

**EGOV**

ECONOMIC GOVERNANCE AND EMU SCRUTINY UNIT



FINANCIAL STABILITY

International comparison of Anti-Money Laundering frameworks

Institutional design, supervision and enforcement across major financial jurisdictions

This briefing provides a comparative analysis of anti-money laundering (AML) frameworks in five major financial jurisdictions: the European Union, the United States, the United Kingdom, Japan and Singapore. Although these jurisdictions broadly follow international standards developed by the Financial Action Task Force (FATF), their institutional architectures and supervisory approaches differ significantly. The analysis examines several key dimensions of AML governance framework, including the legal foundations of AML obligations, supervisory structures, beneficial ownership transparency, the scope of obliged entities, the regulation of crypto-assets, and enforcement mechanisms. Particular attention is given to how different institutional designs influence the credibility and effectiveness of AML supervision.

The European Union is currently implementing the most ambitious AML reforms among the jurisdictions examined, introducing a directly applicable regulatory framework and establishing a new supranational authority, the Anti-Money Laundering Authority (AMLA)¹. By contrast, the United States relies on a long-standing enforcement-driven model centred on the Bank Secrecy Act (BSA) and strong financial intelligence capabilities. The United Kingdom combines principles-based supervision with a multi-supervisor system, while Japan and Singapore illustrate distinct approaches within the Asia-Pacific region, ranging from compliance-oriented supervision to highly centralised regulatory oversight. The analysis shows that while legal frameworks have converged internationally, significant differences remain in supervisory architecture and enforcement practices. These differences highlight the importance of institutional capacity and enforcement credibility in determining the effectiveness of AML regimes.

¹ The EU AML reform package was adopted in 2024 and was planned for phased implementation between 2025 and 2029. AMLA was scheduled to become operational in 2025, with direct supervisory tasks commencing thereafter, aiming for full operational capacity by 2028. Meanwhile, the key provisions of the Anti-Money Laundering Regulation (AMLR) and the Sixth Anti-Money Laundering Directive (AMLD6) were to be applied primarily from July 2027 onwards, subject to transitional arrangements.



1. Introduction and analytical framework

1.1. Rationale and policy relevance

Over the past two decades, anti-money laundering (AML) policy has become a central pillar of financial system integrity and modern governance. Initially conceived primarily as a tool to combat organised crime and drug trafficking, AML frameworks have progressively expanded in scope. Today, they are expected not only to prevent the laundering of illicit proceeds but also to prevent terrorist financing, protect financial integrity, safeguard market confidence and support broader security objectives, including the fight against corruption, terrorism financing and sanctions evasion. This evolution reflects the growing complexity and internationalisation of financial systems, where **financial flows now move across jurisdictions with unprecedented speed**, and is supported by digital infrastructures, globalised capital markets and an expanding ecosystem of non-bank financial intermediaries. Simultaneously, **technological innovation** (including online banking, digital assets² and new payment infrastructures) **has created both new opportunities for economic activity and additional channels for illicit financial flows**. As a result, AML policy now operates at the intersection of financial regulation, law enforcement and international cooperation, and its effectiveness depends not only on the existence of legal rules, but also on the institutional structures responsible for implementing them³.

Supervisory authorities, financial intelligence units (FIUs), law enforcement agencies, financial institutions and other gatekeepers all play critical roles in detecting and preventing illicit financial activity, and the credibility of the system rests therefore on the interaction between legal design, supervisory capacity and enforcement mechanisms⁴. But despite the existence of global standards developed by the [Financial Action Task Force \(FATF\)](#)⁵, AML regimes remain fundamentally national in their implementation. While [FATF recommendations](#), supported by the [FATF Global Network](#) and its regional bodies (FATF-style regional bodies, FSRBs)⁶, provide a common reference framework, jurisdictions retain significant discretion in how they translate these standards into domestic law and institutional practice.

Consequently, **AML systems that appear formally aligned may differ substantially in their governance structures, supervisory approaches and enforcement outcomes**. These differences have direct

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² The increasing use of crypto-assets has introduced additional AML challenges, including issues related to pseudonymity, cross-border enforcement and the supervision of decentralised finance (DeFi) arrangements.

³ See, for example Financial Action Task Force (FATF), [International Standards on Combating Money Laundering and the Financing of Terrorism and Proliferation](#) (FATF Recommendations); and International Monetary Fund (IMF), [The IMF and the Fight Against Money Laundering and Terrorism Financing](#), which highlight the increasing complexity, cross-border nature and systemic relevance of AML/CFT frameworks in modern financial systems.

⁴ See [FATF mutual evaluation reports](#), which assess the effectiveness of AML/CFT frameworks based on technical compliance and operational outcomes.

⁵ The [FATF Recommendations](#), adopted in February 2012 and regularly updated (last updated in October 2025), constitute the primary international standard for AML/CFT frameworks.

⁶ As part of the [Global Network](#), several independent regional organisations collaborate with the FATF to implement its AML/CFT standards, helping more than 200 jurisdictions comply with them.

implications for financial stability and regulatory competition, since weaknesses in one jurisdiction may create opportunities for regulatory arbitrage, allowing illicit actors to exploit inconsistencies between national systems. Conversely, fragmented regulatory frameworks may increase compliance burdens without necessarily improving the detection of illicit activity. Understanding how jurisdictions organise their AML frameworks is therefore essential for assessing both effectiveness and resilience.

Against this backdrop, a comparative approach provides valuable insights into the institutional choices that shape AML outcomes. Rather than focusing exclusively on formal compliance with international standards, such an approach makes it possible to examine how legal traditions, supervisory models and regulatory cultures influence the functioning of AML systems in practice.

1.2. Scope and jurisdictions selected

This paper examines AML frameworks in five major financial jurisdictions: the European Union, the United States, the United Kingdom, Japan and Singapore. These jurisdictions were selected because they represent distinct regulatory traditions, institutional arrangements and financial market structures, while all playing significant roles in the global financial system.

- The **European Union** provides a particularly interesting case study due to its [ongoing reform of the AML](#) regulatory architecture. Historically, EU AML policy relied on a directive-based approach, requiring Member States (MS) to transpose common standards into national law. This model often resulted in uneven implementation and supervisory fragmentation across the internal market and, in response, the EU has adopted a new legislative package that introduces directly applicable rules and establishes a new supranational authority, the [Anti-Money Laundering Authority](#) (AMLA), commonly referred to as AMLA. This reform represents **the most ambitious attempt to centralise AML supervision at the supranational level.**
- The **United States**, by contrast, relies on a long-standing legislative framework centred on the [Bank Secrecy Act](#) (BSA), complemented by an extensive body of regulations and administrative guidance. The US system is characterised by **strong enforcement powers and an investigative approach** led by the [Treasury's Financial Crimes Enforcement Network](#) (FinCEN). Nevertheless, supervisory responsibilities are distributed across multiple federal and state authorities, resulting in a complex institutional landscape.
- The **United Kingdom** occupies an intermediate position. Its [AML regime](#) combines statutory obligations with a principles-based regulatory tradition and relies on **a multi-supervisor model involving both public authorities and professional bodies.** Since the UK's withdrawal from the European Union, questions have emerged regarding the future evolution of its AML framework and the extent to which it may diverge from EU standards.
- **Japan** and Singapore provide two distinct perspectives from the Asia-Pacific region. [Japan's AML regime](#) has evolved gradually under the influence of international standards and FATF evaluations towards a **compliance-oriented system** with supervision largely coordinated by the [Financial Services Agency](#) (FSA).
- **Singapore**, meanwhile, has developed a **highly centralised and risk-based supervisory model** led by the [Monetary Authority of Singapore](#) (MAS), reflecting its position as a major global financial hub.

Taken together, **these five jurisdictions offer a diverse set of institutional models for AML governance**, ranging from highly centralised supervisory frameworks to more fragmented systems relying on strong enforcement.

1.3. Methodological approach

The analysis adopted in this paper follows a functional comparative approach. Rather than assessing jurisdictions solely on the basis of formal legal provisions, the briefing examines how AML frameworks operate through their institutional structures, supervisory practices and enforcement mechanisms. Particular attention is given to the interaction between regulatory design and supervisory capacity, as well as to the broader governance environment in which AML policies are implemented. The comparison focuses on several key dimensions that are central to the effectiveness of AML regimes. These include the legal foundations of AML obligations, the institutional architecture of supervision, the treatment of beneficial ownership transparency⁷, the scope of obliged entities, and the regulatory treatment of emerging financial technologies such as crypto-assets. The analysis also considers enforcement mechanisms, cross-border cooperation arrangements and the systemic challenges that continue to affect AML frameworks globally.

This paper does not attempt to provide a comprehensive assessment of the effectiveness of individual AML regimes. Measuring the real impact of AML policies remains inherently difficult, given the hidden nature of illicit financial flows and the limitations of available data. Instead, the objective is to identify structural differences between jurisdictions and to explore how these differences may influence the credibility and resilience of AML systems. By examining the institutional choices embedded in different AML frameworks, the analysis seeks to contribute to the broader debate on how financial governance can adapt to increasingly complex and interconnected financial systems. This is indicative of different institutional trade-offs between centralisation, legal certainty and enforcement effectiveness.

2. Regulatory basis and legal architecture of AML frameworks

The regulatory basis of AML frameworks provides the legal foundation for supervisory and enforcement mechanisms across jurisdictions. While international standards establish a common reference point, their transposition into domestic law results in different legal structures, reflecting varying balances between harmonisation, flexibility and legal certainty. As summarised in Table 1, the legal architecture of AML frameworks varies significantly across jurisdictions.

