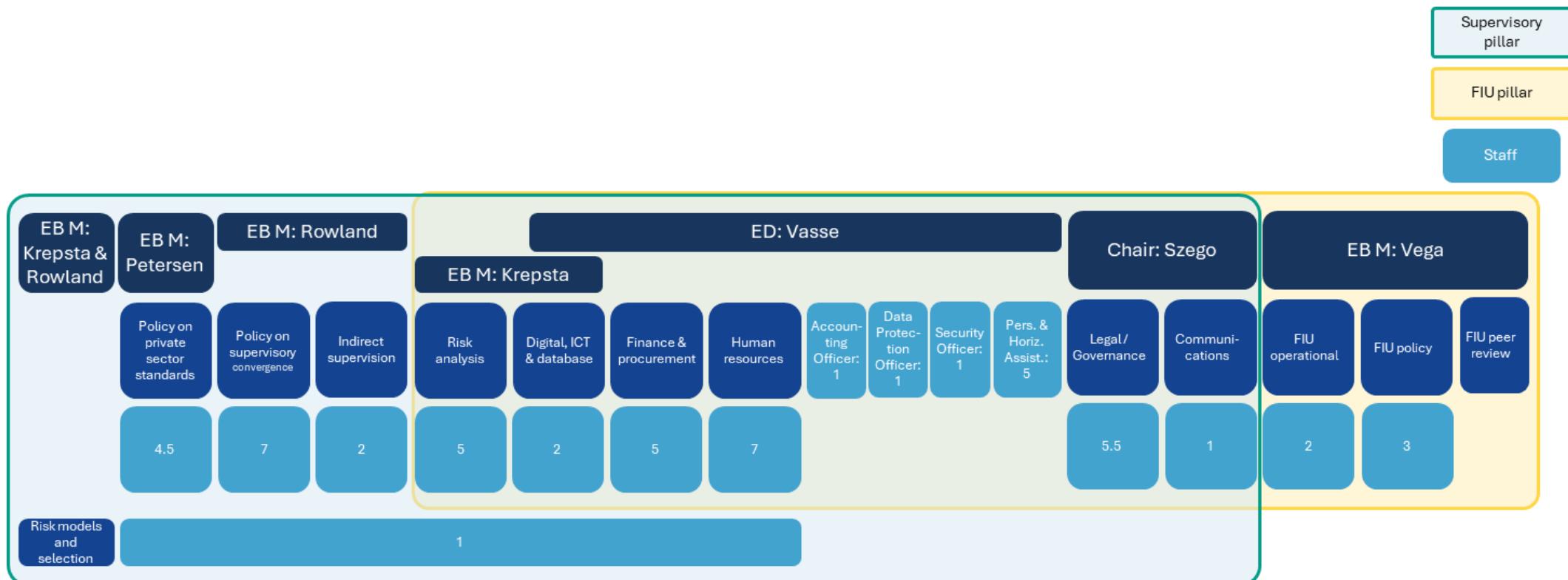
	<ul style="list-style-type: none"><li>• Shared Conference Floor with EIOPA, avoiding duplication of facilities.</li></ul> <p>A fully operational headquarters that supports AMLA's mission and rapid staff growth, providing a modern, flexible, sustainable and collaborative workplace. By optimizing space use and integrating shared facilities, AMLA ensures cost efficiency, accountability, and staff well-being, while laying the foundation for long-term adaptability and institutional credibility.</p>
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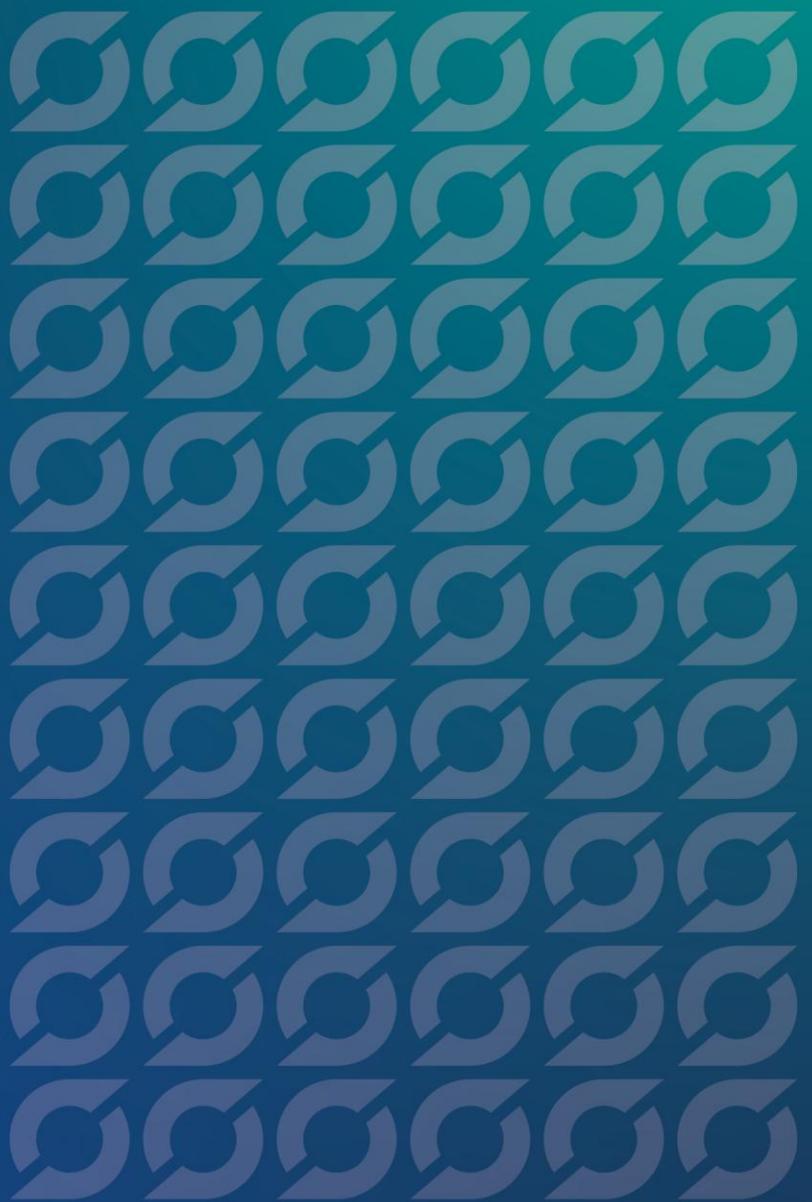




