



# Public Consultation on the draft Regulatory Technical Standards on Customer Due Diligence under Article 28(1) of Regulation (EU) 2024/1624

Fields marked with \* are mandatory.

## Public Consultation on the draft RTS on Customer Due Diligence under Article 28(1) AMLR

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### Objective of the consultation

AML A would like to receive feedback on provisions of the draft RTS under Article 28(1) of [Regulation \(EU\) 2024/1624](#) ('AMLR') and in particular on the specific questions set out below.

Comments are most helpful if they:

- respond to the question stated;
- indicate the specific point to which a comment relates;
- contain a clear rationale;
- provide evidence to support the views expressed/ rationale proposed; and
- describe any alternative regulatory choices AML A should consider.

Such comments should be sent by **8 May 2026, 23:59 (CET)**.

### Personal data protection:

The protection of individuals with regard to the processing of personal data by the AML A is based on Regulation (EU) 2018/1725. Further information on the processing of the personal data is available in the Data Protection Notice.

All legal details can be found in our [Specific Privacy Statement \(SPS\)](#).

## How to provide feedback

All the fields marked with an asterisk (\*) are mandatory. If a question is not relevant for you, please answer with "NA".

We are using a survey format to help us analyse feedback effectively and efficiently. For this reason, document uploads are not enabled for this exercise, and we kindly invite you to share your comments directly within the survey.

Please note that by submitting your contribution, you acknowledge that it will be published on AMLA's website. Contributions will always be published. The name of organisations submitting their contribution will also always be published. The name of the natural person providing a contribution will be published unless they object to said publication. Please refrain from inserting further personal information beyond what we ask from you. In particular, please refrain from providing confidential information or special categories of personal data (that is "personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation"). Your email address will never be published.

Before publication, AMLA staff will perform a limited screening of all contributions provided for the sole purpose of filtering any inappropriate submissions. After this, the replies are made available to the public directly on AMLA's public consultations page.

Please note that your contribution may be subject to a request for access to documents under Regulation 2018 /1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.

## Language disclaimer

AMLA welcomes submissions in all official EU languages. You can change the displayed language of this public consultation using the language selector in the top right corner of the EU Survey platform. Please note that all language versions other than English have been produced using machine translation and may contain inaccuracies. When in doubt, please refer to the English version.

Should you encounter issues with submitting your responses, please contact us by email at public.consultations@amla.europa.eu no later than 48 hours before the deadline of the consultation period.

## Section 1 - Respondent profile

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\* This contribution is made by:

An organisation

\* Name of the organisation

200 character(s) maximum

Verband Internationaler Banken in Deutschland e. V.

\* First name of individual (individual respondent or representative of organisation)

100 character(s) maximum

Andreas

\* Surname of individual (individual respondent or representative of organisation)

100 character(s) maximum

Kastl

\* Email (note that your email address will not be published)

100 character(s) maximum

andreas.kastl@vib.network

\* Publication of your name and surname

- I agree to the publication of my name and surname (note that your email address will never be published).
- Contribution to be published without my name and surname (note that your email address will never be published).

\* Which of the following best describes your activity or organisation? Obligated entities are those listed in Article 3 of [Regulation \(EU\) 2024/1624](#).

Maximum 1 selection(s)

- Obligated entity in the non-financial sector
- Obligated entity in the financial sector
- Self-regulatory body in the sense of Regulation (EU) 2024/1624 Article 2(1) point (47)
- Industry association representing non-financial sector obliged entities
- Industry association representing financial sector obliged entities
- Civil society organisation/non-governmental organisation
- Other

\* Financial sector

Maximum 11 selection(s)

- Credit institution
- Consumer credit, factoring, payment services, guarantees, money market instrument, foreign exchange, electronic money
- Insurance
- Insurance intermediaries
- Investment firms

- Collective investment
- Central securities depositories
- Creditors
- Credit intermediaries
- Crypto assets service providers
- Cross-border branches of financial institutions

\* Please select the country from which you or your organisation carry out your main activities:

DE - Germany

## Section 2 - Substantive comments on the draft Regulatory Technical Standards

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\* 1. Do you agree that the proposals set out in these draft RTS can be applied across the range of products and services provided by your obliged entity?