2.1. European Union

The European Union has historically approached AML regulation through a system of legislative harmonisation based on directives. Since the early 1990s, successive AML Directives have required MS to implement minimum standards derived from [FATF recommendations](#). While this approach facilitated gradual convergence, it also resulted in differences in national implementation and supervisory practices across the Union. These divergences became increasingly visible following several high-profile [money laundering cases](#) involving cross-border banking groups in the late 2010s. Investigations revealed that [inconsistent application of AML obligations](#) and weaknesses in national supervisory arrangements could create vulnerabilities within the EU's internal market.

In particular, the divergence of supervisory responsibilities limited the capacity of authorities to oversee risks in large cross-border financial institutions. In response, the EU adopted a comprehensive legislative reform in 2024 aimed at establishing a more integrated AML framework. The core of this reform is [Regulation \(EU\) 2024/1624](#) (Anti-Money Laundering Regulation, AMLR), which introduces a directly applicable rulebook harmonising key obligations relating to customer due diligence, risk management and reporting requirements for obliged entities (within the meaning of EU AML legislation). The AMLR is complemented by [Directive \(EU\) 2024/1640](#) (Sixth Anti-Money Laundering Directive, AMLD6),

⁷ Recent EU reforms have strengthened beneficial ownership transparency, including enhanced access to registers and verification mechanisms, while ongoing legal and data protection considerations continue to shape their practical implementation.

which focuses on institutional arrangements, including the organisation of national supervisory authorities and FIUs. Unlike the AMLR, the AMLD6 requires transposition into national law, thereby preserving certain elements of the directive-based model. A central institutional innovation of the reform is the **creation of AMLA** under [Regulation \(EU\) 2024/1620](#) (Regulation establishing the Anti-Money Laundering Authority, AMLAR), which is tasked with strengthening supervisory coordination, directly supervising selected high-risk financial institutions and supporting FIUs in cross-border cases. Taken together, these reforms mark a shift from minimum harmonisation towards a more centralised regulatory architecture combining a single rulebook with enhanced supervisory integration, but their effectiveness will depend largely on the progressive development of secondary legislation and supervisory capacity.

2.2. United States

The United States operates one of the longest-standing AML frameworks, based on a federal statutory model centred on the BSA, enacted in 1970 and codified primarily in 31 U.S.C. §5311 et seq. The BSA established record-keeping and reporting obligations designed to support the detection and investigation of financial crime. Under the BSA, financial institutions are required to maintain records of certain transactions and to file [Suspicious Activity Reports](#) (SARs) when they identify potentially illicit activity, and these reports are analysed by the [FinCEN](#), which serves as the **central financial intelligence authority**. The US AML framework has evolved incrementally through legislative amendments and regulatory guidance. Non-financial intermediaries are not subject to BSA requirements (except casinos which are subject to CDD requirements).

A major expansion followed the adoption of the [USA PATRIOT Act](#) (2001), which introduced enhanced customer identification requirements and strengthened obligations related to terrorist financing. More recently, the [Anti-Money Laundering Act of 2020](#), including the [Corporate Transparency Act](#) (CTA), introduced further reforms, notably the creation of a federal beneficial ownership reporting regime. These developments reflect an ongoing effort to modernise the US AML system while maintaining its enforcement-oriented character. Despite its strong legal foundation, the US framework remains **institutionally complex, with supervisory responsibilities distributed across multiple federal and state authorities**. The legal architecture therefore combines a centralised intelligence function with a decentralised supervisory environment.

2.3. United Kingdom

The United Kingdom's AML framework is based on a combination of criminal law provisions and regulatory obligations implemented through secondary legislation. The principal legal foundation is the [Proceeds of Crime Act 2002](#) (POCA), which defines money laundering offences and establishes powers for asset confiscation and recovery. Operational AML obligations are set out in the [Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017](#) (MLR), which implement a risk-based approach consistent with FATF standards. These regulations require firms to conduct customer due diligence, maintain internal controls and report suspicious transactions.

The UK model reflects a regulatory tradition characterised by principles-based supervision, where legal obligations are clearly defined but significant discretion is left to firms in how they implement risk management systems. This approach is supported by guidance issued by supervisory authorities and industry bodies. Following the United Kingdom's withdrawal from the European Union, the UK retains much of the legislative framework previously derived from EU directives but now operates with greater regulatory autonomy. Although the alignment with FATF standards remains a key reference point, the legal architecture allows for potential divergence from EU developments over time.

2.4. Japan

Japan's AML legal framework is based on the [Act on Prevention of Transfer of Criminal Proceeds \(APTCP\)](#), which establishes customer identification, record-keeping and suspicious transaction reporting obligations for financial institutions and certain non-financial businesses. The development of Japan's AML regime has been gradual and closely influenced by international standards, particularly through [FATF evaluations](#). Legislative amendments have been introduced over time to strengthen compliance requirements and align the framework with evolving global expectations. Under the Act, obliged entities must identify customers, verify beneficial ownership information and report suspicious transactions to the authorities. The legal framework is complemented by regulatory guidance issued by the FSA, which plays a key role in shaping supervisory expectations.

Compared with some Western jurisdictions, Japan's legal architecture places relatively greater emphasis on compliance procedures and supervisory guidance rather than detailed legislative codification, but recent reforms indicate a gradual strengthening of the framework in response to international scrutiny.

2.5. Singapore

Singapore's AML framework is grounded in a combination of primary legislation and detailed regulatory guidance. The core legal instrument is the [Corruption, Drug Trafficking and Other Serious Crimes Act \(CDSA\)](#), which criminalises money laundering and provides mechanisms for asset confiscation. In addition to the CDSA, AML obligations are extensively defined through subsidiary legislation and regulatory notices issued by the [MAS](#), with these notices establishing detailed requirements relating to customer due diligence, transaction monitoring, record-keeping and suspicious transaction reporting.

The Singaporean model is indicative of a **highly structured and centralised** approach to regulation, in which detailed supervisory expectations are articulated through regulatory instruments rather than solely through primary legislation. This allows for a high degree of **flexibility and rapid adaptation to emerging risks**. Given Singapore's position as a major international financial centre, the legal framework places strong emphasis on maintaining financial integrity and reputational credibility, with AML regulation closely integrated into broader financial supervision.

2.6. Comparative insight

Across the five jurisdictions examined, AML legal frameworks demonstrate a high degree of **formal convergence**, reflecting the influence of FATF standards. All jurisdictions criminalise money laundering and impose core obligations on key obliged entities, including customer due diligence, record-keeping and suspicious transaction reporting.

Nevertheless, significant **differences** emerge in how these obligations are structured and implemented. A first distinction relates to the **degree of codification**. The European Union has moved towards a highly codified and harmonised framework through the adoption of a directly applicable regulation, whereas the United States relies on a federal statutory model supplemented by extensive regulatory guidance. The United Kingdom occupies an intermediate position, combining primary legislation with detailed secondary regulation.

Another dimension concerns the **balance between legal certainty and regulatory flexibility**. The EU's single rulebook aims to ensure consistency across MS, while jurisdictions such as the United Kingdom and

Singapore rely more heavily on principles-based approaches and supervisory guidance. These models allow greater adaptability but may introduce variability in implementation.

An additional difference relates to **the relationship between legal frameworks and enforcement structures**. In the United States, the legal architecture is closely linked to an enforcement-driven system centred on financial intelligence and investigative capacity. By contrast, the EU framework emphasises regulatory harmonisation and supervisory coordination, while Japan's model is consistent with a more compliance-oriented approach.

Taken together, these differences illustrate that, **despite shared international standards, AML legal frameworks remain shaped by broader institutional and regulatory traditions**. The design of the legal architecture therefore plays a key role in determining how AML obligations are interpreted, supervised and enforced in practice.

Table 1. Comparative overview of regulatory basis and legal frameworks

Feature	EU	USA	UK	Japan	Singapore
Core AML legislation	Regulation (EU) 2024/1624 (AMLR); Directive (EU) 2024/1640 (AMLD6); Regulation (EU) 2024/1620 (AMLA)	Bank Secrecy Act (1970); USA PATRIOT Act (2001); Anti-Money Laundering Act (2020)	Proceeds of Crime Act 2002 (POCA); Money Laundering Regulations (2017)	Act on Prevention of Transfer of Criminal Proceeds (2007)	Corruption, Drug Trafficking and Other Serious Crimes Act 1992 (CDSA)
Legal model	Supranational regulation + national implementation	Federal statutory framework	National legislation with secondary regulation	National legislation	National legislation + regulatory notices
Main AML supervisor	AMLA + NCAs	FinCEN + federal banking regulators	FCA, professional bodies	FSA	MAS
Regulatory philosophy	Harmonisation and supervisory integration	Enforcement-driven	Principles-based supervision	Compliance-oriented	Centralised and risk-based

Source: EGOV elaboration.

3. Supervisory architecture and institutional design of AML governance frameworks

The organisation of supervisory responsibilities plays a central role in shaping how AML rules are implemented, enforced and coordinated across different sectors and authorities. Although all five jurisdictions rely on a combination of supervisory authorities and FIUs, significant differences arise in the degree of centralisation, the allocation of competences and the interaction between supervisory and enforcement functions. Table 2 provides a comparative overview of supervisory structures and governance arrangements across jurisdictions.

3.1. European Union

In the European Union, the organisation of supervisory responsibilities is characterised by a multi-level structure combining national authorities with emerging centralised elements. Under previous AML

Directives, Member States were responsible for supervising obliged entities, including credit institutions, financial institutions and designated non-financial businesses and professions (DNFBPs). This decentralised approach resulted in a [fragmented supervisory landscape](#), with varying supervisory practices, resources and risk assessments across MS. While cooperation mechanisms existed, including through the [European Banking Authority](#) (EBA), these arrangements were often [insufficient to address risks in cross-border financial activities](#).

