



**ACCOUNTANCY
EUROPE.**

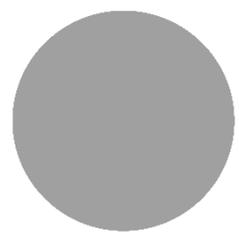
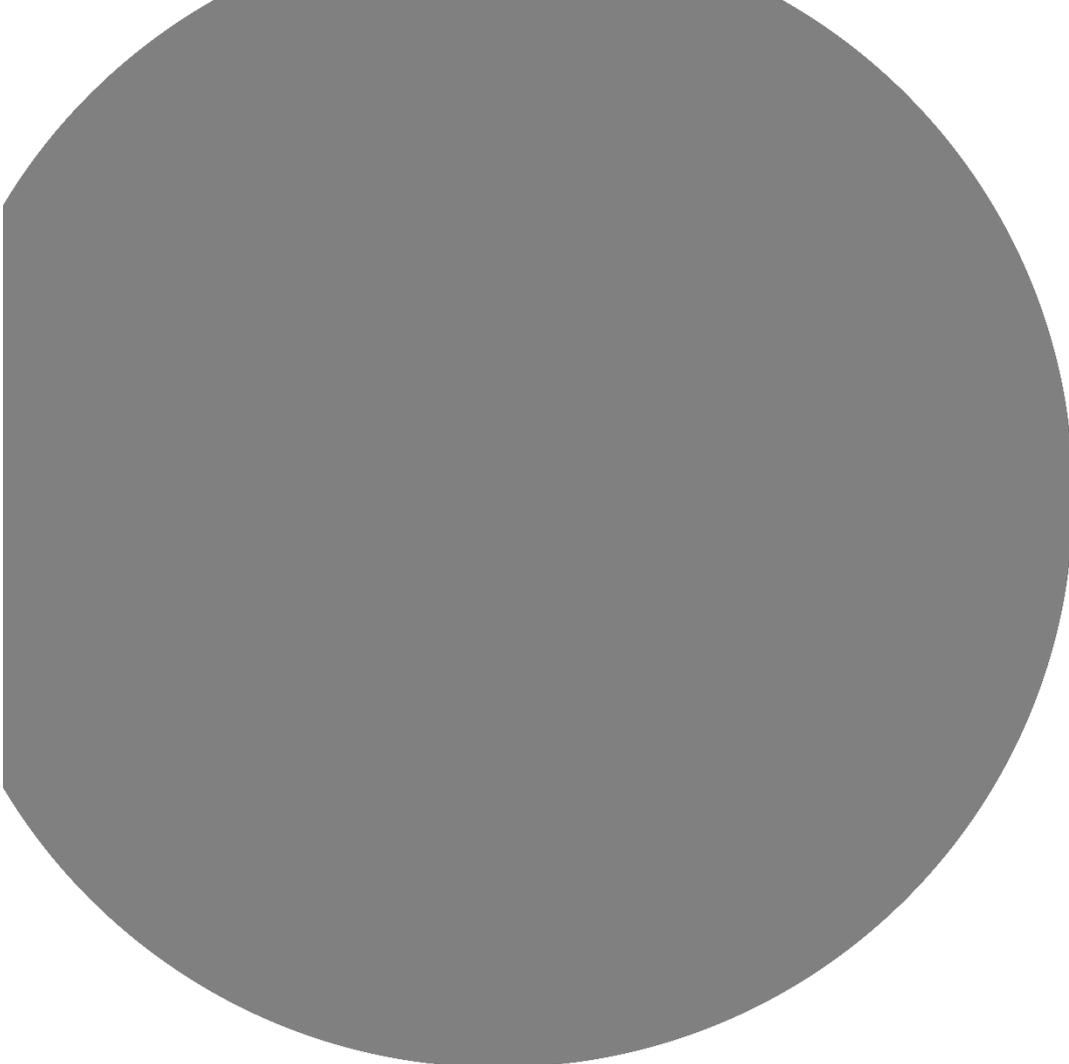
5 WAYS THE 6AMLD WILL IMPACT ACCOUNTANTS AND AUDITORS

How will 6AMLD affect accountants and auditors in practice?

Briefing paper

IDEAS.