If you do not agree, please:

- (i) explain why the current proposals do not provide sufficient flexibility; and
- (ii) provide concrete drafting proposals and explain why the specific measures you propose would be more appropriate.

*Provisions that are clearly marked as applying only to a specific sector or service should not be taken into consideration if they do not impact your sector.*

*5000 character(s) maximum*

The Association of International Banks in Germany (VIB) represents the interest of different categories of obliged entities acc. to AMLR within the financial sector:

- credit institutions: CRR credit institutions with parent undertaking outside of Germany, as well as branches established in Germany by EEA CRR credit institutions and (bank) branches established in Germany by third country banks;
- investment firms: IFR investment firms with parent undertaking outside of Germany, as well as branches established in Germany by EEA IFR investment firms;
- and other financial services institutions and respective branches thereof.

In general, while you correctly emphasize that provisions explicitly confined to a particular sector or service should not be considered if they do not pertain to your sector, it will be exceedingly difficult to apply the RTS both accurately and practicably where numerous rules require assessing a single, sector-specific scope of application (e.g., for credit institutions, for insurers).

While we acknowledge the principle that provisions explicitly scoped to specific sectors or services should not apply where they do not impact a particular entity's operations, we cannot fully agree that the current draft RTS achieves a level of universal applicability without significant operational friction. Our concern lies in the structural complexity of the draft. While the intention to create a harmonized set of standards is commendable, the current drafting – as set out before – relies heavily on a fragmented approach where numerous provisions require a case-by-case determination of their singular applicability based on the specific license type. Bearing in mind that a principal objective of the renewed consultation phase on the RTS for CDD was to ensure that the perspective of the non financial sector is duly taken into account, it cannot be ruled out that further individual provisions may be introduced to cover certain groups of obliged entities of the non-financial sector. However, if every specific exception and particularity of the non financial sector is incorporated into the general framework, the result will become opaque and unmanageable.

Considering all this, it might be the only workable solution to introduce dedicated special parts tailored to defined groups of obliged entities or to particular categories of businesses/transactions.

\* 2. Do you agree that the proposals set out in these draft RTS allow for the effective application of a risk-based approach towards compliance with AML/CFT requirements?

If you do not agree, please:

(i) specify the provisions concerned; and

(ii) provide concrete drafting proposals and explain why the specific measures you propose would be more appropriate.

*5000 character(s) maximum*

The RTS seeks to provide sufficient operational flexibility to allow for a truly risk-based interpretation of the requirements, taking into account the wide variety of business models covered by the obligations and the corresponding risks they face.

Even within banking, numerous distinct business models exist—each operating as a regulated credit institution—so uniform treatment is often inappropriate.

Where obliged entities are required to take “risk-sensitive measures” under the proposed rules, many provisions nonetheless couple that obligation with prescriptive checklists or mandatory minimum information sets. Combining a purportedly risk sensitive duty with fixed, rule based information requirements tends to narrow operational discretion and steers firms toward a tick box compliance mentality. The result is an approach that reads as one size fits all and formulaic rather than enabling proportionate, evidence based responses tailored to each institution’s actual risk landscape.

- \* 3. Considering the nature of your business, including its size, risks, and complexity, are there any situations where the information to be collected for the purposes of customer due diligence as proposed in these draft RTS is routinely unavailable and the proposals in these draft RTS do not provide an alternative solution? If so, please provide concrete examples of such situations and your proposals for alternative solutions.

*5000 character(s) maximum*

Yes, based on the obliged entities' business models, size or operational practice, there are situations where the information required by the draft RTS for customer due diligence is routinely unavailable and no practical alternative is provided. Below we give concrete examples and propose feasible, risk sensitive solutions.

#### 1) Place of birth missing from EU driving licences

- Issue: An EU Member State driving licence is recognised as an equivalent identity document under Article 22(6) AMLR and Article 6 RTS, but it typically does not record the holder's country or place of birth, as required by Article 4 RTS.
- Practical consequence: Firms cannot obtain authoritative documentary evidence of place/country of birth from these licences and must therefore ask the individual directly. That creates reliance on self declared data and introduces verification gaps where documentary corroboration is not available.

