

## Part 3

# More industries under the AML spotlight

*Not only banks*  
are affected by the  
EU AML Regulation.



# Who else is covered by the EU-AML Regulation?



Crowdfunding service providers and intermediaries



Selected mortgage and consumer credit brokers



Football agents and certain professional football clubs (for specific transactions)



Luxury goods dealers, including traders in precious metals, gemstones and high-value goods, such as art

*\*Exemplary*



# Implications for affected industries

The EU positions companies as gatekeepers of the financial system

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- ✓ EU-wide AML rules replace fragmented national requirements and local specifics
- ✓ AML requirements now apply at a level comparable to banks
- ✓ Mandatory establishment or enhancement of existing AML frameworks
- ✓ Heightened supervisory and audit scrutiny driven by EU-wide harmonization



# Sector-focus:

## Luxury goods

Who is affected?	<ul style="list-style-type: none"><li>• Dealers in precious metals and gemstones</li><li>• Dealers in high-value goods, including art dealers</li></ul>
Precious metals & gemstones	Gold, silver, platinum, diamonds, rubies, etc.
High-value goods	<ul style="list-style-type: none"><li>• Private jets <math>\geq</math> EUR 7.5 million</li><li>• Watches, jewelry, gold- and silversmith products <math>\geq</math> EUR 10 thousand</li></ul>
What is new?	<ul style="list-style-type: none"><li>• Customer identification required for transactions of EUR 3,000 or more</li><li>• Cash payment threshold of EUR 10 thousand</li></ul> <hr/> <p>Mandatory transaction reporting to the FIU for</p> <ul style="list-style-type: none"><li>• luxury vehicles for a price of <math>\geq</math> EUR 250 thousand</li><li>• watercraft or aircraft for a price of <math>\geq</math> EUR 7.5 million</li></ul>
When does it apply?	July 2027

# Sector-focus:

## Football

Who is affected?	Professional football clubs and football agents
Why football?	Large sums/cashflows, cross-border transactions, complex ownership structures increase money-laundering risks, further amplified by the prominent role of the sports sector
What is new?	Transactions include, among others, those involving <ul style="list-style-type: none"><li>• Investors</li><li>• Sponsors</li><li>• Football agents and other intermediaries</li><li>• Player transfers</li></ul> ➤ No full regulation of day-to-day operations
Are there any exceptions?	Football clubs <ul style="list-style-type: none"><li>• with a low risk profile and</li><li>• revenues not exceeding ≤ EUR 5 million in the past two years</li></ul>
When does it apply?	Mid 2029

# National vs. EU

## Roles within the new EU AML supervisory framework

- **National authorities**  
Supervision of the financial  
sector
- **AMLA**  
Supporting role by  
performing reviews and  
investigating potential  
breaches  
in the application of the  
AML/CFT framework



# Key milestones

**JUNE 19, 2024**

Adoption of the  
EU AML package

**JULY 10, 2027**

Application of the  
AML Regulation

2024

2027

2029

2030

**JULY 10, 2029**

Extended transition period  
for **football clubs** and  
**football agents**

**JULY 10, 2030**

Potential extension of  
AML requirements to  
**luxury apparel** and  
**other goods**



# Deloitte.

Contacts:

We remain at your disposal.

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**Now is the time to position yourself strategically –  
well ahead of 2027.**



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