

FREE TOOLKIT · EU AML REFORM

The EU AML Reform Readiness Toolkit

A structured maturity self-assessment to measure how ready your financial crime framework is for the EU AML reforms, before AMLA and your national regulator do. Score your institution across eight control domains, see where the gaps are, and prioritise the work that matters before the AML Regulation applies on 10 July 2027.

Why this matters now: the reform timeline

The EU is replacing a patchwork of national rules with a single AML rulebook, supervised by a new EU authority (AMLA, based in Frankfurt and operational since 2025). The dates below are fixed in EU law. Confirm national transposition timing with your own regulator.

Date	Milestone	Instrument
10 Jul 2026	AMLD6 beneficial ownership register provisions to be transposed by Member States.	Directive (EU) 2024/1640
10 Jul 2027	The AML Regulation (the single rulebook) applies directly. AMLD6 remaining provisions transposed.	Regulation (EU) 2024/1624; Directive (EU) 2024/1640
2027	AMLA selects the first group of obliged entities for direct supervision.	Regulation (EU) 2024/1620
2028	AMLA begins direct supervision of the selected groups.	Regulation (EU) 2024/1620
10 Jul 2029	Single access point to real estate registers becomes available.	Directive (EU) 2024/1640

How to use this toolkit

Work through the eight domains with the people who own each control. For each domain, agree a maturity level from 1 to 5 using the scale below, and write it in the box. Be honest: score against what you can **evidence on request**, not what is written in policy. Add up your eight scores (maximum 40) and read the interpretation on the final pages.

The maturity scale

- Level 1, Initial:** ad hoc or undocumented, reliant on individuals.
- Level 2, Developing:** documented in places, applied inconsistently, gaps in evidence.
- Level 3, Defined:** documented, applied consistently across the business, and evidenced on request.
- Level 4, Managed:** measured with management information, tested, and improved over time.
- Level 5, Optimised:** independently assured, visible to the board, and able to withstand AMLA-style examination.

The self-assessment

1 Governance, accountability and three lines of defence

What AMLR and AMLA expect: A named senior compliance officer and an accountable member of the management body, clear responsibilities across the three lines of defence, and a board that receives meaningful AML and financial crime management information and challenges it. (AMLR internal policies and controls; AMLD6 supervision.)

Your maturity level for this domain (1 to 5): 1 = ad hoc 3 = defined and evidenced 5 = independently assured

Evidence to have ready

- A governance map or terms of reference showing who owns first, second and third line responsibilities.
- Board or committee minutes and management information showing AML risk is reported, discussed and challenged.
- Appointment records for the compliance officer and the accountable management body member.

2 Business-wide risk assessment (EWRA / SIRA)

What AMLR and AMLA expect: A documented, current business-wide risk assessment covering your customers, products, services, channels, geographies and transactions, with a clear methodology and senior approval. (AMLR business-wide risk assessment; EBA ML/TF Risk Factors Guidelines.)

Your maturity level for this domain (1 to 5): 1 = ad hoc 3 = defined and evidenced 5 = independently assured

Evidence to have ready

- A dated assessment reviewed within the last 12 months (the SIRA in the Netherlands), with its methodology set out.
- Evidence of board or senior management approval.
- A risk-and-control matrix linking each inherent risk to a mitigating control and a residual rating.

3 Customer due diligence, UBO and source of funds and wealth

What AMLR and AMLA expect: Risk-based customer due diligence with enhanced measures for higher-risk situations, identification and verification of beneficial owners, and source of funds or wealth where required. (AMLR customer due diligence; AMLD6 beneficial ownership.)

Your maturity level for this domain (1 to 5): 1 = ad hoc 3 = defined and evidenced 5 = independently assured

Evidence to have ready

- A documented customer risk model and CDD files showing simplified, standard and enhanced due diligence applied consistently.
- Beneficial ownership records and source-of-wealth documentation for higher-risk relationships.
- Ongoing monitoring and periodic review logs, with management information on overdue reviews.

4 Transaction monitoring effectiveness

What AMLR and AMLA expect: Monitoring calibrated to your real products, channels and typologies that actually detects suspicious activity, rather than simply generating alerts. (AMLR ongoing monitoring; EBA guidance.)

Your maturity level for this domain (1 to 5): 1 = ad hoc 3 = defined and evidenced 5 = independently assured

Evidence to have ready

- A scenario inventory and a coverage assessment against your business model.
- Tuning logs and below-the-line testing showing alerts are neither missed nor excessive.
- Alert and case management information, disposition rationale and quality-assurance samples with an audit trail.

5 Sanctions, PEP and adverse-media screening

What AMLR and AMLA expect: Screening of customers and transactions against current sanctions lists, and defined handling of PEP and adverse-media matches. (EU sanctions regulations; AMLR and EBA expectations on PEPs.)