Proposed solution:

- Allow other documents to declare place/country of birth to be accepted where the presented identity document legitimately lacks that field, provided the obliged entity documents the source of the document and records this in line with its risk assessment.
- Permit besides the use of alternative corroborating evidence where available (e.g., passport, national ID card, birth certificate, or certified public records) as a higher confidence option also self declaration of place /country of birth for low risk cases.

#### 2) Nationality not recorded or verifiable from certain ID documents

- Issue: Some accepted identity documents do not state nationality, yet Article 4 RTS requires nationality. This again forces firms to rely on the individual's self statement without a documentary cross check.
- Practical consequence: Routine reliance on customer-supplied nationality increases administrative friction and may produce inconsistent verification standards across obliged entities.

Proposed solution:

- Allow nationality to be self declared when not present on the primary identity document, subject to a risk based approach: accept the self declaration for low risk cases and require documentary corroboration only where the entity's risk assessment indicates higher risk.
- Where feasible, permit electronic checks against reliable public registries or sanctioned list screening services as an alternative verification method.

#### 3) "Once identified, always identified" — need for clarity on re identification

- Issue: After a (natural or legal) person has been identified, their core identity does not change (only document validity, document number, or name may change). The draft framework could be read as implying periodic re identification or routine reassessment under Article 26(2) AMLR, even where no change in risk or circumstances exists. That would impose unnecessary administrative burden without commensurate benefit.
- Practical consequence: Obligated entities may be required to repeat full identification processes periodically, causing customer friction, operational strain and inconsistent application across firms.

Proposed solution:

- Explicitly state that, for the purposes of ongoing CDD, once a natural person's identity has been satisfactorily established, that identity remains valid unless there are specific, risk based indicators of change (e.g., suspicion of fraud, change in ownership/control, material changes in customer profile, or document expiry where re presentation is needed).
- Clarify that routine periodic re identification is not required as a matter of course; instead, require periodic review of the customer's risk profile and targeted verification measures where the review indicates elevated or changed risk.

- \* 4. Considering AMLA's legal mandate in Article 28(1) of Regulation (EU) 2024/1624, and taking into account your obliged entities' products offered and service provided, what other simplified due diligence measures should be included in the draft RTS, for example because of the associated lower ML/TF risks of these products and services? Please provide concrete drafting proposals and rationale for the specific measures you would propose.

*5000 character(s) maximum*

In line with Article 28(1) of Regulation (EU) 2024/1624 and taking into account the products and services offered by obliged entities, simplified due diligence (SDD) measures should be genuinely proportionate, operationally practicable and underpinned by clear, risk based criteria. The draft RTS should therefore include targeted SDD options for clearly defined low risk products and customer types, together with streamlined documentation requirements and explicit safeguards to prevent misuse.

The current approach has several shortcomings that necessitate a reevaluation of the underlying rationale:

- Disproportionate documentation burden: The current expectation to document the rationale for every SDD decision has become operationally excessive. Individual case by case paperwork is time consuming and diverts resources from higher risk activity.
- Operational Challenge: Given that documenting SDD can be more resource-intensive than standard CDD, firms often find it practical to default to standard measures, which may unintentionally impact the principles of proportionality and efficiency.
- Limited practical benefit vs. classification risk: The incremental AML/CTF benefit of SDD in many well scoped low risk scenarios is small compared with the risk and cost of misclassification; this deters firms from applying legitimate SDD where it would be appropriate.

To restore proportionality and incentivise genuine risk based treatment, the RTS should adopt clear, objective SDD categories, allow recordkeeping at portfolio level where justified, and set out minimum safeguards:

1. Low value, low frequency retail payment products

- Drafting proposal (example wording):

- o "For low value retail payment products, where the cumulative incoming value does not exceed a certain threshold dependent of the respective business over a rolling 12 month period and single transaction value does not exceed another certain threshold dependent of the respective business, obliged entities may apply simplified customer due diligence measures limited to verification of name and one additional identifier. Where these thresholds are used, obliged entities may apply portfolio level documentation of the risk rationale and controls, rather than case by case narrative justification."