# ANNEX I – PROVISIONAL ORGANIGRAM

AMLA Organigram on 16 September 2025





## ANNEX II – FINANCIAL RESOURCES 2026-2028

The below figures stem from AMLA's Legislative Financial Statement and will be reassessed as AMLA develops.

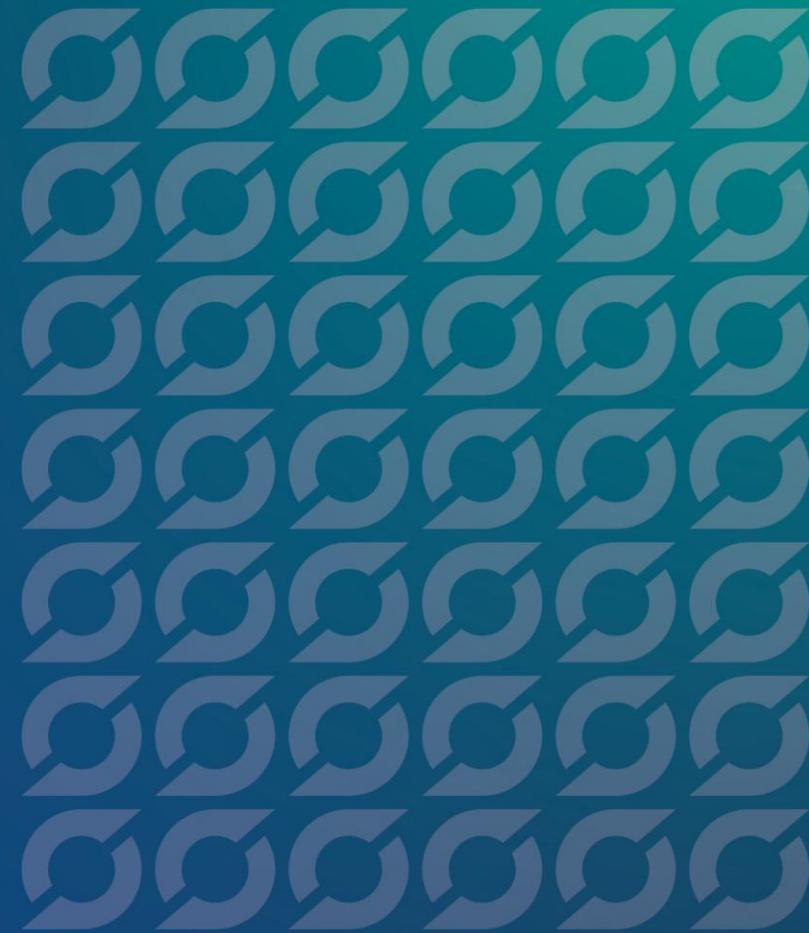
**Table 1. Revenue**

Heading	2026 budget	2027 budget	2028 budget
Revenues from Fees and Charges	0	0	65,155,000
Contributions from the European Union	37,060,950	57,187,248	26,886,000
Other Contributions	6,000,000	9,760,633	4,000,000
<b>Total Revenue</b>	<b>43,060,950</b>	<b>66,947,881</b>	<b>96,041,000</b>

**Table 2. Expenditure**

Heading	2026 budget	2027 budget	2028 budget
Staff in Active Employment	21,055,920	40,380,240	64,158,360
<i>-of which establishment plan posts</i>	16,652,880	33,500,800	55,188,000
<i>- of which external personnel</i>	3,903,040	6,379,440	8,460,360
<i>- other staff-related expenditure</i>	500,000	500,000	510,000
EU pension contributions	0	0	5,580,000
Administrative Missions Expenses	27,000	52,000	53,000
Socio-medical infrastructure	70,035	138,000	141,000
Trainings and Team Buildings	250,360	447,840	466,560
Social activities and representation costs	40,000	56,000	67,200
School and kindergarten	531,000	1,009,000	1,512,907

Heading	2026 budget	2027 budget	2028 budget
<b>TOTAL TITLE I</b>	<b>21,974,315</b>	<b>42,083,080</b>	<b>71,979,027</b>
Rental of building and associated costs	4,505,536	3,726,100	3,323,710
Information technology and Tele-communication	1,570,500	2,854,000	3,064,00
Furniture and movable property	3,102,662	1,116,100	311,720
Current Administrative Expenditure	276,000	321,200	374,440
<b>TOTAL TITLE II</b>	<b>9,454,698</b>	<b>8,017,400</b>	<b>7,074,670</b>
Workshops, Events and Interna-tional Relations	150,000	180,000	216,000
Operational Information	8,385,937	12,008,361	10,804,964
Operational Missions and meetings	1,691,000	3,011,000	4,116,600
Communication and Legal Ex-penses	1,105,000	1,340,200	1,531,509
Other operational expenses	300,000	307,840	318,230
<b>TOTAL TITLE III</b>	<b>11,631,937</b>	<b>16,847,401</b>	<b>16,987,303</b>
<b>GRAND TOTAL</b>	<b>43,060,950</b>	<b>66,947,881</b>	<b>96,041,000</b>



## ANNEX III – HUMAN RESOURCES – QUANTITATIVE

The below figures stem from AMLA's Legislative Financial Statement and will be reassessed as AMLA develops.

