



Inspections are on the rise – Is Your Institution Ready?

AML Package and Increased Inspections for Financial Institutions

July 2025

Navigating the rise in inspections: The Impact of AMLA on Financial Institutions

Context

Creation of the AMLA: Context

To reinforce its fight against money laundering and terrorist financing, the European Union has introduced a comprehensive Anti-Money Laundering (AML) package. This legislative framework harmonizes AML/CFT rules across member states, facilitates access to financial information and enhances supervision and enforcement.

The package includes three core components:

- **A new AML Regulation (AMLR):** Establishing uniform rules on customer due diligence, beneficial ownership transparency, and reporting obligations.
- **The 6th AML Directive (AMLD VI):** Enhancing cooperation between member states, improving the role of Financial Intelligence Units (FIUs), and ensuring better oversight of beneficial ownership registries.
- **Transfer of Funds Regulation (TFR).**
- **Creation of the Anti-Money Laundering Authority (AMLA) by the Regulation (EU) 2024/1620 (AMLAR)** to centralize and enhance supervision at the EU level.

Key roles and responsibilities of AMLA

The AMLAR established the AMLA, headquartered in Frankfurt. The AMLA is a decentralised EU agency that will coordinate national authorities to ensure the correct and consistent application of EU rules. The aim of the EU Authority is to transform the anti-money laundering and countering the financing of terrorism (AML/CFT) supervision in the EU and enhance cooperation among FIUs:

AMLA will directly supervise certain **high-risk financial institutions**, coordinate with national supervisors to enforce consistent AML/CFT rules, support FIUs by enhancing cooperation and information sharing, and develop technical standards to harmonize practices, ensuring a unified and efficient approach across the EU.

Rising AML Inspections

We have observed a marked increase in on-site inspections and visits with financial institutions, as well as regulatory enforcement actions across the EU.

This significant increase could be a precursor of the new AMLA intent to maintain close oversight and be promptly alerted to any suspicious or non-compliant practices.

Be prepared

In this evolving landscape, being compliant and being prepared for dawn raids and regulatory enforcement is no longer optional but essential — financial institutions must anticipate heightened scrutiny and demonstrate impeccable compliance to avoid significant sanctions.

Your dedicated team

Our specialist teams members with streamlined communication

We have AML and regulatory compliance specialists with extensive experience supporting financial institutions regarding their AML obligations.

We can work closely with your internal teams to prepare you proactively, ensuring all necessary documentation, controls, and procedures are in place ahead of any supervisory visit.

In the event of dawn raids, regulatory enforcement and administrative proceedings or the need for a remediation trajectory, we can offer dedicated assistance. Our team includes experienced litigators and counsels, many of whom have in-house experience.

During inspections, we can provide support to help you navigate requests from regulators effectively. Our DLA Piper team is available immediately to assist you at every stage: before, during, and after an (expected or unexpected) inspection. We can help you to ensure that your institution takes all necessary precautions, maintains compliance, and responds swiftly to any findings or recommendations.

Our Belgian team of specialists



Pierre Berger

Partner, Financial
Services &
Insurance



Delphine Goens

Counsel, Financial
Services &
Insurance

Particular
focus on
**anti-money
laundering**



Korneel Debruyne

Lawyer, Financial
Services &
Insurance



Joost Haans

Partner
Competition



Glenn Heirmann

Lead lawyer,
Financial Services
& Insurance

Particular
focus on
litigation

Added value of our team

- **Specialized AML Expertise**

Our team comprises AML specialists, with a deep understanding of EU regulatory frameworks and supervisory practices.

- **Immediate Availability**

We are ready to step in at a moment's notice to assist you during inspections, ensuring your institution is fully prepared and compliant.

- **Litigation and Procedural Support**

Our dedicated litigation lawyers are highly experienced in handling disputes and regulatory proceedings, providing robust representation and strategic advice if required.