Rationale: Low monetary value and predictable, low turnover profiles materially reduce ML/TF exposure; portfolio documentation preserves auditability while reducing per customer burden.

2. Public authorities, listed corporates and regulated financial counterparties

- Drafting proposal:

- o "Where the counterparty is (a) a public authority within EU/EEA, (b) an entity listed on a regulated market in the EU or EEA, or (c) a supervised financial institution established in the EU or EEA and subject to the EU legislation entailing the AML/CFT safeguards, obliged entities may apply simplified due diligence limited to verification of legal status and confirmation of supervisory oversight; verification of beneficial ownership may be carried out proportionately in line with the public-disclosure regime applicable to that entity in the EU or EEA.

- Rationale: High transparency and regulatory oversight lower the need for full scale CDD; a proportionate approach reduces duplication.

3. Low risk cross border remittances with trusted partners

- Drafting proposal:

- o "For correspondent or remittance flows routed through duly licensed and supervised counterparties with demonstrable controls, obliged entities may rely on the counterparty's CDD and apply SDD for the retail originator where transaction values are below specified thresholds and channels are proven to be low risk."

- Rationale: Reliance on trusted counterparties and low transaction values reduce ML/TF exposure.

- Further hint: In the context of correspondent banking relationships, the responsibility for conducting Customer Due Diligence (CDD) measures shall lie exclusively with the institution that maintains the account, commonly referred to as the account-holding bank. It is imperative to clarify that the correspondent bank account holder itself is not required to, nor should it, perform the primary CDD procedures for the underlying account. This regulatory approach ensures that the entity with the direct contractual relationship and operational control over the account assumes full accountability for verifying the identity of its customers and assessing associated risks.
- Further hint: In addition, we recommend inserting a dedicated section on correspondent banking business and explicit recognition of established market standards, such as the Wolfsberg Questionnaire, that would support harmonization and consistency. In this regard, it might be useful to adapt to the special guideline to correspondent banking of the EBA Guidelines on Risk Factors.

\* 5. Additional observations: Do you have any additional comments relevant to the draft RTS that have not been covered above? Please ensure that comments refer to a specific article, are precise, and, where possible, supported by evidence. Where necessary, comments should also include a proposed solution.

*5000 character(s) maximum*

Numerous provisions of the draft Regulatory Technical Standards (RTS) use the term “the customer” as the primary point of reference, which, unless otherwise specified, appears to encompass both natural and legal persons. In this context, we invite AMLA to verify, across all Articles, whether this understanding is intended and consistently reflected throughout the text.

Furthermore, the provisions concerning the identification of persons purporting to act on behalf of the customer are clarified in Article 16, which specifies that obliged entities are required to collect such information “in addition to the information to be collected pursuant to the relevant provisions of Section 2.” However, certain distinctions remain within Section 2 itself, notably in Articles 5 and 6, where persons purporting to act on behalf of the customer are already explicitly referred to. Against this background, AMLA may wish to assess whether it would be more appropriate to introduce, at the beginning of Section 2, a general clarification concerning the identification requirements applicable to persons acting on behalf of the customer.

Furthermore, we propose that the RTS provide a more granular definition of the expression “person purporting to act on behalf of the customer,” complementing the existing definition derived from the Anti-Money Laundering Directive (AMLD). Currently, this terminology has been subject to divergent interpretations across Member States, leading to regulatory fragmentation. To address this, the scope of this term should be strictly limited to external third parties acting under a formal mandate, such as via a power of attorney. Greater precision in this regard is essential to enhance legal certainty and to ensure a consistent interpretation and application of the framework across all stakeholders, including competent authorities, auditors, and obliged entities.

Specifically within the institutional sector, extending identification and verification obligations to employees of the customer who merely support the onboarding process or sign contractual documents on behalf of the legal entity is neither proportionate nor risk-effective. As a legal entity can only act through natural persons, requiring the full identification and verification of internal signatories or authorized staff does not mitigate additional Anti-Money Laundering/Counter-Terrorist Financing (AML/CTF) risks. Instead, such an approach would generate an unnecessary administrative burden for both the customers and the financial institutions.

