OVERVIEW

Introduction

The European Union has long been at the forefront of the fight against money laundering and terrorism financing, adopting successive legislative measures to safeguard the integrity of its financial system. The recently adopted AML/CTF package (the Package) marks the latest milestone in that effort. In particular, this new Package broadens the scope of obliged entities which have to abide by the new EU harmonised rulebook.

The interactive map below sets out the changes brought about by the entry into force of the AML Package with respect to obliged entities compared to the previous EU regime under the AML/CTF directive and, for each Member State, compared to the current domestic framework.

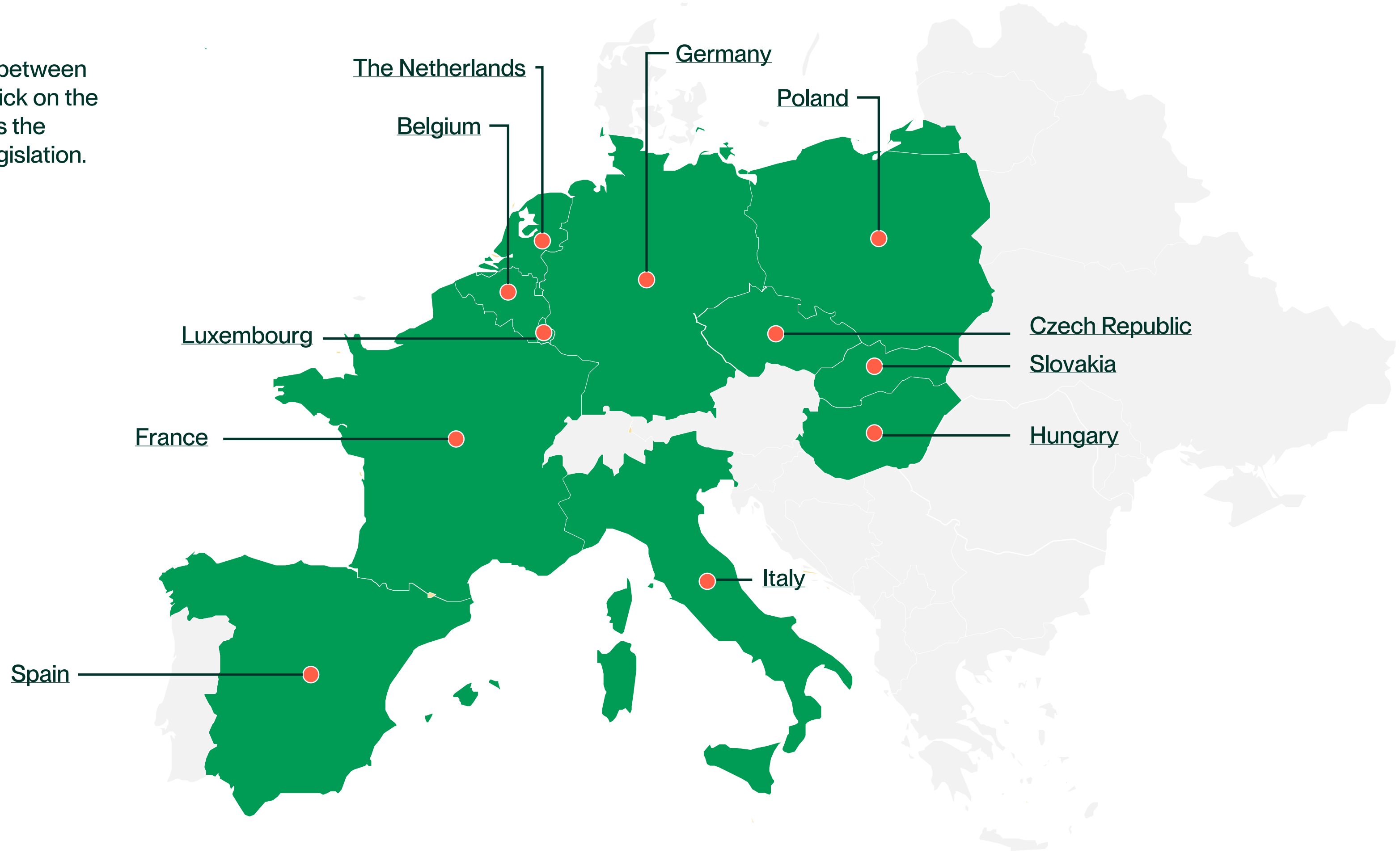
Disclaimer: *The comparisons provided in this map only constitute a high-level overview of the changes introduced by the new Package. They are not intended to be exhaustive and do not take into account all conditions that may be applicable to a given entity in order to be in scope of the new AML/CTF regime or the domestic frameworks. It should not be relied upon as a definitive or comprehensive analysis of any particular entity's obligations or status under either regime. In all cases, in order to properly assess the applicability and impact of the new AML/CTF regime on a specific entity, a concrete, case-by-case analysis of the legal status, regulatory position, and activities of the entity concerned will be required. Readers are therefore encouraged to seek tailored legal advice before drawing any conclusions as to whether, and to what extent, the new AML/CTF regime applies to their particular situation.*

FOR FURTHER INFORMATION, THE KEY CONTACTS ARE LISTED BELOW IN THEIR JURISDICTIONS SLIDE

Click here to view more

Table of obliged entities: comparison between AMLR, AMLD5 and current local legislations

Click the circle to the left to access the comparison between AMLR and AMLD5 at the European Union level or click on the specific jurisdiction on the map to the right to access the comparison between AMLR and the current local legislation.



Obliged entities under the new EU AML regulation (AMLR)– European union (1/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF AMLD5?
Financial Sector	Banks/credit institutions. It includes EU branches of such entities.	Yes
	Undertakings other than a credit institution or an investment firm, carrying out one or more of the activities listed in points (2) to (12), (14) and (15) of Annex I CRD (incl. the activities of currency exchange offices, a financial holding company, a mixed financial holding company and a financial mixed activity holding company but excluding the activities referred to in point (8) of Annex I PSD2 or an undertaking the principal activity of which is to acquire holdings). It includes EU branches of such entities. NB: this includes payment and emoney institutions.	Partially, under AMLD5, financial holding companies, mixed financial holding companies and financial mixed-activity holding companies were not expressly referred to in this section The exclusion of the activities of point (8) of Annex I PSD2 or of undertakings whose principal activity is to acquire holdings did not exist in the corresponding section of AMLD5
	Investment firms. It includes EU branches of such entities.	Yes
	Insurance undertaking carrying out life or other investment-related assurance activities (incl. insurance holding companies and mixed-activity insurance holding companies). It includes EU branches of such entities.	Partially, under AMLD5, (a) insurance holdings and mixed-activity insurance holding companies were not expressly referred to in this section and (b) the AMLD5 only referred to life insurance activities and not to other investment-related assurance activities
	Insurance intermediary acting with respect to life or other investment-related assurance activities with the exception of an insurance intermediary that does not collect premiums or amounts intended for the customer and which acts under the responsibility of one or more insurance undertakings or intermediaries for the products which concern them respectively. It includes EU branches of such entities.	Yes

Obliged entities under the new EU AML regulation (AMLR)– European union (2/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF AMLD5?
Financial Sector	Collective investment undertakings (incl. UCITS, AIFs and their respective management companies). It includes EU branches of such entities.	Yes, but no explicit mention of UCITS, AIFs and their management company
	Central securities depositories. It includes EU branches of such entities.	No
	Lenders. It includes EU branches of such entities.	No
	Credit intermediaries when holding the funds in connection with the credit agreement, with the exception of the credit intermediary carrying out activities under the responsibility of one or more creditors or credit intermediaries. It includes EU branches of such entities.	No
Crypto-Related Entities	Crypto-Asset Service Providers (CASPs). It includes EU branches of such entities.	Yes,[1] but did not include EU branches of such entities
Non-Financial Businesses & Professions (DNFBPs)	Trust or company service providers.	Yes
	Real estate agents and other real estate professionals under certain conditions.	Yes
	Traders in luxury goods (precious metals and stones, high-value items) as a regular or principal professional activity.	No, but more generic category of "persons trading in goods to the extent that payments are made or received in cash in an amount of EUR 10 000 or more" were in the scope of AMLD5

1. Note that CASPs have been introduced in scope of AMLD5 by Regulation (EU) 2023/1113 of the European Parliament and of the Council of 31 May 2023 on information accompanying transfers of funds and certain crypto-assets which is already in force.

Obliged entities under the new EU AML regulation (AMLR)– European union (3/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF AMLD5?
Non-Financial Businesses & Professions (DNFBPs)	Providers of gambling services.	Yes
	Crowdfunding service providers and intermediaries.	No
	Persons trading or acting as intermediaries in the trade of cultural goods under certain conditions.	Partially, AMLD5 applies to "persons trading or acting as intermediaries in the trade of works of art, including when this is carried out by art galleries and auction houses, where the value of the transaction or a series of linked transactions amounts to EUR 10,000 or more" The scope of the AMLR is in fact wider than AMLD5 as it includes the trade in "cultural goods" whereas AML5 only concerns the trade in "works of art"
	Persons storing, trading or acting as intermediaries in the trade of cultural goods and high-value goods, when this is carried out within free zones and customs warehouses under certain conditions.	Partially, as only applicable to "persons storing, trading or acting as intermediaries in the trade of works of art when this is carried out by free ports, where the value of the transaction or a series of linked transactions amounts to EUR 10,000 or more" The scope of the AMLR is in fact wider than the AMLD5 as it includes the trade in "cultural goods" and "high-value goods", including through warehouses whereas AMLD5 only concerns the trade in "works of art" exclusively through free zones
	Investment migration operators under certain conditions.	No

Obliged entities under the new EU AML regulation (AMLR)– European union (4/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF AMLD5?
Non-Financial Businesses & Professions (DNFBPs)	Credit intermediaries for mortgage and consumer credits, other than credit institutions and financial institutions, with the exception of the credit intermediaries carrying out activities under the responsibility of one or more creditors or credit intermediaries.	No
	Non-financial mixed activity holding companies.	No
	Auditors, external accountants and tax advisors, and any other natural or legal person including independent legal professionals such as lawyers, that undertake to provide, directly or by means of other persons to which that other person is related, material aid, assistance or advice on tax matters as principal business or professional activity.	Yes, but no explicit mention of "other natural or legal person including independent legal professionals such as lawyers" (just "and any other person")
	Notaries, lawyers and other independent legal professionals in respect of certain types of transactions.	Yes but no explicit mention of lawyers.
Sports Sector	Football clubs in respect of certain transactions.	No
	Football agents.	No

Obliged entities under the new EU AML regulation (AMLR)—Belgium (1/6)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT BELGIAN AML/CTF FRAMEWORK (INCL. ART. 5 §1 REFERENCE)
Financial Sector	Banks/credit institutions It includes EU branches of such entities	Yes—Article 5, §1, 4° a), b), c), d). This includes, but is not limited to, Belgian credit institutions as well as branches and establishments in Belgium of credit institutions with registered offices abroad (another EU Member States and third countries)
	Undertakings other than a credit institution or an investment firm, carrying out one or more of the activities listed in points (2) to (12), (14) and (15) of Annex I CRD (incl. the activities of currency exchange offices, a financial holding company, a mixed financial holding company and a financial mixed activity holding company but excluding the activities referred to in point (8) of Annex I PSD2 or an undertaking the principal activity of which is to acquire holdings). It includes EU branches of such entities. NB: this includes payment and emoney institutions.	Partially—the list of activities in points (2) to (12), (14) and (15) of Annex I CRD is very broad and the current Belgian AML Law already applies to several entities which are not credit institutions or investment firms and provide these services, for instance (non-exhaustive): • Article 5, §1, 6° , a)–d) covers, amongst others, Belgian payment institutions and branches of payment institutions with registered offices abroad (another EU Member States and third countries); • Article 5, §1, 7° , a)–e) covers, amongst others, Belgian e-money institutions and branches of e-money institutions with registered offices abroad (another EU Member States and third countries); • Article 5, §1, 21° covers the undertakings referred to in Article 2, § 1, of Royal Decree No. 55 of 10 November 1967 regulating the legal status of companies specialising in finance leasing and branches in Belgium of persons engaged in equivalent activities that are governed by the law of another EU Member State; and

Belgian Law of 18 September 2017 on the prevention of money laundering and terrorist financing and on the restriction of the use of cash (**Belgian AML Law**) Source: Banque de données Justel (Art. 5)