The 2024 reform introduced a significant institutional shift through the creation of AMLA under Regulation (EU) 2024/1620. AMLA is endowed with both direct and indirect supervisory powers, so that it will directly supervise a limited number of high-risk, cross-border financial institutions, while coordinating and overseeing national supervisors for the broader population of obliged entities. This hybrid model **combines national supervision with a supranational authority, aiming to enhance consistency while preserving the role of MS.** Indeed, the creation of AMLA is indicative of a deliberate shift towards greater centralisation within a system that preserves a substantial role for national authorities. In addition, AMLA is expected to develop regulatory technical standards and foster supervisory convergence across the Union.

Nevertheless, AMLA's direct supervisory scope will initially remain limited, and **its effectiveness will depend on the progressive development of secondary legislation and supervisory capacity.** This process may also give rise to institutional frictions, as MS retain significant supervisory competences and may seek to preserve national discretion in the implementation of AML frameworks. In addition, **financial intelligence functions remain organised at national level through FIUs**, which are linked through EU cooperation mechanisms, and AMLA will also host a support and coordination mechanism for FIUs, further strengthening integration at the EU level.

3.2. United States

The United States operates a complex but well-established supervisory architecture combining multiple federal and state authorities. Supervisory responsibilities are distributed across federal banking regulators, including the [Federal Reserve](#), the [Office of the Comptroller of the Currency](#) (OCC) and the [Federal Deposit Insurance Corporation](#) (FDIC), as well as sector-specific regulators and state-level authorities. At the centre of the AML system is the [FinCEN](#), which functions as both the FIU and a regulatory authority. FinCEN is responsible for administering the [BSA](#), issuing regulations and analysing suspicious activity reports.

The US model is characterised by a strong integration between supervisory and enforcement functions. Supervisory agencies conduct examinations of financial institutions, while enforcement actions may be taken by multiple authorities, including the Department of Justice. Although the system is decentralised in terms of supervisory actors, it is anchored by a centralised intelligence and regulatory core. Coordination between agencies is facilitated through formal and informal mechanisms, but the multiplicity of authorities can create complexity for supervised entities.

3.3. United Kingdom

The United Kingdom's AML supervisory framework combines multiple supervisory authorities with a central financial intelligence function. Supervisory responsibilities are divided among sectoral regulators, including the [Financial Conduct Authority](#) (FCA) for financial institutions, as well as professional body supervisors overseeing certain DNFBPs. The UK FIU is housed within the [National Crime Agency](#) (NCA),

which is responsible for receiving and analysing suspicious activity reports. The NCA also plays a broader role in coordinating law enforcement efforts related to financial crime.

The UK model is consistent with a risk-based and principles-driven approach to supervision. Supervisory authorities are expected to assess firms' internal controls and risk management systems, rather than relying solely on prescriptive rules. To enhance coordination among the multiple supervisors, the UK has established mechanisms such as the [Office for Professional Body Anti-Money Laundering Supervision](#) (OPBAS), which oversees professional body supervisors and promotes consistency in supervisory practices. Overall, the UK framework combines decentralised supervision with mechanisms aimed at ensuring coherence and effectiveness across sectors.

3.4. Japan

Japan's AML supervisory architecture is centred on the [FSA](#), which acts as the primary regulator for financial institutions. The FSA is responsible for supervising compliance with AML obligations and issuing guidelines to clarify regulatory expectations. Financial intelligence functions are carried out by the [Japan Financial Intelligence Center](#) (JAFIC), which operates within the [National Police Agency](#). The JAFIC receives and analyses suspicious transaction reports and cooperates with law enforcement authorities. Compared with other jurisdictions, Japan's model is relatively **centralised**, with a clear allocation of responsibilities between the FSA as supervisor and the JAFIC as the FIU.

The system places strong emphasis on administrative guidance and supervisory dialogue with financial institutions. [Recent reforms](#) have aimed to strengthen supervisory effectiveness, including by enhancing risk-based supervision and increasing expectations regarding governance and internal controls within financial institutions.

3.5. Singapore

Singapore operates a highly centralised AML supervisory model, with the [MAS](#) acting as both the financial regulator and the primary AML supervisor for financial institutions. The MAS issues detailed regulatory requirements through notices and guidelines, conducts supervisory inspections and enforces compliance with AML obligations. The centralisation of supervisory authority allows for a **high degree of consistency and rapid implementation of regulatory changes**. The financial intelligence function is carried out by the [Suspicious Transaction Reporting Office](#) (STRO), which is part of the [Singapore Police Force](#). STRO receives and analyses suspicious transaction reports and cooperates closely with the MAS and other authorities. Singapore's model is characterised by **strong coordination between supervisory and enforcement functions, supported by a clear institutional structure** and a high level of regulatory capacity. This approach reflects the jurisdiction's emphasis on maintaining its reputation as a secure and well-regulated financial centre.

3.6. Comparative insight

The supervisory architectures of the five jurisdictions reveal different approaches to balancing centralisation, coordination and specialisation, with a first key distinction concerning the degree of centralisation. Singapore and, to a lesser extent, Japan operate relatively centralised supervisory models, with a single authority playing a dominant role. By contrast, the United States and the United Kingdom rely on multi-agency systems, where responsibilities are distributed across several authorities. The European

Union represents a hybrid approach, combining national supervision with an emerging supranational layer through AMLA.

A second aspect relates to the interaction between supervision and financial intelligence. In the United States, FinCEN integrates regulatory and intelligence functions, creating a strong link between supervision and enforcement. Other jurisdictions, including the EU, the UK, Japan and Singapore, maintain a clearer institutional separation between supervisory authorities and FIUs, although coordination mechanisms vary in strength and formality.

A third feature concerns the mechanisms for ensuring supervisory consistency. The EU's creation of AMLA can be explained by an explicit attempt to address fragmentation and promote convergence across MS. The UK relies on oversight bodies such as OPBAS to coordinate multiple supervisors, while Singapore achieves consistency through institutional centralisation. In the United States, coordination is achieved through inter-agency cooperation, although the multiplicity of authorities can introduce complexity.

These variations illustrate that supervisory effectiveness depends not only on formal allocation of competences but also on the capacity of institutions to cooperate, share information and act consistently. As AML risks increasingly span multiple jurisdictions and sectors, the ability to ensure coherent supervision across institutional boundaries becomes a central challenge for all systems.

Table 2. Comparative overview of AML supervisory architecture

Feature	EU	USA	UK	Japan	Singapore
Central coordinating authority	AMLA	FinCEN	FCA / OPBAS coord.	FSA	MAS
Supervisory model	Hybrid supranational + national	Multi-agency federal	Multi-supervisor national	Centralised financial supervisor	Integrated central bank regulator
Direct superv. of financial institutions	AMLA for selected cross-border institutions + national authorities	Federal banking regulators	FCA	FSA	MAS
Financial intelligence unit (FIU)	National FIUs coordinated by AMLA	FinCEN	FIU (within National Crime Agency)	Japan Financial Intelligence Center	STRO
Degree of centralisation	Medium (hybrid model)	Low	Medium	High	Very high

Source: EGOV elaboration.

4. Beneficial ownership and transparency frameworks

Transparency in beneficial ownership constitutes a cornerstone of AML policy⁸, enabling authorities to identify the natural persons behind legal entities and to detect the misuse of corporate structures. While all these systems recognise the importance of identifying the natural persons who ultimately control legal entities, significant differences emerge in the accessibility of information, the structure of ownership registers and the balance between transparency, privacy and enforcement effectiveness. Table 3 presents a comparative overview of the beneficial ownership frameworks.

4.1. European Union

In the European Union, transparency in beneficial ownership is pursued through centralised registers established under successive Anti-Money Laundering Directives. Under the Fourth and Fifth AML Directives ([AMLD4](#) and [AMLD5](#)), MS were required to establish central registers containing information on the beneficial owners of corporate and other legal entities. Initially, these registers were designed to be publicly accessible, reflecting a policy objective of enhancing transparency and enabling scrutiny by civil society, journalists and market participants. However, this approach was significantly affected by the judgment of the Court of Justice of the European Union in joined [cases C-37/20 and C-601/20](#) (Luxembourg Business Registers), which found that general public access to beneficial ownership registers constituted a disproportionate interference with fundamental rights to privacy and data protection.

As a result, access to beneficial ownership information has been restricted to competent authorities, FIUs and obliged entities conducting customer due diligence, as well as persons or organisations demonstrating a legitimate interest. The 2024 AML reform maintains the requirement for central registers and seeks to improve data quality and interconnection across MS. It also reinforces obligations on obliged entities to identify and verify beneficial owners as part of customer due diligence procedures, in line with the broader objective of establishing a consistent and reliable transparency framework across the Union.

4.2. United States

The United States historically lacked a comprehensive federal system for beneficial ownership transparency, relying instead on a combination of customer due diligence obligations and sector-specific requirements. This approach was widely criticised for creating opacity in corporate structures, particularly in the use of shell companies, and a significant reform was introduced with the [CTA](#), enacted as part of the [Anti-Money Laundering Act of 2020](#).

The CTA requires certain legal entities to report information on their beneficial owners to the FinCEN, which maintains a centralised, non-public database. Under the CTA, beneficial ownership information is accessible to federal agencies, certain state authorities and, under specific conditions, financial institutions for due diligence purposes, but the database is not publicly accessible, reflecting a policy choice prioritising confidentiality and law enforcement utility over broader transparency. The US model therefore represents a shift towards greater transparency at the federal level, while maintaining a controlled access regime. Its effectiveness will depend on implementation, including the completeness and accuracy of reported data and the ability of authorities to use this information in practice. In this regard, [recent developments by US authorities](#) cast doubt about a comprehensive application of CTA requirements. Under a [FinCEN interim](#)

⁸ FATF, [Guidance on Beneficial Ownership of Legal Persons](#) (2023).

