

Consultation on the draft ITS pursuant to Art. 69 (3) AMLR on the format to be used for the reporting of suspicions and for the provision of transaction records

Fields marked with * are mandatory.

Objective of the consultation

AMLA would like to receive feedback on provisions of the draft ITS under Article 69(3) of Regulation (EU) 2024 /1624 ('AMLR') and in particular on the specific questions set out below.

Comments are most helpful if they:

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

Such comments should be sent by **20 September 2026, 23:59 (CET)**.

Personal data protection:

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

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

How to provide feedback

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

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

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

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

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

Language disclaimer

AMLA welcomes submissions in all official EU languages. You can change the displayed language of this public consultation using the language selector in the top right corner of the EU Survey platform. Please note that all language versions other than English have been produced using machine translation and may contain inaccuracies. When in doubt, please refer to the English version. Should you encounter issues with submitting your responses, please contact us by email at public.consultations@amla.europa.eu no later than 48 hours before the deadline of the consultation period.

* This contribution is made by:

- ☒ An organisation
☐ An individual

* Name of the organisation

200 character(s) maximum

Accountancy Europe

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

100 character(s) maximum

Iryna

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

100 character(s) maximum

de Smedt

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

100 character(s) maximum

iryna@accountancyeurope.eu

* Publication of your name and surname

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

* Select to which member state(s) your response refers:

Minimum 1 selection(s)

Austria
Belgium
Bulgaria
Croatia
Cyprus
Czechia
Denmark
Estonia
Finland
France
Germany
Greece
Hungary
Ireland
Italy
Latvia
Lithuania
Luxembourg
Malta
Netherlands
Poland
Portugal
Romania
Slovak Republic
Slovenia
Spain
Sweden
Other (please specify)

If you selected 'Other', please specify here your Country.

Accountancy Europe is a European Association

* Select the country in which you or your organisation carry out your main activities:

Minimum 1 selection(s)

Austria
Belgium
Bulgaria
Croatia
Cyprus
Czechia
Denmark
Estonia
Finland
France
Germany
Greece
Hungary
Ireland
Italy
Latvia
Lithuania
Luxembourg
Malta
Netherlands
Poland
Portugal
Romania
Slovak Republic
Slovenia
Spain
Sweden
Other (please specify)

★ Which of the following best describes your organisation?

- ☐ Obligated entity (OE) (in the sense of Regulation (EU) 2024/1624 Art. 3 [Regulation - EU - 2024/1624 - EN - EUR-Lex](#))
- ☐ Competent Authority (in the sense of Regulation (EU) 2024/1624 Art. 2 (1) (44) [Regulation - EU - 2024/1624 - EN - EUR-Lex](#))
- ☐ Self-Regulatory Body (in the sense of Regulation (EU) 2024/1624 Art. 2 (1) (47) [Regulation - EU - 2024/1624 - EN - EUR-Lex](#))
- ☒ Industry Association
- ☐ Civil Society Organisation / NGO
- ☐ Other (please specify)

* In which sector(s) do you primarily operate or engage with?

- ☐ Financial Sector
- ☒ Non-Financial Sector
- ☐ Other (please specify)

* Non-Financial Sector

- ☐ Crowdfunding service providers and intermediaries
- ☐ Investment migration operators
- ☐ Non-financial mixed activity holding companies
- ☐ Persons trading in precious metals and stones (as a regular or principal activity)
- ☐ Persons trading in high-value goods (as a regular or principal activity)
- ☐ Persons trading/intermediating in the trade of cultural goods (including art galleries, auction houses)
- ☐ Persons storing/trading/intermediating in the trade of cultural goods and high value goods within free zones and customs warehouses
- ☐ Football agents
- ☐ Professional football clubs
- ☐ Credit intermediaries for mortgage and consumer credit (other than credit institutions)
- ☐ Lawyers and other independent legal professionals
- ☐ Notaries
- ☒ External accountants
- ☒ Auditors
- ☒ Tax advisors
- ☐ Trust and company service providers
- ☐ Estate agents
- ☐ Provider of gambling services

Compared to the current suspicion reporting process, what would be the expected level of monetary one-off investment costs for your institution (e.g. IT system changes, staff training, internal policy/procedure updates, etc.), based on the details provided in the draft ITS:

- ☐ Nontangible one-off costs
- ☐ Limited
- ☐ Manageable
- ☒ Disruptive (please provide further details and evidence)

* Justification of assessment as Disruptive

From the perspective of accountants and auditors, the one-off investment costs are expected to be disruptive in the current form of the draft ITS. These costs could be manageable if the final ITS was implemented in a genuinely proportionate way. This would require FIU reporting platforms to present only the data points relevant to the reporting entity and the type of suspicion reported, and to fully respect the distinction between mandatory, mandatory-if-available, optional, dependent and FIU-required data points. The draft ITS itself recognises that templates should be adapted to the reporting obliged entity and the suspicion reported, and that reporting platforms should request only necessary and relevant data points.

For the accountancy sector, the main one-off costs would arise from mapping existing national reporting practices to the new EU format, updating internal policies and procedures, training staff, adapting case-management or AML workflow tools, and preparing internal guidance on how to complete the new structured fields without undermining the quality of narrative reporting.

The main source of disruption is the mandatory nature of information that is not routinely available to accountants and auditors. Many accountancy-sector reports arise from professional observations, documentation inconsistencies, business-rationale concerns or difficulties in completing CDD, rather than from account-level payment or transaction data. AMLA's own impact assessment recognises that detailed account and transaction information is often not available to non-financial obliged entities.