Obliged entities under the new EU AML regulation (AMLR)– Belgium (2/6)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT BELGIAN AML/CTF FRAMEWORK (INCL. ART. 5 §1 REFERENCE)
Financial Sector	(Cont) Undertakings other than a credit institution or an investment firm, carrying out one or more of the activities listed in points (2) to (12), (14) and (15) of Annex I CRD (incl. the activities of currency exchange offices, a financial holding company, a mixed financial holding company and a financial mixed activity holding company but excluding the activities referred to in point (8) of Annex I PSD2 or an undertaking the principal activity of which is to acquire holdings). It includes EU branches of such entities. NB: this includes payment and emoney institutions.	- Article 5, § 1, 16° covers persons established in Belgium who, by way of their business activity, carry out spot purchases and sales of foreign currency in the form of cash or cheques expressed in foreign currencies, or by using a credit or payment card, as referred to in Article 102, third subparagraph, of the Law of 25 October 2016 on access to the activity of an investment service provider and on the legal status and supervision of portfolio management and investment advice companies The AMLR definition of “financial institution” is, however, much broader and will trigger a substantive extension of the scope of application of the current Belgian AML/CTF framework. For instance, financial holding companies, mixed financial holding companies and financial mixed-activity holding companies are not listed as obliged entities in Article 5 of the Belgian AML Law, which is built around operating financial undertakings rather than holding vehicles. Their express inclusion in the AMLR definition of “financial institution” is therefore a substantive extension compared to the current Belgian regime

Belgian Law of 18 September 2017 on the prevention of money laundering and terrorist financing and on the restriction of the use of cash (**Belgian AML Law**) Source: Banque de données Justel (Art. 5)

Obliged entities under the new EU AML regulation (AMLR)—Belgium (3/6)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT BELGIAN AML/CTF FRAMEWORK (INCL. ART. 5 §1 REFERENCE)
Financial Sector	Investment firms. It includes EU branches of such entities.	Yes—Article 5, § 1, 10° , a)–c) and 11° , a)–c). This includes, but is not limited to, Belgian investment firms as well as branches and establishments in Belgium of investment firms with registered offices in other EU Member States
	Insurance undertaking carrying out life or other investment-related assurance activities (incl. insurance holding companies and mixed-activity insurance holding companies). It includes EU branches of such entities.	Partially—Article 5, §1, 5° a) and b). This includes Belgian insurance undertakings authorised to conduct life insurance business and Belgian branches of insurance undertakings authorised to conduct life insurance business in another EU Member State or a third country Insurance holding companies and mixed-activity insurance holding companies are currently not explicitly included as a separate category in Article 5 of the Belgian AML Law
	Insurance intermediary acting with respect to life or other investment-related assurance activities with the exception of an insurance intermediary that does not collect premiums or amounts intended for the customer and which acts under the responsibility of one or more insurance undertakings or intermediaries for the products which concern them respectively. It includes EU branches of such entities.	Yes—Article 5, §1, 19°, but subject to certain conditions which will be impacted by the AMLR
	Collective investment undertakings (incl. UCITS, AIFs and their respective management companies). It includes EU branches of such entities.	Yes—Article 5, §1, 12°, a)–d) and 13°, a), c) and d), but subject to certain conditions which will be impacted by the AMLR The current scope of application of the Belgian AML Law includes, but is not limited to, Belgian UCITS Management Companies and AIFMs (including sub-threshold AIFMs) as well as branches in Belgium of such entities
	Central securities depositories. It includes EU branches of such entities.	Yes—Article 5, §1, 8/1°

Belgian Law of 18 September 2017 on the prevention of money laundering and terrorist financing and on the restriction of the use of cash (**Belgian AML Law**) Source: Banque de données Justel (Art. 5)

Obliged entities under the new EU AML regulation (AMLR)—Belgium (4/6)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT BELGIAN AML/CTF FRAMEWORK (INCL. ART. 5 §1 REFERENCE)
Financial Sector	Lenders. It includes EU branches of such entities.	Yes—Article 5, §1, 20°. This includes Belgian mortgage credit lenders and Belgian branches of mortgage credit lenders with registered offices in other EU Member States
	Credit intermediaries when holding the funds in connection with the credit agreement, with the exception of the credit intermediary carrying out activities under the responsibility of one or more creditors or credit intermediaries. It includes EU branches of such entities.	Not as such, but the intermediation in mortgage credit can be combined with other capacities which may fall under one of the categories mentioned in Article 5, §1 of the Belgian AML Law
Crypto-Related Entities	Crypto-Asset Service Providers (CASPs). It includes EU branches of such entities.	Yes—Article 5, §1, 14/1°, a) and b). This includes Belgian CASPs as well as branches and establishments in Belgium of CASPs with registered offices in other EU Member States
Non-Financial Businesses & Professions (DNFBPs)	Trust or company service providers.	Yes—Article 5, §1, 29°
	Real estate agents and other real estate professionals under certain conditions.	Yes—Article 5, §1, 30°
	Traders in luxury goods (precious metals and stones, high-value items) as a regular or principal professional activity.	No, only traders of diamonds, art (and other goods) dealers and persons owning or managing storage for certain artworks or goods that fulfil the criteria mentioned in Article 5, §1, 31°, 31°/1 and 31°/2
	Providers of gambling services.	Yes—Article 5, §1, 33° (if not exempted by Royal Decree)
	Crowdfunding service providers and intermediaries.	Not as such, but the status under Regulation (EU) 2020/1503 can be combined with other capacities which may fall under one of the categories mentioned in Article 5, §1 of the Belgian AML Law
	Persons trading or acting as intermediaries in the trade of cultural goods under certain conditions.	Not as such—only if they fall under one of the categories mentioned in Article 5, §1, 31°, 31°/1 and 31°/2

Belgian Law of 18 September 2017 on the prevention of money laundering and terrorist financing and on the restriction of the use of cash (**Belgian AML Law**) Source: Banque de données Justel (Art. 5)

Obliged entities under the new EU AML regulation (AMLR)—Belgium (5/6)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT BELGIAN AML/CTF FRAMEWORK (INCL. ART. 5 §1 REFERENCE)
Financial Sector	Persons storing, trading or acting as intermediaries in the trade of cultural goods and high-value goods, when this is carried out within free zones and customs warehouses under certain conditions.	Not as such—only if they fall under one of the categories mentioned in Article 5, §1, 31°, 31°/1 and 31°/2
	Investment migration operators under certain conditions.	No
	Credit intermediaries for mortgage and consumer credits, other than credit institutions and financial institutions, with the exception of the credit intermediaries carrying out activities under the responsibility of one or more creditors or credit intermediaries.	Not as such, but the intermediation in mortgage and consumer credit can be combined with other capacities which may fall under one of the categories mentioned in Article 5, §1 of the Belgian AML Law
	Non-financial mixed activity holding companies.	Not as such
	Auditors, external accountants and tax advisors, and any other natural or legal person including independent legal professionals such as lawyers, that undertake to provide, directly or by means of other persons to which that other person is related, material aid, assistance or advice on tax matters as principal business or professional activity.	Not as a separate category—only if this is covered by another provision, which would, for example, not be the case for lawyers currently
	Notaries, lawyers and other independent legal professionals in respect of certain types of transactions.	Yes, for bailiffs, notaries and lawyers—Article 5, §1, 26°, 27°, 28°
Sports Sector	Football clubs in respect of certain transactions.	Yes, for all of their regulated activities—Article 5, §1, 31°/3. The Royal Belgian Football Association is also in scope (Article 5, §1, 31°/5)
	Football agents.	No

Belgian Law of 18 September 2017 on the prevention of money laundering and terrorist financing and on the restriction of the use of cash (**Belgian AML Law**) Source: Banque de données Justel (Art. 5)

Obliged entities under the new EU AML regulation (AMLR)–Belgium (6/6)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT BELGIAN AML/CTF FRAMEWORK (INCL. ART. 5 §1 REFERENCE)
Additional comments on national specificities		The comparison as set out above between the scope of application of the current Belgian AML Law and the scope of application as laid down in the new AML Regulation is intended solely as a first, high-level overview. This overview is not exhaustive and does not take into account all conditions that may be applicable to a given entity for the Belgian AML/CTF framework to apply to it. For instance, the Belgian AML Law is also, amongst others, applicable to the National Bank of Belgium acting in the context of its regulated professional activities. The overview above solely intends to provide a high-level, holistic summary of the categories of entities that fall within the respective scopes of the current Belgian AML Law and the new AML Regulation. It should not be relied upon as a definitive or comprehensive analysis of any particular entity's obligations or status under either regime. In all cases, in order to properly assess the applicability and impact of the applicable AML/CTF framework on a specific entity, a concrete, case-by-case analysis of the legal status, regulatory position, and activities of the entity concerned will be required. Readers are therefore encouraged to seek tailored legal advice before drawing any conclusions as to whether, and to what extent, the Belgian AML Law or AML Regulation applies/will apply to their particular situation

Belgian Law of 18 September 2017 on the prevention of money laundering and terrorist financing and on the restriction of the use of cash (**Belgian AML Law**) Source: Banque de données Justel (Art. 5)

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Obliged entities under the new EU AML regulation (AMLR)—Czech Republic (1/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT CZECH AML/CTF FRAMEWORK
Financial Sector	Banks/credit institutions It includes EU branches of such entities	Yes—§ 2(1) a) 1) and 2)
	Undertakings other than a credit institution or an investment firm, carrying out one or more of the activities listed in points (2) to (12), (14) and (15) of Annex I CRD (incl. the activities of currency exchange offices, a financial holding company, a mixed financial holding company and a financial mixed-activity holding company but excluding the activities referred to in point (8) of Annex I PSD2 or an undertaking the principal activity of which is to acquire holdings) It includes EU branches of such entities NB: this includes payment and e-money institutions	Yes—§ 2(1) b) 1)–14)
	Investment firms It includes EU branches of such entities	Yes—§ 2(1) b) 3)
	Insurance undertaking carrying out life or other investment-related assurance activities (incl. insurance holding companies and mixed-activity insurance holding companies) It includes EU branches of such entities	Yes—§ 2(1) b) 8)
	Insurance intermediary acting with respect to life or other investment-related assurance activities with the exception of an insurance intermediary that does not collect premiums or amounts intended for the customer and which acts under the responsibility of one or more insurance undertakings or intermediaries for the products which concern them respectively It includes EU branches of such entities	Yes—§ 2(1) b) 8)

Source: Hlavní stránka—e-Sbírka (§2 Povinné osoby)

Obliged entities under the new EU AML regulation (AMLR)—Czech Republic (2/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT CZECH AML/CTF FRAMEWORK
Financial Sector	Collective investment undertakings (incl. UCITS, AIFs and their respective management companies) It includes EU branches of such entities	Yes—§ 2(1) b) 4)
	Central securities depositories It includes EU branches of such entities	Yes—§ 2(1) b) 1)
	Lenders It includes EU branches of such entities	Yes—§ 2(1) b) 6)
	Credit intermediaries when holding the funds in connection with the credit agreement, with the exception of the credit intermediary carrying out activities under the responsibility of one or more creditors or credit intermediaries It includes EU branches of such entities	Yes – § 2(1) b) 7)
Crypto-Related Entities	Crypto-Asset Service Providers (CASPs) It includes EU branches of such entities	Yes—§ 2(1) b) 15)

Source: Hlavní stránka—e-Sbírka (§2 Povinné osoby)

Obliged entities under the new EU AML regulation (AMLR)—Czech Republic (3/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT CZECH AML/CTF FRAMEWORK
Non-Financial Businesses & Professions (DNFBPs)	Trust or company service providers	Yes—§ 2(1) h) 1)–5)
	Real estate agents and other real estate professionals under certain conditions	Yes—§ 2(1) d) 1)–2) (lease only if monthly amount ≥ EUR10, 000)
	Traders in luxury goods (precious metals and stones, high-value items) as a regular or principal professional activity	Yes—§ 2(1) n)
	Providers of gambling services	Yes—§ 2(1) c)
	Crowdfunding service providers and intermediaries	No—not referred to in § 2
	Persons trading or acting as intermediaries in the trade of cultural goods under certain conditions	Yes—§ 2(1) i) 1)
	Persons storing, trading or acting as intermediaries in the trade of cultural goods and high-value goods, when this is carried out within free zones and customs warehouses under certain conditions	Yes—§ 2(1) i) 2)
	Investment migration operators under certain conditions	No—not referred to in § 2
	Credit intermediaries for mortgage and consumer credits, other than credit institutions and financial institutions, with the exception of credit intermediaries carrying out activities under the responsibility of one or more creditors or credit intermediaries	Yes—§ 2(1) b) 7)
	Non-financial mixed-activity holding companies	No—not referred to in § 2
	Auditors, external accountants and tax advisers, and any other natural or legal person including independent legal professionals such as lawyers, that undertake to provide, directly or by means of other persons to which that other person is related, material aid, assistance or advice on tax matters as a principal business or professional activity	Yes—§ 2(1) e)
	Notaries, lawyers and other independent legal professionals in respect of certain types of transactions	Yes—§ 2(1) g) 1)–5)