**ANTI-MONEY LAUNDERING
MARCH 2026**



HIGHLIGHTS

This paper explains what the 6 Anti-Money Laundering Directive (6AMLD) means in practice for accountants, auditors, and tax advisers. While formally addressed to Member States and supervisory authorities, 6AMLD will significantly shape how AML obligations are supervised, enforced, and applied across the profession.

The paper translates supervisory reforms into clear, profession-relevant insights, stressing the importance of understanding the new supervisory architecture and emerging expectations in order to interpret obligations correctly and embed proportionate, effective compliance measures in good time.



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6AML DIRECTIVE - TRANSLATING SUPERVISORY REFORMS INTO PRACTICAL INSIGHTS FOR ACCOUNTANTS

Accountants, auditors, and tax advisers are facing a major shift in how anti-money laundering rules (AML) are enforced and supervised across the EU. Accountancy Europe is publishing a series of factsheets to help professionals understand how the new AML framework affects their obligations and their daily work.

The factsheet [Navigating the EU Anti-Money Laundering Regulation: Key issues for the accountancy profession](#) outlines the main provisions of the Anti-Money Laundering Regulation (AMLR) and their practical implications for accountants, auditors, and tax advisers. While the AMLR sets out harmonised obligations for obliged entities, including the accountancy profession, the 6 Anti-Money Laundering Directive (6AMLD) focuses on how these rules are supervised, enforced, and coordinated across the EU.

Formally addressed to Member States and supervisors, 6AMLD will significantly shape the operating environment for the accountancy profession as well. In practice, this means accounting and audit firms should expect more rigorous and coordinated supervision, new and more structured information flows from regulators, and higher expectations in key areas. While some of these measures may already be familiar in certain countries, this is the first time that EU-wide obligations of this kind have been established, creating a consistent framework across all Member States.

Published alongside the [6AMLD factsheet](#), this paper translates these supervisory and institutional changes into clear, profession-relevant implications, showing what accountants, auditors, and tax advisers should expect as the new supervisory framework takes effect. Understanding the supervisory architecture and institutional changes introduced by 6AMLD is essential for firms to prepare effectively and align their compliance practices with evolving EU standards.

1. MORE INTENSIVE AND COORDINATED SUPERVISION

Under 6AMLD, national AML supervisors, including professional bodies with self-regulatory responsibilities, will operate under stronger mandates and closer coordination at EU level.

6AMLD requires supervisors in all Member States to apply a consistent, risk-based approach to monitoring compliance. They are explicitly empowered to carry out on-site and off-site **inspections**, request information at any time, and impose **sanctions** or remedial measures where AML failures are identified.

For the first time, where accounting or audit firms operate across borders, for example through international networks with offices in multiple Member States, supervisors will be required to establish **AML supervisory colleges** to coordinate oversight. In practice, this means firms operating as international networks or providing services in multiple Member States should expect **more harmonised and collaborative supervision**.

Home and host authorities will be required to share information and coordinate their supervisory actions, reducing gaps between national approaches. In practice, if a supervisor in one Member State identifies a serious breach in a multinational firm, this information will be communicated through the supervisory college, allowing authorities in other countries to take appropriate action and leading to more consistent enforcement across the EU.

As a result, accountancy firms will continue to need to maintain consistently high AML compliance standards across all offices, as divergencies between jurisdictions will be easier for supervisors to identify and address.

2. INCREASED OVERSIGHT OF PROFESSIONAL BODIES

Many accountants in the EU are supervised by self-regulatory bodies, such as **national institutes of accountants or auditors**. Under 6AMLD, where these bodies act as AML supervisors, they must themselves be **subject to oversight by a public authority**. Some jurisdictions are still in the process of designating such

public authorities. This additional layer of supervision is designed to support consistent and effective application of AML requirements by professional bodies.

Self-regulatory bodies will be assessed on whether they have adequate resources, qualified staff, and effective procedures. They will receive guidance from public authorities and may be required to address identified shortcomings.

For practitioners, and depending on the country, this may result in **changes to audit approaches and inspections** by their professional bodies. Accountancy professionals may also see greater consistency in supervisory standards across Member States, as all self-regulatory bodies will be subject to common requirements.

In practical terms, **the supervisory chain is tightening: accountants → self-regulatory body → public oversight authority → EU AML Authority (AMLA)**. Each level will be expected to hold the one below it to account.