**Table 3. Staff population and its evolution, Overview of all categories of staff**

Staff	2024			2025	2026	2027	2028
ESTABLISHMENT PLAN POSTS	Authorised Budget	Actually filled as of 31/12/2024	Occupancy rate %	Authorised staff	Envisaged staff	Envisaged staff	Envisaged staff
Administrators (AD)	7	0	0%	88 <sup>3</sup>	138 <sup>4</sup>	297	297
Assistants (AST)	1	0	0%	8	12	23	23
Assistants/Secretaries (AST/SC)					3	3	3
TOTAL ESTABLISHMENT PLAN POSTS	8	0	0	96	153	323	323
EXTERNAL STAFF	FTE corresponding to the authorised budget	Executed FTE as of 31/12/2024	Execution Rate %	FTE corresponding to the authorised budget	FTE corresponding to the authorised budget	Envisaged FTE	Envisaged FTE

<sup>3</sup> AMLA requested the frontloading of 30 AD 7 posts (58 posts plus 30 AD 7 posts) from 2026 to 2025 in order to meet its operational needs already in 2025.

<sup>4</sup> Numbers are by 31 December. Recruitment will take place along the year. On average new recruits will work 4 months in the year 2026.

Contract Agents (CA)	9	1	11%	25	50	77	77
Seconded National Experts (SNE)	2	0	0%	29	30	32	32
TOTAL EXTERNAL STAFF	11	1	9%	54	80	109	109
TOTAL STAFF	19	1	5%	150	233	432	432

Table 4. Multi-annual staff policy plan (2026-2028)

Function group and grade	2024				2025		2026		2027		2028	
	Authorised Budget		Actually filled as of 31/12/2024		Authorised Budget		Envisaged		Envisaged		Envisaged	
	Permanent posts	Temporary posts	Permanent posts	Temporary posts	Permanent posts	Temporary posts	Permanent posts	Temporary posts	Permanent posts	Temporary posts	Permanent posts	Temporary posts
AD 16		1		0		6		6		6		6
AD 15												
AD 14		1		0		5		8		8		8
AD 13						1		4		6		6
AD 12		1		0		6		6		8		8
AD 11						4		4		9		9
AD 10		2		0		10		15		20		20
AD 9								2		10		10
AD 8						8		8		30		30
AD 7		1		0		33		50		100		100
AD 6		1		0		5		15		50		50
AD 5						10		20		50		50

AD subtotal		7		0		88		138		297		297
AST 11												
AST 10								1		2		2
AST 9								1		2		2
AST 8						2		3		5		5
AST 7												
AST 6								4		8		8
AST 5						2						
AST 4												
AST 3		1		0		4		3		6		6
AST 2												
AST 1												
AST subtotal		1		0		8		12		23		23
AST/SC 6												
AST/SC 5												
AST/SC 4												
AST/SC 3								3		3		3
AST/SC 2												
AST/SC 1												
AST/SC subtotal		0		0		0		3		3		3
<b>TOTAL</b>		8		0		96		153		323		323

**Table 5. Recruitment forecasts 2026 following retirement / mobility or new requested posts**

As AMLA is in its start-up phase and will be aiming to meet its establishment plan targets for 2025-2027, so no new requested posts are foreseen.

**Table 6. Gender representation**

Gender	As at 31/12/2025
Female	61
Male	58
<b>Grand Total</b>	<b>119<sup>5</sup></b>

**Table 7. Data regarding gender evolution over 5 years of the Middle and Senior management**

As at 31/12/2025:

	Male	Female
Senior Management	3	3
Middle Management		1

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<sup>5</sup> The figure includes all recruited and onboarded staff. It does not include offer letters awaiting acceptance.

**Table 8. Geographical balance**

As at 31/12/2025:

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%

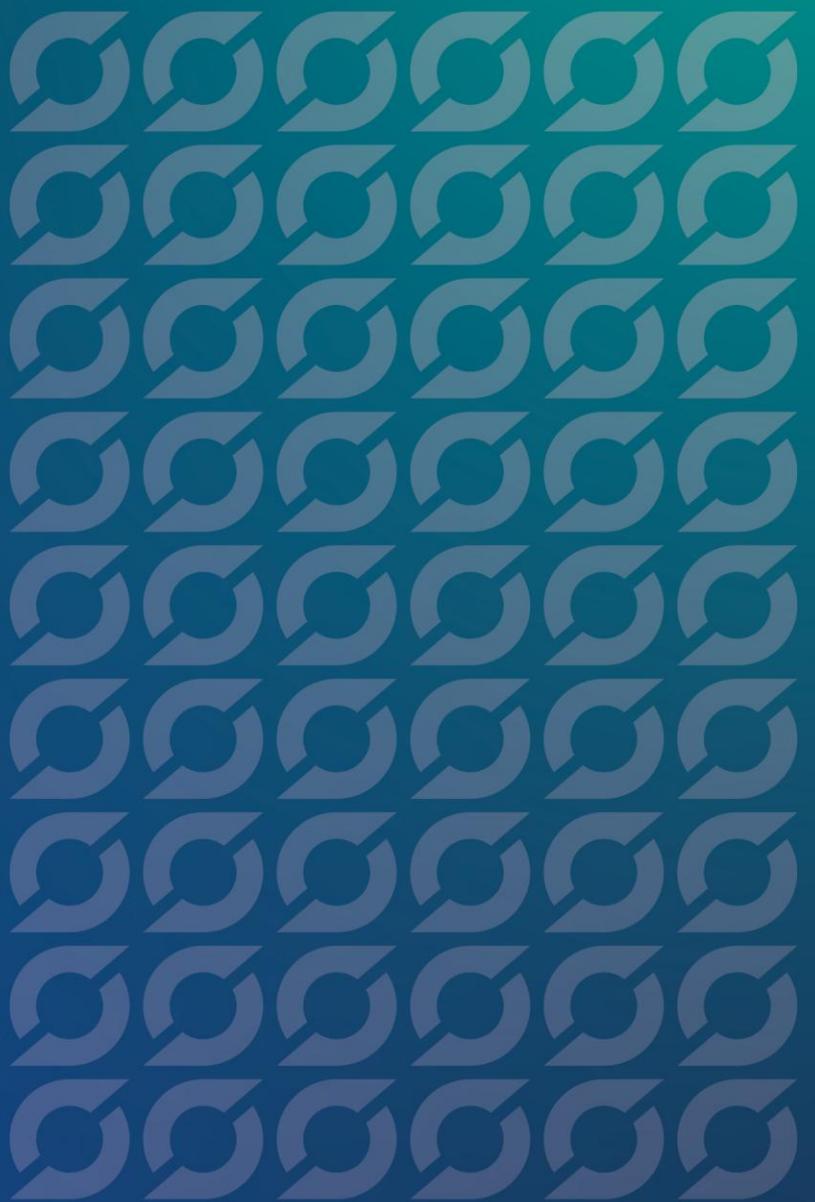
Luxembourgish	1	1.6%	0	0%	1	0.8%
Maltese	1	1.6%	2	3.4%	3	2.5%
Polish	1	1.6%	2	3.4%	3	2.5%
Portuguese	3	4.9%	4	6.9%	7	5.9%
Romanian	1	1.6%	2	3.4%	3	2.5%
Slovak	1	1.6%	1	1.7%	2	1.7%
Slovenian	1	1.6%	1	1.7%	2	1.7%
Spanish	4	6.6%	7	12.1%	11	9.2%
Swedish	1	1.6%	2	3.4%	3	2.5%
<b>Grand Total</b>	<b>61</b>	<b>100%</b>	<b>58</b>	<b>100%</b>	<b>119</b>	<b>100%</b>