Conversely, the identification and verification of external third parties—such as external law firms or proxies acting on behalf of the customer and representing them vis-à-vis the financial institution—constitutes a meaningful risk mitigant. Limiting the rigorous application of these measures to such external actors would ensure full alignment with the fundamental risk-based approach enshrined in EU law.

## Section 3 - Additional substantive input

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Use this section to provide feedback on specific articles of the draft RTS, in case these were not already covered in your responses to the previous questions.

For each reply, please describe the issue identified, indicating, where relevant, whether it relates to legal certainty, proportionality, technical implementation or other factors. You are kindly asked to provide alternative drafting proposals and to explain why your proposal would be more appropriate.

Do you have any comments on a specific article in the draft RTS? There is no need to repeat comments made in the previous sections of this survey.

- Yes
- No

\* Please state the article number in simple figures, without referring to the subparagraphs or points (e.g. '3' or '21')

*Only values between 1 and 33 are allowed*

2

\* Please share your comments below, specifying the subparagraph and point, if applicable (e.g. paragraph 1 point (a)).

*5000 character(s) maximum*

Article 2, paragraph 2

The current draft stipulates that for legal entities, both the registered name and one single trade or commercial name must be recorded. However, in practical operation, it is frequently the case that a legal entity utilizes multiple trade names, variations, or aliases for commercial purposes. This reality mirrors the complexities encountered in the context of the SEPA "name check" mechanism regarding the verification of payees, where the existence of multiple valid trading names can create discrepancies in automated validation processes. To ensure the proportionality and operational feasibility of the proposed measures, it is necessary to clarify that the mandatory recording obligation applies strictly to one primary trade or commercial name. The registration of any additional trade names, variations, or aliases utilized by the legal entity should be considered voluntary. This distinction prevents the imposition of an undue administrative burden on obliged entities while maintaining the integrity of the customer identification process. It allows financial institutions to capture the essential identifier required for verification without mandating the exhaustive cataloging of every commercial variation, thereby aligning with the risk-based approach and ensuring consistency with existing payment verification frameworks.

Do you have any other comments on a specific article in the draft RTS?

- Yes
- No

\* Please state the article number in simple figures, without referring to the subparagraphs or points (e.g. '3' or '21')

*Only values between 1 and 33 are allowed*

6

\* Please share your comments below, specifying the subparagraph and point, if applicable (e.g. paragraph 1 point (a)).

*5000 character(s) maximum*

Article 6

Article 6, Paragraph 5 of the draft Regulatory Technical Standards (RTS) explicitly references the possibility of accepting a certified copy of an identification document provided by "that person," which we understand to refer to the individual whose identity is subject to verification. From a substantive perspective, this provision is sound and aligns with the principle of direct customer interaction.

However, a critical interpretative question arises regarding the permissibility of alternative channels for obtaining such certified copies. Specifically, it remains unclear whether the framework allows for the reliance on a certified copy retrieved or issued by another obliged entity that has already executed its own Customer Due Diligence (CDD) measures in full compliance with the Anti-Money Laundering Regulation (AMLR).

Confirming the admissibility of this approach would significantly enhance operational efficiency, facilitate cross-border cooperation, and fully leverage the principle of reliance without compromising the integrity of the verification process.

Do you have any other comments on a specific article in the draft RTS?

Yes

No

\* Please state the article number in simple figures, without referring to the subparagraphs or points (e.g. '3' or '21')

*Only values between 1 and 33 are allowed*

7

\* Please share your comments below, specifying the subparagraph and point, if applicable (e.g. paragraph 1 point (a)).

*5000 character(s) maximum*

Article 7

The draft RTS appropriately prioritises eIDAS-compliant solutions, in particular the European Digital Identity Wallet (EUDI Wallet), as these provide a harmonised and high-assurance standard across the Union. At the same time, Article 7(2) recognises that not all customers are able to access such solutions, notably non-EU residents, expatriates or vulnerable persons. The possibility to rely on alternative remote identification and verification methods under strict conditions is therefore welcome, as it ensures that legitimate customers are not excluded where eIDAS-compliant credentials are unavailable.