[final rule](#), the requirement for US companies and US persons to [report beneficial ownership information to FinCEN has been removed](#), thus limiting the registration requirement only to foreign companies.

4.3. United Kingdom

The United Kingdom has been a pioneer in beneficial ownership transparency through the establishment of the [People with Significant Control \(PSC\) register](#), introduced under the [Small Business, Enterprise and Employment Act 2015](#). The PSC register requires UK companies to identify and disclose individuals who exercise significant control over the entity. This information is publicly accessible through [Companies House](#), reflecting a strong commitment to transparency and open data. Public access to beneficial ownership information is intended to enhance accountability and support the detection of illicit activity by a wide range of stakeholders, including financial institutions, civil society and investigative journalists, **but concerns have been raised regarding the accuracy and verification of data**, as the system has historically relied on [self-reporting with limited validation mechanisms](#). In recent years, the UK has taken steps to strengthen the integrity of the PSC register, including [reforms](#) to Companies House aimed at improving verification processes and reducing the risk of misuse.

4.4. Japan

Japan's approach to beneficial ownership transparency is more limited compared with other jurisdictions. While financial institutions are required to identify and verify beneficial owners as part of customer due diligence (CDD) obligations under the [APTCP](#), there is no comprehensive, publicly accessible central register of [beneficial ownership](#). Information on company ownership is available through corporate registries, but these do not systematically capture beneficial ownership in the sense defined by FATF standards. **As a result, authorities rely heavily on information collected by financial institutions and on investigative processes to identify ultimate beneficial owners.** Japan has faced criticism in international evaluations for the limited availability of beneficial ownership information, and efforts have been made to improve transparency in line with FATF recommendations, but the system continues to rely primarily on private sector reporting rather than centralised public or semi-public registers.

4.5. Singapore

Singapore's beneficial ownership framework combines centralised reporting with restricted access to information. Under the [Companies Act](#) and related regulations, companies are required to maintain registers of beneficial owners (referred to as "controllers") and to provide this information to authorities upon request. In addition, Singapore has introduced a central register of controllers maintained by the [Accounting and Corporate Regulatory Authority \(ACRA\)](#). Nevertheless, access to this information is limited to competent authorities and is not publicly available. This model reflects a policy approach that emphasises effective access for authorities while limiting public disclosure in order to protect privacy and maintain a business-friendly environment. Financial institutions are also required to identify and verify beneficial ownership information as part of their AML obligations. Singapore's framework is generally considered robust in terms of regulatory design, although its reliance on non-public registers places greater importance on supervisory and enforcement capacity.

4.6. Comparative insight

The analysis of beneficial ownership frameworks reveals a central policy trade-off between transparency, privacy and effectiveness.

An important singularity concerns the accessibility of information. The United Kingdom stands out as the only jurisdiction among those analysed that provides broad public access to beneficial ownership data. By contrast, the United States and Singapore operate centralised but non-public systems, while the European Union has moved from a model of general public access towards a more restricted regime following judicial intervention. Japan remains more reliant on decentralised information held by financial institutions, with no comprehensive central register.

Another relevant side relates to the structure and reliability of ownership data. Centralised registers, such as those in the EU, the US and Singapore, can facilitate access for authorities but depend critically on data quality and verification mechanisms. The UK's experience highlights that public accessibility does not automatically ensure accuracy, particularly in systems based on self-reporting.

A third peculiarity concerns the role of beneficial ownership information in the broader AML framework. In all five jurisdictions, financial institutions play a central role in identifying beneficial owners through customer due diligence, but the availability of centralised information can either support or constrain these processes, depending on its accessibility and reliability.

In sum, these differences suggest that beneficial ownership transparency is not solely a question of legal obligation but also of institutional design and implementation. **The effectiveness of such frameworks ultimately depends on the interaction between data availability, verification mechanisms and the capacity of authorities and obliged entities to use this information in practice.**

Table 3. Comparative overview of beneficial ownership frameworks

Feature	EU	USA	UK	Japan	Singapore
Core legislation	AMLD4 (2015); AMLD5 (2018); AMLD6 (2024); AMLR (2024)	Corporate Transparency Act (2020)	Small Business, Enterprise and Employment Act 2015; Economic Crime and Corporate Transparency Act 2023	Act on Prevention of Transfer of Criminal Proceeds (2007)	Companies Act
Central register	Yes (national registers interconnected at EU level)	Partially (FinCEN database)	Yes (PSC register at Companies House)	No central register	Company- level registers
Public access	Restricted after CJEU ruling (2022)	No public access	Public access	No public access	No public access
Supervising authority	National authorities - EU Commission/ coord.	FinCEN	Companies House / UK authorities	National Police Agency / FSA	ACRA / MAS
Transparency model	Public register with controlled access	Law- enforcement database	Public transparency	CDD-based identification	Authority- access model

Source: EGOV elaboration.

5. Scope of obliged entities and risk coverage

The scope of obliged entities determines the breadth of AML coverage and the extent to which different sectors are integrated into the detection and prevention of illicit financial activity. The five frameworks follow a risk-based approach and include core financial institutions, but differences arise in the extent to which non-financial sectors are covered, the treatment of emerging risks and the regulatory perimeter. Table 4 provides a comparative overview of the scope of obliged entities and the application of risk-based approaches across jurisdictions.

5.1. European Union

The European Union applies a broad definition of obliged entities, reflecting successive expansions of scope through AML Directives and, more recently, the AMLR. In addition to financial institutions (including credit institutions) the EU framework covers a wide range of DNFBPs, including lawyers, notaries, auditors, accountants, real estate agents, trust and company service providers, and gambling service providers. Obligations typically include customer due diligence, transaction monitoring and suspicious transaction reporting.

The EU has progressively expanded the scope of AML obligations to address emerging risks. [Recent reforms extend coverage to additional sectors](#), including certain crowdfunding platforms and crypto-asset service providers (CASPs), aligning the regulatory perimeter with developments in financial innovation. A defining feature of the EU approach is its emphasis on risk-based supervision, requiring both authorities and obliged entities to assess and mitigate risks according to their nature and scale. However, the breadth of scope also raises challenges in ensuring consistent supervision across diverse sectors, particularly for DNFBPs where supervisory capacity varies significantly across MS.

5.2. United States

The United States adopts a more sector-specific approach to defining obliged entities under the [BSA](#). Core financial institutions, including banks, broker-dealers and money services businesses, are subject to comprehensive AML obligations. By contrast, the coverage of non-financial sectors is more limited compared to FATF standards. While certain professions and activities are included to some extent, others (such as lawyers, accountants and real estate professionals) have historically not been subject to comprehensive AML requirements. This narrower scope has been identified as a potential vulnerability, particularly in relation to the use of non-financial intermediaries in money laundering schemes. Recent policy discussions have focused on expanding AML obligations to additional sectors, including real estate transactions and investment advisers, although reforms remain ongoing. The US model therefore is consistent with a more targeted regulatory perimeter, with strong obligations for financial institutions but comparatively limited coverage of DNFBPs.

5.3. United Kingdom

The United Kingdom's AML framework adopts a broad scope of obliged entities, largely reflecting its historical alignment with European Union directives. Financial institutions and a wide range of DNFBPs are subject to AML obligations under the Money Laundering Regulations 2017. Covered sectors include legal professionals, accountants, estate agents, trust and company service providers and gambling operators. The UK framework emphasises a risk-based approach, requiring firms to assess their exposure to money laundering risks and implement proportionate controls. In recent years, the UK has expanded its

regulatory perimeter to address emerging risks, including the inclusion of crypto-asset businesses within the scope of AML supervision. This reflects **a proactive approach to adapting the framework to technological developments**. Despite the broad scope, challenges remain in ensuring effective supervision across all sectors, particularly given the diversity of supervisory bodies and the varying levels of expertise among professional body supervisors.

5.4. Japan

Japan's AML framework covers financial institutions and certain non-financial sectors under the APTCP. Obligated entities include banks, securities firms, insurance companies and some categories of DNFBPs, such as real estate agents and dealers in precious metals and stones. However, the overall scope is narrower than in the European Union or the United Kingdom. Certain professions, including legal and accounting services, are subject to more limited AML obligations, reflecting differences in regulatory traditions and legal frameworks. Japan has taken steps to expand the scope of coverage in response to international [recommendations](#), particularly from the FATF. Nonetheless, the regulatory perimeter remains more focused on core financial activities and selected high-risk sectors. The Japanese approach emphasises compliance and reporting obligations within the covered sectors, supported by supervisory guidance rather than extensive expansion of scope.

5.5. Singapore

Singapore applies a comprehensive and risk-based approach to define obliged entities, with a strong focus on financial institutions and key non-financial sectors. In addition, certain DNFBPs, including casinos, real estate agents, dealers in precious stones and metals, and corporate service providers, are covered by AML requirements. Singapore has been **proactive in extending AML obligations to emerging sectors**, including digital payment token service providers, reflecting its role as a major financial and technological hub. The scope of obliged entities is defined through a combination of legislation and regulatory notices, allowing for flexibility in adapting to new risks. At the same time, the relatively centralised supervisory model facilitates consistent application of AML obligations across sectors.

5.6. Comparative insight

The comparison of regulatory scope across jurisdictions highlights differences in how AML frameworks define and manage risk exposure.

A relevant distinction concerns the breadth of the regulatory perimeter. The European Union and the United Kingdom adopt relatively expansive approaches, covering a wide range of DNFBPs in addition to financial institutions. By contrast, the United States and Japan maintain more limited coverage of non-financial sectors, which may create potential vulnerabilities in areas such as real estate and legal professional services.

A further feature relates to the treatment of emerging risks. All jurisdictions have taken steps to extend AML obligations to crypto-related activities, although the timing and scope of these measures vary. The EU, the UK and Singapore have moved more decisively to integrate new sectors into the regulatory perimeter, while the United States continues to adapt its framework incrementally.