3. ENHANCED INFORMATION AND FEEDBACK LOOPS

6AMLD introduces stronger two-way information flows and feedback mechanisms that will directly affect accountants and other obliged entities.

From authorities to accountants: supervisors will be required to proactively share relevant AML/CFT information and guidance with obliged entities, including accountancy firms. This includes national and supranational risk assessment findings, AMLA guidance, indicators of suspicious activity, and updates on high-risk third countries.

Financial Intelligence Units (FIUs) will be required to issue **alerts** on specific high-risk trends, geographic areas, or entities. For example, an FIU may alert accountants to a new money-laundering scheme involving shell companies or to increased risks linked to clients from a particular region, allowing firms to adjust their controls more quickly.

From accountants to authorities: accountants submit suspicious transaction reports (STRs) to authorities. Under 6AMLD, FIUs must provide annual feedback on the quality and usefulness of these reports.

While individual STRs will not usually receive tailored responses, accountants will receive aggregated feedback highlighting common issues, such as incomplete information or delays in reporting. This helps firms improve future submissions and gives supervisors insight into which firms may need closer attention under risk-based supervision. It is particularly relevant for accountants and auditors, who often have limited visibility on the impact of their reports, and for firms that submit very few STRs, as this feedback will guide supervisory focus.

4. GREATER EMPHASIS ON RISK ASSESSMENTS AND SANCTIONS COMPLIANCE

6AMLD raises expectations around compliance, particularly in the area of risk assessment. Accountants will need to stay aligned with **evolving requirements relating to risk assessments** at both the EU and national level. A key change is the explicit inclusion of **targeted financial sanctions** in AML risk assessments.

This means accountancy firms must integrate **sanctions screening and controls** directly into their AML programs, rather than treating them as a separate process. For example, when accepting or reviewing clients, firms should assess not only money laundering risks but also whether a client is subject to EU sanctions or may be involved in sanctions evasion. Supervisors, tasked with monitoring compliance with sanctions obligations under the AML framework, are likely to ask questions during inspections about how firms ensure they do not engage with sanctioned parties. This can be a particularly impactful change especially for smaller practices.

5. STRONGER ENFORCEMENT AND LIABILITY

6AMLD increases the stakes for non-compliance by accountants. National authorities are required to impose **effective, proportionate, and dissuasive penalties** for AML breaches and, in many cases, make them public. For accountancy firms, major failures such as systematic lack of customer due diligence or ignoring suspicious transactions could lead to **significant fines**, up to €1 million or twice the benefit gained, whichever is higher, per 6AMLD's minimum sanction levels. These amounts may be even higher under national law.

Importantly, any person discharging managerial responsibilities can also be held liable and, in serious cases, may be temporarily **banned from managerial roles**. Publication rules mean that a firm's name, the nature of the breach, and the penalty could be disclosed publicly for up to five years, potentially impacting reputation.

On the positive side, clearer rules and EU-level guidance are intended to ensure more **consistency and fairness in enforcement**. All EU supervisors will follow common criteria for assessing the gravity of breaches, with AMLA developing regulatory technical standards. Nevertheless, accountancy firms should strengthen compliance controls now in anticipation of stricter oversight. Regular internal audits, staff training, and management oversight of AML processes will be crucial to avoid sanctions.

GETTING READY FOR THE NEW SUPERVISORY REGIME

With the new AML package, accountants and auditors will need not only additional training and guidance but also to update governance frameworks to meet the new AML/CFT requirements. 6AMLD encourages Member States and professional associations to support **AML/CFT training for new professionals entering the field**. As supervisors tighten requirements, firms should invest in upskilling staff on the new expectations set out in both AMLR and 6AMLD, such as conducting sanctions screening, identifying emerging typologies of illicit finance, and using feedback from FIUs to improve reporting.

The package also increases accountability for senior management. Firms should review and adjust governance structures to ensure clear responsibilities, robust oversight, and proper reporting lines. Strong governance frameworks help embed compliance into decision-making and support senior management in meeting both regulatory and supervisory expectations.