Relevant credentials



Relevant work we have done

Our recent experience includes advising the following:

- Assisting a Belgian significant bank with **investigations conducted by the FSMA** in relation to AML infringements.
- Assistance of an international payments group with an AML investigation by the FSMA, as well as the subsequent administrative sanctions procedure and remediation measures' design
- Assistance of 2 significant financial conglomerates with the design of their AML procedures and policies
- Assistance of an international insurance group with the design of its AML procedures and policies
- Assistance of an international diamond trader with a large AML investigation and related remediation measures
- Assistance of several banks with AML and fraud litigation
- Assistance of an international money transfer business with an AML investigation by the FSMA, as well as the subsequent administrative sanctions procedure
- Assisting a major Belgian bank in investigations conducted by the ECB in relation to capital requirements, including its **defense before the Investigatory Unit of the ECB.**
- Assisting a PSP with **investigations conducted by the FOD Economie.**
- Assisting a payment institution with **investigations conducted by FOD Economie** in relation to consumer credit and market practices legislation.
- Assisting a Belgian significant bank with investigations conducted by the FSMA in relation to funds commercialization infringements.
- Assisting an insurance undertaking in connection with a major Belgian insurance company in its **criminal file against the Belgian public prosecutor.**
- Conducting mock dawn raids to advising on **immediate response strategies**, we equip clients active in the financial services and insurance sectors with the tools and knowledge needed to navigate unannounced inspections confidently and compliantly
- Assisting multiple Belgian banks with the **review of their dawn raid policies.**
- **Assisting the FSMA** with a regulations' changing market abuse case.
- Assisting several Belgian significant banks with **investigations conducted by the FSMA** in relation to MiFID infringements.

Appendix

CVs of our team members





Pierre E. Berger

Financial Services Partner

Antwerp/Brussels



Band 1
FinTech
(2025)
Chambers



Band 2
Banking &
Finance:
Regulatory
(2014-2025)
Chambers



Leading individual
FinTech
(2009-2025)
Legal 500



Leading individual
EU Regulatory
Financial
services
(2009-2025)
Legal 500

“

Pierre and his team have a deep understanding of the market and are passionate about digital finance. They spot new market trends at early stages and are keen to understand their legal implications and share their insights with clients.

Client testimonials, legal 500 - 2025

”

Contact

pierre.berger@dlapiper.com

Sectors

- Financial Services
- Insurance

Practice areas

- Banking and Finance
- Insurance
- Corporate Finance
- Mergers and Acquisitions
- Reorganisations
- Financial Services Regulatory
- Insurance Regulatory
- FinTech/InsurTech
- Litigation
- Securities
- Funds

Pierre is the head of our financial services practice in Belgium

Pierre is a **corporate finance and regulatory partner** focusing on the financial services and insurance industry. He advises clients on all aspects of financial services, funds and insurance law. Complex regulatory issues, global product scaling, regulatory driven strategic projects, bancassurance, fund structuring, cross-border transactions & restructurings, **financial services and insurance litigation & investigations**, distribution of financial products as well as Brexit and FinTech related assignments are his core area of practice.

Pierre has assisted both regulators and financial institutions with administrative investigations (by ECB, NBB, FSMA, FOD Economie, GBA and competition authorities) and related litigation in relation to price cartels, abuse of dominant positions, data breaches, prudential infringements (such as capital requirements, market abuse and AML rules) and conduct of business rules infringements (such as marketing and product regulations).

Pierre heads the Firm's Belgium Financial Services & Insurance sector group. He is also chairing the Firm's global financial services (general) client group and is co-chairing the Firm's global financial services regulatory and global insurance regulatory product group as well as the global InsurTech group. He also co-chairs the Firm's ESG in finance group.

Pierre has been awarded with the Client Choice Award 2017 and 2018 for Banking in Belgium. He is also ranked as a hall of fame lawyer by Legal 500 and highly regarded by Chambers and IFLR. Who 's Who Legal mentions him as a global FinTech expert. DLA Piper also won the Trends Legal Award for best law firm in banking, finance and insurance.

