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Part 10

Group information exchange in focus of AML

Is your data *ready*?

AML-Insight-Hub

What does “group-wide” mean under the AML Regulation?

ML/TF risks

ML/TF risks emerge across jurisdictions, entities and group structures.

Risks are group-wide – data often is not.

Group*

Parent entity	Subsidiary/branch
Headquarter = EU EU obliged entity as top entity	**Location =** EU ≥ 1 obliged entity
Headquarter ≠ EU EU obliged entity with sufficient prominence	**Location =** EU ≥ 2 obliged entities

Responsibility of the parent company

Implementation and enforcement of group-wide policies, strategies and controls.

**Simplified illustration*

What obligations does the AML Regulation place on groups?

Requirement to **exchange data and information** within the group

- for due diligence purposes
- required for AML/CFT risk management to comply with Article 16 (3) AMLR

Covers the following **data and information**:

Identity & characteristics of

- the customer,
- its beneficial owner, or
- the identity of the person acting on behalf of the customer

Nature and purpose of the business relationship and of occasional transactions

Suspicious transaction reports (Article 69 AMLR)

10 July 2026

Publication of RTS under Article 16 (4) AMLR by AMLA, further specifying the requirements for information sharing within groups

What does AMLA's draft RTS say about data sharing?

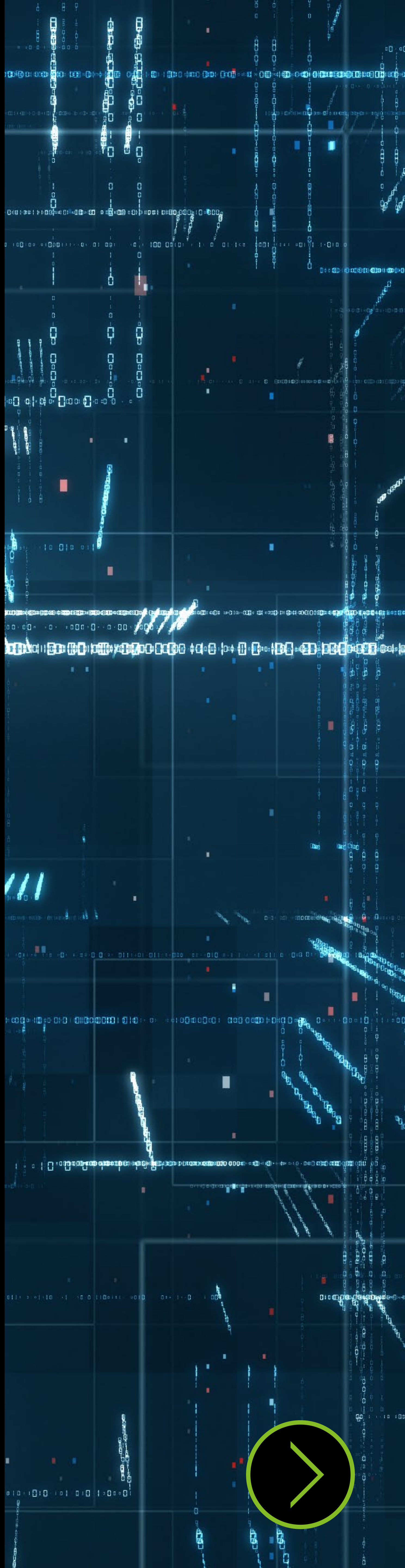
16 April 2026

Draft publication of the RTS for information sharing according to Article 16 (4) AMLR

Minimum standards for group-wide AML/CFT frameworks & definition of parent undertaking, requirements for Groups

Focus: how data is shared, used and governed within Groups and which data needs to be shared

Objective: enable consistent, group-wide AML/CFT risk management



When should data be shared according to AMLA's draft RTS?

Groups must define when information sharing is mandatory – at a minimum in cases of:

... shared customers or

... shared beneficial owners or

... customers belonging to the same customer group ...

... in at least ≥ 2 entities.

Which data should be shared within groups according to AMLA's draft RTS?

Customer due diligence, e.g.

- Customer identification data
- Information on authorized representatives
- Information on beneficial owners
- Information on enhanced due diligence measures

Transactions / services and activities, e.g. information on

- Customer or counterparties transactions
- Occasional transactions
- Cash transactions and/or volumes
- Payment methods

Risk assessments, e.g.

- Risk assessment at entity level
- Risk classification at individual customer level

Suspicious transaction reports and information on volumes / typologies

Other relevant information, e.g.

- Training materials related to AML/CFT and sanctions
- Information on interaction with supervisory authorities, in particular on-site inspections
- Information on record-keeping requirements

How should data sharing be organized according to AMLA's Draft RTS?

Definition of data

Defined by the parent company, specifying which data must be shared

1

Guidelines for data sharing

- transparent and documented
- clearly assigned responsibilities (ensure accountability)
- accessible to authorities

2

Requirements for data provision

- up to date
- traceable, based on the "need-to-know" principle
- aligned with data protection requirements

3

→ Data sharing should be usable, consistent and auditable.

→ Data sharing does not replace internal risk assessments or compliance with due diligence obligations.

→ Each entity remains responsible.00

What should Groups do now?

- Initial assessment
  Which entities are part of the Group?
- Set up a project regarding information exchange
  - ✓ Evaluate the RTS draft and assess its impact
  - ✓ Identify relevant data and review availability
  - ✓ Adapt information sharing policies in line with data protection requirements
- Monitoring
  Track the RTS consultation and further developments

The challenge is not only data sharing but also structuring it consistently across the Group.

Timeline for the RTS under Article 16 (4) AMLR regarding information sharing

2026

16 APRIL 2026
Publication of the draft

20 MAY 2026
Public consultation (webinar)

15 JUNE 2026
Final deadline of the public consultation

30 SEPTEMBER 2026
Submission of RTS to European Commission by AMLA

Publication of RTS by European Commission

2027

10 JULY 2027
Application of AMLR

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Contacts:
We remain at your disposal.

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

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