Source: Hlavní stránka—e-Sbírka (§2 Povinné osoby)

Obliged entities under the new EU AML regulation (AMLR)—Czech Republic (4/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT CZECH AML/CTF FRAMEWORK
Sports sector	Football clubs in respect of certain transactions	No—not referred to in § 2
	Football agents	No—not referred to in § 2
Additional comments on national specificities		• Judicial executors—when performing ancillary activities and holding client money, securities or other assets in escrow (§ 2(1)(f)) • Insolvency practitioners and restructuring administrators—persons authorised to act as insolvency or restructuring administrators (§ 2(1)(m)) • Second-hand dealers and pawnshops—persons authorised to trade in second-hand goods, intermediate such trade or accept items as pledge (§ 2(1)(j)) • National administrator of the emissions allowance trading registry—the entity administering the Czech carbon emissions registry (§ 2(1)(k)) • Auctioneers—in connection with auctions of real estate (§ 2(1)(d)(3)) • Postal service providers—persons authorised to provide postal services involving the delivery of remitted money (§ 2(1)(b)(11)) • Trustees—trustees of trusts or persons in an equivalent position in relation to arrangements similar in structure or function to trusts governed by the law of another state (§ 2(1)(l))

Source: Hlavní stránka—e-Sbírka (§2 Povinné osoby)

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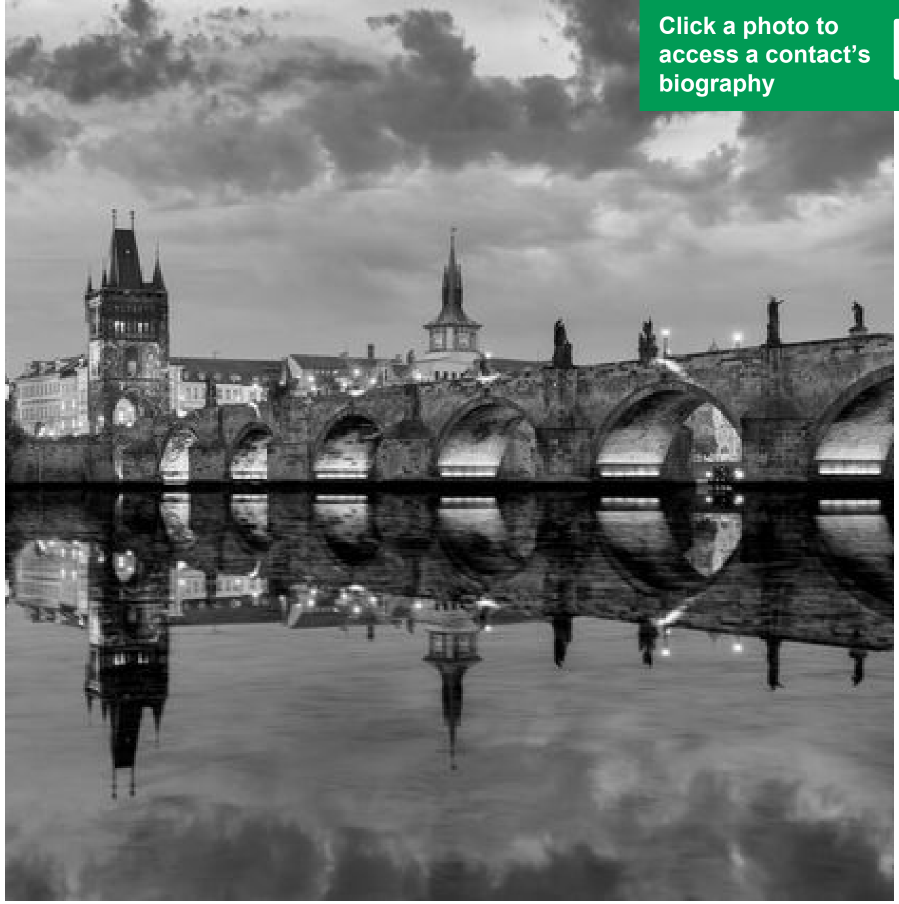

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Obliged entities under the new EU AML regulation (AMLR)—France (1/8)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT FRENCH AML/CTF FRAMEWORK
Financial Sector	Banks/credit institutions It includes EU branches of such entities	Yes – Article L. 561-2, 1°- includes also French third country branches of non-EEA banks, French branches of EEA credit institutions) and financial institutions, as defined under CRR *("undertaking other than an institution and other than a pure industrial holding company, the principal activity of which is to acquire holdings or to pursue one or more of the activities listed in points **2 to 12 and 15** of Annex I to Directive 2013/36/EU"), as well as other specific French entities (such e.g. financing companies (sociétés de financement), Banque de France …)*
	Undertakings other than a credit institution or an investment firm, carrying out one or more of the activities listed in points (2) to (12), (14) and (15) of Annex I CRD (incl. the activities of currency exchange offices, a financial holding company, a mixed financial holding company and a financial mixed-activity holding company but excluding the activities referred to in point (8) of Annex I PSD2 or an undertaking the principal activity of which is to acquire holdings) It includes EU branches of such entities NB: this includes payment and e-money institutions	Partially: see above definition of a financial institution regarding an undertaking other than an institution and other than a pure industrial holding company, the principal activity of which is to to pursue one or more of the activities listed in points **2 to 12 and 15** of Annex I to Directive 2013/36/EU. The activities of currency exchange offices are set out under Article L. 561-2, 7°). Under French law, financial holding companies, mixed financial holding companies and financial mixed activity holding companies were not expressly referred to in this section but could arguably be considered as covered through the cross-reference made to entities and services mentioned under title I of book V of the French monetary and financial code but not very clear.
	Investment firms It includes EU branches of such entities	Yes – Article L. 561-2, 6° (covers French licensed, French branches of EEA entities and third country branches)
	Insurance undertaking carrying out life or other investment-related assurance activities (incl. insurance holding companies and mixed-activity insurance holding companies) It includes EU branches of such entities	French law is broader as both life and non-life insurance undertakings are covered (Article L. 56 No as regards insurance holding companies and mixed-activity insurance holding companies1-2, 2°)

Source: Code Monétaire et Financier Section 2: Personnes assujetties aux obligations de lutte contre le blanchiment des capitaux et le financement du terrorisme (Articles L561-2 à L561-4)—Légifrance

Obliged entities under the new EU AML regulation (AMLR)—France (2/8)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT FRENCH AML/CTF FRAMEWORK
Financial Sector	Insurance intermediary acting with respect to life or other investment-related assurance activities with the exception of an insurance intermediary that does not collect premiums or amounts intended for the customer and which acts under the responsibility of one or more insurance undertakings or intermediaries for the products which concern them respectively It includes EU branches of such entities	Partly – Article L. 561-2, 3° bis only refers to insurance intermediaries save for those acting under the responsibility of an insurance undertaking or insurance broker No – Article L. 561-2, 3° bis – does not include French branches of insurance intermediaries
	French Collective investment undertakings (incl. UCITS, AIFs and their respective management companies) It includes EU branches of such entities	Yes – Article L. 561-2, 6° Only French branches of EEA UCITS Manco and AIFM
	Central securities depositories It includes EU branches of such entities	Yes – Article L. 561-2, 6°
	Lenders It includes EU branches of such entities	Yes – Article L. 561-2, 1° (credit institutions) and French financing companies (*sociétés de financement*) which are only licensed to lend but cannot be passported. Article L. 561-2, 20°) credit servicer (pursuant to directive (UE) 2021/2167 but not their branches.
	Credit intermediaries when holding the funds in connection with the credit agreement, with the exception of credit intermediaries carrying out activities under the responsibility of one or more creditors or credit intermediaries It includes EU branches of such entities	Partially. French law relates to a broader category (payment services and banking transactions intermediaries) to the extent they act under the mandate of a client and when they receive clients' funds Article L. 561-2, 3° French branches are not included.

Source: Code Monétaire et Financier Section 2: Personnes assujetties aux obligations de lutte contre le blanchiment des capitaux et le financement du terrorisme (Articles L561-2 à L561-4)—Légifrance

Obliged entities under the new EU AML regulation (AMLR)—France (3/8)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT FRENCH AML/CTF FRAMEWORK
Crypto-related entities	Crypto-Asset Service Providers (CASPs) It includes EU branches of such entities	Yes – Article L. 561-2, 7° bis and 7° quarter French and EEA passported CASPs (Article L. 561-2, 7° bis) and Caisse des dépôts et consignations when providing crypto-assets services. French law lists French financial investment advisors, central depositories and portfolio management companies, when they are authorised to provide services on crypto-assets, including the French branches of EEA portfolio management companies (Article L. 561-2, 7° bis)
Non-financial businesses and professions (DNFBPs)	Trust or company service providers	Yes – Article L. 561-2, 15° (domiciliation activity)
	Real estate agents and other real estate professionals under certain conditions	Partly, as limited to the persons carrying out the activities listed under Article L. 561-2, 1°) but with respect to their rental activity only when acting under a mandate for real estate transactions where the monthly rent is equal to or exceeds EUR 10,000, as well as the activities referred to in 2°, 4°, 5° and 8° of Article 1 of Law No. 70-9 of 2 January 1970 regulating the conditions for exercising activities relating to certain transactions involving real property and business assets (fonds de commerce) – Article L. 561-2, 8°
	Traders in luxury goods (precious metals and stones, high-value items) as a regular or principal professional activity	Yes – Article L. 561-211° bis Persons, other than those referred to in 1° to 7° quater, engaged on a habitual and principal basis in the trade of precious metals or precious stones, where the value of the transaction or a series of linked transactions amounts to EUR 10,000 or more.

Source: Code Monétaire et Financier Section 2: Personnes assujetties aux obligations de lutte contre le blanchiment des capitaux et le financement du terrorisme (Articles L561-2 à L561-4)—Légifrance

Obliged entities under the new EU AML regulation (AMLR)—France (4/8)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT FRENCH AML/CTF FRAMEWORK
Non-financial businesses and professions (DNFBPs)	Providers of gambling services	Yes – Article L. 561-2, 9°: gambling or betting operators authorised pursuant to Articles L. 321-1 and L. 321-3 of the Internal Security Code (Code de la sécurité intérieure), and pursuant to paragraph V of Article 34 of Law No. 2017-257 of 28 February 2017 on the status of Paris and metropolitan planning, as well as their legal representatives and responsible directors; and L. 561-2, 9° bis: Gambling or betting operators authorised pursuant to Article 21 of Law No. 2010-476 of 12 May 2010 on the opening up to competition and regulation of the online gambling and betting sector, as well as their legal representatives; operators authorised pursuant to Article 5 of the Law of 2 June 1891 regulating the authorisation and operation of horse racing; and operators authorised pursuant to Article 137 of Law No. 2019-486 of 22 May 2019 on the growth and transformation of businesses.
	Crowdfunding service providers and intermediaries	Yes – Article L. 561-2, 4° and 6° (where applicable)
	Persons trading or acting as intermediaries in the trade of cultural goods, including when this is carried out by art galleries and auction houses, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency	Yes – Article L. 561-2, 10° (first part) Persons who trade in works of art and antiques or act as intermediaries in the trade of works of art and antiques, including when such trade is carried out by art galleries, where the value of the transaction or a series of linked transactions amounts to EUR 10,000 or more. Article L. 561-2, 14°: Operators of voluntary sales of movable property at public auction, where the value of the transaction or a series of linked transactions amounts to EUR 10,000 or more.