Where information that accountants and auditors do not routinely hold is classified as Technically Required, practices may need to make significant changes to their systems, internal procedures and information-gathering processes to adapt to the new reporting requirements.

This goes beyond a simple adjustment to the reporting form. For example, where an accountant has well-founded grounds for suspicion but does not hold the bank account or transaction information required to pass technical validation, the practice may need to seek additional information before it can submit the report. This creates additional operational burden and may delay reporting: more importantly, attempts to obtain information from a client after a suspicion has arisen may, in certain circumstances, increase the risk of tipping-off. A reporting framework that mandates acquisition of information which would not be readily available to an accounting firm before a report can be submitted could therefore undermine the objective of timely and effective suspicious activity reporting.

The scale of the one-off costs will consequently depend heavily on the final design and implementation of the ITS. Clear guidance, smart dependencies, validation rules that do not reject reports where information is genuinely unavailable, and sufficient implementation and testing time would substantially reduce the burden. Smaller and medium-sized practices are likely to face particular challenges and will require practical guidance and support.

Illustrative example: A small accountancy practice identifying a suspicion during bookkeeping or tax compliance may be able to provide the client identity, service type, reason for suspicion and relevant documents, but may not have access to banking-origin, destination or transaction-reference information. If such information is Technically Required, the practice may be unable to submit the report without first seeking additional information. This would not only create additional burden and potentially delay reporting, but could also, in certain circumstances, alert the client to the fact that further scrutiny is taking place and increase the risk of tipping-off. Requiring reporting entities to obtain information they do not routinely hold could therefore undermine the objective of timely and effective suspicious activity reporting. This illustrates why implementation becomes disruptive where the reporting framework requires information that is not routinely available to accountants and auditors.

Accordingly, the combination of system changes, changes to information-gathering processes, internal procedures, training and technical validation requirements makes implementation of the ITS in its current form disruptive for the accountancy sector.

In your view, how would the implementation of a new format for reporting suspicions affect your institution's ongoing (recurrent) suspicion reporting process costs (excluding one-off investments)?

- ☒ Increase
- ☐ Decrease
- ☐ No impact

If you expect increase or decrease, please estimate the percentage change in ongoing costs compared to the current situation.

- ☐ <5
- ☐ 6-10
- ☐ 11-20
- ☒ 21-30
- ☐ 31-50
- ☐ 51-75
- ☐ 76-100
- ☐ >100 (increase only)

What are the main drivers of the expected change in costs?

- ☒ Changes in reporting format complexity
- ☐ Degree of harmonisation across jurisdictions
- ☒ IT system adaptation requirements
- ☒ Staff training and procedural changes
- ☒ Volume of required data fields
- ☒ Automation opportunities
- ☒ Other (please specify)

* Specification of Other

We expect recurrent reporting costs to increase, at least during the first years of implementation. The increase will stem from the need to assess more structured datapoints, perform additional internal quality checks, document why certain information is unavailable, train staff, adapt internal templates and monitor changes in FIU-specific requirements. The ITS should reduce fragmentation over time, but those benefits will materialise only if country-specific fields remain limited, guidance is consistent, and FIU platforms apply dependencies and “mandatory if available” fields in a proportionate way.

We are not in a position to estimate a uniform percentage increase. The impact will vary significantly depending on firm size, current national reporting processes, whether the firm operates cross-border, and whether the reporting entity uses an internal AML workflow tool or relies on manual filing. For smaller accountancy practices, even limited additional steps may be material.

Among the main drivers of the expected change in costs are:

1. Changes in reporting format complexity: accountancy sector reports are often narrative and document-based, not transaction-system based. Costs rise significantly if validation rules require information the reporting entity does not possess. Limited FIU-required fields may be justified, but excessive national additions would preserve the current fragmentation and undermine the cost-reduction objective of the ITS.
2. IT system adaptation requirements: any IT system adaption is a significant increase in compliance cost. Any IT system adaptation is likely to significantly increase compliance costs, particularly for smaller firms, as implementation costs can be disproportionate to the low volume of reports filed.
3. Staff training and procedural changes: Staff will need guidance on when to use STR, SAR, product /service fields, non-transactional activity fields, and attachments.
4. Volume of required data fields: see comments on complexity
5. Other: data availability, professional secrecy/confidentiality review, SME implementation capacity. Note: Smaller practices will need accessible guidance, model procedures and practical examples.

The timeframe needed to adapt to the new framework

A realistic adaptation timeframe for the accountancy sector is 2 to 3 years, counted from the moment when the final ITS, national FIU platform specifications, validation rules and practical guidance are available. The proposed phased approach is welcome, but the accountancy sector adaptation period should not begin in practice until obliged entities have sufficient certainty about the final fields, national FIU-required datapoints, technical submission requirements, testing environment and examples for non-financial sector reports.

Ensure the efficiency of the reporting process

To reduce unnecessary administrative burden and avoid duplication, the reporting system should be capable of retaining information relating to registered reporting entities and automatically pre-filling these fields for subsequent submissions.

Once a reporting entity has been registered, information such as the reporting entity identifier should not need to be re-entered for each report unless it has changed. This would improve the efficiency of the reporting process while reducing the risk of manual errors.

What would be the timeframe needed for you to adapt to the new framework?