**Table 9. Evolution over 5 years of the most represented nationality in the Agency**

Will be presented in future SPDs.

**Table 10. Schooling**

AMLA provides its staff with free access to the European school from the age of 4 years. The European School based in Frankfurt offers high-quality education, fosters multilingualism and cultural diversity, and provides an enriching international environment for its staff.



## ANNEX IV – HUMAN RESOURCES – QUALITATIVE

### A. Recruitment policy

AMLA's recruitment policy for the years 2025-2027 has been targeted to filling all posts in both core and corporate profiles in order to ensure that it delivers on its mandate and is fully operational by the beginning of 2028, after which it will reach its cruising speed. During the course of 2025, it has filled all senior management posts and has launched the majority of its planned middle management positions. In addition to critical corporate profiles in the areas of HR, Finance and Budget, as well as IT, AMLA has managed to recruit AML experts as well as economists.

### B. Appraisal of performance and reclassification/promotions

The first appraisal exercise will be launched in 2026 for both contract and temporary agents. No reclassification is foreseen for the years 2024-2025.

**Table 11. Reclassification of temporary staff/promotion of officials**

Not applicable

**Table 12. Reclassification of contract staff**

Not applicable

## ANNEX V – ENVIRONMENT MANAGEMENT

### 1. Strategy and Vision

AMLA is committed to progressively improve its environmental performance and reducing the impact of its operations in line with the European Green Deal and the European Court of Auditors' recommendations to all EU institutions and bodies. As a very recently established EU agency, AMLA is in the process of transitioning from temporary premises to its long-term headquarters in the **MesseTurm**. The first floors will be handed over by the end of 2025, with further floors added gradually until 2027.

Although AMLA's direct influence on the building's core infrastructure is limited due to its status as a tenant, the choice of the MesseTurm provides a strong starting point. An architectural landmark in Frankfurt, the building is not only recognised for its distinctive historic design but also for the environmental responsibility inherent in preserving and upgrading an existing structure rather than demolishing and rebuilding. This approach avoids the substantial carbon emissions associated with new construction, while extending the life of a high-quality asset. The MesseTurm has undergone a comprehensive modernisation of its technical systems, uses certified green electricity, operates with advanced building management controls, and holds a **BREEAM**<sup>6</sup> **Excellent** certification. These features provide a robust environmental baseline that AMLA can build on.

The planning of the **fit-out works** and the allocation of office space is a key task in getting AMLA fully operational, particularly for a newly created agency that is onboarding significant numbers of newcomers each month. From the first AMLA staff members arriving in January 2025, the organisation will grow to its established size of around 450 staff by 2027. In this context, **space efficiency** is a cornerstone of AMLA's approach. The Authority will operate primarily in **open-plan** layouts, with an 8:10 desk ratio supported by hot-desking and teleworking arrangements. This approach reduces the total space needed, lowers energy consumption, and limits operational costs. In addition, AMLA has agreed to share one office floor and the entire Conference Floor with EIOPA from 2028, eliminating duplication of large meeting facilities and reducing the total **space footprint** required for EU agencies in Frankfurt.

A very important element in creating a sustainable and attractive working environment is the way open-plan space is furnished and organised. For a rapidly growing organisation, it is essential to create a welcoming and functional atmosphere for colleagues. Beyond the workstations, AMLA is designing a variety of spaces to support a balanced and **sustainable office life**. These include: a multi-purpose room that can host sports activities, lectures, celebrations, and social events,

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<sup>6</sup> **BREEAM Excellent** – BREEAM (Building Research Establishment Environmental Assessment Method) is an internationally recognised sustainability assessment method for buildings. The “Excellent” rating indicates that the building performs at a very high standard in categories such as energy use, water efficiency, indoor environmental quality, and materials selection.

equipped with changing rooms; showers on every floor to encourage physical activity and support “green” commuting by bicycle or on foot; a large staff lounge for relaxation, meditation, reading, or informal conversations; numerous smaller social corners on all floors for spontaneous exchanges between colleagues; and one kitchenette per floor with multiple seating options for shared lunches. There is also a small co-working style corner to test **alternative ways of working** and pilot new concepts on site, enabling AMLA to adapt and adjust its space to **future needs**.

