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Deloitte AMLR Gap Analysis & Readiness Assessment

**Supporting financial sector professionals
for AMLR application by July 2027**

Context

A new AML framework for the EU

The upcoming EU Anti-Money Laundering Regulation (AMLR) will apply starting July 2027 and will fundamentally reshape the implementation of AML/CFT framework for financial sector professionals in Luxembourg.

Key characteristics of AMLR:

- Direct effect in all Member States, reducing local flexibility and interpretation gaps.
- More granular and prescriptive requirements on risk assessment, CDD and monitoring.
- Stronger expectations on governance, data, technology and intra-group consistency.
- Intensified supervisory scrutiny and enforcement action.

For Luxembourg entities, AMLR is not an incremental update. It requires a structured and documented transition from today's framework to an AMLR-compliant target state by 2027.



Your AMLR journey

Key challenges



Complex regulatory landscape

Navigating AMLR alongside AMLD VI, EU guidelines, CSSF requirements and group policies.



Unclear impact on existing frameworks

Translating AMLR articles into concrete changes to policies, risk models, processes and systems.



Resource and timeline pressure

Limited internal capacity and competing priorities while preparing for July 2027.



Need to demonstrate readiness

Providing clear, evidence-based AMLR readiness to boards, auditors and supervisors.

How we support your readiness



Clear view of AMLR impact

Structured mapping of AMLR requirements to your business, controls and processes.



Risk-based prioritization of remediation

Focus on the most material gaps to reduce regulatory, operational and reputational risk.



Actionable roadmap to July 2027

Concrete workstreams, sequencing and progress goals for implementation.



Enhanced stakeholder confidence

Robust documentation and analyses to support discussions with management, boards and regulators.

Our approach

Our AMLR Gap Analysis is modular and tailored to your organisation's size, business model and risk profile.

PHASE 1

AMLR impact mapping

- Analyse AMLR provisions relevant to your entity and activities.
- Align interpretation with EU guidance and Luxembourg specifics.
- Define a structured AMLR control framework (articles → controls → evidence).

Illustrative deliverable:

AMLR requirement catalogue and impact matrix.

PHASE 2

Current state assessment

- Review key policies, procedures, risk methodologies and control designs.
- Conduct targeted interviews with Compliance, Risk, Operations, Business and IT.
- Evaluate control implementation maturity and practical application.
- Identify overlaps, gaps and inconsistencies between entities and locations.

Illustrative deliverable:

Current state report with maturity rating by AMLR domain.

PHASE 3

Gap analysis & risk prioritisation

- Compare current state to AMLR expectations and industry leading practices.
- Identify gaps, weaknesses and interpretation issues.
- Assess regulatory, operational and reputational risk of each gap.
- Prioritise remediation actions using a risk-based approach.

Illustrative deliverable:

Structured AMLR gap register with impact, root cause and priority.

PHASE 4

Readiness roadmap & implementation planning

- Define target state vision and design principles.
- Outline concrete workstreams (policy, process, data, technology, training, change).
- Plan sequencing, dependencies and resource implications up to July 2027.
- Provide quick wins and "no-regret" actions to launch promptly.

Illustrative deliverables:

- AMLR Readiness Roadmap (2026–2027)
- Management presentation pack for steering bodies and boards.

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