- ☐ Less than 1 year
- ☐ 1 to 2 years
- ☒ 2 to 3 years
- ☐ More than 3 years

While the exact timeframe needed for technical implementation and full application of the ITS is not determined yet, it is envisaged to provide five years (three for FIUs and two for obliged entities integrating the reporting schemes into their internal systems, with a possible overlap). Is this timeframe:

- ☐ Adapted to the respective needs of FIUs and obliged entities
- ☒ Too short (please provide explanation)
- ☐ Too long (please provide explanation)

* Explanation

The envisaged five-year period can be adapted to the respective needs of FIUs and obliged entities, provided that the two-year period for obliged entities is a genuine implementation period after national technical requirements and FIU guidance are finalised. It would be too short if the period for obliged entities overlaps substantially with FIU design, testing and platform development, because obliged entities would then be expected to prepare against moving specifications.

We recommend that AMLA and FIUs provide:

- finalised non-financial sector guidance before obliged-entity implementation begins;
- test environments and sample filings;
- clear implementation milestones;
- a no-rejection or supervisory-forgiveness period for good-faith filings where validation errors relate to genuinely unavailable information; and
- specific support for SMPs and professional bodies.

How would you rate the proposed approach, in particular Articles 3 and 4 of the draft ITS, regarding the necessary balance between harmonisation, quality and efficiency of reporting?

- ☐ Fully agree
- ☐ Agree to some extent (please provide explanation)
- ☐ Disagree to some extent (please provide explanation)
- ☒ Fully disagree (please provide explanation)

* Explanation:

We disagree that the proposed approach, in its current form, achieves the necessary balance between harmonisation, quality and efficiency of reporting. While we support the objective of greater harmonisation, the reporting requirements are not sufficiently proportionate or adapted to the operating models of the different obliged entities covered.

Greater differentiation of reporting requirements for non-financial obliged entities is needed to reflect the specificities of the different professional activities carried out and the information available to reporting entities. In its current form, the list of data points applicable to accountants and auditors is disproportionate and includes information that is not routinely available to them when reporting suspicions arise from professional engagements.

In particular, structured data points that may be appropriate for credit and financial institutions should not be Technically Required where the information is not routinely available to accountants and auditors. Where such information is required to pass technical validation, the reporting framework risks becoming unworkable in practice and may delay or prevent the submission of well-founded suspicions. This is elaborated in detail under the data point impact section.

The approach should also protect the quality of narrative reporting. For accountancy-sector reports, the explanation of the suspicion is often the most valuable part of the report. Structured fields should support that

narrative; they should not substitute for professional judgement or require information that is not available to the reporting entity.

Do you agree with the grouping of obliged entities for the purpose of different templates for the reports of suspicion and for the transaction records?

- ☐ Yes
- ☒ No (please provide explanation)

★ Explanation

We agree with the grouping of obliged entities for the purpose of different templates, especially the decision to adapt templates to the non-financial sector and to sub-sector specificities where needed. This is preferable to a single financial-sector-oriented template. However, it should be refined so that it does not obscure material differences between audit, accounting, tax advisory and TCSP activities.

Does the ITS need further clarification on definitions, processes or legal aspects?

- ☒ Yes (please provide explanation)
- ☐ No

★ Explanation

Yes. Further clarification is needed on definitions, processes and legal aspects to ensure a uniform application of ITS in Member States, enhance legal certainty and avoid misinterpretations and disproportionate burdens on obliged entities.

Align the definition of “reporting of suspicions” with Article 69 AMLR

The definition of “reporting of suspicions” in Article 2 of the draft ITS should be more closely aligned with Article 69(1)(a) AMLR.

Article 69(1)(a) refers to situations where an obliged entity “knows, suspects or has reasonable grounds to suspect”, whereas Article 2 refers only to “knowledge or suspicion”. The reference to “reasonable grounds to suspect” should therefore be included.

Article 2 also refers to “funds or activities, including transactions and any type of behaviour”, while Article 69(1)(a) refers to “funds or activities”. A customer’s behaviour may itself give rise to a suspicion. However, it should be clarified whether “behaviour” is intended to fall within the concept of “activities” under Article 69(1)(a), rather than to establish a broader reporting obligation.

We recommend aligning the definition with Article 69(1)(a) AMLR or clarifying the relationship between the two provisions.

Ensure Technically Required data points do not delay reporting or increase the risk of tipping-off

Technical validation requirements should not delay or prevent the timely submission of suspicious activity reports. Where obliged entities are required to obtain information that is not available to them, there is a risk that reporting may be delayed while attempts are made to obtain the missing information.

This would be contrary to the objective of timely reporting of suspicions. In some circumstances, such delays may also increase the risk of tipping-off, particularly where attempts to obtain additional information alert the customer to the existence of a suspicion.

AMLA should clarify how the validation and submission process should operate where a reporting obliged entity has a well-founded suspicion but information classified as Technically Required is legitimately unavailable, and ensure that this does not prevent the submission of the report.

Clarify reporting status terminology

The ITS distinguishes between several reporting statuses, including “Mandatory”, “Mandatory if Available”,

“Technically Required”. While “Technically Mandatory” is used in ANNEX I of the draft ITS, it is not defined. By contrast, “Technically Required” is expressly explained in the draft ITS. Consequently, the distinction between these two reporting statuses is unclear.

AMLA should clearly define each reporting status and explain the practical implications of each classification, including its impact on the technical validation of reports and whether the absence of a data point prevents successful submission through the reporting gateway.

Without clear definitions, reporting entities cannot determine whether “Technically Mandatory” and “Technically Required” are intended to have different practical consequences, which may lead to inconsistent implementation across sectors.

Clarify the meaning of “available” and “in possession”

The ITS should clarify that “mandatory if available” means information already held or reasonably accessible through the reporting entity's ordinary AML/CFT processes and professional engagement, without requiring additional investigation outside the engagement, client enquiries or information collection after a suspicion has arisen.”

