



AMLA and AMLR: What Cross-Border Financial Services Firms Need to Know

A briefing note for banks and payments firms with an EU footprint.



The Regulatory Change Firms Cannot Afford to Ignore

By July 2027, the EU anti-money laundering framework will change in a way that goes beyond a routine legislative update. The newest AML package from the EU introduces three interconnected instruments:

1. The AMLR (the Regulation), which sits at the centre;
2. AMLA (the Authority), which gives it supervisory force; and
3. The Sixth Anti-Money Laundering Directive (AMLD6), which handles the elements requiring national transposition.

Together, from 2027, they will reshape how firms and National Authorities manage AML/CFT obligations across the European Union.

For cross-border firms with an EU footprint, the practical question is: do you understand how this new landscape affects your business, where the likely pressure points are, and what your plan is between now and July 2027? If the answer is no, that isn't a problem to solve by waiting for more legal clarity – it's a signal that ownership and oversight of the issue need to be established now.

What Is Changing

AMLA is the EU's new centralised AML/CFT supervisory body. As of 1 January 2026, all AML/CFT mandates previously held by the EBA transferred to AMLA. Its remit includes direct supervision of around 40 higher-risk firms, coordination of national supervisory approaches, and the development of binding technical standards.

AMLR is a directly applicable EU regulation replacing the current directive-based framework. Unlike directives, which required national transposition and produced significant variation, AMLR applies uniformly across all Member States from 10 July 2027.

AMLD6 sits alongside the AMLR, and continues the theme of European consistency. While the AMLR supersedes elements of the AMLD6, matters relating to member state infrastructure have been retained: the powers and organisation of national supervisory authorities, beneficial ownership registers and FIU cooperation. Note that AMLD6 replaces entirely AMLD4 and AMLD5 – so it is a defining piece of EU legislation.

Confusion can also arise because Directive 2018/1673 was previously referred to as the 'sixth AMLD'. This remains in force as criminal law and is not repealed by the 2024 package. However, what we refer to as AMLD6 in this Briefing is Directive 2024/1640.

Don't dismiss this as irrelevant if you're UK-based. If you have EU entities, AMLR applies to them, and the need for group consistency may also affect your wider framework.

Why This Matters for Cross-Border Firms

The consistency challenge

For firms operating across several EU jurisdictions, dealing with the internal differences that have built up over time may prove more challenging, politically and operationally, than absorbing the new requirements themselves. Many firms still operate AML frameworks that function quite differently from one jurisdiction to another, shaped by years of responding to local supervisory expectations.

As the European framework becomes more harmonised, the pressure moves in the opposite direction: towards reducing those internal differences. Which local variations still serve a real purpose? Which can be removed? Which exist mainly because they were built around a particular supervisory relationship? Those discussions are often difficult because they cut across local ownership, second-line judgement and operational practicality.

Consistency is the outcome AMLA is seeking. The question is whether it will prove achievable in practice for the many firms that will remain under the direct supervision of their home regulator, rather than being part of the roughly 40 directly supervised by AMLA itself.

Harmonisation is not the same as simplification

It would be a mistake to assume a single rulebook automatically makes compliance simpler. Technical standards exist to remove ambiguity, but ambiguity is also where firms exercise judgement within a risk-based approach. If early standards are detailed and prescriptive, firms used to more principles-based supervisory styles – including many UK-authorized firms with EU operations – may experience a tightening of expectations rather than a relaxation.

It is also worth noting how AMLA itself is likely to shape these standards. AMLA is building quickly and recruiting heavily and is anticipated to be fully operational by 2028. However, there is a finite pool of deep AML regulatory expertise in Europe, and much of it will come from existing national authorities. Early standards may therefore reflect established EU supervisory approaches in tone and structure, which is worth bearing in mind when reading draft RTS and ITS as they emerge.

The opportunity to consolidate

Even with the caveat that harmonisation is not the same as simplification, there is a meaningful internal opportunity for cross-border groups, but one which requires careful consideration and strategic planning. A single rulebook provides the mandate many groups have lacked to consolidate fragmented AML operating models. Firms that use this moment to streamline their operating model, rationalise policies and align control standards across their EU footprint will come out of the transition with a more

defensible, more efficient framework. Those that treat it purely as a compliance exercise risk embedding the same inconsistencies under a new label.