One more difference concerns the interaction between scope and supervisory capacity. A broader regulatory perimeter increases the potential coverage of AML frameworks but also raises challenges in ensuring effective supervision across diverse sectors. This is particularly evident in systems with multiple supervisory bodies or limited resources for overseeing DNFBPs.

The analysis indicates that **defining the appropriate scope of obliged entities involves balancing comprehensive risk coverage with the practical capacity to supervise and enforce compliance.** Differences across jurisdictions reflect varying assessments of this trade-off, shaped by institutional structures and regulatory priorities.

Table 4. Comparative overview of obliged entities

Feature	EU	USA	UK	Japan	Singapore
Financial institutions	Yes	Yes	Yes	Yes	Yes
Lawyers / legal professionals	Yes	No	Yes	Limited coverage	Partial
Accountants / auditors	Yes	No	Yes	Limited coverage	Yes
Real estate agents	Yes	No	Yes	Yes	Yes
Trust and company service providers	Yes	No	Yes	Limited coverage	Yes
Casinos / gambling sector	Yes	Yes	Yes	Yes	Yes
Dealers in high-value goods	Yes	Partial	Yes	Yes	Yes

Source: EGOV elaboration.

6. Crypto-assets and digital finance

The rapid development of crypto-assets and digital financial services has introduced new channels for financial activity, while simultaneously creating novel vulnerabilities for money laundering and illicit finance⁹. In fact, technological innovation, including crypto-assets and decentralised finance (DeFi), has further exposed the limitations of existing AML frameworks, particularly in relation to cross-border supervision, traceability and the identification of responsible entities. Even though the five systems increasingly recognise the risks associated with digital assets, differences emerge in regulatory approach, scope of obligations and supervisory integration. A comparative overview is presented in Table 5.

6.1. European Union

The European Union has developed one of the most comprehensive regulatory frameworks for crypto-assets, combining sector-specific regulation with AML obligations. Under the [Regulation \(EU\) 2023/1114](#) (Markets in Crypto-Assets Regulation, MiCA), crypto-asset service providers (CASPs) are subject to authorisation and prudential requirements, and the regulation also establishes a harmonised regulatory framework governing the issuance, offering and provision of services related to crypto-assets across the Union.

⁹ FATF, [Understanding and Mitigating the Risks of Offshore Virtual Asset Service Providers](#) (oVASPs) (2026); Financial Stability Board (FSB), [Global Regulatory Framework for Crypto-Asset Activities](#) (2023); and IMF [Understanding Stablecoins](#) (2025).

Besides, from an AML perspective, CASPs are included within the scope of obliged entities under the AMLD5 and AMLR and are therefore required to conduct customer due diligence, monitor transactions and report suspicious activity. In addition, the [Regulation \(EU\) 2023/1113](#) (Transfer of Funds Regulation, TFR) extends the so-called “travel rule” to crypto-asset transfers, requiring the transmission of information on the originator and beneficiary of transfers, which aims to enhance traceability and align crypto transactions with standards applicable to traditional financial transfers.

The EU approach is characterised by a high degree of regulatory integration, combining market regulation (MiCA) with AML obligations under a unified rulebook, and this is consistent with the policy objective of ensuring both financial innovation and financial integrity within a harmonised framework, but significant gaps remain, particularly in relation to decentralised finance (DeFi), self-hosted wallets and activities falling outside MiCA’s regulatory perimeter.

6.2. United States

The United States does not yet have a single comprehensive federal framework equivalent to MiCA. Instead, the regulation of crypto-assets is based on the application of existing legal regimes, combined with guidance from regulatory authorities. From an AML perspective, crypto-asset activities fall within the scope of the BSA where they qualify as money transmission. The FinCEN has clarified that certain virtual asset service providers are considered money services businesses and are therefore subject to AML obligations, including customer identification and suspicious activity reporting. Supervisory and regulatory responsibilities are distributed across multiple agencies, including the [Securities and Exchange Commission](#) (SEC) and the [Commodity Futures Trading Commission](#) (CFTC), depending on the classification of the asset. This fragmented approach reflects broader uncertainties in the legal classification of crypto-assets. While AML obligations are in place, the absence of a unified regulatory framework creates challenges in ensuring consistent oversight, and even though [recent legislative interpretations](#) have sought to provide greater clarity, the regulatory landscape remains in development.

6.3. United Kingdom

The United Kingdom has integrated crypto-asset activities into its AML framework through amendments to the MLR. Crypto-asset businesses, including exchanges and custodian wallet providers, are required to register with the FCA and comply with AML obligations, including customer due diligence and suspicious activity reporting. The UK has also implemented the “travel rule” for crypto-asset transfers, aligning its framework with international standards. This is indicative of a commitment to maintaining consistency with [FATF recommendations](#) while adapting to technological developments, and although the UK does not yet have a comprehensive regulatory framework equivalent to MiCA, it is developing broader legislation for crypto-assets. In the meantime, AML regulation serves as a key mechanism for overseeing the sector. The UK approach combines AML-focused supervision with a developing regulatory framework, allowing for gradual adaptation while maintaining regulatory oversight.

6.4. Japan

Japan was among the first jurisdictions to introduce a regulatory framework for crypto-assets, following amendments to the Payment Services Act and related legislation with crypto-asset exchange service providers required to register with the FSA and comply with AML and counter-terrorist financing obligations. These include customer identification, transaction monitoring and reporting

requirements. Japan has also implemented the **“travel rule”** in line with international standards, further strengthening the traceability of crypto-asset transactions. The Japanese approach is characterised by early regulatory intervention and a relatively high level of legal clarity, but the framework remains focused on exchanges and intermediaries, with ongoing [discussions](#) regarding the regulation of more decentralised forms of finance.

6.5. Singapore

Singapore has established a comprehensive [framework for digital finance](#) through the [Payment Services Act 2019](#), which regulates digital payment token service providers with entities providing services related to digital payment tokens required to be licensed by the MAS and to comply with AML obligations, including customer due diligence and suspicious transaction reporting. Singapore has also implemented the **“travel rule”** and issued detailed guidance on AML controls for digital asset activities. The regulatory framework is designed to balance innovation with risk mitigation, reflecting Singapore’s position as a global financial and technological hub, and the centralised supervisory model allows the MAS to maintain consistent oversight of the sector and to adapt regulatory requirements in response to evolving risks.

6.6. Comparative insight

The treatment of crypto-assets across jurisdictions illustrates different approaches to integrating innovation within AML frameworks.

A primordial dimension concerns the level of regulatory integration. The European Union stands out for its comprehensive approach, combining a dedicated regulatory framework (MiCA) with harmonised AML obligations. Japan and Singapore also provide relatively clear and structured frameworks, albeit with different institutional designs. By contrast, the United States and the United Kingdom rely more heavily on the application of existing legal regimes, resulting in a more fragmented regulatory landscape.

Another aspect relates to the scope of AML coverage. All jurisdictions include crypto-asset intermediaries within the scope of AML obligations, particularly where activities resemble traditional financial services. However, challenges remain in addressing DeFi and peer-to-peer transactions, which may fall outside existing regulatory definitions.

An additional peculiarity concerns the speed of regulatory adaptation. Jurisdictions such as the EU, Japan and Singapore have moved more decisively to establish formal regulatory frameworks, while others continue to rely on incremental developments and interpretative guidance.

The comparison shows that **the integration of crypto-assets into AML frameworks remains an evolving process**, and even though convergence around core obligations is evident, **differences in regulatory design and implementation reflect broader uncertainties regarding the classification and supervision of digital financial activities**. In addition, these divergences may, in practice, give rise to **regulatory arbitrage**, potentially undermining the effectiveness of AML frameworks and creating uneven supervisory outcomes across jurisdictions.

Table 5. Comparative overview of AML regulation for crypto-assets

Feature	EU	USA	UK	Japan	Singapore
Core legislation	MiCA (2023); Transfer of Funds Regulation (2023)	Bank Secrecy Act + FinCEN guidance	Money Laundering Regulations (amended)	Payment Services Act	Payment Services Act
Regulatory model	Comprehensive regulatory framework	Enforcement-driven	Registration regime	Licensing regime	Licensing regime
Supervisory authority	National authorities / AMLA coord.	FinCEN + federal agencies	FCA	FSA	MAS
Travel rule implementation	Yes	Yes	Yes	Yes	Yes
Regulatory philosophy	Harmonisation	Enforcement and guidance	Compliance-focused	Prudential and consumer protection	Innovation with strong safeguards

Source: EGOV elaboration.

7. Sanctions and enforcement mechanisms

Enforcement frameworks are central to AML effectiveness, as they determine the extent to which legal obligations translate into credible deterrence and behavioural change. This section examines how AML frameworks are enforced across the five jurisdictions, focusing on sanctions, supervisory powers and deterrence mechanisms, and highlights the differences in enforcement intensity, institutional capacity and the strategic use of sanctions. Table 6 summarises enforcement powers and sanctioning frameworks across jurisdictions.

7.1. European Union

The European Union's AML [enforcement framework](#) has traditionally relied on national authorities, reflecting the directive-based nature of earlier legislation ([Directive \(EU\) 2019/1153, Use of Financial Information Directive](#)) with competent authorities in each MS responsible for supervising compliance and imposing administrative sanctions, while criminal enforcement is carried out by national law enforcement and judicial authorities. Under previous AML Directives, minimum requirements were established for sanctions, including the availability of administrative penalties such as fines, public statements and withdrawal of authorisation. Nevertheless, the level and application of sanctions varied significantly across MS, contributing to an uneven enforcement landscape. To address this, the 2024 reform seeks to address these divergences, with the [AMLD6](#) introducing more harmonised rules on administrative sanctions, including minimum powers for competent authorities. In parallel, Level 2 and Level 3 measures will aim at reinforcing convergence and enforcement of sanctions.