SAR versus STR distinction

Clear examples are needed for accountants' scenarios where suspicion relates to activity, documentation, beneficial ownership, or refusal to provide CDD information, but no transaction is necessarily executed or observed.

Professional secrecy and confidentiality

Guidance should explain how the reporting format interacts with AMLR safeguards for auditors, external accountants and tax advisors when information is obtained while ascertaining a client's legal position or in relation to judicial proceedings.

Preserve the central role of the narrative

The ITS should ensure that the narrative field in DP0015 remains central and sufficiently flexible, particularly for non-financial obliged entities where suspicions may arise from professional observations, documentation inconsistencies or CDD concerns rather than from a specific transaction. Technical validation and structured data requirements should support, rather than constrain, the reporting of the circumstances and grounds giving rise to the suspicion.

Attachments: FIUs should clarify when working papers, charts, corporate structure diagrams or invoices should be attached and how irrelevant or confidential information should be redacted.

Country-specific datapoints: FIU-required fields should be transparent, justified, mapped to legal bases and subject to periodic review.

Examples for SMPs: AMLA should publish practical examples for bookkeeping and audit.

Several data points will be country-specific and not required by all FIUs, depending on their national legal frameworks.

How would you rate the addition of country-specific data points?

- ☐ The country-specific data points are acceptable
- ☐ The country-specific data points have no impact
- ☒ The country-specific data points pose challenges (please provide explanation)

*** Explanation**

Country-specific data points may be necessary to reflect national specificities. However, their addition could increase complexity for reporting entities and lead to divergent reporting requirements across Member States if

not appropriately constrained. We therefore recommend that country-specific data points be:

- limited and justified;
- clearly marked in FIU platforms;
- supported by legal references and examples;
- subject to periodic AMLA-coordinated review;
- not used to request information that the reporting entity does not hold; and
- implemented with common naming, definitions and validation rules wherever possible.

AMLA developed templates adapted to various types of obliged entities (see [Annexes I and II](#) of the Draft ITS and [Interpretative Note](#)).

How would you rate the established list of data points for the various sector categories, as established in Annexes I and II, in terms of comprehensiveness and clarity?

	Please select the list you wish to comment on	Please rate the list in terms of comprehensiveness; are all required data points included? The list is:	Please rate the list in terms of clarity; are the data points defined clearly without ambiguity? The list is:	Provide comments if you choose major adjustments needed in either category
1	Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs	major adjustments needed	major adjustments needed	Better tailor reporting requirements to different non-financial obliged entities While the list is extensive, comprehensiveness should not be assessed solely by whether all potentially relevant data points are included. The data points and their treatment also need to be appropriately tailored to the obliged entities to which the relevant sectoral template applies. Accountancy Europe recognises the objective of establishing a common reporting format across obliged entities. While the draft ITS includes a dedicated reporting template (I.6) for auditors, external accountants, tax advisers, other legal professionals and trust or company service providers, a number of Technically Required data points within that template are not fully adapted to the different operating models of the professions covered. In particular, a number of Technically Required data points have been designed primarily with the reporting models of credit and financial institutions in mind. While such information may be routinely available to financial institutions, it is not routinely available to accountants and auditors reporting suspicions arising from professional engagements. Unlike financial institutions, accountants and auditors may identify suspicious activity without access to account information or transaction-specific data. The reporting template should therefore better accommodate the different operating models of obliged entities by ensuring that data points which are not routinely available in the context of accountancy services are generally classified as Mandatory if Available, rather than Technically Required. Otherwise, reporting entities may be prevented from submitting suspicious activity reports despite having well-founded suspicions, undermining the objective of timely and effective reporting of suspicions. The individual comments below provide an overview of data points where this issue arises. Greater clarity is needed not only in the definitions of individual data points, but also regarding their intended application to the different categories of obliged entities covered by the ITS. A number of data points appear to reflect concepts and information that are readily understood and routinely available in the context of credit and financial institutions, but their meaning and intended application are not always sufficiently clear in the context of professional services provided by accountants and auditors. This is particularly important given that Annex I includes a dedicated template (I.6) for auditors, external accountants, tax advisers, other legal professionals and trust or company service providers. The data points within that template should be sufficiently clear as to what information each of these obliged entities is expected to provide in the context of their respective activities. However, the terminology used often assumes concepts or information that are more readily

			associated with financial-sector activities. For example, DP0501 assumes a connection with an identifiable account, although accountants and auditors may identify suspicious activity in the course of a professional engagement where no relevant account exists or account information is not available. Similarly, DP0023–DP0024 refer to “action taken regarding the suspicion”, a concept readily applicable to financial institutions that may refuse or suspend transactions or freeze accounts, but whose intended application to accountants and auditors requires further clarification. DP0802 requires the initiation date and time of a suspicious activity, although the availability and practical meaning of this information may differ significantly depending on the nature of the obliged entity and the circumstances in which the suspicion arises. AMLA should therefore review the definitions, terminology and intended application of the data points from the perspective of the different obliged entities covered by the relevant templates and provide sector-appropriate definitions and practical examples where necessary. This would help ensure that the harmonised data points are understood and applied consistently across sectors.
☐ Annex 1 - Financial institution and credit institutions ☐ Annex 1 - Credit intermediaries for mortgage and consumer credits other than credit and financial institutions ☐ Annex 1 - Crowdfunding service providers and intermediaries ☐ Annex 1 - Notaries ☐ Annex 1 - Real estate agents ☐ Annex 1 - Auditors, external	☐ fully comprehensive ☐ sufficiently comprehensive ☐	☐ fully clear ☐ sufficiently clear ☐	