AMLA matters even outside direct supervision

If your firm is likely to fall within AMLA's directly supervised population – broadly, those operating across six or more EU Member States with 20,000 or more customers – this should already be on your agenda, and you should be mobilising now rather than waiting for full clarity.

If you are likely to sit outside that group, a proportionate approach still makes sense. All firms in relevant EU Member States will need to produce data for AMLA's risk-based supervisory approach. Any changes needed to find and report that data sit with the firm, regardless of size.

Implementation Timeline

The timeline below sets out key milestones from Q4 2025 through Q4 2027, together with the final RTS, ITS and guideline texts due across each quarter.

The next two years will not unfold evenly. Activity is heavily concentrated in 2026 – particularly Q2 and Q3 – when most substantive RTS, ITS and guidelines enter consultation or land as final texts. By mid-2027, the pace slows and the focus shifts from rule-making to implementation. Reading the timeline this way helps firms plan resourcing, rather than treating every quarter as equally demanding.

Three types of event drive what firms should be doing at each stage:

Milestones (dated obligations) are fixed points. The 10 July 2027 implementation deadline is the hard stop.

Consultation launches are where the direction of travel becomes hard to change. In our experience, underlying policy intent rarely shifts between consultation and final publication.

Final texts published make expectations concrete, triggering a gap analysis, and an update to the position paper. The heavy Q2 and Q4 2026 clusters will be the pinch points – firms should plan capacity accordingly.

A note on existing EBA standards. *The timeline below covers AMLA's forward work plan only. A separate body of EBA Guidelines and RTS – including the ML/TF Risk Factors Guidelines, Remote Onboarding Guidelines, Travel Rule Guidelines, De-risking Guidelines and Supervision RBA Guidelines – remains in force today and will continue to apply until AMLA issues equivalent replacement standards. Firms should not treat these as superseded in the interim. Some will be directly replaced by items in this timeline (for*

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example, the Risk Factors Guidelines will effectively be superseded by the AMLR 10(4), 20(3) and 26(5) guidance bundle); others will likely be refreshed later in AMLA's workplan beyond the period shown here.

Implementation Timeline

Quarter	Key Milestones	Consultations Launched	Final Drafts Due
Q4 2025			RTS: AML-R 12(7) Supervisory Risk Assessment (to identify the Top 40) AML 40(2) FS Assessment methodology for Top 40 – Financial Sector
Q1 2026	1 Jan 2026 Transfer of all AML/CFT mandates and functions from the EBA to AMLA completed 4 Feb 2026 AMLA 2026–28 Single Programming Document (SPD) published	ITS: AML-R 15(3) Supervisory coordination for Competent Authorities RTS: AML 53(10) Pecuniary Sanctions (NFS edition)	
Q2 2026		RTS: AMLR 16(4) Risk Classification (group-wide policies) AMLR 19(9) Business Relationships & Thresholds AMLR 28(1) Customer Due Diligence AMLR 17(3) Risk Scoring Methodology (third-country branches) AML-R 11(6) Supervisory Selection Criteria (central DB) AML 46(4) FIU Cooperation (home/host supervisors) AML 31(3) Beneficial Ownership Registers (STR relevance) ITS: AML-R 41(2) Data Submission Standards (EPPO reporting) AMLR 81(1) Reporting Templates (FIU dissemination) AML 31(2) BO Register Access (FIU exchange format)	ITS: AML-R 15(3) Supervisory coordination for Competent Authorities AMLR 81(1) Reporting Templates AML 31(2) BO Register Access RTS: AML 53(10) Pecuniary Sanctions AMLR 16(4) Risk Classification AMLR 19(9) Business Relationships & Thresholds AMLR 28(1) Customer Due Diligence AML-R 11(6) Supervisory Selection Criteria AMLR 17(3) Risk Scoring Methodology AML 46(4) FIU Cooperation