A key institutional development is the [role of AMLA](#), which will have the power to impose sanctions on entities under its direct supervision and to coordinate enforcement actions across MS. This is expected to enhance consistency and credibility, particularly for cross-border financial institutions, but despite these reforms, enforcement remains partly dependent on national authorities, and differences in supervisory culture, resources and legal systems may persist.

7.2. United States

The United States is widely regarded as operating one of the most enforcement-driven AML governance frameworks in which the [BSA](#) is supported by a strong enforcement apparatus involving multiple authorities, including the [FinCEN](#), federal banking regulators, law enforcement authorities and the [Department of Justice](#). Administrative and civil penalties can be imposed by regulatory authorities and can result in substantial monetary fines for financial institutions, and criminal enforcement is also a central feature of the US system, with the [Department of Justice](#) pursuing cases against both institutions and individuals. Law enforcement investigations and prosecutions have traditionally been a strong feature of the AML system, as is the “follow the money approach” in predicate offence investigations. Enforcement actions are frequently publicised and may involve coordinated action among different agencies, so high-profile cases and significant penalties have a deterrent effect, reinforcing compliance incentives within the financial sector. Furthermore, the US approach places particular emphasis on accountability, including individual liability for senior management in certain cases, which contributes to a culture in which AML compliance is closely linked to enforcement risk.

7.3. United Kingdom

The United Kingdom’s AML enforcement framework combines administrative sanctions with criminal enforcement under the [POCA](#) and related legislation. Supervisory authorities, particularly the [FCA](#), have the power to impose financial penalties, restrict business activities and withdraw authorisation in cases of non-compliance. The FCA has [increasingly used](#) these powers in recent years, including through significant fines against financial institutions. Criminal enforcement is carried out by law enforcement agencies, including the [NCA](#), and may involve prosecution for money laundering offences or related crimes. The UK framework also includes mechanisms such as [Unexplained Wealth Orders](#) (UWOs), aimed at enhancing the ability of authorities to investigate and recover illicit assets, or tools designed to promote individual accountability within financial institutions, such as the [Senior Managers and Certification Regime](#) (SMCR), that places specific responsibilities on senior managers and may expose them to regulatory sanctions if they fail to ensure adequate compliance systems within their organisations.

Overall, the UK model combines elements of enforcement and supervision, with an increasing emphasis on the use of sanctions to promote compliance.

7.4. Japan

Japan’s AML enforcement framework is more administrative in nature, with a strong emphasis on supervisory guidance and corrective measures, and with [APTCP](#) as a primary law. The FSA is responsible for supervising compliance and may issue business improvement orders or other administrative measures in response to deficiencies, and financial penalties are available but are generally used less prominently than in some Western jurisdictions. Criminal enforcement is conducted by law enforcement authorities, but the overall system places greater emphasis on preventive supervision and compliance rather than punitive enforcement. In recent years, Japan has taken [steps to strengthen enforcement](#), including increasing expectations regarding internal controls and governance within financial institutions, but the system remains less enforcement-intensive compared with the United States or the United Kingdom.

7.5. Singapore

Singapore combines strong supervisory oversight with effective enforcement mechanisms, empowering the MAS with broad powers to impose administrative sanctions, including financial penalties, reprimands and restrictions on business activities. Enforcement actions are typically targeted and proportionate, reflecting a risk-based approach. The MAS also works closely with law enforcement agencies, including the Singapore Police Force, to investigate and prosecute financial crime, and the framework emphasises both deterrence and regulatory credibility, with enforcement actions supporting its reputation as a well-regulated financial centre. While penalties may be less publicly prominent than in the United States, the combination of strong supervision and credible enforcement contributes to effective compliance.

7.6. Comparative insight

The comparison of enforcement frameworks highlights substantial differences in how jurisdictions use sanctions to promote compliance and deter illicit activity.

An essential divergence concerns enforcement intensity. The United States stands out for its highly enforcement-driven approach, characterised by proactive enforcement measures and criminal prosecutions. The United Kingdom also demonstrates a relatively strong enforcement profile, although with a greater balance between supervision and enforcement. By contrast, Japan places more emphasis on administrative guidance and corrective measures, while Singapore combines targeted enforcement with strong supervisory oversight. The European Union is moving towards greater convergence, but enforcement remains influenced by national practices.

A further facet relates to the role of sanctions in shaping compliance behaviour. In enforcement-intensive systems, such as the United States, the threat of potential significant penalties plays a central role in incentivising compliance. In more supervisory-driven systems, compliance is supported by ongoing engagement between authorities and institutions, with sanctions acting as a complementary tool.

Another dimension concerns the degree of harmonisation and consistency. The EU has historically faced challenges due to variations in national enforcement practices, although recent reforms aim to address this through AMLA and more harmonised rules. Other jurisdictions achieve consistency either through centralised institutions (Singapore) or through strong enforcement culture (United States).

The analysis suggests that the **effectiveness of AML enforcement depends not only on the scope of sanctions but also on how they are applied in practice, and differences in institutional capacity, legal frameworks and supervisory culture contribute to varying levels of deterrence across jurisdictions.**

Table 6. Comparative overview of sanctions and enforcement mechanisms

Feature	EU	USA	UK	Japan	Singapore
Administ. sanctions	Yes (nation. authorities)	Yes	Yes	Yes	Yes
Criminal enforcem.	Yes (national law)	Yes	Yes	Yes	Yes
Maximum penalties	Up to EUR 5 million or 10% of turnover	Potentially very large fines	Significant FCA fines	Moderate penalties	Finan. penalties and prohibition orders
Individual liability	Possible	Strong	Senior Managers	Limited	Possible
Enforcem. intensity	Varies across MS	Very high	High	Moderate	High

Source: EGOV elaboration.

8. Cross-border cooperation and information sharing

Given the inherently transnational nature of financial crime, effective AML frameworks rely on robust mechanisms for cross-border cooperation and timely information sharing between authorities. The five jurisdictions participate in international AML frameworks and rely on FIUs, but some differences emerge in the degree of institutional integration, the use of formal cooperation mechanisms and the effectiveness of information exchange.

Box 1: The role of the Financial Action Task Force (FATF) in cross-border AML cooperation

Financial Action Task Force (FATF) and cross-border cooperation

- The Financial Action Task Force (FATF) plays a central role in shaping international cooperation in anti-money laundering and counter-terrorist financing (AML/CFT). Established in 1989, FATF develops globally recognised standards, notably the FATF Recommendations, which provide a comprehensive framework for national AML/CFT systems.
- Beyond standard-setting, FATF promotes cross-border cooperation through its Global Network, which includes nine FATF-Style Regional Bodies (FSRBs) covering over 200 jurisdictions. This network facilitates the exchange of information, peer learning and capacity-building across countries.
- Mutual evaluations constitute a key mechanism to ensure consistency and effectiveness. Through these assessments, FATF and FSRBs review jurisdictions' compliance with international standards and the effectiveness of their AML/CFT frameworks, including international cooperation mechanisms.
- While FATF does not have direct enforcement powers, its monitoring processes and public listings (including the so-called "grey list" and "black list") exert significant reputational and economic pressure on jurisdictions to strengthen their AML/CFT regimes and enhance cross-border cooperation.

Source: EGOV elaboration.

Within this global framework, jurisdictions have developed distinct mechanisms for cross-border cooperation and information exchange. Table 7 provides a comparative overview.

8.1. European Union

In the European Union, the cross-border cooperation is structured through a combination of formal legal mechanisms and institutional networks linking national authorities. FIUs cooperate through the [FIU.net](https://www.fiu.net)

system, which facilitates the secure exchange of information between national FIUs. In addition, EU legislation establishes obligations for cooperation between competent authorities, including supervisors and law enforcement bodies. Despite these mechanisms, cooperation has historically been constrained by differences in national legal frameworks, data protection rules and operational practices. These limitations have been particularly evident in cases involving cross-border financial institutions, where [fragmented](#) supervision has hindered effective information sharing. The 2024 AML reform seeks to address these challenges through the establishment of AMLA, hosting a support and coordination mechanism for FIUs, aimed at enhancing cooperation, improving information exchange and supporting joint analysis. It will also facilitate coordination among supervisory authorities in cross-border cases. This can be explained by a move towards greater institutional integration, although cooperation remains partly dependent on national authorities.

8.2. United States

The United States operates a centralised model of financial intelligence, with the [FinCEN](#) acting as the national FIU and coordinating authority, and playing a central role in both domestic and international information sharing. It exchanges information with foreign FIUs through established international networks, including the [Egmont Group](#), and supports cooperation with law enforcement agencies. Domestically, information sharing is facilitated through mechanisms such as Section 314 of the [USA PATRIOT Act](#), which allows for information exchange between financial institutions and government authorities in relation to suspected money laundering or terrorist financing. Even though the US model benefits from a high degree of centralisation and strong integration between intelligence and enforcement functions, the broader supervisory landscape remains fragmented, which can introduce complexity in cross-border supervisory coordination.

8.3. United Kingdom

The United Kingdom has developed a range of mechanisms to support cross-border cooperation and information sharing, combining formal legal frameworks with operational initiatives. The UK FIU, located within the [National Crime Agency \(NCA\)](#), participates in international information exchange through established networks, including the [Egmont Group](#). The UK also engages in bilateral and multilateral cooperation with foreign authorities, and a distinctive feature of the UK approach is the [Joint Money Laundering Intelligence Taskforce \(JMLIT\)](#), which facilitates information sharing between financial institutions and law enforcement authorities, and while primarily domestic, JMLIT contributes to broader intelligence development that may support international cooperation. The UK framework reflects a combination of formal cooperation mechanisms and public-private partnerships, enhancing the ability to detect and respond to complex financial crime.