However, the current drafting appears to be predominantly tailored to retail banking relationships and implicitly assumes that the customer is a natural person. This does not adequately reflect the realities of wholesale and corporate banking, where financial institutions generally maintain long-standing relationships with legal entity customers through dedicated relationship managers who are regularly in contact with the customer and possess extensive knowledge of both the legal entity and the individuals acting on its behalf. Against this background, restricting the available identification and verification methods for natural persons connected to a legal entity customer does not necessarily mitigate identity fraud risks. Rather, it may create disproportionate operational and administrative burdens, particularly where beneficial owners or other relevant individuals are located outside the Union and eIDAS-compliant solutions are not available. In particular, established identification methods that have been used in certain Member States for many years without material

supervisory concerns — such as video identification procedures in Germany — should remain permissible under the RTS.

In addition, it should be clarified how the RTS will interact with the existing Guidelines on the use of remote customer onboarding solutions under Article 13(1) of Directive (EU) 2015/849 dated 22 November 2022 (EBA/GL/2022/15), which will continue to apply to the financial sector under the AMLR framework from 10 July 2027. AMLA should therefore provide further guidance on the relationship between Article 7 of the RTS and the EBA Guidelines in order to ensure legal certainty and supervisory consistency, especially with regards to cases in which – after 10 July 2027 – obliged entities rely on capabilities to access EUDI Wallets through a service provider: what specific requirements and safeguards should be observed to ensure compliance with the EUDI Regulation, particularly as regards data protection, operational resilience, contractual arrangements and oversight of third-party providers?

Furhermore, for counterparties established outside the EU, in circumstances where eIDAS-compliant means of identification or verification are not available, it would be helpful to clarify the criteria according to which the fallback mechanism set out in Article 7(2) is to be applied. In particular, it would be useful to specify whether the applicability of that fallback depends on objective unavailability, legal impossibility, or other conditions, and how such conditions are to be assessed in practice.

Do you have any other comments on a specific article in the draft RTS?

- Yes  
 No

\* Please state the article number in simple figures, without referring to the subparagraphs or points (e.g. '3' or '21')

*Only values between 1 and 33 are allowed*

10

\* Please share your comments below, specifying the subparagraph and point, if applicable (e.g. paragraph 1 point (a)).

*5000 character(s) maximum*

Article 10

The reference to 'utility bills' as an example of 'third-party sources' in the context of identifying the beneficial owner under Article 10 of the draft RTS is unhelpful in the context of wholesale banking. Given the nature of wholesale banking business and the profile of wholesale banking customers, it is not realistic to expect wholesale banks to obtain utility bills (or similar documents) from UBOs (or SMOs).

We recognise the challenges faced by the AMLA and NCAs in drafting regulation intended to apply across all sectors. Nevertheless, regulatory requirements must remain realistic, proportionate, and fit for purpose for the sectors concerned.

Do you have any other comments on a specific article in the draft RTS?

- Yes  
 No

\* Please state the article number in simple figures, without referring to the subparagraphs or points (e.g. '3' or '21')

Only values between 1 and 33 are allowed

29

- \* Please share your comments below, specifying the subparagraph and point, if applicable (e.g. paragraph 1 point (a)).

5000 character(s) maximum

Article 29

Art. 29 is to be supplied with this sentence 2: "For credit institutions, those obligations shall be without prejudice to any additional screening obligations laid down in Article 5d of Regulation (EU) No 260/2012, including the obligation of payment service providers falling within the scope of that Regulation to carry out at least daily and event-triggered checks of their customers against the relevant Union restrictive measures lists."

Rationale: The additional sentence clarifies the relationship between the general sanctions-screening obligations under the AML framework and the specific screening regime established under Article 5d of Regulation (EU) No 260/2012 because of instant credit transfer processing. It ensures legal certainty by making explicit that the AML-related screening requirements do not replace, limit or exhaust the separate obligations applicable to payment service providers under the SEPA framework. The clarification also reduces the risk of interpretative inconsistencies regarding the coexistence of customer-based screening obligations and the specific at least daily screening mechanism introduced for the processing of instant payments.

Do you have any other comments on a specific article in the draft RTS?