At present, AMLA is working closely with the landlord, the architects responsible for the fit-out works, and the MesseTurm facility management team to finalize the plans for its long-term floors and ensure that the spaces delivered meet the agency’s operational needs and mission. This collaboration covers all aspects of the fit-out planning, from layout to technical infrastructure, with the shared goal of creating a **functional, efficient, and environmentally responsible workplace**.

## 2. Key Commitments

As a newly created agency still in temporary premises, AMLA’s immediate focus is on the fit-out and furnishing of its long-term floors in the MesseTurm, which will be delivered progressively until 2027. The planning of these works is essential to get AMLA fully operational and to accommodate rapid staff growth — from the first arrivals in January 2025 to an established size of around 450 staff in 2027.

In the short term, AMLA will prioritise:

- **Sustainable fit-out and furniture strategy** – From the outset, AMLA has embedded sustainability into its operational set-up. Desks and chairs will be procured through the OIB’s existing framework contracts, ensuring EU-wide compliance with environmental and quality standards. In furnishing its new premises, the Authority is implementing a circular economy initiative by reusing surplus high-quality furniture from the European Central Bank’s space optimization project. This initiative among EU bodies prevents large volumes of durable furniture from becoming waste, significantly reduces procurement costs for AMLA, shortens delivery lead-times, and promotes resource efficiency across the EU institutional network.
- **Sustainability in procurement processes** - Sustainability is also embedded in ongoing and planned calls for tenders. For example, AMLA and EIOPA have jointly launched a call for tenders for plants specifying low-maintenance, drought-resistant species, and the cleaning services call for tenders to be launched shortly will require the use of eco-friendly cleaning products.
- **Targeted procurement for additional items** – For items that require tailored procurement in the longer term, such as acoustic panels and conviviality elements, AMLA will launch calls for tenders that prioritise recycled and recyclable materials, suppliers holding recognised eco-labels, and companies with social inclusion credentials. Further

sustainability criteria under consideration include the use of low-VOC<sup>7</sup> finishes, modular designs for future reuse or reconfiguration, and partnerships with local or regional suppliers to reduce transport emissions.

- **Efficient space use and teleworking** – AMLA will operate in open space supported by hot-desking and teleworking arrangements, reducing the overall space needed, lowering energy use, and containing operational costs.
- **Shared facilities** – From 2028, AMLA will share one office floor and the entire Conference Floor with EIOPA, avoiding duplication of large meeting facilities and reducing the total space footprint required for EU agencies in Frankfurt.

Long-term objectives are already being planned despite limited resources:

- Establish a formal **Environmental Policy** by the end of 2026.
- Prepare for **EMAS**<sup>8</sup> registration.
- Participate actively in the **EU Greening Network** and other EU networks related to sustainability, integrating its recommendations into AMLA operations.

### 3. Environmental Priorities

In the short term, AMLA's environmental priorities are directly linked to its fit-out, furnishing, and operational set-up:

- **Maximise reuse and recycling** of materials and furniture during fit-out.
- **Minimise waste** from works by encouraging contractors to follow environmental best practices.
- Use **contractors** who meet **environmental and social responsibility standards**.
- Install, in cooperation with the landlord, **smart occupancy and energy management tools** such as presence sensors for lighting and HVAC controls.
- Introduce **recycling and waste-sorting** facilities on all newly handed-over floors.

In the medium to long term, as AMLA's long-term premises become fully operational, the Authority will:

- Implement an **Environmental Management System**.
- Monitor and optimise key **KPIs** (energy use, CO<sub>2</sub> emissions, water use, waste volumes, recycling rates).

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<sup>7</sup>**VOC** – Volatile Organic Compounds, organic chemicals that easily evaporate at room temperature. Many VOCs can contribute to indoor air pollution and cause adverse health effects; low-VOC finishes use materials formulated to release fewer of these compounds.

<sup>8</sup>**EMAS** – Eco-Management and Audit Scheme, the official environmental management system of the European Union, enabling organisations to evaluate, report, and improve their environmental performance beyond legal compliance.

- Continue regular **staff awareness campaigns** such as “Green Weeks” and targeted training.
- Cooperate with the landlord on potential **on-site renewable energy projects** and further building-level **sustainability upgrades**.

#### 4. Monitoring and Reporting

While AMLA’s environmental reporting capacity will grow as the agency expands into its long-term floors, some steps can already be taken to prepare for full monitoring:

- From 2027, AMLA will produce an **annual environmental report** covering energy, water, waste, procurement, mobility, and training indicators, aligned with EMAS core indicators.
- An internal **environmental register**<sup>9</sup> will be established as new floors are delivered, allowing AMLA to progressively integrate environmental indicators into its corporate reporting.
- **Annual reviews** will assess progress in sustainability-related procurement, efficiency of space use, trends in resource consumption, waste management performance, and staff engagement.
- **Results** will be shared with senior management and, where relevant, with stakeholders, in line with EU transparency and accountability principles.
- In the medium term, AMLA will explore **advanced monitoring tools** such as a digital twin and will discuss with the landlord the feasibility of **renewable energy initiatives** for the building.

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<sup>9</sup> **Environmental register** - internal record used to identify, track, and update an organisation’s environmental aspects (e.g., energy use, waste generation, water consumption) and their impacts, along with related legal requirements, performance indicators, and responsibilities. It serves as a reference point for monitoring progress, informing decisions, and providing evidence for environmental audits or certifications such as EMAS and ISO 14001.

# ANNEX VI- BUILDING POLICY

## 1. Context and Objectives/ Strategy and Vision

AMLA is currently in the process of progressively moving into its long-term headquarters in the MesseTurm building in Frankfurt. The handover of floors will be phased between 2025 and 2027, requiring careful planning of fit-out works, furniture purchase, and space allocation. This Building Policy sets the guiding framework for AMLA's use of its premises, ensuring that the Authority's workplaces are efficient, functional, supportive of staff well-being, and adaptable to future needs.