8.4. Japan

Japan's cross-border cooperation framework is centred on the [JAFIC](#), which acts as the national FIU and coordinates information exchange with foreign counterparts. The JAFIC participates in international cooperation through the [Egmont Group](#) and engages in bilateral exchanges with foreign FIUs and law enforcement authorities. Information sharing is supported by legal provisions allowing the exchange of financial intelligence for the purposes of combating money laundering and terrorist financing, and while the framework provides for international cooperation, it is generally **more formal and less operationally integrated compared with some other jurisdictions**. Cooperation relies on established

channels rather than extensive real-time or joint analysis mechanisms, but recent reforms have aimed to strengthen Japan's international engagement, reflecting increasing expectations under FATF evaluations.

8.5. Singapore

Singapore operates a highly coordinated model of cross-border cooperation, supported by strong institutional capacity and clear legal frameworks. The [STRO](#), as the national FIU, plays a central role in international information exchange, and Singapore actively participates in the [Egmont Group](#) and maintains extensive bilateral cooperation arrangements. The centralised regulatory and supervisory structure facilitates coordination between authorities, including the MAS and law enforcement agencies, which allows for efficient sharing of information both domestically and internationally. **Singapore places strong emphasis on timely and effective cooperation**, reflecting its position as an international financial centre exposed to cross-border risks.

8.6. Comparative insight

The comparison of cross-border cooperation frameworks highlights differences in institutional integration and operational effectiveness.

A major distinction concerns the degree of centralisation of financial intelligence functions. The United States and Singapore benefit from highly centralised FIU models, which facilitate coordination and international engagement. By contrast, the European Union relies on a network of national FIUs, requiring additional mechanisms to ensure effective cooperation. The United Kingdom and Japan occupy intermediate positions, combining central FIUs with broader institutional arrangements.

An additional aspect relates to the nature of cooperation mechanisms: all jurisdictions participate in international networks such as the Egmont Group, but differ in the extent to which they develop additional tools. The United States and the United Kingdom have established mechanisms that support operational information sharing, including public-private partnerships, while the EU is moving towards greater integration through AMLA.

A further difference concerns the effectiveness of information sharing in practice: centralised systems may facilitate faster and more consistent exchange of information, while decentralised systems can face challenges related to legal inconsistency and coordination. The EU's ongoing reforms reflect an effort to address these limitations and enhance the functioning of its cross-border framework.

In short, **as financial flows become increasingly global, the effectiveness of AML systems will depend not only on domestic frameworks, but on the ability of jurisdictions to operate as part of an interconnected supervisory ecosystem.** Indeed, the effectiveness of cross-border cooperation remains contingent on the compatibility of legal frameworks, data protection regimes and institutional mandates across jurisdictions. This underscores the limits of formal convergence under international standards in the absence of deeper institutional integration.

Table 7. Comparative overview of cross-border cooperation and information sharing

Feature	EU	USA	UK	Japan	Singapore
FIU structure	Decentralised network of national FIUs connected through EU mechanisms (FIU.net)	Highly centralised FIU model (FinCEN)	Central FIU within the National Crime Agency (NCA)	Japan Financial Intelligence Center (JAFIC) within National Police Agency	Central FIU (STRO) within Singapore Police Force
Degree of centralisation	Low–medium (national FIUs with EU-level coord.; AMLA to strengthen integration)	High (single national FIU with strong coordinating role)	Medium (central FIU with multiple supervisory bodies)	Medium–high (clear institutional allocation, but less operational integration)	High (centralised system with strong inter-agency coord.)
International cooperation frameworks	EU legal framework + participation in Egmont Group; cooperation obligations under EU law	Extensive participation in Egmont Group + bilateral agreements; strong global engagement	Egmont Group + bilateral/multilateral cooperation arrangements	Egmont Group + bilateral exchanges	Egmont Group + extensive bilateral cooperation
Supervisory cooperation (cross-border)	Limited historically; enhanced through AMLA coord. and joint supervision mechanisms	Coord. across federal and state regulators; complexity due to multi-agency system	Coord. across multiple supervisors; oversight via OPBAS	More formal and structured cooperation; limited joint supervision tools	Strong coord. due to centralised supervisory model (MAS)
Public–private information sharing	Limited and fragmented across MS; evolving under AMLA framework	Advanced mechanisms (e.g. USA PATRIOT Act Section 314) enabling information sharing between institutions and authorities	Strong model via JMLIT (public–private partnership)	Limited structured public–private cooperation	Increasing emphasis on public–private cooperation, though less formalised than UK/US
Operational effectiveness	Improving but constrained by fragmentation and legal differences between MS	High, supported by centralisation and enforcement integration	Relatively high, supported by public–private initiatives	Moderate, with more formal than operational cooperation	High, supported by centralisation and strong institutional capacity
Recent reforms / developments	Creation of AMLA, FIU coord. mechanism, enhanced data sharing	Ongoing improvements under Anti-Money Laundering Act 2020; strengthening FinCEN role	Expansion of JMLIT and reforms to strengthen coord.	Gradual strengthening following FATF evaluations	Continuous refinement of coop. mechanisms aligned with global standards

Source: EGOV elaboration.

9. Regulatory gaps, systemic risks and emerging challenges

Despite significant regulatory progress, AML frameworks continue to face structural gaps and emerging risks linked to financial innovation, sectoral coverage and the evolving strategies of illicit actors, reflecting the limits of regulatory design, institutional capacity and international coordination in addressing increasingly complex financial crime risks. Table 8 summarises key regulatory gaps, systemic risks and emerging challenges across jurisdictions.

9.1. European Union

The European Union has made substantial progress in strengthening its AML framework, particularly with the 2024 reform. However, several structural challenges remain. A key issue has been divergence in supervision and enforcement, resulting from the historically decentralised model. In fact, differences in supervisory practices, resources and risk assessments across MS have created uneven levels of effectiveness.

Although the creation of AMLA is intended to address these weaknesses, its effectiveness will depend on implementation and the balance between EU-level and national competences. Another challenge concerns the supervision of non-financial sectors (DNFBPs), where capacity and expertise vary significantly across MS. This creates potential blind spots in areas such as real estate, legal services and corporate structures. Finally, the increasing complexity of financial flows, including the use of crypto-assets and cross-border structures, continues to test the EU's ability to ensure consistent risk coverage across its internal market.

9.2. United States

The United States benefits from a strong enforcement framework but faces significant regulatory gaps, one longstanding issue being the limited coverage of certain non-financial sectors, including real estate and legal professional services. These sectors have been identified as potential channels for money laundering, particularly through the use of shell companies and complex ownership structures, and the lack of an adequate beneficial ownership information collection system remains a challenge. In addition, the overlap of supervisory responsibilities across multiple federal and state authorities can create coordination challenges and regulatory complexity. While FinCEN provides a central intelligence function, supervisory practices may vary across agencies. Emerging risks related to crypto-assets and new financial technologies also present additional supervisory and enforcement challenges, particularly in the absence of a fully harmonised regulatory framework. Ongoing reforms aim to address some of these gaps, but the system remains in transition.

9.3. United Kingdom

The United Kingdom has a relatively comprehensive AML framework but continues to face challenges in implementation and enforcement with a key issue concerning the effectiveness of supervision in non-financial sectors, particularly those overseen by professional body supervisors. Variations in supervisory quality and resources have raised concerns about consistency. The accuracy and reliability of beneficial ownership data in the PSC register has also been identified as a vulnerability, although recent reforms aim to strengthen verification mechanisms. In addition, the UK faces challenges related to the evolving nature of

financial crime, including the use of complex corporate structures and digital **assets**. Addressing these risks requires ongoing adaptation of both regulatory frameworks and supervisory practices.

9.4. Japan

Japan's AML framework has improved in response to international recommendations but continues to face structural challenges. A key limitation is the relatively narrow scope of obliged entities, particularly in non-financial sectors. This may create vulnerabilities in areas not fully covered by AML obligations. In addition, the system places strong emphasis on administrative guidance and compliance, which, while effective in promoting adherence, may limit the deterrent effect of enforcement measures compared with more enforcement-driven jurisdictions. Japan has also faced challenges in beneficial ownership transparency, with limited availability of centralised information. Efforts to address these issues are ongoing, particularly in response to FATF evaluations.

9.5. Singapore

Singapore's AML framework is generally considered robust, but certain challenges remain. As a major international financial centre, it is exposed to significant cross-border risks, including the use of complex financial structures and international capital flows. This increases the importance of effective cooperation and information sharing. The system's reliance on non-public beneficial ownership registers places greater emphasis on the effectiveness of supervisory and enforcement mechanisms to ensure that relevant information is available and accurate. In addition, the rapid evolution of financial technologies requires continuous adaptation of regulatory frameworks to address emerging risks, including those associated with digital assets and innovative payment systems.

9.6. Comparative insight

The analysis of regulatory gaps and systemic challenges reveals several cross-cutting themes across jurisdictions.

A key issue concerns the limits of regulatory scope. Even in jurisdictions with relatively broad AML frameworks, gaps remain in the coverage of non-financial sectors and emerging activities. These gaps may facilitate regulatory arbitrage, allowing illicit actors to exploit differences between sectors and jurisdictions.

Another angle relates to institutional capacity and supervisory effectiveness. The existence of comprehensive legal frameworks does not guarantee effective implementation, and variations in supervisory resources, expertise and coordination mechanisms can lead to uneven outcomes, particularly in complex or cross-border cases.