2	accountants, tax advisors, lawyers, TCSPs ● Annex 1 - Persons trading in precious metals and stones, in high-value goods and in cultural goods ● Annex 1 - Providers of gambling services ● Annex 1 - Football agents and professional football clubs ● Annex 2 - Banking ● Annex 2 - Money remittance ● Annex 2 - Correspondent banking ● Annex 2 - CASPs	minor adjustments needed ● major adjustments needed	minor adjustments needed ● major adjustments needed	
	● Annex 1 - Financial institution and credit institutions ● Annex 1 - Credit intermediaries for mortgage and consumer credits other than credit and financial institutions			

3	● Annex 1 - Crowdfunding service providers and intermediaries ● Annex 1 - Notaries ● Annex 1 - Real estate agents ● Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs ● Annex 1 - Persons trading in precious metals and stones, in high-value goods and in cultural goods ● Annex 1 - Providers of gambling services ● Annex 1 - Football agents and professional football clubs ● Annex 2 - Banking ● Annex 2 - Money remittance ● Annex 2 - Correspondent banking ● Annex 2 - CASPs	● fully comprehensive ● sufficiently comprehensive ● minor adjustments needed ● major adjustments needed	● fully clear ● sufficiently clear ● minor adjustments needed ● major adjustments needed	
	●			

- Annex 1 - Financial institution and credit institutions
- ☐ Annex 1 - Credit intermediaries for mortgage and consumer credits other than credit and financial institutions
- ☐ Annex 1 - Crowdfunding service providers and intermediaries
- ☐ Annex 1 - Notaries
- ☐ Annex 1 - Real estate agents
- ☐ Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs
- ☐ Annex 1 - Persons trading in precious metals and stones, in high-value goods and in cultural goods
- ☐ Annex 1 - Providers of gambling services
- ☐ Annex 1 - Football agents and

- ☐ fully comprehensive
- ☐ sufficiently comprehensive
- ☐ minor adjustments needed
- ☐ major adjustments needed

- ☐ fully clear
- ☐ sufficiently clear
- ☐ minor adjustments needed
- ☐ major adjustments needed

	- professional football clubs ☐ Annex 2 - Banking ☐ Annex 2 - Money remittance ☐ Annex 2 - Correspondent banking ☐ Annex 2 - CASPs			
5	☐ Annex 1 - Financial institution and credit institutions ☐ Annex 1 - Credit intermediaries for mortgage and consumer credits other than credit and financial institutions ☐ Annex 1 - Crowdfunding service providers and intermediaries ☐ Annex 1 - Notaries ☐ Annex 1 - Real estate agents ☐ Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs	☐ fully comprehensive ☐ sufficiently comprehensive ☐ minor adjustments needed ☐	☐ fully clear ☐ sufficiently clear ☐ minor adjustments needed ☐	

Annex 1 - Persons trading in precious metals and stones, in high-value goods and in cultural goods Annex 1 - Providers of gambling services Annex 1 - Football agents and professional football clubs Annex 2 - Banking Annex 2 - Money remittance Annex 2 - Correspondent banking Annex 2 - CASPs	major adjustments needed	major adjustments needed	
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Please comment on the individual data points of your selection.

Select the data point on which you would like to comment, then select which aspect of the data point you would like to comment (name, definition, treatment, attributes, etc.), and provide the content of your comment.

Note: you can submit comments on up to 20 questions in one questionnaire. Should you wish to comment on more than the indicated number, please submit another questionnaire again.

	Datapoints list version your comment pertains to	Ref. No. of the datapoint you would like to comment on: To ensure the processing of your comment, please provide the full reference number: "DPXXXX"	Particular field of the selected datapoint the comment pertains to:	The body of the comment
				Reporting status (Changing Technically Required to Mandatory if Available) DP0501 ACCOUNT - Account Relationship - connection between account and obliged entity - Connection between the holder of the account and the reporting obliged entity - Technically required Field: Treatment Comment This data point is classified as Technically Required. However, it appears to have been designed primarily with the operating model of credit and financial institutions in mind, where suspicious activity is commonly linked to an identifiable account. By contrast, accountants and auditors may identify suspicious activity in the course of providing professional services where no relevant account exists or where account information is not available to the reporting entity. Requiring completion of this data point could therefore delay or prevent the submission of a suspicious activity report despite the existence of well-founded suspicions. This data point should be classified as Mandatory if Available, rather than Technically Required. DP0023 – REPORT - Suspicion Details - Action taken regarding the suspicion reported - Indication whether an action has been taken regarding the suspicion reported. Technically required DP0024 – REPORT - Suspicion Details - Description of the action taken regarding the suspicion reported - Description of the action taken regarding the suspicion reported. Mandatory DP0023 Comment This data point appears to have been designed primarily with the operating model of credit and financial institutions in mind. Actions such as refusing or suspending a transaction or freezing an account are generally not available to accountants and auditors reporting suspicions arising from professional engagements. AMLA should therefore clarify the relevance of this data point for non-financial obliged entities and provide examples of the types of actions that should be reported in this context or classify this DP as Mandatory if Available, rather than Technically Required DP0203 LEGAL ENTITY - Entity Relationship - Risk classification - Risk classification applied by the obliged entity to perform customer due diligence – Mandatory - DP0201 - Customer, occasional customer, prospective customer This datapoint is, by its