Selection of experience

- Assistance of an international payments group with an AML investigation by the FSMA, as well as the subsequent administrative sanctions procedure and remediation measures' design
- Assistance of 2 significant financial conglomerates with the design of their AML procedures and policies
- Assistance of an international insurance group with the design of its AML procedures and policies
- Assistance of an international diamond trader with a large AML investigation and related remediation measures
- Assistance of several banks with AML and fraud litigation
- Assistance of an international money transfer business with an AML investigation by the FSMA, as well as the subsequent administrative sanctions procedure

Your DLA Piper team

Belgian Team



Joost Haans
Partner
Brussels
joost.haans@dlapiper.com

Joost practices EU and Belgian competition law and coordinates multi-jurisdictional matters in different areas of competition law.

He advises clients on a wide variety of competition law matters, and has significant experience in merger control, including submitting merger filings to the European Commission and national competition authorities.

In addition, Joost assists clients in cartel proceedings, including **dawn raid assistance** and leniency applications, with the European Commission, Belgian and other national competition authorities.

Also, Joost advises on distribution agreements, licensing agreements, cooperation agreements, abuse of dominance and competition law compliance programs.

Joost works with clients in various industries, with a particular **focus on financial services**, healthcare, automotive, chemicals, consumer goods, and IT.

Joost has represented clients before national and EU competition authorities and courts.

Sectors

- Financial Services
- Healthcare

Practice areas

- Antitrust and Competition



Delphine Goens
Counsel
Antwerp/Brussels
delphine.goens@dlapiper.com

Delphine Goens is a financial law Counsel with particular focus on anti-money laundering, consumer law and data protection within the financial sector.

After obtaining a PhD in law from the University of Ghent (2016), she took on several key positions within the banking and insurance sector. In particular as data protection officer and subsequently anti-money laundering compliance officer.

Throughout her career, in addition to legal knowledge, Delphine has built up practical experience and insights on the financial and insurance sector. This allows her to advise clients in a pragmatic manner on complex legal issues.

Sectors

- Financial Services

Practice areas

- Regulatory
- Payment services

Your DLA Piper team

Belgian Team



Glenn Heirman
Senior Lead Lawyer
Antwerp/Brussels
glenn.heirman@dlapiper.com

Glenn is a **litigation lawyer**. Assisting leading banks, insurance undertakings, global manufacturers and public authorities, Glenn primarily handles **complex litigation files** relating to contract law, banking law and insurance law. He is also **defending regulated companies in supervisory investigations**.

Before joining DLA Piper, Glenn gained experience as a lawyer in the litigation department of another reputed law firm.

Glenn obtained a PhD degree from the University of Antwerp on the subject “contractual freedom and transparency in insurance contracts” and an LL.M. degree from the University of Virginia School of Law (Charlottesville, U.S.A.). Based on this solid academic background, Glenn is forming close working relationships with his clients and delivering pragmatism, experience and technical versatility in all matters.

Sectors

- Financial Services

Practice areas

- Litigation
- Payment services



Korneel Debruyn
Lawyer, Antwerp/Brussels
korneel.debruyn@dlapiper.com

Korneel works with Belgian and foreign financial institutions on **all aspects of banking, financial services, funds and insurance law**.

His primary focus is on transactional regulatory and prudential matters. He has been involved in several restructurings of private banking, custody and asset management businesses, advising on prudential and regulatory aspects, including the preparation of necessary regulatory approvals and notifications from the Belgian supervisory authorities such as the NBB and the FSMA.

Korneel has furthermore a strong interest in financial regulatory matters, with a focus on Anti-Money Laundering, MiFID II and PSD2.

Prior to joining DLA Piper, Korneel gained experience as a Legal Consultant in financial services for an international consulting company based in Brussels, giving him strong operational insights of the financial market. He holds a Master's Degree in Law from University of Hasselt (Cum Laude).

Sectors

- Financial Services

Practice areas

- Regulatory
- Payment services

Thank you

Key point of contact



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