Source: Code Monétaire et Financier Section 2: Personnes assujetties aux obligations de lutte contre le blanchiment des capitaux et le financement du terrorisme (Articles L561-2 à L561-4)—Légifrance

Obliged entities under the new EU AML regulation (AMLR)—France (5/8)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT FRENCH AML/CTF FRAMEWORK
Non-financial businesses and professions (DNFBPs)	Persons storing, trading or acting as intermediaries in the trade of cultural goods and high-value goods, when this is carried out within free zones and customs warehouses under certain conditions	Yes – Article L. 561-2, 10° (second part) Persons who store or trade in works of art or act as intermediaries in the trade of works of art when such trade is carried out in free ports or free zones, where the value of the transaction or a series of linked transactions amounts to EUR 10,000 or more.
	Investment migration operators under certain conditions	No - – Not referred to in Article L. 561-2
	Credit intermediaries for mortgage and consumer credits, other than credit institutions and financial institutions, with the exception of credit intermediaries carrying out activities under the responsibility of one or more creditors or credit intermediaries	Yes – Article L. 561-2,
	Non-financial mixed-activity holding companies	No – Not referred to in Article L. 561-2

Source: Code Monétaire et Financier Section 2: Personnes assujetties aux obligations de lutte contre le blanchiment des capitaux et le financement du terrorisme (Articles L561-2 à L561-4)—Légifrance

Obliged entities under the new EU AML regulation (AMLR)—France (6/8)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT FRENCH AML/CTF FRAMEWORK
Non-financial businesses and professions (DNFBPs)	Auditors, external accountants and tax advisers, and any other natural or legal person including independent legal professionals such as lawyers, that undertake to provide, directly or by means of other persons to which that other person is related, material aid, assistance or advice on tax matters as a principal business or professional activity	Yes – Article L. 561-2, 12°: chartered accountants (*experts-comptables*), and employees authorised to practise the profession of chartered accountant pursuant to Articles 83 ter and 83 quater of Ordinance No. 45-2138 of 19 September 1945 establishing the Order of Chartered Accountants and regulating the titles and the profession of chartered accountant; Article L. 561-2,12° bis: statutory auditors (*commissaires aux comptes*)
	Notaries, lawyers and other independent legal professionals in respect of certain types of transactions	Yes – Article L. 561-2, 13° (lawyers (avocats) admitted to the Council of State (*Conseil d'État*) and the Court of Cassation (*Cour de cassation*), lawyers (*avocats*), notaries (*notaires*), judicial officers (*commissaires de justice*), court-appointed administrators (*administrateurs judiciaires*) and court-appointed receivers (*mandataires judiciaires*) subject to Article L. 561-3)
Sports sector	Football clubs in respect of certain transactions	No – Not referred to in Article L. 561-2
	Football agents	French law is broader as it covers any type of sports agents (not limited to football)–Article L. 561-2, 16°

Source: Code Monétaire et Financier Section 2: Personnes assujetties aux obligations de lutte contre le blanchiment des capitaux et le financement du terrorisme (Articles L561-2 à L561-4)—Légifrance

Obliged entities under the new EU AML regulation (AMLR)—France (7/8)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT FRENCH AML/CTF FRAMEWORK
Additional comments on national specificities	The following entities are obligors under French Article L. 561-2: 1°) Financing companies (sociétés de financement) 2°) Life insurance undertaking 2° bis Provident institutions or unions governed by Title III of Book IX of the French Social Security Code 2° ter Mutual societies and unions carrying out operations referred to in 1° of paragraph I of Article L. 111-1 of the French Mutual Insurance Code 2° quater Supplementary occupational retirement funds referred to in Article L. 381-1 of the French Insurance Code 2° quinquies Supplementary occupational retirement mutual societies or unions referred to in Article L. 214-1 of the French Mutual Insurance Code 2° sexies Supplementary occupational retirement institutions referred to in Article L. 942-1 of the Social Security Code 5° The Banque de France, the note-issuing institution for the overseas departments (Institut d'émission des départements d'outre-mer) referred to in Article L. 721-7 of the French Monetary and Financial Code, and the overseas note-issuing institution (Institut d'émission d'outre-mer) referred to in Articles L. 721-18 and L. 721-19 of the same Code	

Source: Code Monétaire et Financier Section 2: Personnes assujetties aux obligations de lutte contre le blanchiment des capitaux et le financement du terrorisme (Articles L561-2 à L561-4)—Légifrance

Obliged entities under the new EU AML regulation (AMLR)—France (8/8)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT FRENCH AML/CTF FRAMEWORK
Additional comments on national specificities	The following entities are obligors under French Article L. 561-2: 6°) Market operators referred to in Article L. 421-2, operators of settlement and delivery systems for financial instruments, financial investment advisors, and authorised intermediaries referred to in Article L. 211-4 of the same Code 6° bis EU/EEA Investment services providers when carrying out their activities in France using tied agents referred to in Article L. 545-1 of the French Monetary and Financial Code 11° Persons accepting payments in cash or by means of electronic money in an amount exceeding a threshold set by decree and engaged in the trade of goods 17° Persons authorised pursuant to paragraph I of Article L. 621-18-5, i.e. the management and other aspects of the auctioning of greenhouse gas emission allowances 18° Lawyers' financial settlement funds (Caisses des règlements pécuniaires des avocats — CARPA) established pursuant to 9° of Article 53 of Law No. 71-1130 of 31 December 1971, in respect of funds, instruments or securities deposited by lawyers on behalf of their clients in the course of the activities referred to in paragraph I of Article L. 561-3 19° Clerks of the commercial courts (greffiers des tribunaux de commerce) referred to in Article L. 741-1 of the French Commercial Code	

Source: Code Monétaire et Financier Section 2: Personnes assujetties aux obligations de lutte contre le blanchiment des capitaux et le financement du terrorisme (Articles L561-2 à L561-4)—Légifrance

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Obliged entities under the new EU AML regulation (AMLR)—Germany (1/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT GERMAN AML/CTF FRAMEWORK
Financial Sector	Banks/credit institutions. It includes EU branches of such entities.	Yes—Sec. 2(1) no. 1 GwG; includes branches and establishments in Germany of credit institutions with registered offices abroad
	Undertakings other than a credit institution or an investment firm, carrying out one or more of the activities listed in points (2) to (12), (14) and (15) of Annex I CRD (incl. the activities of currency exchange offices, a financial holding company, a mixed financial holding company and a financial mixed activity holding company but excluding the activities referred to in point (8) of Annex I PSD2 or an undertaking the principal activity of which is to acquire holdings). It includes EU branches of such entities. NB: this includes payment and emoney institutions.	Yes—Sec. 2(1) no. 2 no. 3, no. 4, no. 5 and no. 6 GwG (*Finanzdienstleistungsinstitute*, *Finanzunternehmen*); includes branches and establishments in Germany of foreign entities
	Investment firms. It includes EU branches of such entities.	Yes—Sec. 2(1) no. 2 GwG; includes branches and establishments of comparable foreign entities
	Insurance undertaking carrying out life or other investment-related assurance activities (incl. insurance holding companies and mixed-activity insurance holding companies). It includes EU branches of such entities.	Yes—Sec. 2(1) no. 7 GwG; covers life insurance, accident insurance with premium refunds, loan origination and capitalisation products; includes German branches of foreign insurers
	Insurance intermediary acting with respect to life or other investment-related assurance activities with the exception of an insurance intermediary that does not collect premiums or amounts intended for the customer and which acts under the responsibility of one or more insurance undertakings or intermediaries for the products which concern them respectively. It includes EU branches of such entities.	Yes—Sec. 2(1) no. 8 GwG, insofar as they require a licence under the German Trade Code (Gewerbeordnung—GwG); includes German branches of foreign insurance intermediaries

Source: https://www.gesetze-im-internet.de/gwg_2017/__2.htmlGerman Money Laundering Act (Geldwäschegesetz—**GwG**) (link)

Obliged entities under the new EU AML regulation (AMLR)—Germany (2/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT GERMAN AML/CTF FRAMEWORK
Financial Sector	Collective investment undertakings (incl. UCITS, AIFs and their respective management companies). It includes EU branches of such entities.	Yes—Sec. 2(1) no. 9 GwG; includes EU management companies' branches, foreign AIF management companies' branches and foreign AIFMs for which Germany is a reference Member State
	Central securities depositories. It includes EU branches of such entities.	No—not expressly listed as such in Sec. 2 GwG
	Lenders. It includes EU branches of such entities.	Yes—Sec. 2(1) no. 1 and no. 7(c) GwG (credit institutions and insurers granting loans); includes German branches of foreign entities
	Credit intermediaries when holding the funds in connection with the credit agreement, with the exception of the credit intermediary carrying out activities under the responsibility of one or more creditors or credit intermediaries. It includes EU branches of such entities.	No, not generally. Sec. 2(1) no. 10 lit. b), no. 11 GwG covers only those persons who are authorised to provide legal services, including lawyers, notaries and persons authorised under the Act on the Provision of Legal Services (*Rechtsdienstleistungsgesetz*—RDG), and perform real estate transactions in the name and for the account of their client. Mere mortgage credit intermediaries in the sense of Sec. 34i GewO are not caught by this provision.
Crypto-Related Entities	Crypto-Asset Service Providers (CASPs). It includes EU branches of such entities.	Yes—Sec. 2(1) no. 2 GwG (providers of crypto-asset services and issuers of asset-referenced tokens); includes branches of foreign entities

Source: https://www.gesetze-im-internet.de/gwg_2017/__2.htmlGerman Money Laundering Act (*Geldwäschegesetz*—**GwG**) (link)

Obliged entities under the new EU AML regulation (AMLR)—Germany (3/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT GERMAN AML/CTF FRAMEWORK
Non-Financial Businesses & Professions (DNFBPs)	Trust or company service providers.	Yes—Sec. 2(1) no. 13 GwG (company and trust service providers, if they perform one of the actions listed)
	Real estate agents and other real estate professionals under certain conditions.	Yes—Sec. 2(1) no. 14 GwG (real estate brokers)
	Traders in luxury goods (precious metals and stones, high-value items) as a regular or principal professional activity.	Yes—Sec. 2(1) no. 16 GwG (goods traders, art intermediaries and art warehouse keepers, if the art is kept in customs-free zones)
	Providers of gambling services.	Yes—Sec. 2(1) no. 15 GwG (gambling organisers and intermediaries, with listed exceptions)
	Crowdfunding service providers and intermediaries.	No—not expressly listed as such in Sec. 2 GwG
	Persons trading or acting as intermediaries in the trade of cultural goods under certain conditions.	Yes—Sec. 2(1) no. 16 GwG (art intermediaries)
	Persons storing, trading or acting as intermediaries in the trade of cultural goods and high-value goods, when this is carried out within free zones and customs warehouses under certain conditions.	Yes—Sec. 2(1) no. 16 GwG (art storage in customs-free zones)
	Investment migration operators under certain conditions.	No—not referred to in Sec. 2 GwG
	Credit intermediaries for mortgage and consumer credits, other than credit institutions and financial institutions, with the exception of the credit intermediaries carrying out activities under the responsibility of one or more creditors or credit intermediaries.	No—credit intermediaries as such are not listed in Sec. 2 GwG. Please see above for persons providing legal services in relation to real estate transactions
	Non-financial mixed activity holding companies.	No—not referred to in Sec. 2 GwG

Source: https://www.gesetze-im-internet.de/gwg_2017/__2.htmlGerman Money Laundering Act (*Geldwäschegesetz*—**GwG**) (link)

Obliged entities under the new EU AML regulation (AMLR)—Germany (4/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT GERMAN AML/CTF FRAMEWORK
	Auditors, external accountants and tax advisors, and any other natural or legal person including independent legal professionals such as lawyers, that undertake to provide, directly or by meansof other persons to which that other person is related, material aid, assistance or advice on tax matters as principal business or professional activity.	Yes—Sec. 2(1) no. 12 GwG
	Notaries, lawyers and other independent legal professionals in respect of certain types of transactions.	Yes—Sec. 2(1) nos. 10 and 11 GwG (for listed financial, corporate and real estate activities)
Sports Sector	Football clubs in respect of certain transactions.	No—not referred to in Sec. 2 GwG
	Football agents.	No—not referred to in Sec. 2 GwG
Additional comments on national specificities		

Source: https://www.gesetze-im-internet.de/gwg_2017/__2.htmlGerman Money Laundering Act (*Geldwäschegesetz*—**GwG**) (link)

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Obliged entities under the new EU AML regulation (AMLR)—Hungary (1/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT HUNGARIAN AML/CTF FRAMEWORK
Financial Sector	Banks/credit institutions It includes EU branches of such entities	Yes—§ 1(1)(a); includes entities having a seat, branch or establishment in Hungary, including foreign entities operating via permanent presence (§ 1(1a))
	Undertakings other than a credit institution or an investment firm, carrying out one or more of the activities listed in points (2) to (12), (14) and (15) of Annex I CRD (incl. the activities of currency exchange offices, a financial holding company, a mixed financial holding company and a financial mixed-activity holding company but excluding the activities referred to in point (8) of Annex I PSD2 or an undertaking the principal activity of which is to acquire holdings) It includes EU branches of such entities NB: this includes payment and e-money institutions	Yes—§ 1(1)(b) (financial service providers); includes foreign entities with a seat/branch/establishment in Hungary (§ 1(1a))
	Investment firms It includes EU branches of such entities	Yes—§ 1(1)(b) (financial service providers); includes foreign entities with a branch or establishment in Hungary (§ 1(1a))
	Insurance undertaking carrying out life or other investment-related assurance activities (incl. insurance holding companies and mixed-activity insurance holding companies) It includes EU branches of such entities	Yes—§ 1(1)(d) (voluntary mutual insurance funds); includes Hungarian and foreign entities with establishments in Hungary (§ 1(1a))