The building policy focuses on ensuring that AMLA's premises are functional, cost-effective, adaptable, and supportive of staff well-being:

- Ensuring the fit-out and operational setup meet AMLA's evolving needs during its rapid staffing expansion (from the one staff member in January 2025 to around 450 by end-2027).
- Efficient and responsible use of rented space maximised by the use of open space and resources.
- Providing modern and flexible working environments that foster collaboration, and encourage productivity, cooperation, and innovation.
- Ensuring staff well-being through dedicated facilities;
- Embedding future-proof office concept solutions to adapt to changing work patterns.

## 2. MesseTurm Building Overview

The MesseTurm is a recognised architectural landmark in Frankfurt and one of Europe's tallest office buildings. Located in Frankfurt's business district, it offers excellent connectivity, access to services, and meets high technical and operational standards required for hosting EU institutions. The building underwent a comprehensive renovation of its technical systems and is managed to high real estate standards, ensuring reliable infrastructure, security, and professional facility management services. As a historic property, its preservation and full renovation demonstrate a sustainable approach to real estate management, avoiding the environmental impact of demolition and reconstruction. These features provide AMLA with a strong foundation to build its operational environment.

Building Name: MesseTurm

Location: Frankfurt, Germany

AMLA Office Space (m<sup>2</sup>): 8,163

Underground car parking: 65 places (by 1 January 2027)

### 3. AMLA Floor Allocation and Handover Schedule

AMLA's occupation of MesseTurm will be phased between 2025 and 2027:

November 2025:	Floor 51 (1,253 m <sup>2</sup> )	81 WS Office
	Floor 54 (1,159 m <sup>2</sup> )	81 WS Management and Meetings
Q1/Q2 2026:	Floor 53 (1,159 m <sup>2</sup> )	81 WS FIU
Q2 2026 (tentative):	Floor 10 (1,100 m <sup>2</sup> )	81 WS Conferencing
Q3 2026:	Floor 52 (1,253 m <sup>2</sup> )	81 WS Office
Q4 2026 – Q1 2027:	Floor 55 (1,118 m <sup>2</sup> )	81 WS Office
Q3/Q4 2027:	Floor 56 (1,118 m <sup>2</sup> )	81 WS Office and Multipurpose

This progressive handover allows AMLA to scale operations in line with staffing growth and to plan fit-out works floor-by-floor to optimise time and resources.

### 4. Office Space and Staff Facilities

Space efficiency is a cornerstone of AMLA's building policy. The Authority will operate primarily in open-space environments, applying an 8:10 desk ratio supported by hot-desking and teleworking arrangements. This allows efficient use of rented space, reduces energy needs, and supports modern working practices. Each floor will include quiet rooms, meeting rooms, and project spaces to balance collaboration with concentration. This approach reduces the total rented space, lowers operational costs, and promotes flexibility.

**Staff well-being and facilities:** AMLA is committed to providing a supportive work environment. Key features of the office concept include:

- **Open space design** with workstations complemented by dedicated meeting rooms, quiet rooms, and project spaces.
- **Co-working** style corner to pilot alternative working methods and test new ideas with staff, ensuring AMLA remains attractive for future generations and adaptable to evolving work practices.
- **Multipurpose room** for sports activities, lectures, celebrations, and social gatherings, complemented by changing rooms.
- **Staff lounge** for relaxation, meditation, reading, and informal exchanges.
- **Social corners** on all floors to foster interaction and cooperation.
- **Showers on every floor** and changing rooms on two floors, to encourage active commuting and physical activity during the day.
- **One kitchenette per floor** with multiple seating arrangements to encourage shared breaks and joint lunches.

## Shared Facilities with EIOPA

From 2028, AMLA will share one full office floor (57<sup>th</sup> floor) and the entire dedicated Conferencing Floor (10<sup>th</sup> floor) with the EIOPA. The Conference Floor will host a 118-seat Board Room, meeting rooms for up to 40 participants, smaller breakout rooms, and a 180 m<sup>2</sup> lounge for receptions and informal networking. This arrangement avoids duplication of large meeting spaces and event facilities, reduces the total space required by EU agencies in Frankfurt, increasing efficiency and opportunities for inter-agency cooperation.

## 5. Priorities

To ensure AMLA's premises remain functional, efficient, and adaptable, the Authority has identified key priorities:

### Short term (2025-2026):

- Completion of phased fit-out works and delivery of essential furniture;
- Set-up of staff facilities and social spaces;
- Coordination with the landlord on building services and floor handovers.

### Medium term (2026-2027):

- Monitoring occupancy levels and space efficiency to adapt layouts where needed;
- Regular review and reconfiguration space allocation to align with growing staffing levels and organizational priorities, to support AMLA's growth;
- Pilot innovative workspace concepts in the co-working corner before wider rollout.

### Long term (2027 and beyond):

- Strengthening collaboration with EIOPA on shared use of facilities.
- Continuous adaptation of workplace design to meet evolving staff needs and attract new generations;
- Exploring digital workplace tools (e.g. digital twin of AMLA floors and smart building tools) to optimize use and efficiency.

## 6. Governance and Responsibilities

The Building and Facilities Team will oversee the planning, implementation, and ongoing adaptation of AMLA's office environment. Progress will be regularly reported to senior management as part of AMLA's corporate reporting cycle. Key elements include:

- Ensuring that operational aspects of the premises support AMLA's mission and staff needs;
- Overseeing fit-out works and liaising with the landlord and contractors.
- Tracking the timely delivery of fit-out and furniture projects;
- Monitoring occupancy rates and efficiency of space use;

- Managing space allocation and moves, reconfiguring space allocation to align with growing staffing numbers and AMLA's developing structure;
- Gathering staff feedback on workplace functionality and well-being for improvement;
- Coordinating building-related contacts and contracts (cleaning, reception, security, maintenance).
- Coordinating with the landlord, facility contractors and EIOPA to ensure smooth operations and shared solutions.