One more challenge concerns the adaptation to technological change. Digitalisation, including crypto-assets and new payment systems, continues to reshape the landscape of financial crime. While jurisdictions have taken steps to address these risks, regulatory frameworks often lag behind innovation. Technological capacity is indeed emerging as a critical determinant of AML effectiveness across jurisdictions.

Finally, the analysis highlights the persistent tension between national implementation and global standards. Although FATF recommendations provide a common reference framework, differences in legal traditions, institutional design and policy priorities result in divergent approaches. This fragmentation can undermine the overall effectiveness of AML systems at the global level.

Taken together, these findings suggest that addressing AML risks requires not only strengthening individual frameworks but also enhancing coordination, improving supervisory capacity and adapting regulatory approaches to an evolving financial environment. In this respect, AML vulnerabilities increasingly intersect with broader financial stability risks, particularly in sectors characterised by opacity, rapid innovation or limited supervisory coverage.

Table 8. Comparative overview of regulatory gaps, systemic risks and emerging challenges

Feature	EU	USA	UK	Japan	Singapore
Key structural gaps	Divergence in supervision and enforcement across MS (partly addressed by AMLA)	Limited AML coverage of certain non-financial sectors (e.g. real estate, profess. services)	Variability in supervision of DNFBPs (professional body supervisors)	Narrower scope of obliged entities, particularly in non-financial sectors	Exposure to complex cross-border financial flows due to internat. financial centre status
Beneficial ownership vulnerabilities	Transition from public to restricted access; data quality and interconnection challenges	Historically limited transparency	Public register (PSC) but concerns over data accuracy and verification	Absence of comprehensive central beneficial ownership register	Non-public register; reliance on supervisory and enforcement effectiveness
Supervisory capacity constraints	Uneven resources and expertise across MS; challenges in supervising DNFBPs	Overlap across multiple federal and state authorities; coord. complexity	Differ. in capacity and effectiveness across supervisory bodies	Strong central supervision but reliance on administrative guidance	High capacity, supported by centralised model
Enforcement-related challenges	Divergent enforcement practices across MS; ongoing harmonisation efforts	Strong enforcement but uneven coverage across sectors	Increasing enforcement, but still uneven across sectors	Lower enforcement intensity; reliance on preventive supervision	Targeted enforcement; less reliance on large-scale sanctions
Exposure to emerging risks (crypto, fintech)	Expanding framework (MiCA, AMLR), but complexity of implementation across MS	Ongoing regulatory devel.; lack of unified framework creates uncertainty	Gradual integration of crypto-assets; evolving approach	Regulatory framework in place; challenges with decentralised finance (DeFi)	Advanced framework, but continuous adapt. required due to innovation
Cross-border vulnerabilities	Internal market integration creates exposure to cross-border risks; coord. challenges	Strong international engagement, but domestic overlap may affect coord.	Active international coop.; reliance on operational mechanisms (e.g. JMLIT)	More formal and less operationally integrated cooperation	High exposure to international flows; strong reliance on effective cooperation
Main systemic risk drivers	Fragmentation, supervisory divergence, and complexity of cross-border financial activity	Sectoral gaps, regulatory fragmentation and evolving financial innovation	Supervisory inconsistency and data reliability issues	Limited scope and lower enforcement intensity	Global financial hub exposure and reliance on institutional capacity
Recent reforms / policy responses	Creation of AMLA, single rulebook (AMLR), strengthened FIU coord.	AML Act 2020, CTA, ongoing regulatory proposals	Companies House reform, strengthening supervision of profess. bodies	Gradual strengthening following FATF evaluations	Continuous regulatory updates under MAS; strengthening AML controls

Source: EGOV elaboration.

10. Conclusions and policy implications

The comparative analysis of AML frameworks highlights a significant degree of formal convergence across jurisdictions, reflecting the influence of international standards developed by the FATF. All systems share core features, including the criminalisation of money laundering, the application of risk-based approaches and the imposition of customer due diligence and reporting obligations on financial institutions and, to varying degrees, non-financial sectors.

Nevertheless, beyond this convergence, the comparison reveals substantial divergence in institutional design and implementation. Jurisdictions differ in the way supervisory responsibilities are organised, ranging from highly centralised models to multi-agency systems. These differences shape not only how AML rules are applied but also how effectively risks are identified, monitored and mitigated in practice.

A first key finding concerns the importance of supervisory architecture. Centralised systems, such as those in Singapore, benefit from consistency and rapid implementation, while decentralised or multi-agency systems, such as those in the United States and the United Kingdom, may offer flexibility but introduce coordination challenges. The European Union represents a hybrid model that is currently evolving through the establishment of AMLA, with the objective of enhancing convergence while preserving national competences.

A second finding relates to the role of transparency mechanisms, particularly in relation to beneficial ownership with the analysis showing that there is no uniform approach to balancing transparency, privacy and effectiveness. While some jurisdictions provide broad public access to ownership information, others prioritise restricted access for competent authorities. The effectiveness of these frameworks ultimately depends not only on accessibility but also on the accuracy, verification and usability of the underlying data.

A third key insight concerns the scope of AML obligations and the coverage of risks. Jurisdictions adopting broader regulatory perimeters, including extensive coverage of non-financial sectors, aim to reduce opportunities for regulatory arbitrage. However, expanding the scope of obligations also raises challenges in ensuring effective supervision across diverse sectors, particularly where supervisory resources are limited.

A fourth finding highlights the divergence in enforcement approaches and deterrence mechanisms with enforcement-intensive systems, such as that of the United States, relying on potential significant penalties and criminal prosecution to drive compliance, whereas other jurisdictions place greater emphasis on supervisory engagement and preventive measures. The European Union is moving towards greater harmonisation in this area, although enforcement outcomes remain influenced by national practices.

Finally, the analysis underscores the growing importance of cross-border cooperation and the persistent presence of regulatory gaps as financial crime increasingly exploits differences between jurisdictions, sectors and regulatory regimes. Despite the existence of international cooperation frameworks, challenges remain in ensuring timely, effective and consistent information sharing. Taken together, these findings suggest that there is no single "optimal" model of AML governance. Rather, each jurisdiction reflects a different balance between legal certainty, supervisory centralisation and enforcement discretion. The European Union's ongoing reform, centred on the creation of AMLA, represents a particularly significant institutional novelty, the outcomes of which may influence future developments in international AML governance, and may also strengthen the EU's role as a global AML actor, particularly through enhanced supervisory coordination and external engagement.

From a policy perspective, several implications emerge. First, efforts to enhance AML effectiveness should focus not only on the adoption of legal rules but also on strengthening institutional capacity and supervisory convergence. Second, improving the quality and usability of data, particularly in relation to beneficial ownership, is essential for effective risk detection. Third, addressing regulatory gaps in non-financial sectors and emerging activities remains a priority to reduce vulnerabilities. And finally, enhancing cross-border cooperation and operational information sharing is critical in a financial system characterised by high levels of international integration.

More broadly, the persistence of structural differences across jurisdictions highlights both the limits of formal convergence under FATF standards and the continued importance of national institutional choices. For policymakers and supervisors, this underscores the need to balance regulatory harmonisation with flexibility, while ensuring enforcement credibility, supervisory capacity and high-quality data infrastructures (capable of supporting risk-based oversight in an increasingly complex financial system).

LIST OF ABBREVIATIONS

ACRA	Accounting and Corporate Regulatory Authority (Singapore)
AML	Anti-Money Laundering
AMLA	Anti-Money Laundering Authority
AMLAR	Regulation establishing the Anti-Money Laundering Authority
AMLD	Anti-Money Laundering Directive
AMLD4	Fourth Anti-Money Laundering Directive
AMLD5	Fifth Anti-Money Laundering Directive
AMLD6	Sixth Anti-Money Laundering Directive
AMLR	Anti-Money Laundering Regulation
APTCP	Act on Prevention of Transfer of Criminal Proceeds (Japan)
BSA	Bank Secrecy Act (United States)
CASP	Crypto-Asset Service Provider
CDD	Customer Due Diligence
CDSA	Corruption, Drug Trafficking and Other Serious Crimes Act (Singapore)
CFT	Countering the Financing of Terrorism
CFTC	Commodity Futures Trading Commission (United States)
CTA	Corporate Transparency Act (United States)
DeFi	Decentralised Finance
DNFBPs	Designated non-financial businesses and professions
EBA	European Banking Authority
EU	European Union
FATF	Financial Action Task Force
FCA	Financial Conduct Authority (United Kingdom)
FDIC	Federal Deposit Insurance Corporation (United States)
FinCEN	Financial Crimes Enforcement Network (United States)
FIU	Financial Intelligence Unit
FSA	Financial Services Agency (Japan)

FSB	Financial Stability Board
FSRB	FATF-style regional body
IMF	International Monetary Fund
JAFIC	Japan Financial Intelligence Center
JMLIT	Joint Money Laundering Intelligence Taskforce (United Kingdom)
MAS	Monetary Authority of Singapore
MiCA	Markets in Crypto-Assets Regulation
MLR	Money Laundering, Terrorist Financing and Transfer of Funds (United Kingdom)
MS	Member State
NCA	National Competent Authority
NCA (UK)	National Crime Agency (United Kingdom)
OCC	Office of the Comptroller of the Currency (United States)
OPBAS	Office for Professional Body Anti-Money Laundering Supervision (United Kingdom)
oVASP	Offshore Virtual Asset Service Provider
POCA	Proceeds of Crime Act 2002 (United Kingdom)
PSC	People with Significant Control (United Kingdom)
SAR	Suspicious Activity Report (United States)
SEC	Securities and Exchange Commission (United States)
SMCR	Senior Managers and Certification Regime (United Kingdom)
STRO	Suspicious Transaction Reporting Office (Singapore)
TFR	Transfer of Funds Regulation
UWO	Unexplained Wealth Orders (United Kingdom)
VASP	Virtual Asset Service Provider

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