Source: 2017. évi LIII. törvény—Nemzeti Jogszabálytár

Obliged entities under the new EU AML regulation (AMLR)—Hungary (2/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT HUNGARIAN AML/CTF FRAMEWORK
Financial Sector	Insurance intermediary acting with respect to life or other investment-related assurance activities with the exception of an insurance intermediary that does not collect premiums or amounts intended for the customer and which acts under the responsibility of one or more insurance undertakings or intermediaries for the products which concern them respectively It includes EU branches of such entities	No—insurance intermediaries not expressly designated
	Collective investment undertakings (incl. UCITS, AIFs and their respective management companies) It includes EU branches of such entities	Yes—§ 1(1)(b) (financial service providers—where carrying out regulated financial activities)); includes foreign entities with an establishment in Hungary (§ 1(1a))
	Central securities depositories It includes EU branches of such entities	No—not expressly designated
	Lenders It includes EU branches of such entities	Yes—§ 1(1)(b) (financial service providers); includes foreign entities with a branch or establishment in Hungary (§ 1(1a))
	Credit intermediaries when holding the funds in connection with the credit agreement, with the exception of credit intermediaries carrying out activities under the responsibility of one or more creditors or credit intermediaries It includes EU branches of such entities	Yes—§ 1(1)(b) (financial service providers)

Source: 2017. évi LIII. törvény—Nemzeti Jogszabálytár

Obliged entities under the new EU AML regulation (AMLR)—Hungary (3/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT HUNGARIAN AML/CTF FRAMEWORK
Crypto-related entities	Crypto-Asset Service Providers (CASPs) It includes EU branches of such entities	Partially—explicitly covered only for travel rule-related obligations under § 2 in conjunction with § 1(1)(a), (b) and (e); general CASP designation not expressly listed
Non-financial businesses and professions (DNFBPs)	Trust or company service providers	Yes—§ 1(1)(m) (fiduciary asset managers) and § 1(1)(r) (seat-service providers)
	Real estate agents and other real estate professionals under certain conditions	Yes—§ 1(1)(f) (real estate-related activity)
	Traders in luxury goods (precious metals and stones, high-value items) as a regular or principal professional activity	Yes—§ 1(1)(j) (precious metals, except investment gold) and § 1(1)(s) (investment gold)
	Providers of gambling services	Yes—§ 1(1)(i) (casinos, card rooms, betting, online casino games)
	Crowdfunding service providers and intermediaries	No—not expressly designated
	Persons trading or acting as intermediaries in the trade of cultural goods under certain conditions	Yes—§ 1(1)(p) (artworks and antiques ≥ HUF 3 million)
	Persons storing, trading or acting as intermediaries in the trade of cultural goods and high-value goods, when this is carried out within free zones and customs warehouses under certain conditions	Yes—§ 1(1)(q) (free ports, ≥ HUF 3 million)
	Investment migration operators under certain conditions	No—not referred to
	Credit intermediaries for mortgage and consumer credits, other than credit institutions and financial institutions, with the exception of credit intermediaries carrying out activities under the responsibility of one or more creditors or credit intermediaries	Yes—§ 1(1)(b) (financial service providers)

Source: 2017. évi LIII. törvény—Nemzeti Jogszabálytár

Obliged entities under the new EU AML regulation (AMLR)—Hungary (4/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT HUNGARIAN AML/CTF FRAMEWORK
Non-financial businesses and professions (DNFBPs)	Non-financial mixed-activity holding companies	No—not referred to
	Auditors, external accountants and tax advisers, and any other natural or legal person including independent legal professionals such as lawyers, that undertake to provide, directly or by means of other persons to which that other person is related, material aid, assistance or advice on tax matters as a principal business or professional activity	Yes—§ 1(1)(g) and (h)
	Notaries, lawyers and other independent legal professionals in respect of certain types of transactions	Yes—§ 1(1)(l)
Sports sector	Football clubs in respect of certain transactions	No—not referred to
	Football agents	No—not referred to

Source: 2017. évi LIII. törvény—Nemzeti Jogszabálytár

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Obliged entities under the new EU AML regulation (AMLR)—Italy (1/5)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT ITALIAN AML/CTF FRAMEWORK
Financial Sector	Banks/credit institutions. It includes EU branches of such entities.	Yes—Article 3(2)(a); includes Italian branches of EU and third-country banks having establishments other than branches in Italy (stabiliti senza succursale) (Article 3(2)(t) and (u))

	Undertakings other than a credit institution or an investment firm, carrying out one or more of the activities listed in points (2) to (12), (14) and (15) of Annex I CRD (incl. the activities of currency exchange offices, a financial holding company, a mixed financial holding company and a financial mixed activity holding company but excluding the activities referred to in point (8) of Annex I PSD2 or an undertaking the principal activity of which is to acquire holdings).
	It includes EU branches of such entities.
	NB: this includes payment and emoney institutions.
		Yes—in particular, please note as follows:
		a) EMIs, Article 3(2)(c);
		b) IPs, Article 3(2)(d);
		c) currency exchange offices, Article 3(3)(d);
		d) financial intermediaries, enrolled on the register held by the Bank of Italy pursuant to Article 106 of the ICBA, Article 3(2)(l); and
		e) money exchanges, Article 3(2)(i),
		including (i) Italian branches of the above EU or third-country intermediaries; and (ii) the above EU intermediaries, having in Italy an establishment other than a branch (Article 3(2)(t) and (u))

	Investment firms. It includes EU branches of such entities.	Yes—Article 3(2)(e) (SIM); includes Italian branches of EU or third-country investment firms and EU MiFID investment firms having in Italy an establishment other than a branch (stabiliti senza succursale) (Article 3(2)(t) and (u))
	Insurance undertaking carrying out life or other investment-related assurance activities (incl. insurance holding companies and mixed-activity insurance holding companies) It includes EU branches of such entities.	Yes—Article 3(2)(n) (CAP Article 2(1)); includes: (a) Italian branches of EU and third-country insurers (Article 3(2)(t)); (b) EU insurers having in Italy establishments other than branches (*stabiliti senza succursale*) (Article 3(2)(u); (c) the ultimate Italian controlling entity (which includes inter alia an insurance holding company or a mixed-activity insurance holding company established in Italy) (Article 3(1)(d) of IVASS Regulation no. 44/2019; and (d) to a limited extent, EU/EEA insurers operating in Italy on a cross-border basis (Article 3(1)(e) of IVASS Regulation no. 44/2019)

Source: DECRETO LEGISLATIVO 21 novembre 2007, n. 231—Normattiva, Art. 3 (Soggetti obbligati)

Obliged entities under the new EU AML regulation (AMLR)—Italy (2/5)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT ITALIAN AML/CTF FRAMEWORK
Financial Sector	Insurance intermediary acting with respect to life or other investment-related assurance activities with the exception of an insurance intermediary that does not collect premiums or amounts intended for the customer and which acts under the responsibility of one or more insurance undertakings or intermediaries for the products which concern them respectively It includes EU branches of such entities	Yes, but only to agents; brokers or insurance intermediaries identified under Article 109(2)(d) CAP, jointly the In-Scope Intermediaries (Article 3(2)(o)). This includes: (a) branches of EU/third-country In-Scope Intermediaries (Article 3(2)(t)); and (b) In-Scope Intermediaries having in Italy establishments other than branches (*stabiliti senza succursale*) (Article 3(2)(u))
	Collective investment undertakings (incl. UCITS, AIFs and their respective management companies). It includes EU branches of such entities.	Yes—Article 3(2)(f), (g), (h); includes: (a) the respective external managers (Article 3(2-ter)); and (b) Italian branches of EU or third-country asset managers (Article 3(2) t) The AML Decree has been recently amended to include, among the obliged entities, limited partnerships (*società di partenariato),* self or externally managed (Article 3(2)(v.ter) and Article 3(2-ter)
	Central securities depositories It includes EU branches of such entities	Yes (limited scope)—Article 3(8) (centralised securities management, clearing and settlement systems)
	Lenders. It includes EU branches of such entities.	Yes—Article 3(2)(a), (l), (banks, intermediaries ex Article 106 ICBA). This includes: (a) Italian branches of EU or third-country entities (Article 3(2)(t)); and (b) EU entities having in Italy establishments other than branches (Article 3(2)(u))
	Credit intermediaries when holding the funds in connection with the credit agreement, with the exception of the credit intermediary carrying out activities under the responsibility of one or more creditors or credit intermediaries. It includes EU branches of such entities.	Yes—Article 3(3)(b) and (c) (credit brokers and credit/payment services agents), irrespective of the fact that they hold funds in connection with the credit agreement. This includes the Italian branches of foreign credit brokers/credit or payment services agents

Source: DECRETO LEGISLATIVO 21 novembre 2007, n. 231—Normattiva, Art. 3 (Soggetti obbligati)

Obliged entities under the new EU AML regulation (AMLR)—Italy (3/5)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT ITALIAN AML/CTF FRAMEWORK
Crypto-Related Entities	Crypto-Asset Service Providers (CASPs). It includes EU branches of such entities.	Yes—Article 3(2)(v-bis); Italian-authorised CASPs under MiCA (excluding crypto advice). This includes: (a) Italian branches of EU/third-country CASPs; and (b) EU CASPs having in Italy an establishment other than a branch (*stabiliti senza succursale*)
Non-Financial Businesses & Professions (DNFBPs)	Trust or company service providers	Yes, but it only applies to: (a) providers of services relating to companies or trusts, provided that certain conditions are met (Article 3(6-bis)); and (b) fiduciaries companies, registered in a sub-section of the register held by the Bank of Italy pursuant to Article 106 of the ICBA Article 3(2)(s)
	Real estate agents and other real estate professionals under certain conditions.	Yes—Article 3(5)(e); includes intermediaries in leases with monthly rent ≥ EUR10,000, including Italian branches of foreign real estate agents/professionals
	Traders in luxury goods (precious metals and stones, high-value items) as a regular or principal professional activity	Yes—Article 3(5)(d) (gold), Article 3(5)(b) (art and antiques ≥ EUR10,000), including the Italian branches of foreign traders
	Providers of gambling services	Yes—Article 3(6)(a), (b), (c), including the Italian branches of foreign gambling providers
	Crowdfunding service providers and intermediaries	No—not expressly designated in Article 3

Source: DECRETO LEGISLATIVO 21 novembre 2007, n. 231—Normattiva, Art. 3 (Soggetti obbligati)

Obliged entities under the new EU AML regulation (AMLR)—Italy (4/5)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT ITALIAN AML/CTF FRAMEWORK
Non-Financial Businesses & Professions (DNFBPs)	Persons trading or acting as intermediaries in the trade of cultural goods under certain conditions	Yes—Article 3(5)(b), including the Italian branches of foreign intermediaries
	Persons storing, trading or acting as intermediaries in the trade of cultural goods and high-value goods, when this is carried out within free zones and customs warehouses under certain conditions	Yes—Article 3(5)(c), including the Italian branches of these legal persons
	Investment migration operators under certain conditions	No—not referred to in Article 3
	Credit intermediaries for mortgage and consumer credits, other than credit institutions and financial institutions, with the exception of the credit intermediaries carrying out activities under the responsibility of one or more creditors or credit intermediaries	Yes—Article 3(3)(b) and (c). This includes the Italian branches of foreign credit brokers/credit or payment services agents
	Non-financial mixed activity holding companies	No—not referred to in Article 3
	Auditors, external accountants and tax advisors, and any other natural or legal person including independent legal professionals such as lawyers, that undertake to provide, directly or by means of other persons to which that other person is related, material aid, assistance or advice on tax matters as principal business or professional activity	Yes—Article 3(4)(a), (b), (d), (e). This includes Italian branches of these foreign professional firms
	Notaries, lawyers and other independent legal professionals in respect of certain types of transactions	Yes—Article 3(4)(c). This includes Italian branches of these foreign professional firms
Sports Sector	Football clubs in respect of certain transactions	No—not referred to in Article 3 (in any event please note that some requirements in terms of traceability of cash payments—provided for under ad hoc pieces of legislation—would nonetheless apply)
	Football agents	No—not referred to in Article 3

Source: DECRETO LEGISLATIVO 21 novembre 2007, n. 231—Normattiva, Art. 3 (Soggetti obbligati)