Progress will be reviewed annually and reported to AMLA's senior management to ensure alignment with operational priorities and resource planning.

## **7. Monitoring and Reporting**

An internal building performance register will be created as long-term floors are delivered, consolidating technical data, maintenance schedules, and occupancy statistics (when implemented).

Annual internal reports will assess:

- Space use efficiency versus staff occupancy rate
- Condition of AMLA-managed assets and furniture
- Performance of facility services (cleaning, maintenance, waste-handling, etc.)
- Accessibility compliance and user satisfaction

From 2027 onwards, building-related indicators will be integrated into AMLA's annual Environmental and Building Performance Report, aligned with EU transparency and accountability standards.

Regular reviews will identify opportunities for optimising space use, improving facility services, and coordinating sustainability upgrades with the landlord.

## ANNEX VII – PRIVILEGES AND IMMUNITIES

### AMLA:

The headquarters agreement with the Government of the Federal Republic of Germany as the host Member State was jointly signed on 30 January 2025 in Berlin. It is under ratification and is expected to enter into force in early 2026.

Privileges granted to staff		
Privileges of the Authority	Protocol of privileges and immunities/diplomatic status	Education/day care
Refunds (upon request) of value added tax (VAT) for purchases of goods, services and the energy duty for the authority, if the tax amount exceeds 25 euro.	<p>Diplomatic status (without tax and customs privileges) to the Chair, the members of the Executive Board and their respective family members living in the same household.</p> <p>Importation of personal effects including motor vehicles free of customs duty.</p> <p>A special residence permit.</p> <p>Special vehicle registration.</p>	European schooling from the age of 4 years.

## ANNEX VIII – EVALUATIONS

AMLA is subject to regular reviews by the EU institutions, in accordance with Article 102 of the AMLAR.

So far, no assessment on the operation of AMLA has been published.

Furthermore, scrutiny is exercised by:

- The European Parliament, in its role as authority granting discharge to the Executive Director in respect of the implementation of the budget, but also by way of the yearly hearing the AMLA Chair attends at the EPs ECON and LIBE committee; as well as by
- The European Court of Auditors, and through
- The publication of the AMLA'S Consolidated Annual Activity Report which provide an overview of the execution of the Work Programme and more detail on the above external evaluations.

# **ANNEX IX – STRATEGY FOR THE ORGANISATIONAL MANAGEMENT AND INTERNAL CONTROL**

## **Organisational management**

AMLA is represented by its Chair who is responsible for chairing and preparing the work of the two decision making bodies, the General Board and the Executive board. This includes setting the agenda, convening meetings, guiding discussions and tabling items for decisions.

The Executive Board is AMLA main decision making body. It takes all decisions, except those reserved for the General Board. It's responsible for the overall planning and execution of all AMLA tasks, which includes: decisions addressed to selected obliged entities and individual public authorities, decisions on administrative and budgetary matters, decisions on the establishment of AMLA's internal structures and on their modification where necessary. It also performs other tasks as defined by AMLA founding Regulation.

The Executive Director is a senior member of AMLA staff entrusted with the "day-to-day management" of AMLA including responsibility for budget administration, procurement, and recruitment and staffing. It reports to the Executive Board and implements its decisions .

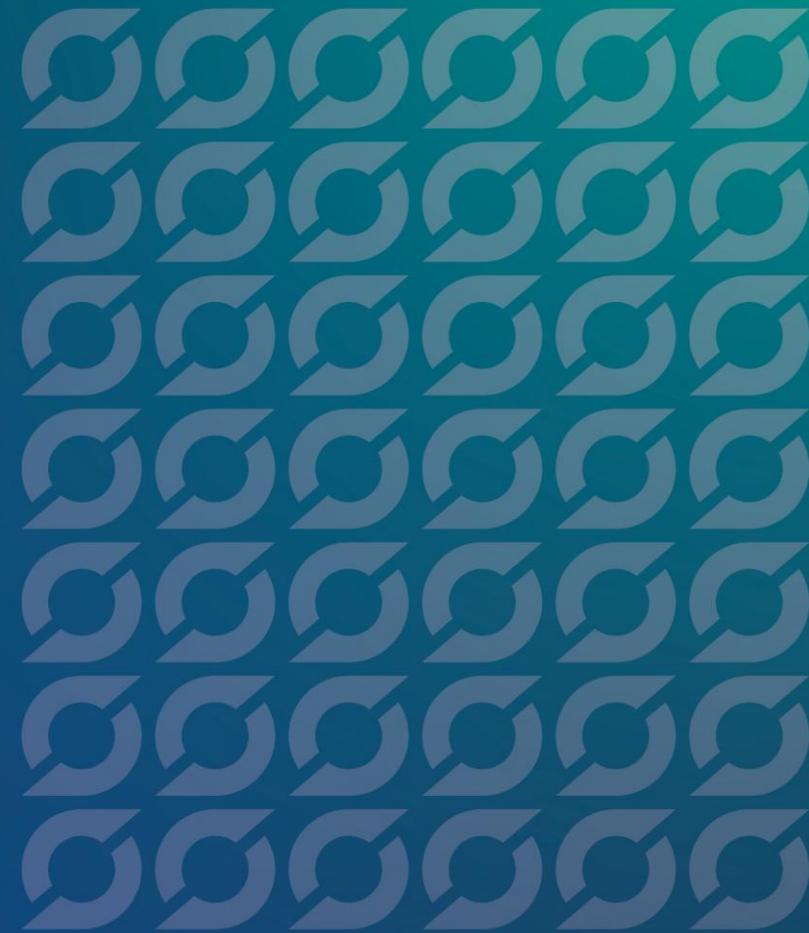
The General Board meets at least twice a year to ensure good governance of AMLA.

