

Part 04

AML Data Collection Exercise

What credit- and
financial institutions
need to know *now!*



Why did AMLA launch a data collection exercise in March 2026?



The purpose of the data collection is to test and calibrate AMLA's risk assessment models.



Its aim is to ensure a consistent assessment of ML/TF risks by local supervisors.



At the same time, it underlines the shift towards a more data-driven and model-based AML supervision.

A large, stylized graphic on the right side of the slide. It features the letters 'AML' in a bold, white, sans-serif font, centered within a glowing blue hexagonal outline. The background is dark blue with a network of glowing lines and nodes, suggesting a digital or data-driven environment. In the bottom right corner, there is a small white circle containing a right-pointing arrow.

Selecting institutions for AMLA supervision

Based on the data collection and model testing, AMLA will determine

- which institutions will be directly supervised by AMLA
- &
- which institutions will remain under national supervision.

Up to 40 institutions may fall under AMLA's direct supervision from 2028 onwards.



How will AMLA measure ML/TF risks?

Inherent Risk – Control Effectiveness
= Residual Risk

Inherent ML/TF risk:

What is the overall risk level?

Examples:

- Customer risk profile data
- Products & services
- Distribution channels
- Geographic parameters

AML/CFT-Controls:

How effective are the existing controls?

Examples:

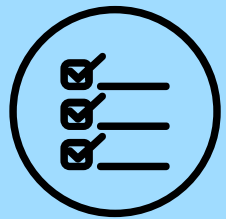
- Governance, culture & compliance function
- Internal controls & outsourcing
- Risk assessment
- CDD and monitoring processes
- Transaction monitoring & suspicious activity reporting
- Targeted financial sanctions
- Group-wide AML/CFT strategies



Why this Topic matters now

The era of highly fragmented national supervisory systems is coming to an end.

Financial institutions need to prepare for the following changes:



Increasing requirements for data quality



Standardized data requests by AMLA and national supervisors



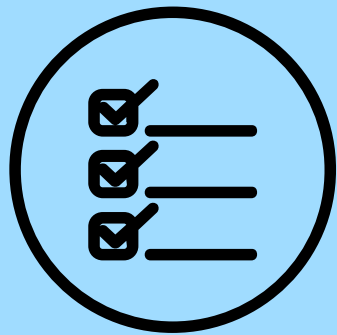
Increased EU-wide comparability between institutions



Summary

AMLA is currently building the analytical backbone of the European AML supervision.

To be prepared for this new supervisory reality, institutions must ensure readiness across **three core areas**:



Structured,
analysis-ready
KYC data



Transparent,
well-calibrated
ascertainable
risk models



Strong and clear
governance and
effective AML/CFT
controls



Deloitte.

Contacts:

We remain at your disposal.

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



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