Obliged entities under the new EU AML regulation (AMLR)—Italy (5/5)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT ITALIAN AML/CTF FRAMEWORK
Additional comments on national specificities		The following entities are listed among the “obliged entities” pursuant to the Italian AML Decree: a) Poste Italiane S.p.A.; b) Cassa Depositi e Prestiti S.p.A; c) micro-credit providers, pursuant to Article 111 ICBA; d) confidi, pursuant to Article 112 ICBA; e) financial advisers and financial advisory companies; f) master services providers in the context of a securitisation transaction; g) fiduciaries companies pursuant to law no. 1966/1939; h) professional operators in gold, pursuant to law no. 7/2000; and i) to a limited extent, cash-for-gold operators, pursuant to legislative decree no. 92/2017, including the Italian branches of the above entities, if incorporated in a foreign country, or the above entities having, in Italy, an establishment other than a branch

Source: DECRETO L—SLATIVO 21 novembre 2007, n. 231—Normattiva, Art. 3 (Soggetti obbligati)

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Obliged entities under the new EU AML regulation (AMLR)– Luxembourg (1/7)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT LUXEMBOURG AML/CTF FRAMEWORK
Financial Sector	Banks/credit institutions. It includes EU branches of such entities.	Yes
	Undertakings other than a credit institution or an investment firm, carrying out one or more of the activities listed in points (2) to (12), (14) and (15) of Annex I CRD (incl. the activities of currency exchange offices, a financial holding company, a mixed financial holding company and a financial mixed activity holding company but excluding the activities referred to in point (8) of Annex I PSD2 or an undertaking the principal activity of which is to acquire holdings). It includes EU branches of such entities. NB: this includes payment and emoney institutions.	Partially, under the AML Act, financial holding companies, mixed financial holding companies and financial mixed-activity holding companies were not expressly referred to in this section The exclusion of the activities of point (8) of Annex I PSD2 or of undertakings whose principal activity is to acquire holdings did not exist in the AML Act In addition, the Luxembourg provision has a broader scope since it applies to any person (other than a credit institution, an investment firm, an insurance undertaking or intermediary, a collective investment undertaking or a CASP) carrying out, by way of its business and on behalf of or for a customer, any activity listed in Annex I of the AML Act (this list encompasses more activities than Annex I CRD)
	Investment firms. It includes EU branches of such entities.	Yes
	Insurance undertaking carrying out life or other investment-related assurance activities (incl. insurance holding companies and mixed-activity insurance holding companies). It includes EU branches of such entities.	Partially, under the AML Act, (a) insurance holdings and mixed-activity insurance holding companies were not expressly referred to and (b) the AML Act only referred to life insurance activities and not to other investment-related assurance activities In addition, the scope of the AMLR is narrower than the AML Act in that the latter included non-life insurance companies operating under branches 14 (surety) and 15 (credit) (which is no longer the case of the AMLR)

Obliged entities under the new EU AML regulation (AMLR)—Luxembourg (2/7)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT LUXEMBOURG AML/CTF FRAMEWORK
Financial Sector	Insurance intermediary acting with respect to life or other investment-related assurance activities with the exception of an insurance intermediary that does not collect premiums or amounts intended for the customer and which acts under the responsibility of one or more insurance undertakings or intermediaries for the products which concern them respectively. It includes EU branches of such entities.	Yes—the scope of the AMLR is in fact narrower than the AML Act as the latter included all agencies (which is no longer the case of the AMLR)
	Collective investment undertakings (incl. UCITS, AIFs and their respective management companies). It includes EU branches of such entities.	Yes
	Central securities depositories. It includes EU branches of such entities.	No
	Lenders. It includes EU branches of such entities.	Yes, indirectly as the AML Act applies to any person (other than a credit institution, an investment firm, an insurance undertaking or intermediary, a collective investment undertaking or a CASP) carrying out, by way of its business and on behalf of or for a customer, any activity listed in Annex I of the AML Act (this list encompasses "(2) Lending, including consumer credit, mortgage credit, factoring, with or without recourse, and financing of commercial transactions (including forfeiting)")
	Credit intermediaries when holding the funds in connection with the credit agreement, with the exception of the credit intermediary carrying out activities under the responsibility of one or more creditors or credit intermediaries. It includes EU branches of such entities.	No

Obliged entities under the new EU AML regulation (AMLR)– Luxembourg (3/7)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT LUXEMBOURG AML/CTF FRAMEWORK
Crypto-Related Entities	Crypto-Asset Service Providers (CASPs). It includes EU branches of such entities.	Yes
Non-Financial Businesses & Professions (DNFBPs)	Trust or company service providers.	Yes
	Real estate agents and other real estate professionals under certain conditions.	Yes, noting that real estate developers are also expressly in scope of the AML Act
	Traders in luxury goods (precious metals and stones, high-value items) as a regular or principal professional activity.	No, but more generic category of “other persons trading in goods to the extent that payments are made or received in cash in an amount of EUR 10,000 or more, whether the transactions or series of transactions are executed in a single operation or in several operations which appear to be linked” are in scope of the current Luxembourg AML framework
	Providers of gambling services.	Yes
	Crowdfunding service providers and intermediaries.	No
	Persons trading or acting as intermediaries in the trade of cultural goods under certain conditions.	Partially, the AML Act applies to “persons trading or acting as intermediaries in the trade of works of art, including when this is carried out by art galleries and auction houses, where the value of the transaction or a series of linked transactions amounts to EUR 10,000 or more” The scope of the AMLR is in fact wider than the AML Act as it includes the trade in “cultural goods” whereas the AML Act only concerns the trade in “works of art”

Obliged entities under the new EU AML regulation (AMLR)–Luxembourg (4/7)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT LUXEMBOURG AML/CTF FRAMEWORK
Non-Financial Businesses & Professions (DNFBPs)	Persons storing, trading or acting as intermediaries in the trade of cultural goods and high-value goods, when this is carried out within free zones and customs warehouses under certain conditions.	Partially, as only applicable to "persons storing, trading or acting as intermediaries in the trade of works of art when this is carried out by free ports, where the value of the transaction or a series of linked transactions amounts to EUR 10,000 or more" The scope of the AMLR is in fact wider than the AML Act as it includes the trade in "cultural goods" and "high-value goods" including through warehouses whereas the AML Act only concerns the trade in "works of art" through free ports
	Investment migration operators under certain conditions.	No
	Credit intermediaries for mortgage and consumer credits, other than credit institutions and financial institutions, with the exception of the credit intermediaries carrying out activities under the responsibility of one or more creditors or credit intermediaries.	No
	Non-financial mixed activity holding companies.	No
	Auditors, external accountants and tax advisors, and any other natural or legal person including independent legal professionals such as lawyers, that undertake to provide, directly or by means of other persons to which that other person is related, material aid, assistance or advice on tax matters as principal business or professional activity.	Yes, noting that the AML Act also applies to lawyers and any other person that exercises in Luxembourg, by way of a business relationship, an activity of tax advice

Obliged entities under the new EU AML regulation (AMLR)–Luxembourg (5/7)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT LUXEMBOURG AML/CTF FRAMEWORK
Non-Financial Businesses & Professions (DNFBPs)	Notaries, lawyers and other independent legal professionals in respect of certain types of transactions.	Yes, noting that: • the AML Act applies to notaries in general (no restriction to certain types of transactions); • in respect of lawyers, it expressly mentions that the AML Act applies to (a) the transactions listed in the AMLR when in relation to crypto-assets, (b) domiciliation of trusts, companies or other similar structures, (c) acting for and on behalf of their customer in any financial or real estate transaction, (d) providing a service of a trust and company service provider, (e) carrying out the activity of Family Office and (f) acting as depositaries of bearer shares; and • the AML Act also applies to any other person exercising in Luxembourg, by way of business relationship, the activities of assisting in the planning or execution of certain transactions listed in the AML Act or acting for and on behalf of their customer in any financial or real estate transaction
Sports Sector	Football clubs in respect of certain transactions.	No
	Football agents.	No

2. (i) buying and selling of real property or business entities, (ii) managing client money, securities or other assets, (iii) opening or management of bank, savings or securities accounts, (iv) organisation of contributions necessary for the creation, operation or management of companies, (v) creation, domiciliation, operation or management of trusts, companies or other similar structures.

Obliged entities under the new EU AML regulation (AMLR)– Luxembourg (6/7)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT LUXEMBOURG AML/CTF FRAMEWORK
Additional comments on national specificities		On top of the scope which is harmonized at EU level, Luxembourg law subjects the following entities to the t AML/CTF regime: • professionals of the financial sector subject to national licensing regime; • tied agents within the meaning of MiFID2 established in Luxembourg; • agents within the meaning of PSD2 established in Luxembourg; • exempted persons under article 32 PSD2 or article 9 EMD (as implemented into Luxembourg law); • professionals of the insurance sector authorised to carry out their business in Luxembourg pursuant to the act of 7 December 2015 on the insurance sector, as amended; • pension funds under the prudential supervision of the Commissariat aux assurances or of the Commission de Surveillance du Secteur financier; • advisers of undertakings for collective investment, investment companies in risk capital (SICAR) and pension funds; • securitisation undertakings, when they perform trust and company service provider activities; • non-life insurance and reinsurance undertakings and their intermediaries whenever they perform credit and surety operations;

2. (i) buying and selling of real property or business entities, (ii) managing client money, securities or other assets, (iii) opening or management of bank, savings or securities accounts, (iv) organisation of contributions necessary for the creation, operation or management of companies, (v) creation, domiciliation, operation or management of trusts, companies or other similar structures.

Obliged entities under the new EU AML regulation (AMLR)– Luxembourg (7/7)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT LUXEMBOURG AML/CTF FRAMEWORK
Additional comments on national specificities		• any person carrying out a Family Office activity within the meaning of the act of 21 December 2012 relating to Family Office activity; • operators in a free zone authorised to carry out their activity pursuant to an authorisation by the Administration des douanes et accises (customs and excise) within the Community control type 1 free zone located in the municipality of Niederanven Section B Senningen called Parishaff L-2315 Senningerberg (Hoehenhof); and • any person in respect of which the CSSF is in charge of ensuring compliance with the professional obligations as regards the fight against money laundering and terrorist financing • The AML Act is also applicable to any of the professionals listed in Article 2 of the AML Act (that is all the professionals listed in this Luxembourg table) established under the laws of foreign countries who supply services in Luxembourg without establishing any branch in Luxembourg

2. (i) buying and selling of real property or business entities, (ii) managing client money, securities or other assets, (iii) opening or management of bank, savings or securities accounts, (iv) organisation of contributions necessary for the creation, operation or management of companies, (v) creation, domiciliation, operation or management of trusts, companies or other similar structures.

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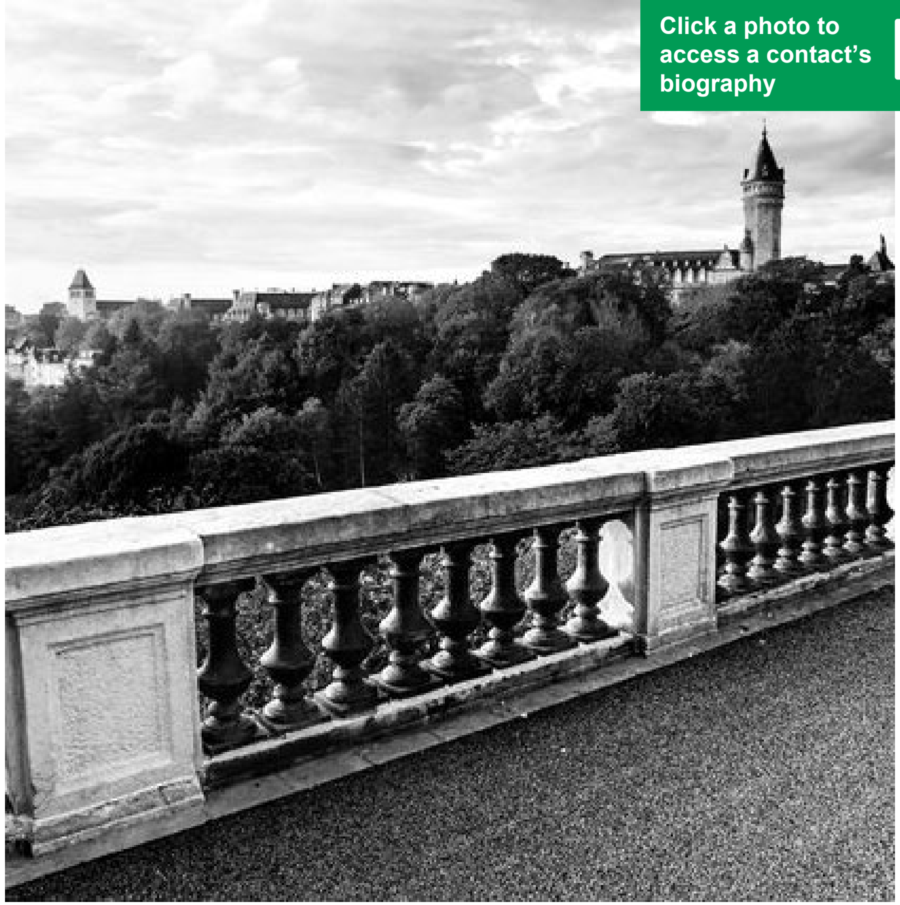