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Quarter	Key Milestones	Consultations Launched	Final Drafts Due
		GL: AMLR 10(4) Risk-Based Approach (BWRA content) AMLD 53(11) Sanctions Framework (base amounts)	
Q3 2026	10 Jul 2026 AMLA must issue guidance to support Obligated Entities in implementing various Articles of AMLR	GL: AMLR 20(3) Customer Risk Assessment AMLR 26(5) Enhanced Due Diligence (ongoing monitoring) ITS: AMLR 69(3) Information Exchange (STR formats) RTS: AMLD 41(2) Record Retention (central contact points) AMLD 40(2) NFS Non-Financial Scope	—
Q4 2026		RTS: AMLD 50(13) Supervisory Powers (NFS colleges) AMLD 49(14) Supervisory Cooperation (FS colleges)	ITS: AMLA-R 41(2) Data Submission Standards AMLR 69(3) Information Exchange GL: AMLD 53(11) Sanctions Framework AMLR 10(4) Risk-Based Approach AMLR 20(3) Customer Risk Assessment AMLR 26(5) Enhanced Due Diligence RTS: AMLD 31(3) Beneficial Ownership Registers AMLD 41(2) Record Retention AMLD 40(2) NFS Non-Financial Scope
Q1 2027		GL: AMLR 9(4) Internal Controls	RTS: AMLD 50(13) Supervisory Powers AMLD 49(14) Supervisory Cooperation

Quarter	Key Milestones	Consultations Launched	Final Drafts Due
Q2 2027		—	GL: AMLR 9(4) Internal Controls
Q3 2027	<p>10 Jul 2027</p> <p>AMLR implementation deadline for all EU Member States</p> <p>AMLA must issue further guidance to support Obligated Entities in implementing various Articles of AMLR</p>	—	—
Q4 2027	<p>10 Oct 2027</p> <p>Member States must provide AMLA with a list of the types of legal entities existing under national law with beneficial owners</p>	—	—

Source: AMLA Single Programming Document 2026–28, Annex XI Planning on RTS/ITS/GL. Consultation-phase entries reflect AMLA’s planned consultation start quarters; final drafts show when the final text is expected to be published.

Plain English labels are BeyondFS interpretations of the subject matter of each standard and are provided as a navigational aid, not a substitute for the full title.

What Firms Should Be Doing Now

The easy mistake to make is to wait for perfect clarity. In practice, this will leave you with no time to mobilise, unclear ownership and a weak answer when boards or regulators ask what has been done so far.

That does not mean every firm needs to redesign its framework. For MLROs and Heads of Financial Crime, if your core control architecture is robust today, it should remain directionally sound under AMLR. The work is one of structured assessment and targeted adjustment, not wholesale rebuild.

There is more you can test now than many firms think. Several parts of AMLR are already explicit enough to assess without waiting for further technical standards: how often customer and business-wide risk assessments must be reviewed, timelines for key processes, required content for business-wide risk assessments, defined internal roles and responsibilities, and minimum policy requirements. Firms should not assume later guidance will dilute points already set out plainly in the regulation.

Write the positioning paper before you need it

A short internal paper covering four areas will give leaders something many firms still lack: a defensible narrative.

1. **Scope and footprint.** Which entities, business lines and jurisdictions are affected, and on what basis.
2. **Points already clear enough to assess,** with any material gaps identified.
3. **Areas deferred pending RTS or guidance,** with named ownership and a trigger for revisiting.
4. **Governance route** for oversight, escalation and board reporting.

This is most effective with a combined 1LOD and 2LOD structure. If challenged, you can show you have separated known requirements from open questions, assigned accountability and avoided both complacency and overreaction.

Use AMLR as the mandate to harmonise

Cross-border groups should use this as the trigger for a focused review of where local variation has accumulated: local additions to group policy, differences in evidence expectations, country-specific process steps, uneven quality thresholds, and areas where decisions depend heavily on local interpretation.

The highest-impact areas to prioritise in any gap analysis are those where harmonised standards are most likely to test existing practice: CDD triggers and thresholds, beneficial ownership verification depth and evidence, documentation standards, and group policy alignment across EU entities.

The firms that come out of this well will be those that use AMLR as the basis for genuine consolidation, not those that bolt new requirements onto fragmented foundations.

Brief your board

Boards do not need a dramatic message. They need to know whether this is a horizon-scanning item, a readiness exercise or a more active programme, and why. Frame it simply:

- This is more than a legal change. It may expose differences in how the group operates across jurisdictions.
- The transition will not be neat. AMLA still has a substantial delivery agenda ahead.
- The key questions are where local variation remains justified and where group standards need to be firmer.