- Yes
- No

- \* Please state the article number in simple figures, without referring to the subparagraphs or points (e.g. '3' or '21')

Only values between 1 and 33 are allowed

27

- \* Please share your comments below, specifying the subparagraph and point, if applicable (e.g. paragraph 1 point (a)).

5000 character(s) maximum

Article 27

Proposal: Amendment to Art. 27 of the RTS for the application of Enhanced Due Diligence measure "source of wealth" in the Context of Correspondent Banking Relationships

Where a credit institution enters into or maintains a correspondent banking relationship, the application of enhanced due diligence measures shall be calibrated to reflect the specific nature of the counterparty as a regulated financial institution. In this context, competent authorities and obliged entities shall have regard to the fact that concepts developed for the assessment of natural persons, including the determination of source of wealth and source of funds, are not appropriate for application to regulated financial institutions, whose financial position is derived from diversified commercial activities, regulated funding structures, and ongoing prudential supervision, as evidenced by audited financial statements and supervisory assessments. This should be clarified.

Do you have any other comments on a specific article in the draft RTS?

- Yes
- No

\* Please state the article number in simple figures, without referring to the subparagraphs or points (e.g. '3' or '21')

*Only values between 1 and 33 are allowed*

\* Please share your comments below, specifying the subparagraph and point, if applicable (e.g. paragraph 1 point (a)).

*5000 character(s) maximum*

Article 33  
The RTS shall enter into force on the twentieth day following that of its publication as Delegated Regulation in the Official Journal of the European Union. It may reasonably be assumed that this will occur towards the end of 2026 or in early 2027.  
This timing is significant because the implementation provision in Article 33, second sentence, directly refers to the publication date of the Delegated Regulation. Specifically, where a customer entered into a business relationship before the publication date of the RTS, the relevant documents, data, and information relating to that customer must be aligned with the requirements of both the RTS and the AMLR (“actualization” or “refresh”) on a risk-sensitive basis, and in any event no later than within the time periods set out in Article 26(2) AMLR.  
Accordingly, the RTS effectively defines “standing customers” by reference to a point in time prior to 10 July 2027. Against this background, AMLA should clarify whether, for customers onboarded after publication of the RTS in the Official Journal of the European Union but before 10 July 2027, the AMLR refresh periods are intended to run immediately from the date of their onboarding, rather than only from 10 July 2027, as appears to be the case for customers onboarded before publication of the RTS in the Official Journal; and if this is the case, AMLA should give guidance how obliged entities shall implement AMLR and RTS CDD standards for actualization before the implementation date of AMLR, for example, regarding the intended nature of a business relationship.

Do you have any other comments on a specific article in the draft RTS?

- Yes
- No

Do you have any comments on the recitals? The recitals are the statements at the start of the draft RTS and are numbered from (1) to (25).

- Yes
- No

Do you have any comments on the Annex in the draft RTS?

- Yes
- No

## Section 4 - Overall assessment

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\* How would you rate the proposals set out in the draft RTS overall?

- Inadequate
- Somewhat inadequate
- Neutral
- Good
- Excellent

Would the implementation of the draft RTS generate any of the following additional costs beyond the adjustments that would be required to implement the rules set out in Chapter III of Regulation (EU) 2024/1624 (customer due diligence)?

This question is aimed at understanding the additional costs stemming from the implementation of these specific draft RTS, rather than the additional costs stemming from the provisions of Regulation (EU) 2024 /1624. We are interested in understanding the additional costs arising from the implementation of the draft RTS for your obliged entity. Please provide your responses with this context in mind.

For this survey, “costs” refer to the financial and resource implications your entity may face in implementing the draft RTS, including both initial setup efforts and ongoing operational commitments. Examples of one-off costs include amending policies and procedures, system upgrades, staff training or consultancy fees. Examples of recurring costs may include additional reporting, monitoring, software subscriptions, or allocation of additional full-time equivalent resources, etc.

Please describe and substantiate the specific costs you foresee when implementing the provisions of these draft RTS.

	Manageable impact	Disruptive impact	No significant additional costs	Not applicable/no information available
One-off implementation costs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Recurrent costs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Thank you very much for your feedback.

### Contact

[Contact Form](#)

