

Key legal sources for payment service providers in anti-money laundering law*

	Directives and RL (EU) Laws (DE)	Delegated acts (EU) Regulations (DE)		Administrative publications	
EU	AMLD ¹	Delegated Regulation (EU) [Draft] ³ RTS on the determination of the inherent and residual risk of obliged entities	Delegated Regulation (EU) [Draft] ³ RTS on the risk assessment of credit and financial institutions directly supervised by the AMLA	EBA/GL/2024/14 Guidelines on sanctions	EBA/GL/2024/11 Guidelines on the Funds Transfer Regulation
	Regulation (EU) 2024/1624 on the prevention of money laundering and terrorist financing (AMLR) ²	Delegated Regulation (EU) [Draft] ³ RTS on customer due diligence obligations	Delegated Regulation (EU) [Draft] ³ RTS on fines, administrative measures and periodic penalty payments	EBA/GL/2024/01 Guidelines on risk factors for money laundering and terrorist financing	EBA/GL/2022/15 Guidelines on remote customer onboarding
	Regulation (EU) 2024/1620 establishing a new EU Anti-Money Laundering Authority (AMLA Regulation) ²	Delegated Regulation (EU) 2019/758 RTS on third-country measures	Delegated Regulation (EU) 2018/1108 RTS on central contact points	EBA/GL/2023/04 Guidelines on policies and controls for the effective management of money laundering (ML) and terrorist financing (TF) risks	EBA/GL/2022/05 Guidelines on compliance management and the anti-money laundering reporting officer (MLRO)
	Regulation (EU) 2023/1113 on information accompanying transfers of funds and certain crypto-assets (FCTR)	Delegated Regulation (EU) 2016/1675 RTS on the identification of high-risk third countries		JC/GL/2017/16 Joint guidelines on measures to be taken in case of missing information under the Funds Transfer Regulation (FTR)	
DE	GwG	ZIdPrüfV		Circular 07/2025 on high-risk countries	Notes on the Funds Transfer Regulation (FTR)
	HinSchG			AuA AT Interpretation and application notes on the German Anti-Money Laundering Act (GwG)	Circular 02/2020 on the audit and reporting period as well as the audit cycle in relation to money laundering
				Circular 03/2017 on video identification procedures	Guidance notice Due diligence and organisational obligations in the e-money business

*no claim to completeness

¹The AMLD6 must be transposed into German law by 10 July 2027. With effect from 10 July 2027, AMLD4, as amended by AMLD5, will be repealed.

²The AMLR will apply directly in Germany from 10 July 2027, partially already from 1 July 2025. The AMLA Regulation will apply from 1 July 2025.

³The EBA is expected to submit the final drafts to the Commission in October 2025.