Track consultations and engage early

Twenty-two consultations are being launched through 2026 and 2027. However, in our experience underlying policy direction rarely changes dramatically between consultation and final text. Put a plan in place to assess and respond as they are released. Responding to consultations – whether directly or through industry bodies – gives you sight of supervisory thinking as it develops and positions your firm as a constructive voice rather than a reactive one.

Avoid the ‘two camps’ trap

Based on our conversations with the market, it would be easy to fall into one of two camps here: either mobilising substantially before the detail is known, or prevaricating and doing nothing until everything comes out in the wash. Our view is that neither extreme is the right one.

The better route is more balanced: test what is already clear, record what is still moving, decide what is proportionate for your footprint, and keep the issue visible in governance.

Handled early and calmly, the road to AMLR is manageable. Left late, it risks becoming another stressful delivery exercise under regulatory pressure.

How BeyondFS Can Help

At BeyondFS, we have reviewed the key elements of the new framework and the obligations likely to follow from it. We can support firms through two complementary workstreams:

1. AMLR Readiness Assessment

- **Scope definition:** Map your EU footprint and determine which entities, business lines and jurisdictions are directly or indirectly affected.
- **Gap analysis:** Benchmark your current AML/CFT framework against AMLR requirements and emerging RTS/ITS, identifying material gaps and areas of misalignment.
- **Position paper:** Draft or review an internal position paper covering known requirements, deferred decisions, governance and accountability – giving you a defensible starting point.
- **Consultation tracking:** Establish a structured approach to monitoring and responding to AMLA's consultation programme as standards are finalised.

2. Cross-Border Harmonisation

- **Variation mapping:** Identify where local differences have accumulated across jurisdictions – in policy, process, evidence standards and governance.
- **Target operating model:** Design a harmonised AML/CFT framework that balances group consistency with justified local variation.
- **Remediation and delivery:** Support the practical work of consolidating policies, aligning controls and closing gaps across the group.
- **Board and governance reporting:** Provide clear, structured updates suitable for Risk Co, board committees and senior stakeholders.

Meet Our AMLA / AMLR Experts



Adrian Barnett – Director

Adrian brings over 20 years' experience as an in-house lawyer and compliance professional, with senior roles in Big-4 consulting and major global banks. He specialises in financial crime risk, particularly AML/KYC, Sanctions, and failure to prevent offences. Adrian leads our Financial Crime Prevention and Regulatory consulting services.



Clarinda Woodford – Director

Clarinda is a financial crime compliance specialist with over 13 years' experience advising firms across the financial services sector, with a focus on Payments, EMI and FinTechs. She has led numerous s166 reviews, AML audits and advisory engagements, and often acts as a trusted advisor for FCA-authorized firms requiring financial crime compliance framework uplift. She has also worked across banking, gaming, legal, crypto, the art market and real estate, giving her a rare breadth of perspective.

About BeyondFS

Founded in 2018 by former Big 4 consultants, BeyondFS helps financial institutions build high-performing Financial Crime programmes that reduce risk, satisfy regulators, and run efficiently.

We work with clients facing regulatory pressure, limited resources, stalled programmes or urgent remediation needs. Our senior experts bring clarity, focus and momentum to turn strategy into practical results that last.

By combining expertise across regulation, operations, data, technology and change, we help FinCrime leaders regain control and deliver meaningful progress.

Your Next Steps

Leading firms are already taking action: forming internal positions, benchmarking against AMLR requirements, and building structured plans for the period through to July 2027. With eighteen final texts due in Q3–Q4 2026 and a hard implementation deadline, the window for measured preparation is narrowing.

If you would like to discuss how these developments may apply to your organisation, we would be happy to help.

Our Advisory & Regulatory Response Services

Regulatory Response

- Inspection and review preparation
- Mock interviews, training and briefings
- Support with regulator scope (e.g. VREQs, s166)
- Regulator-ready documentation

Horizon Preparation

- 3-year Regulatory Radar to anticipate change
- Map new rules to your controls
- Translate policy shifts into practical steps

Risk Assessment (CRA & BWRA)

- Proven methodology and scoring approach
- Build or calibrate risk frameworks regulators trust
- Simplify models for sustainability

Gap & Control Reviews

- Independent gap and model reviews
- Actionable roadmaps for remediation
- Strong foundations for long-term compliance



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