

Europe's AML landscape is in the middle of its most significant structural transformation. The era of 27 national interpretations of the same directive is ending - and institutions that have relied on local flexibility to manage group-wide compliance are running out of road.

The EU AML Package, adopted in 2024 and now in active implementation, represents the most consequential structural change to European financial crime compliance in a generation. The ambition is explicit: end the fragmentation that allowed high-risk institutions to arbitrage between national supervisors, and replace it with a single, directly applicable standard.

For financial institutions operating across the continent, this is a fundamental operating model question - not a regulatory update cycle. Group-wide consistency is now the baseline. Local variations that once offered operational flexibility are becoming supervisory exposure.

## Key Regulations and Supervisors, Decoded

| REGULATION / AUTHORITY                                                                                                                 | WHAT IT DEMANDS?                                                                                                                                                                                                                                                  | WHAT IT MEANS FOR THE FIs?                                                                                                                              |
|----------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|
| <br><b>EU AML Package (2024, in implementation)</b>    | Eliminates the gap between directive and execution. Replaces minimum harmonisation with maximum consistency - institutions can no longer rely on national interpretation to soften requirements. The most consequential overhaul of European AML in a generation. | EU AML rules will be applied more consistently across countries, so align controls and evidence group-wide and accelerate structured implementation.    |
| <br><b>Single EU AML Rulebook</b>                    | Directly applicable CDD, monitoring, governance, and control standards. What was guidance is now law. What was local practice must now be group-standard - with no room for jurisdictional variation to lower the bar.                                            | Move to a single EU-wide standard for CDD, monitoring, and governance, with consistent thresholds and decisioning that supervisors can test group-wide. |
| <br><b>EU Anti-Money Laundering Authority (AMLA)</b> | Begins operations in 2025, with phased direct supervision of selected high-risk cross-border institutions over subsequent years. Europe's first supranational FCC supervisor, with consistency written into its mandate.                                          | Prepare for AMLA engagement with board-level, group-wide governance and evidence of consistent, effective controls across entities.                     |
| <br><b>Sixth AML Directive (AMLD6)</b>               | Expands criminal liability to legal persons, strengthens senior management accountability, and raises the personal stakes for board-level FCC ownership. FCC failures can now result in personal liability for individuals at the top.                            | AMLD6 raises personal accountability, so tighten decision ownership, escalation trails, and governance evidence to withstand scrutiny.                  |
| <br><b>UK AML Regime (POCA / MLRs / FCA)</b>         | Post-Brexit, the UK operates a rigorous, independently supervised regime. FCA enforcement activity has intensified - institutions with UK presence face dual scrutiny and must maintain compliance with both regimes without cross-reliance.                      | Run UK and EU compliance in parallel with strong UK controls, coordinated governance, and consistent data to avoid duplication and conflicts.           |

## What financial institutions should expect from their operations partners?



### Group-wide standardisation is urgent

Institutions operating with locally adapted controls - different thresholds, documentation standards, risk appetite interpretations - must consolidate now. The Single Rulebook removes the space for variation.



### AMLA readiness is a board agenda item

Direct supervisory engagement with a supranational authority requires group-level governance accountability, not just national exam readiness.



### Senior management accountability is now personal

AMLD6 makes it explicit. The governance paper trail - who approved what, who escalated what, who owned which risk - matters in an entirely new way.



### Cross-border data consistency is the enabler of everything else

Inconsistent data across jurisdictions is not just an operational problem - it is the root cause of most group-level FCC failures under regulatory examination.



## LEADERSHIP INSIGHT

The institutions that will lead in Europe's new FCC environment are not the ones working hardest to comply - they are the ones that built group-wide consistency before the regulator arrived to test it. AMLA's first examination wave will reveal exactly who is ready and who was still adapting.

### About Wipro

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