Your maturity level for this domain (1 to 5): 1 = ad hoc 3 = defined and evidenced 5 = independently assured

Evidence to have ready

- Screening configuration and list-update logs covering the EU sanctions regimes and national requirements that apply to you.
- PEP and adverse-media hit-handling procedures, with a sample of resolved alerts and documented decisions.

6 Suspicious activity reporting and record-keeping

What AMLR and AMLA expect: Timely reporting of suspicious transactions to your national FIU, and retention of the records that evidence your decisions. (AMLR reporting and record-keeping; AMLD6.)

Your maturity level for this domain (1 to 5): 1 = ad hoc 3 = defined and evidenced 5 = independently assured

Evidence to have ready

- A suspicious or unusual transaction register, with objective and subjective indicators and timeliness MI.
- A record-retention schedule and evidence that CDD, monitoring and reporting records are retained as required.

7 Data quality, systems and beneficial-ownership readiness

What AMLR and AMLA expect: Reliable, complete data underpinning your due diligence, screening and monitoring, and readiness for the AMLD6 beneficial ownership registers. (AMLR data and record expectations; AMLD6 beneficial ownership registers, to be transposed by 10 July 2026.)

Your maturity level for this domain (1 to 5): 1 = ad hoc 3 = defined and evidenced 5 = independently assured

Evidence to have ready

- Data-quality controls and an understanding of data lineage across your AML systems.
- A system inventory covering screening, monitoring and case management.
- Beneficial-ownership data that is complete, accurate and ready for register submission.

8 Independent assurance, internal audit, training and culture

What AMLR and AMLA expect: Independent testing of the framework, findings tracked to closure, trained staff, and a culture that surfaces issues. (AMLR internal controls and audit; AMLD6.)

Your maturity level for this domain (1 to 5): 1 = ad hoc 3 = defined and evidenced 5 = independently assured

Evidence to have ready

- Internal audit or external review reports covering the AML and financial crime framework.
- An action tracker showing findings followed through to closure.
- Current training records, and management information on completion and risk culture.

Score and interpret your readiness

Add up your eight domain scores (maximum 40) and read the band below. Any single domain scored 1 or 2 is a priority, whatever your total.

Total (out of 40)	What it means
8 to 16	Foundational gaps. Several domains are ad hoc. Get an independent review before your next supervisory contact.
17 to 28	On track but uneven. Core controls exist, but evidence and testing are inconsistent. Prioritise your lowest-scoring domains.
29 to 36	Strong. Close the remaining gaps and shore up your evidence and assurance.
37 to 40	Examination-ready. Maintain, keep your evidence current, and test it independently.

The business-wide risk assessment, in more detail

The business-wide risk assessment (the SIRA in the Netherlands) is the foundation regulators test first, so it is worth getting right. A strong assessment is current and dated, combines qualitative judgement with quantitative data, and covers every category of risk: customers, products and services, delivery channels, geographies and transactions. It aggregates risk across the whole business rather than in silos, links each inherent risk to a specific control and a residual rating, is approved by senior management, and visibly drives the rest of the framework, from due diligence tiers to monitoring scenarios.

Preparing for supervisory contact or an independent audit

If your regulator or an independent auditor asked tomorrow, could you hand over a clean evidence pack? Assemble and keep current:

- The business-wide risk assessment and its risk-and-control matrix.
- A representative sample of CDD files across risk tiers, including UBO and source-of-wealth evidence.
- The transaction monitoring scenario inventory, coverage assessment and tuning logs.
- Sanctions and PEP screening configuration, list-update logs and resolved-alert samples.
- The suspicious transaction register and timeliness management information.
- Internal audit and review reports, with an action tracker showing findings closed.
- Training records and board or committee AML management information.

Want an independent view of your gaps?

Alsina Advisory provides independent, senior-led financial crime and non-financial risk audits for EU and UK regulated banks, payment institutions, EMIs, fintechs and crypto-asset service providers, built to stand up to regulatory scrutiny. We are rooted in the Netherlands and work Europe-wide. Book a free, no-obligation consultation to talk it through with a senior specialist.

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Sources

Regulation (EU) 2024/1624 (AML Regulation); Directive (EU) 2024/1640 (AMLD6); Regulation (EU) 2024/1620 (AMLA Regulation); EBA Guidelines on ML/TF risk factors; FATF Recommendations. Dates per EUR-Lex and AMLA.

This toolkit is a general readiness aid, not legal, regulatory or audit advice, and does not create an engagement. Confirm all dates against the official sources cited, and tailor the assessment to your institution's risk profile and obligations.