1	Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs	DP0501, DP0023, DP0024, DP0203, DP0802, DP0135	Treatment	very nature, a very limited source of relevant information for the financial intelligence units (FIUs) and constitutes an additional administrative burden on obliged entities. Accountancy Europe would therefore recommend considering deleting it altogether. If not possible, then as a minimum the field should clarify that the reported risk classification is the obliged entity's CDD risk rating for the client, not a legal conclusion on the suspicion itself. Firms use different internal risk models, especially across Member States and networks. Mapping to "low / medium / high / unknown" should be permitted without forcing changes to the firm's entire internal methodology. DP0802 - NON TRANSACTIONAL ACTIVITY - Activity details - activity initiation date and time - The date and time the suspicious activity occurred or was attempted by the customer or counterparty - Technically required Field: Treatment Comment The relevance and availability of this information differ across categories of obliged entities. While the initiation date and time may be routinely available to credit and financial institutions, this information may legitimately not be available to accountants and auditors reporting suspicions arising from professional engagements. AMLA should ensure that the technical validation rules accommodate these differences so that reporting entities are not prevented from submitting reports where the precise initiation date and time is not available. In light of the above, we recommend that this data point should be classified as Mandatory if Available, rather than Technically Required. DP0135 NATURAL PERSON - person details - date of death - Date of the death. FIU-required DP0134 Field: Treatment Comment Information on the date of death will not routinely be available to accountants and auditors when reporting suspicions arising from professional engagements. We recognise that the fact that the person concerned is deceased may be highly relevant to the FIU. However, a reporting entity may know that a person is deceased without knowing the precise date of death. The template should therefore allow the fact that a person is deceased to be reported even where the exact date of death is not available. Requiring completion of this data point where the information is legitimately unavailable could create an unnecessary reporting burden and, depending on the applicable validation rules, delay the submission of a suspicious activity report. Recommendation: This data point should be classified as Mandatory if Available.
				Sector-specific applicability DP0001 - REPORT - Reporting entity - Reporting entity activity - Economic activity of the reporting obliged entity according to the classification of Article 3 of Regulation (EU) 2024/1624. – Technically mandatory DP0001 should identify the relevant activity performed by the reporting obliged entity rather than relying solely on professional status or national professional classification, particularly where professionals perform several different activities. DP0002 - REPORT - Reporting entity - Reporting entity activity - For obliged entities performing different activities, indication of the activity related to the report. - Mandatory if available - DP0001 -Certified Accountant -Auditor -Asset management The values should be refined for the I.6 template. The template should allow the reporting entity to identify the activity giving rise to the report, including audit, external accounting, bookkeeping, payroll, tax compliance, tax advisory, company formation, registered office, company administration and trust/company services. Multiple selections should be possible for multidisciplinary firms. The current reference to "Certified Accountant / Auditor / Asset management" is too narrow and risks misclassification for tax advisors and TCSPs. DP0013

2	Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs	DP0001, DP0002, DP0013, DP0015, DP0016	Definition	REPORT - Report Information - report on an activity/transaction carried out in the EU under the freedom of services - Indication whether the report concerns a transaction or an activity carried out by the reporting entity through the freedom to provide services in the EU. - Update def with XBR def - Technically required Field: Treatment The relevance of this data point for accountants and auditors reporting suspicions arising from professional engagements is unclear. AMLA should clarify the circumstances in which the accountancy sector would be expected to complete this field. Where the information is not routinely applicable to accountants and auditors, the data point should be classified as Mandatory if Available, rather than Technically Required. DP0015 - REPORT - Suspicion Details - Suspicion description/reason for suspicion - Detailed explanation of why the activity or transaction is considered suspicious - Technically required This should remain the central field for accounting-sector reports. The field should accept a full narrative explaining the professional context, documents reviewed, inconsistencies identified, CDD concerns, client explanations, and why the matter is suspicious. It should not be constrained by overly restrictive length or validation rules. The interpretative note correctly recognises DP0015 as the narrative of the analysis and explanation of the suspicious transaction or activity. DP0016 – REPORT - Suspicion Details - suspicion indicator - Specific indicators or red flags that triggered the suspicion - Technically required The indicator list should include accounting-sector red flags and allow multiple selections, “other” and “unknown”, and to make it optional. Indicators should support, not replace, professional judgement. The reporting entity should not be required to determine the predicate offence or prove the suspicion. The interpretative note states that related offence fields capture the main reason triggering the decision to report and do not need to be justified or further investigated because the report is only a suspicion. To promote consistent reporting, AMLA should ensure that the list of indicators is sufficiently comprehensive and includes sector-specific red flags relevant to accountants and auditors. In the absence of appropriate indicators, particularly for smaller practices and sole practitioners, reporting entities may struggle to identify the most appropriate indicator, resulting in inconsistent reporting or potentially discouraging the submission of suspicious activity reports.
				Sector-specific applicability DP0019 - REPORT - Suspicion Details - Period of analysis by the obliged entity - start date - Start date of analysed transactions or activities - Technically required DP0020 REPORT Suspicion Details - Period of analysis by the obliged entity - end date - End date of analysed transactions or activities - Mandatory if available Field: Treatment / Definition The distinction between the reporting status of these two data points should be reconsidered. While the end date of the period analysed is classified as Mandatory if Available, the start date is classified as Technically Required, even though, in practice, it may be more difficult for accountants and auditors to determine the precise start of the relevant period. The relevance and practical application of this data point may also vary depending on the nature of the professional service provided. Suspicions identified in the course of professional engagements often arise from the cumulative assessment of information, documents or activities over time, rather than from a clearly identifiable starting point. By contrast, the end of the period analysed, or the point at which the reporting entity concluded its assessment, is generally easier to determine. AMLA should therefore either: • classify