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Obliged entities under the new EU AML regulation (AMLR)—The Netherlands (1/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT DUTCH AML/CTF FRAMEWORK
Financial Sector	Banks/credit institutions. It includes EU branches of such entities.	Yes—Article 1a(2)
	Undertakings other than a credit institution or an investment firm, carrying out one or more of the activities listed in points (2) to (12), (14) and (15) of Annex I CRD (incl. the activities of currency exchange offices, a financial holding company, a mixed financial holding company and a financial mixed activity holding company but excluding the activities referred to in point (8) of Annex I PSD2 or an undertaking the principal activity of which is to acquire holdings). It includes EU branches of such entities. NB: this includes payment and emoney institutions.	Yes: Article 1a(3)(a)—CRD activities listed in (2), (3), (5), (6), (9), (10), (12) and (14) Article 1a(3)(b)—PSD2 activities (including account information services) Article 1a(3)(l) Article 1a(3)(e) No—for those carrying out activities listed in (7), (8) and (11) that do not qualify as an investment firm
	Investment firms. It includes EU branches of such entities.	Yes—Article 1a(3)(c) and Article 1a(3)(l)
	Insurance undertaking carrying out life or other investment-related assurance activities (incl. insurance holding companies and mixed-activity insurance holding companies). It includes EU branches of such entities.	Yes—Article 1a(3)(g) and Article 1a(3)(l)
	Insurance intermediary acting with respect to life or other investment-related assurance activities with the exception of an insurance intermediary that does not collect premiums or amounts intended for the customer and which acts under the responsibility of one or more insurance undertakings or intermediaries for the products which concern them respectively. It includes EU branches of such entities.	Yes—Article 1a(3)(i) and Article 1a(3)(l)

Source: wetten.nl—Regulation—Money Laundering and Terrorist Financing (Prevention) Act—BWBR0024282

Obliged entities under the new EU AML regulation (AMLR)—The Netherlands (2/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT DUTCH AML/CTF FRAMEWORK
Financial Sector	Collective investment undertakings (incl. UCITS, AIFs and their respective management companies). It includes EU branches of such entities.	Yes—Article 1a(3)(d), Article 1a(3)(h) and Article 1a(6)
	Central securities depositories. It includes EU branches of such entities.	No
	Lenders. It includes EU branches of such entities.	Yes—Article 1a(3)(a) (CRD activity listed in (2)) and Article 1a(3)(l)
	Credit intermediaries when holding the funds in connection with the credit agreement, with the exception of the credit intermediary carrying out activities under the responsibility of one or more creditors or credit intermediaries. It includes EU branches of such entities.	No
Crypto-Related Entities	Crypto-Asset Service Providers (CASPs). It includes EU branches of such entities.	Yes—Article 1a(3)(k)
Non-Financial Businesses & Professions (DNFBPs)	Trust or company service providers.	Yes—Article 1a(4)(f)

Source: wetten.nl—Regulation—Money Laundering and Terrorist Financing (Prevention) Act—BWBR0024282

Obliged entities under the new EU AML regulation (AMLR) – The Netherlands (3/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT DUTCH AML/CTF FRAMEWORK
Non-Financial Businesses & Professions (DNFBPs)	Real estate agents and other real estate professionals under certain conditions.	Yes—Article 1a(4)(h)
	Traders in luxury goods (precious metals and stones, high-value items) as a regular or principal professional activity.	Yes—Article 1a(4)(j) and Article 1a(4)(k)
	Providers of gambling services.	Yes—Article 1a(4)(l)
	Crowdfunding service providers and intermediaries.	No
	Persons trading or acting as intermediaries in the trade of cultural goods under certain conditions.	Yes—Article 1a(4)(j) and Article 1a(4)(k)
	Persons storing, trading or acting as intermediaries in the trade of cultural goods and high-value goods, when this is carried out within free zones and customs warehouses under certain conditions.	No
	Investment migration operators under certain conditions.	No
	Credit intermediaries for mortgage and consumer credits, other than credit institutions and financial institutions, with the exception of the credit intermediaries carrying out activities under the responsibility of one or more creditors or credit intermediaries.	No
	Non-financial mixed activity holding companies.	No
	Auditors, external accountants and tax advisors, and any other natural or legal person including independent legal professionals such as lawyers, that undertake to provide, directly or by means of other persons to which that other person is related, material aid, assistance or advice on tax matters as principal business or professional activity.	Yes—Article 1a(4)(a), (b), (c) and (d); litigation excluded, Article 1a(5)
	Notaries, lawyers and other independent legal professionals in respect of certain types of transactions.	Yes—Article 1a(4)(c), (d), (e); litigation excluded, Article 1a(5)

Source: wetten.nl—Regulation—Money Laundering and Terrorist Financing (Prevention) Act—BWBR0024282

Obliged entities under the new EU AML regulation (AMLR)—The Netherlands (4/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT DUTCH AML/CTF FRAMEWORK
Sports Sector	Football clubs in respect of certain transactions.	No
	Football agents.	No
Additional comments on national specificities		

Source: wetten.nl—Regulation—Money Laundering and Terrorist Financing (Prevention) Act—BWBR0024282

Netherlands

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Obliged entities under the new EU AML regulation (AMLR)—Poland (1/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT POLISH AML/CTF FRAMEWORK
Financial Sector	Banks/credit institutions. It includes EU branches of such entities.	Yes—Article 2(1) 1) (banks, branches of foreign banks and branches of credit institutions operating in Poland)
	Undertakings other than a credit institution or an investment firm, carrying out one or more of the activities listed in points (2) to (12), (14) and (15) of Annex I CRD (incl. the activities of currency exchange offices, a financial holding company, a mixed financial holding company and a financial mixed activity holding company but excluding the activities referred to in point (8) of Annex I PSD2 or an undertaking the principal activity of which is to acquire holdings). It includes EU branches of such entities. NB: this includes payment and emoney institutions.	Yes—Article 2(1) 1) (financial institutions with a seat or branch in Poland) Yes—Article 2(1) 3) (payment institutions, e-money institutions, EU and non-EU branches, small payment institutions, payment bureaux and clearing agents)
	Investment firms. It includes EU branches of such entities.	Yes—Article 2(1) 4) and 5) (investment firms, custody banks, brokerage houses and branches of foreign investment firms operating in Poland)
	Insurance undertaking carrying out life or other investment-related assurance activities (incl. insurance holding companies and mixed-activity insurance holding companies). It includes EU branches of such entities.	Yes—Article 2(1) 8) (insurance undertakings carrying out life insurance activities, incl. domestic insurers and foreign insurers' branches)
	Insurance intermediary acting with respect to life or other investment-related assurance activities with the exception of an insurance intermediary that does not collect premiums or amounts intended for the customer and which acts under the responsibility of one or more insurance undertakings or intermediaries for the products which concern them respectively. It includes EU branches of such entities.	Yes—Article 2(1) 9) (insurance intermediaries and branches of foreign intermediaries, subject to listed exclusions)

Source: Akt prawny (Art. 2)

Obliged entities under the new EU AML regulation (AMLR)—Poland (2/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT POLISH AML/CTF FRAMEWORK
Financial Sector	Collective investment undertakings (incl. UCITS, AIFs and their respective management companies) It includes EU branches of such entities	Yes—Article 2(1) 7) (investment funds, alternative investment companies, management companies and EU branches operating in Poland)
	Central securities depositories It includes EU branches of such entities	Yes—Article 2(1) 10) (Krajowy Depozyt Papierów Wartościowych S.A. and delegated entities operating securities accounts)
	Lenders It includes EU branches of such entities	Yes—Article 2(1) 1) and 25) (banks, financial institutions and consumer lending institutions)
	Credit intermediaries when holding the funds in connection with the credit agreement, with the exception of credit intermediaries carrying out activities under the responsibility of one or more creditors or credit intermediaries It includes EU branches of such entities	Yes—Article 2(1) 3) and 25) (payment institutions and consumer lending institutions, where applicable)
Crypto-Related Entities	Crypto-Asset Service Providers (CASPs) It includes EU branches of such entities	Yes—Article 2(1) 12) (virtual-currency exchange service providers and wallet providers)
Non-Financial Businesses & Professions (DNFBPs)	Trust or company service providers	Yes—Article 2(1) 16) (entrepreneurs providing company or trust services)
	Real estate agents and other real estate professionals under certain conditions	Yes—Article 2(1) 18) (real estate intermediaries; rental transactions excluded below EUR10,000 monthly rent)
	Traders in luxury goods (precious metals and stones, high-value items) as a regular or principal professional activity	Yes—Article 2(1) 23) (entrepreneurs accepting or making cash payments ≥ EUR10,000)

Source: Akt prawny (Art. 2)

Obliged entities under the new EU AML regulation (AMLR)—Poland (3/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT POLISH AML/CTF FRAMEWORK
Non-Financial Businesses & Professions (DNFBPs)	Providers of gambling services	Yes—Article 2(1) 20) (gambling operators under the Gambling Act)
	Crowdfunding service providers and intermediaries	No—not expressly designated in Article 2
	Persons trading or acting as intermediaries in the trade of cultural goods under certain conditions	Yes—Article 2(1) 24a)(a) (art, collectibles and antiques ≥ EUR10,000)
	Persons storing, trading or acting as intermediaries in the trade of cultural goods and high-value goods, when this is carried out within free zones and customs warehouses under certain conditions	Yes—Article 2(1) 24a)(a)–(b) (free ports)
	Investment migration operators under certain conditions	No—not referred to in Article 2
	Credit intermediaries for mortgage and consumer credits, other than credit institutions and financial institutions, with the exception of credit intermediaries carrying out activities under the responsibility of one or more creditors or credit intermediaries	Yes—Article 2(1) 25)
	Non-financial mixed-activity holding companies	No—not referred to in Article 2
	Auditors, external accountants and tax advisers, and any other natural or legal person including independent legal professionals such as lawyers, that undertake to provide, directly or by means of other persons to which that other person is related, material aid, assistance or advice on tax matters as a principal business or professional activity	Yes—Article 2(1) 15) and 15a)
	Notaries, lawyers and other independent legal professionals in respect of certain types of transactions	Yes—Article 2(1) 13), 13a) and 14)

Source: Akt prawny (Art. 2)

Obliged entities under the new EU AML regulation (AMLR)—Poland (4/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT POLISH AML/CTF FRAMEWORK
Sports Sector	Football clubs in respect of certain transactions	No—not referred to in Article 2
	Football agents	No—not referred to in Article 2
Additional comments on national specificities		

Source: Akt prawny (Art. 2)

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Obliged entities under the new EU AML regulation (AMLR)—Slovakia (1/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT SLOVAK AML/CTF FRAMEWORK
Financial Sector	Banks/credit institutions It includes EU branches of such entities	Yes—§ 5(1) a)
	Undertakings other than a credit institution or an investment firm, carrying out one or more of the activities listed in points (2) to (12), (14) and (15) of Annex I CRD (incl. the activities of currency exchange offices, a financial holding company, a mixed financial holding company and a financial mixed-activity holding company but excluding the activities referred to in point (8) of Annex I PSD2 or an undertaking the principal activity of which is to acquire holdings) It includes EU branches of such entities NB: this includes payment and e-money institutions	Yes—§ 5(1) b) 1)–14)
	Investment firms It includes EU branches of such entities	Yes—§ 5(1) b) 5)
	Insurance undertaking carrying out life or other investment-related assurance activities (incl. insurance holding companies and mixed-activity insurance holding companies) It includes EU branches of such entities	Yes—§ 5(1) b) 8)

Source: 297/2008 Z. z. - Zákon o ochrane pred legalizáciou príjmov z trestnej činnosti a o ochrane pred financovaním terorizmu a o zmene a doplnení niektorých zákonov (§5 *Povinná osoba*)

Obliged entities under the new EU AML regulation (AMLR)—Slovakia (2/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT SLOVAK AML/CTF FRAMEWORK
Financial Sector	Insurance intermediary acting with respect to life or other investment-related assurance activities with the exception of an insurance intermediary that does not collect premiums or amounts intended for the customer and which acts under the responsibility of one or more insurance undertakings or intermediaries for the products which concern them respectively It includes EU branches of such entities	Yes—§ 5(1) b) 6) (excluding non-life insurance activities)
	Collective investment undertakings (incl. UCITS, AIFs and their respective management companies) It includes EU branches of such entities	Yes—§ 5(1) b) 4) and 7)
	Central securities depositories It includes EU branches of such entities	Yes—§ 5(1) b) 1)
	Lenders It includes EU branches of such entities	Slovak mortgage credit intermediaries are not allowed to hold client funds. Persons under §5(1)b)12) and n) are not allowed to intermediate mortgage credit
	Credit intermediaries when holding the funds in connection with the credit agreement, with the exception of credit intermediaries carrying out activities under the responsibility of one or more creditors or credit intermediaries It includes EU branches of such entities	Yes—§ 5(1) b) 6)