The aim is to **embed an AML-conscious culture** in everyday professional work. In practical terms, accountancy firms should update internal policies by 2027, when most AMLR and 6AMLD provisions take effect, to reflect the new regulatory and supervisory landscape. This includes incorporating any new guidance from regulators, ensuring compliance programs fully cover sanctions, and establishing clear escalation protocols for interacting with FIUs and supervisors.

Accountancy Europe's publication [New EU AML rules: advice for accountancy practitioners](#) provides practical examples of how firms can strengthen training, update internal policies, and foster an AML-aware culture in preparation for the new EU AML framework.

By taking a proactive approach, the profession can turn these regulatory developments into an opportunity to enhance trust and demonstrate its commitment to combating financial crime.

ANNEX: 6AMLD IMPACT ON ACCOUNTANTS – AT A GLANCE

This is an overview of some of the Articles from 6AMLD that may have a more direct impact on the work of accountancy professionals. The list is not necessarily fully exhaustive, and professionals are encouraged to familiarise themselves with the original [legislation](#).

REQUIREMENTS RELATING TO THE GRANTING OF RESIDENCE RIGHTS IN EXCHANGE FOR INVESTMENT

Article 5 requires Member States that operate residence-by-investment (“golden visa”) schemes to apply robust AML risk management, including source-of-funds and source-of-wealth checks, ongoing reviews of higher-risk applicants, and public reporting on money laundering or terrorist financing (ML/TF) risks.

For accountants, this means that any involvement of clients, their Ultimate Beneficial Owner (UBO), or other client-related parties in such schemes carries a higher inherent AML risk. This in turn requires enhanced due diligence, stronger verification of financial information provided, and increases the likelihood of scrutiny in relation to suspicious transaction reporting.

CHECKS ON THE SENIOR MANAGEMENT AND BENEFICIAL OWNERS OF CERTAIN OBLIGED ENTITIES

Article 6 requires Member States to ensure that the senior management and beneficial owners of certain obliged entities¹ are fit and proper, including being of good repute, having integrity, and sufficient AML-relevant knowledge, and to exclude or remove persons convicted of money laundering or terrorist financing.

For accountants, this means that partners, directors and owners of accountancy firms may be subject to ongoing integrity, competence and criminal-record checks, with supervisors empowered to block accreditation, require removal from management, or force divestment where AML standards are not met. Comparable obligations exist in some countries, though the scope and implementation of these checks, including access to beneficial ownership data, can vary.

ACCESS TO BENEFICIAL OWNERSHIP INFORMATION

Article 11 requires Member States to ensure that competent authorities, self-regulatory bodies, and obliged entities have timely access to beneficial ownership information² held in interconnected central registers. Access is granted to authorities such as tax bodies, AMLA, the European Public Prosecutor’s Office (EPPO), the European Anti-Fraud Office (OLAF), and law enforcement, while obliged entities must be able to consult the registers when conducting customer due diligence.

For accountants, this means that clients’ corporate structures and ultimate beneficial owners will be more transparent to authorities, increasing scrutiny of financial documentation and AML compliance. Accurate recording, verification, and alignment with due diligence obligations are therefore essential.

SPECIFIC ACCESS RULES TO BENEFICIAL OWNERSHIP REGISTERS FOR PERSONS WITH LEGITIMATE INTEREST

Article 12 expands access to beneficial ownership registers to persons with a legitimate AML/CFT interest, allowing wider, risk-based scrutiny of ownership and control structures without alerting the entity concerned.

For accountants, this means beneficial ownership information they rely on or help prepare must be accurate, consistent and backed by defensible due diligence, as any errors or lack of professional scrutiny can now be detected more easily.

¹ Refer to Article 6 for full details.

² Article 10 (6AMLD) empowers entities managing the registers to request supporting documentation, such as directors’ resolutions, minutes of meetings, partnership agreements, trust deeds, powers of attorney, or other contractual documents, to verify beneficial ownership.

SINGLE ACCESS POINT TO REAL ESTATE INFORMATION

Article 18 requires Member States to create a single, digital access point giving authorities real-time access to comprehensive real estate ownership and transaction data to detect and analyse money-laundering risks.

For accountants, while ethical obligations and professional standards have always required ensuring the accuracy and reliability of information and advice, the new system means that any mistakes or inconsistencies in property-related work are now more likely to be visible to authorities. This increases scrutiny of valuations, ownership information, and alignment with AML due diligence records, making careful documentation and verification even more critical.