3	Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs	DP0019, DP0020, DP0601–DP0618, DP0701, DP0702, DP0703, DP0017	Definition	DP0019 as Mandatory if Available, or • clarify that the start date refers to the point at which the reporting entity first identified or began analysing the suspicious activity, rather than the date on which the underlying activity itself commenced. DP0601–DP0618 Transaction fields Transaction fields should not be hard validations for accounting-sector SARs unless the transaction information is genuinely available to the reporting entity. Accountants and auditors may see invoices, ledgers, bank statements or audit evidence, but they do not ordinarily execute payments or hold complete payment-system data such as transaction references, initiation time, origin/destination of funds or bank routing information. The template should allow a SAR without transaction fields where the suspicion relates to activity, service provision or CDD failure. DP0701 PRODUCT & SERVICES - product / service information - Detailed product / service type - Further details of the type of product or service offered to the customer - Technically required DP0702 PRODUCT & SERVICES - product / service information - product or service date - Date on which the product or service was sought or provided - Mandatory DP0703 PRODUCT & SERVICES - product / service information - product or service identification number - The unique identification number assigned to the product or service by the obliged entity - Optional The terminology used in these data points appears to have been drafted primarily with the operating model of credit and financial institutions in mind. It is not always clear how concepts such as "detailed product/service type" and "product or service identification number" should be applied in the context of professional services provided by accountants and auditors. AMLA should review the terminology to ensure that it better accommodates the different operating models of non-financial obliged entities. In particular, these fields should be supported by sector-specific enumerations and, where appropriate, additional guidance or practical examples illustrating how they should be completed by accountants and auditors. Suggested values for DP0701 include statutory audit, assurance engagement, bookkeeping, payroll, tax return preparation, tax advisory, corporate restructuring, insolvency support, company formation, registered office, directorship/company administration and trust/company services. DP0703 should remain optional, as many professional services do not have a unique product or service identification number. DP0017 - REPORT - Suspicion Details Possible Criminal offence type - Type of possible criminal offence: ML, TF, PF, Other - Technically required Field: Definition This comment also applies to the DP0018. The ITS should better distinguish between information that reporting entities are expected to know and report, and assessments that fall within the remit of the FIU. For accountants and auditors, the relevant information is the basis for the suspicion, the activity giving rise to the report and the reasons why it is considered suspicious. Their role is to report suspicions based on the information available to them, rather than to determine the legal characterisation of the possible criminal offence. This data point should not require reporting entities to make legal determinations regarding the possible criminal offence where they are not in a position to do so. The FIU should be able to assess the possible criminal offence on the basis of the information provided.
				Sector-specific applicability DP0801–DP0808 Non-transactional activity fields These fields are particularly important for accountancy-sector reports and should be clarified. Activity types should include attempted onboarding, refusal or failure to

4	Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs	DP0801–DP0808	Definition	complete CDD, inconsistent source-of-funds explanations, unexplained capital contribution, unusual ownership/control structure, nominee arrangements, suspicious business rationale, unusual documentation, and activity identified during audit or tax work. Date/time fields should allow approximate periods where the activity is discovered retrospectively during professional work. Clarification will also be needed on the relationship between transaction-based reporting and non-transactional activity reporting, including when non-financial obliged entities may submit reports based solely on suspicious activity, professional observations, CDD concerns or behavioural indicators without providing transaction or account-related information.
5	Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs	DP0008, DP0901, DP0903, DP0101-DP0104	Definition	Clarity and consistency DP0008 - REPORT - Report Information – Urgency - Identified need for a particularly swift treatment from the FIU. Technically required Field: Definition Accountancy Europe supports the inclusion of this data point. However, given that it is classified as Technically Required, additional clarification would be helpful regarding the circumstances in which a reporting entity should indicate an identified need for particularly swift treatment by the FIU. Practical guidance or examples would help ensure that this field is applied consistently across reporting entities. DP0901 OBJECT - Object type - Object type - Type of object concerned by the transaction or activity reported. - Technically required Field: Definition It is unclear what is meant by 'object type' or how this data point is intended to be completed by reporting entities. AMLA should clarify the scope of this data point and provide practical examples to ensure its consistent interpretation and application. DP0903 - OBJECT- Object location – Address - Indication whether the address of the object is known or not. - Technically required Field: Definition It is not sufficiently clear what is meant by "address of the object" or how this data point is intended to be completed by reporting entities. AMLA should clarify the scope of this data point and provide practical examples to ensure its consistent interpretation and application. DP0101 - NATURAL PERSON - Person Reporting Entity Relationship - connection to obliged entity - natural person - Connection between the natural person and reporting obliged entity - Technically required DP0102 - NATURAL PERSON - Person Reporting Entity Relationship - Onboarding date - Relationship start date - Mandatory - DP0101; Customer, Occasional Customer, DP0103 - NATURAL PERSON - Person Reporting Entity Relationship - End date - Date of termination of the business relationship - Mandatory if available - DP0101; Customer, Occasional Customer DP0104 - NATURAL PERSON - Person Reporting Entity Relationship - Status of the relationship - Operational status of the business relationship at the date of the report - Mandatory if available - DP0101; Customer, Occasional Customer, Prospective Customer Field: Definition The terminology used for this data point is unclear and should be made more consistent. The ITS refers to: • person reporting entity relationship • connection to obliged entity – natural person, and • connection between the natural person and reporting obliged entity While DP0102–DP0104 appear to indicate that the intended meaning is the relationship between the natural person who is the subject of the report and the reporting obliged entity, this is not sufficiently clear from the terminology used in DP0101. It could also be understood as referring to the individual submitting the report on behalf of the obliged entity (e.g. the MLRO or another authorised representative). AMLA should clarify this explicitly, harmonise the terminology used throughout the ITS and provide a clear definition, supported where appropriate by practical examples. Clear definitions and practical examples for the