Source: 297/2008 Z. z. - Zákon o ochrane pred legalizáciou príjmov z trestnej činnosti a o ochrane pred financovaním terorizmu a o zmene a doplnení niektorých zákonov (§5 *Povinná osoba*)

Obliged entities under the new EU AML regulation (AMLR)—Slovakia (3/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT SLOVAK AML/CTF FRAMEWORK
Crypto-related entities	Crypto-Asset Service Providers (CASPs) It includes EU branches of such entities	Yes—§ 5(1) b) 15) (excluding crypto-advice-only providers)
Non-financial businesses and professions (DNFBPs)	Trust or company service providers	Yes—§ 5(1) k)
	Real estate agents and other real estate professionals under certain conditions	Yes—§ 5(1) i) (leases covered only if monthly rent ≥ EUR10, 000)
	Traders in luxury goods (precious metals and stones, high-value items) as a regular or principal professional activity	Yes—§ 5(1) m) and n) (threshold: EUR10, 000)
	Providers of gambling services	Yes—§ 5(1) d)
	Crowdfunding service providers and intermediaries	No—not referred to in § 5
	Persons trading or acting as intermediaries in the trade of cultural goods under certain conditions	Yes—§ 5(1) m)
	Persons storing, trading or acting as intermediaries in the trade of cultural goods and high-value goods, when this is carried out within free zones and customs warehouses under certain conditions	Yes—§ 5(1) m)
	Investment migration operators under certain conditions	No—not referred to in § 5
	Credit intermediaries for mortgage and consumer credits, other than credit institutions and financial institutions, with the exception of credit intermediaries carrying out activities under the responsibility of one or more creditors or credit intermediaries	Yes—§ 5(1) b) 6) and n)
	Non-financial mixed-activity holding companies	No—not referred to in § 5

Source: 297/2008 Z. z. - Zákon o ochrane pred legalizáciou príjmov z trestnej činnosti a o ochrane pred financovaním terorizmu a o zmene a doplnení niektorých zákonov (§5 *Povinná osoba*)

Obliged entities under the new EU AML regulation (AMLR)—Slovakia(4/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT SLOVAK AML/CTF FRAMEWORK
	Auditors, external accountants and tax advisers, and any other natural or legal person including independent legal professionals such as lawyers, that undertake to provide, directly or by means of other persons to which that other person is related, material aid, assistance or advice on tax matters as a principal business or professional activity	Yes—§ 5(1) h)
	Notaries, lawyers and other independent legal professionals in respect of certain types of transactions	Yes—§ 5(1) j) 1)–4)
Sports sector	Football clubs in respect of certain transactions	No—not referred to in § 5
	Football agents	No—not referred to in § 5
Additional comments on national specificities		

Source: 297/2008 Z. z. - Zákon o ochrane pred legalizáciou príjmov z trestnej činnosti a o ochrane pred financovaním terorizmu a o zmene a doplnení niektorých zákonov (§5 *Povinná osoba*)

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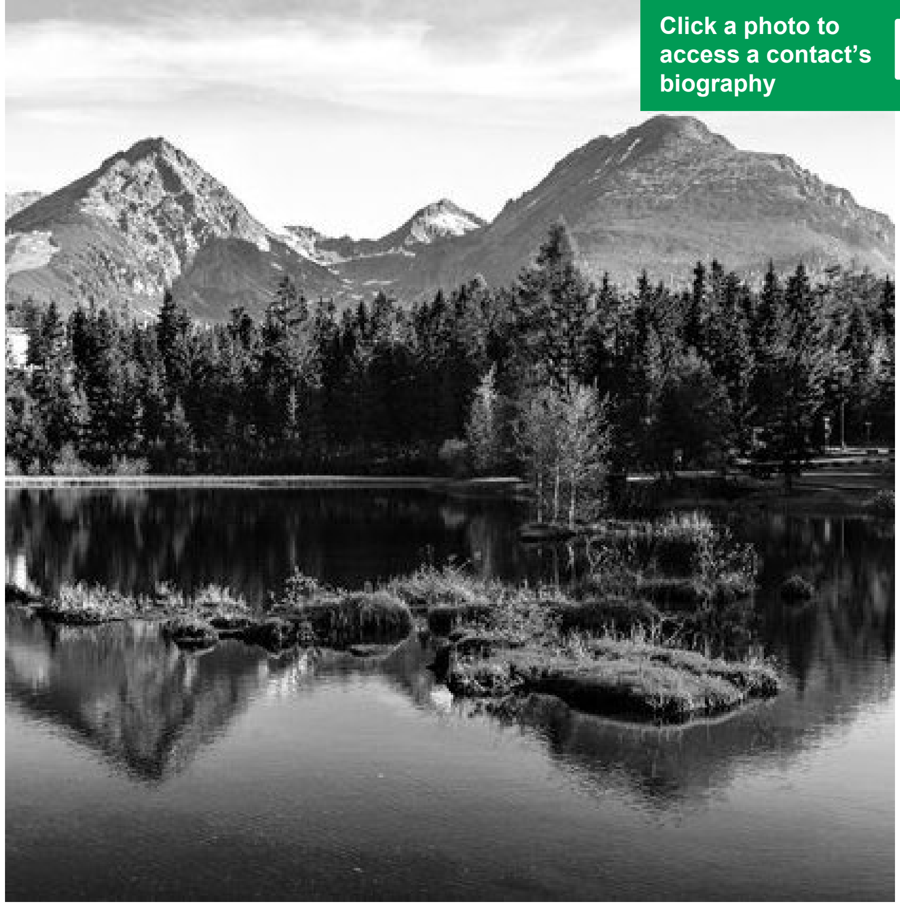

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Obliged entities under the new EU AML regulation (AMLR)—Spain (1/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT SPANISH AML/CTF FRAMEWORK
Financial Sector	Banks/credit institutions. It includes EU branches of such entities.	Yes—Article 2(1)(a); includes non-resident entities operating in Spain via branches, agents or cross-border services (paragraph after (z))
	Undertakings other than a credit institution or an investment firm, carrying out one or more of the activities listed in points (2) to (12), (14) and (15) of Annex I CRD (incl. the activities of currency exchange offices, a financial holding company, a mixed financial holding company and a financial mixed activity holding company but excluding the activities referred to in point (8) of Annex I PSD2 or an undertaking the principal activity of which is to acquire holdings). It includes EU branches of such entities. NB: this includes payment and emoney institutions.	Partially, under Spanish law, financial holding companies, mixed financial holding companies and financial mixed-activity holding companies were not expressly referred to in this section The exclusion of the activities of point (8) of Annex I CRDVI or of undertakings whose principal activity is to acquire holdings did not exist in the corresponding section of AMLD5—Article 2(1)(h), (i), (j), (k); includes non-resident entities via branches, agents or cross-border services in Spain (paragraph after (z)) Undertakings that render Advice to undertakings on capital structure, industrial strategy and related questions and advice as well as services relating to mergers and the purchase of undertakings which were not under the scope of Spanish law
	Investment firms. It includes EU branches of such entities.	Yes—Article 2(1)(c); includes non-resident entities via branches, agents or cross-border services in Spain (paragraph after (z))
	Insurance undertaking carrying out life or other investment-related assurance activities (incl. insurance holding companies and mixed-activity insurance holding companies). It includes EU branches of such entities.	Partially, under Spanish law, insurance holdings and mixed-activity insurance holding companies were not expressly referred to in this section—Article 2(1)(b); includes non-resident entities via branches, agents or cross border services in Spain (paragraph after (z))

Source: Ley 10/2010 de prevención del blanqueo de capitales (Art. 2) (link)

Obliged entities under the new EU AML regulation (AMLR)—Spain (2/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT SPANISH AML/CTF FRAMEWORK
Financial Sector	Insurance intermediary acting with respect to life or other investment-related assurance activities with the exception of an insurance intermediary that does not collect premiums or amounts intended for the customer and which acts under the responsibility of one or more insurance undertakings or intermediaries for the products which concern them respectively. It includes EU branches of such entities.	Yes—Article 2(1)(b); includes non-resident intermediaries operating in Spain (paragraph after (z))
	Collective investment undertakings (incl. UCITS, AIFs and their respective management companies). It includes EU branches of such entities.	Yes—Article 2(1)(d) and (f); includes non-resident entities via branches, agents or cross border services in Spain (paragraph after (z))
	Central securities depositories. It includes EU branches of such entities.	No—not expressly designated as such in Article 2
	Lenders. It includes EU branches of such entities.	Yes—Article 2(1)(k); includes non-resident entities operating via branches, agents or cross border services in Spain (paragraph after (z))
	Credit intermediaries when holding the funds in connection with the credit agreement, with the exception of the credit intermediary carrying out activities under the responsibility of one or more creditors or credit intermediaries. It includes EU branches of such entities.	Yes—Article 2(1)(k); includes non-resident intermediaries (paragraph after (z))

Source: Ley 10/2010 de prevención del blanqueo de capitales (Art. 2) (link)

Obliged entities under the new EU AML regulation (AMLR)—Spain (3/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT SPANISH AML/CTF FRAMEWORK
Crypto-Related Entities	Crypto-Asset Service Providers (CASPs). It includes EU branches of such entities.	Yes—Article 2(1)(z); includes non-resident providers operating in Spain via branches, agents or cross-border services (paragraph after (z))
Non-Financial Businesses & Professions (DNFBPs)	Trust or company service providers.	Yes—Article 2(1)(o); includes non-resident providers operating in Spain (paragraph after (z))
	Real estate agents and other real estate professionals under certain conditions.	Yes—Article 2(1)(l); includes non-resident agents operating in Spain (paragraph after (z))
	Traders in luxury goods (precious metals and stones, high-value items) as a regular or principal professional activity.	Yes—Article 2(1)(q) and (w); includes non-resident traders operating in Spain (paragraph after (z))
	Providers of gambling services.	Yes—Article 2(1)(p) and (u); includes non-resident operators operating in Spain (paragraph after (z))
	Crowdfunding service providers and intermediaries.	No—not expressly designated in Article 2
	Persons trading or acting as intermediaries in the trade of cultural goods under certain conditions.	Yes—Article 2(1)(r); includes activities carried out in free ports and by non-resident persons operating in Spain (paragraph after (z))
	Persons storing, trading or acting as intermediaries in the trade of cultural goods and high-value goods, when this is carried out within free zones and customs warehouses under certain conditions.	Yes—Article 2(1)(r) (*puertos francos*)
	Investment migration operators under certain conditions.	No—not referred to in Article 2
	Credit intermediaries for mortgage and consumer credits, other than credit institutions and financial institutions, with the exception of the credit intermediaries carrying out activities under the responsibility of one or more creditors or credit intermediaries.	Yes—Article 2(1)(k); includes non-resident intermediaries operating in Spain (paragraph after (z))
	Non-financial mixed activity holding companies.	No—not referred to in Article 2

Source: Ley 10/2010 de prevención del blanqueo de capitales (Art. 2) (link)

Obliged entities under the new EU AML regulation (AMLR)—Spain (4/4)

CATEGORY	OBLIGED ENTITIES	ALREADY IN SCOPE OF THE CURRENT SPANISH AML/CTF FRAMEWORK
Non-Financial Businesses & Professions (DNFBPs)	Auditors, external accountants and tax advisors, and any other natural or legal person including independent legal professionals such as lawyers, that undertake to provide, directly or by means of other persons to which that other person is related, material aid, assistance or advice on tax matters as principal business or professional activity.	Yes—Article 2(1)(m); includes non-resident professionals operating in Spain (paragraph after (z))
	Notaries, lawyers and other independent legal professionals in respect of certain types of transactions.	Yes—Article 2(1)(n) and (ñ); includes non-resident professionals operating in Spain (paragraph after (z))
Sports Sector	Football clubs in respect of certain transactions.	No—not referred to in Article 2
	Football agents.	No—not referred to in Article 2
Additional comments on national specificities	The following entities are obligors under Spanish AML laws: payment and securities clearing and settlement system (in the AMLR equivalent to CSD), foundations and associations and persons in the business of selling assets to consumers with an undertaking to repurchase	

Source: Ley 10/2010 de prevención del blanqueo de capitales (Art. 2) (link)

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