SUSPENSION OR WITHHOLDING OF CONSENT BY FIUS

Article 24 allows Financial Intelligence Units (FIUs) to urgently suspend or block suspicious transactions, accounts, or business relationships to prevent money laundering or terrorist financing while they conduct analysis. In some countries, competent authorities have already held similar powers, while in others this is a new development, and it may lead to significant operational disruption.

For accountants, this means that suspicious transaction reports can quickly lead to frozen transactions or client relationships, increasing the need for timely, well-documented AML judgments. It also heightens client-management risks, as accountants must handle disruptions without breaching tipping-off rules.

FIU INSTRUCTIONS TO OBLIGED ENTITIES TO MONITOR TRANSACTIONS OR ACTIVITIES

Article 25 allows FIUs to instruct obliged entities to carry out enhanced, time-limited monitoring of transactions or business relationships linked to significant ML/TF risk and to report the monitoring results to the FIU.

For accountants, this means they may be formally required to apply targeted ongoing monitoring to specific clients or engagements, increasing compliance workload and documentation expectations, while maintaining strict confidentiality and avoiding tipping-off.

FEEDBACK BY FIU

Article 28 requires FIUs to provide periodic, risk-based feedback to obliged entities on the quality, timeliness, and usefulness of their suspicious transaction reports, without compromising investigations.

For accountants, this potentially means clearer supervisory signals on how well their AML reporting meets expectations, which may help them improve suspicion narratives, documentation, and internal AML processes, while also increasing accountability for poor-quality reporting.

POWERS AND RESOURCES OF NATIONAL SUPERVISORS

Article 37 sets out the powers, responsibilities, and resourcing requirements of national AML/CFT supervisors, ensuring all obliged entities are subject to effective, well-coordinated, and risk-based supervision with strong investigative and sanctioning powers. While some of these supervisory powers already exist in certain jurisdictions, the explicit resourcing requirements represent a new element aimed at strengthening oversight.

For accountants, this may mean more intensive and consistent supervision (often via professional bodies), greater scrutiny of AML policies, risk assessments, and controls, and a higher likelihood of inspections, information requests, and sanctions where AML obligations are not properly implemented.

AML/CFT SUPERVISORY COLLEGES IN THE NON-FINANCIAL SECTOR

Article 50 requires non-financial supervisors to set up AML/CFT supervisory colleges for cross-border groups or obliged entities in the non-financial sector, enabling coordinated supervision, information exchange, and joint action to address ML/TF risks.

For accountants, particularly those in networks, partnerships, or multinational firms, this means their firms may be subject to coordinated, cross-border oversight, increasing scrutiny of compliance, risk management, and reporting practices across all jurisdictions where they operate.

PECUNIARY SANCTIONS

Article 55 establishes that Member States must ensure pecuniary sanctions can be imposed on obliged entities for serious, repeated, or systematic breaches of AML/CFT obligations, including internal controls, customer due diligence, reporting, and record-keeping. Maximum fines for serious breaches can reach €1 million for non-financial entities and up to 10% of annual turnover for financial institutions, highlighting the significant financial risk of non-compliance.

For accountants, this means that failure to maintain robust AML controls, properly conduct client due diligence, file accurate STRs, or retain records can result in very large fines, underscoring the importance of strong compliance frameworks, careful documentation, and adherence to regulatory obligations.

ADMINISTRATIVE MEASURES

Article 56 empowers supervisors to apply administrative measures to obliged entities to address breaches, weaknesses, or inadequacies in AML/CFT policies, procedures, and controls.

For accountants, this means that regulators can require corrective actions such as strengthening internal controls, implementing specific client or transaction measures, imposing temporary bans on managers, or restricting business operations. This makes proactive compliance, proper documentation, and risk-based policies essential to avoid regulatory interventions.

PERIODIC PENALTY PAYMENTS

Article 57 allows supervisors to impose periodic penalty payments on obliged entities or individuals that fail to comply with administrative measures, as a means to compel timely adherence.

For accountants, this means that non-compliance with corrective AML/CFT actions, such as implementing required policies, ceasing prohibited conduct, or addressing governance issues, can result in ongoing financial penalties until compliance is achieved, emphasising the importance of prompt action on supervisory instructions.



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