## **ANNEX X – PLAN FOR GRANT, CONTRIBUTION OR SERVICE-LEVEL AGREEMENTS**

Agreement between the AMLA and Federal Republic of Germany on the host country financial contribution to the establishment and start-up costs of the Authority was signed on 7 November 2024 for a total amount of EUR 20 million.

The contribution is to be made in annual installments as follows:

- 2024: EUR 2 million,
- 2025: EUR 3 million,
- 2026: EUR 6 million,
- 2027: EUR 5 million,
- 2028: EUR 4 million.



## ANNEX XI PLANNING on RTS/ITS/GL

Texts	Articles	Title	Type	Consultation Phase	Final Draft
AMLA-R	12(7)	Direct supervision selection process: minimum activities for determining when a credit or financial institution operates in a Member State other than where it is established and the methodology for classifying risk profiles.	RTS	N/A	Q4 2025
AMLD 	40(2) FS	Benchmarks and methodology for assessing and classifying the risk profile of obliged entities and the frequency of reviews of that risk profile (financial sector).	RTS	N/A	Q4 2025
AMLA-R	15(3)	Cooperation for the purposes of direct supervision including conditions under which financial supervisors assist AMLA, the periodic risk assessment process and the respective roles of supervisors and AMLA, working arrangements for the transfer of supervisory tasks, procedures for preparation and adoption of decisions and rules and arrangements for joint supervisory teams.	ITS	Q1 2026	Q3 2026
AMLD	53(10)	Indicators to classify the level and gravity of breaches of AML/CFT obligations, criteria to be taken into account when determining pecuniary sanctions or administrative measures, and a methodology for the application of periodic penalty payments.	RTS	Additional NFS edition Q1 2026	Q3 2026

Texts	Articles	Title	Type	Consultation Phase	Final Draft
AMLR	16(4)	Minimum requirements of group-wide policies including minimum standards for information sharing, criteria for identifying the parent undertaking and the conditions under which group-wide requirements apply to entities that are part of structures, and the criteria for identifying the parent undertaking in the Union in those cases.	RTS	Q2 2026	Q3 2026
AMLR	19(9)	Higher-risk sectors and associated occasional transaction thresholds, and measures for identifying occasional transactions and business relationships.	RTS	Q2 2026	Q3 2026
AMLR	28(1)	Information required for performing customer due diligence.	RTS	Q2 2026	Q3 2026
AMLA-R	11(6)	Central AML/CFT database: procedure, formats and timelines for the transmission of information, scope and level of detail of information, type of information to be disclosed, information requiring prior approval, materiality of breaches for submission of information, conditions for directing additional requests, and types of additional information to be transmitted to AMLA	RTS	Q2 2026	Q3 2026
AMLA-R	41(2)	Format to be used by AMLA for reporting information, including the results of joint analyses, to the EPPO - in consultation with EPPO.	ITS	Q2 2026	Q4 2026

Texts	Articles	Title	Type	Consultation Phase	Final Draft
AMLR	17(3)	Additional measures for branches and subsidiaries in a third country where the law of that third country does not permit compliance with AMLR, and related supervisory actions.	RTS	Q2 2026	Q3 2026
AMLD	46(4)	Duties of the home and host supervisors and the modalities of cooperation between them.	RTS	Q2 2026	Q3 2026
AMLD	53(11)	Base amounts of pecuniary sanctions relative to turnover, per type of breach and category of obliged entity.	GL	Q2 2026	Q4 2026
AMLR	81(1)	Format for dissemination of information from FIUs to EPPO - in consultation with EPPO.	ITS	Q2 2026	Q3 2026
AMLD	31(2)	Format for the exchange of information among FIUs.	ITS	Q2 2026	Q3 2026
AMLD	31(3)	Relevance and selection criteria for FIUs to determine whether a suspicious transaction report concerns another Member State.	RTS	Q2 2026	Q4 2026
AMLR	10(4)	Minimum requirements for the content of the business-wide risk assessment	GL	Q3 2026	Q4 2026
AMLR	20(3)	Risk variables and risk factors when entering into business relationships or carrying out occasional transactions.	GL	Q3 2026	Q4 2026

Texts	Articles	Title	Type	Consultation Phase	Final Draft
AMLR	26(5)	Ongoing monitoring of a business relationship and monitoring of transactions within the business relationship.	GL	Q3 2026	Q4 2026
AMLR	69(3)	Formats for STRs and transaction record.	ITS	Q3 2026	Q4 2026
AMLD	41(2)	Criteria for determining whether to appoint a central contact point, and the functions of central contact points.	RTS	Q3 2026	Q4 2026
AMLD 	40(2) NFS	Benchmarks and methodology for assessing and classifying the risk profile of obliged entities and the frequency of reviews of that risk profile (non-financial sector).	RTS	Q3 2026	Q4 2026
AMLD	50(13)	General conditions for the functioning of AML/CFT supervisory colleges in the non-financial sector, including terms of cooperation, operational functioning, the written agreement, conditions for participation of third country non-financial supervisors and measures to be implemented by the colleges when groups include credit or financial institutions.	RTS	Q4 2026	Q1 2027

Texts	Articles	Title	Type	Consultation Phase	Final Draft
AMLR	9(4)	Elements to be taken into account, based on the entity's nature of the business, including its risks and complexity, and their size, in determining the extent of internal policies, procedures and controls, in particular as regards the staff allocated to the compliance functions. Those Guidelines shall also identify situations where internal controls should be organised at the level of the commercial function, of the compliance function and of the audit function; the independent audit function may be carried out by an external expert.	GL	Q1 2027	Q2 2027
AMLD	49(14)	General conditions for the functioning of AML/CFT supervisory colleges in the financial sector, including terms of cooperation, operational functioning, the written agreement, and conditions for participation of third country financial supervisors.	RTS	Q4 2026	Q1 2027



AMLA will deliver the RTS in two phases: first financial sector (FS) and second non-financial sector (NFS).

## Contact Information



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