				categories “customer”, “occasional customer” and “prospective customer” are also needed to ensure consistent classification by non-financial obliged entities. In practice, these distinctions may not be straightforward for professional service firms, particularly where relationships are intermittent or long-standing.
6	● Annex 1 - Financial institution and credit institutions ● Annex 1 - Credit intermediaries for mortgage and consumer credits other than credit and financial institutions ● Annex 1 - Crowdfunding service providers and intermediaries ● Annex 1 - Notaries ● Annex 1 - Real estate agents ● Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs ● Annex 1 - Persons trading in precious metals and stones, in high-value goods and in cultural goods ●	DP0003, DP0507, DP0508, DP0607, DP0608	Treatment	Improving usability DP0003 REPORT - Reporting entity - Reporting entity - ID Official registration or license number of the reporting obliged entity, Legal Entity Identifier, or VAT number or equivalent number issued to a natural person conducting business as a sole trader, practitioner or equivalent position issued by the Chamber of Commerce or professional supervisory body. - Technically mandatory Field: Treatment To reduce unnecessary administrative burden and avoid duplication, the reporting system should be capable of retaining information relating to registered reporting entities and automatically pre-filling these fields for subsequent submissions. Once a reporting entity has been registered, information such as the reporting entity identifier should not need to be re-entered for each report unless it has changed. This would improve the efficiency of the reporting process while reducing the risk of manual errors. DP0507 ACCOUNT - Account Details - Suspended Amount - The amount of funds (in the currency of the account) subject to Suspension - Mandatory - DP0505 - Suspended/Frozen, Blocked DP0508 ACCOUNT - Account Details - account currency - The currency of the account(s) being reported - Mandatory if available DP0607 TRANSACTION - Transaction Details - transaction amount - The numeric value of the transaction in the currency specified in “transaction currency” - Technically mandatory - DP0608 (value different from local currency) DP0608 TRANSACTION - Transaction Details - transaction currency - Currency in which the transaction was conducted - Technically required Field: Definition AMLA should clarify how these data points should be completed where the account or transaction is denominated in a crypto-asset or another non-fiat currency. The reporting framework should preserve the original currency of the account or transaction, including crypto-assets where relevant, as this information may itself be material to the FIU's

	Annex 1 - Providers of gambling services ☐ Annex 1 - Football agents and professional football clubs ☐ Annex 2 - Banking ☐ Annex 2 - Money remittance ☐ Annex 2 - Correspondent banking ☐ Annex 2 - CASPs			analysis. The ITS should therefore ensure sufficient flexibility for reporting entities to report the original currency and provide clear guidance on the treatment of crypto-assets to promote consistent reporting across obliged entities.
7	Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs	DP0411, DP0401–DP0411, DP0003	Definition	Need for further guidance DP0411 - ADVERSE INFORMATION - Media information - Media information Indication of any known negative publicity which is relevant to this report - conditional Field: Definition Media information may be relevant as contextual information or as a trigger for further enquiries. However, it should not be regarded as the basis for, or evidence supporting, the reported suspicion. The grounds for suspicion should instead be based on the objective facts, circumstances and indicators identified by the reporting obliged entity. AMLA should clarify the intended purpose of this data point to ensure that media information is reported only as supporting contextual information rather than as an investigative fact. DP0401–DP0411 Adverse information and other actors These fields should remain “mandatory if available” or optional where appropriate. Accountants may identify adverse media, sanctions or PEP issues through CDD, but they may not know whether law enforcement or other public bodies are involved. Guidance should also explain how to report adverse information without breaching confidentiality, professional secrecy or tipping-off rules DP0003 REPORT Reporting entity Reporting entity ID Official registration or license number of the reporting obliged entity, Legal Entity Identifier, or VAT number or equivalent number issued to a natural person conducting business as a sole trader, practitioner or equivalent position issued by the Chamber of Commerce or professional supervisory body. Technically mandatory Where the reporting obliged entity is an individual professional and the suspicious transaction report is transmitted to the FIU through a self-regulatory body, the ITS should clarify how DP0003 should be completed and handled in order to preserve the confidentiality of the reporting professional. In particular, AMLA should clarify whether identifying information, such as the professional's registration number, should be collected or stored separately where necessary to protect the identity of the person making the report.
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Annex 1 - Financial institution and credit institutions

● Annex 1 - Credit intermediaries for mortgage and consumer credits other than credit and financial institutions

● Annex 1 - Crowdfunding service providers and intermediaries

● Annex 1 - Notaries

● Annex 1 - Real estate agents

● Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs

● Annex 1 - Persons trading in precious metals and stones, in high-value goods and in cultural goods

● Annex 1 - Providers of gambling services

● Annex 1 - Football agents and

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	professional football clubs Annex 2 - Banking Annex 2 - Money remittance Annex 2 - Correspondent banking Annex 2 - CASPs			
9	Annex 1 - Financial institution and credit institutions Annex 1 - Credit intermediaries for mortgage and consumer credits other than credit and financial institutions Annex 1 - Crowdfunding service providers and intermediaries Annex 1 - Notaries Annex 1 - Real estate agents Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs	Category Sub-category Name of the datapoint Definition		

● Annex 1 - Persons trading in precious metals and stones, in high-value goods and in cultural goods ● Annex 1 - Providers of gambling services ● Annex 1 - Football agents and professional football clubs ● Annex 2 - Banking ● Annex 2 - Money remittance ● Annex 2 - Correspondent banking ● Annex 2 - CASPs		Treatment ● Dependency	
● Annex 1 - Financial institution and credit institutions ● Annex 1 - Credit intermediaries for mortgage and consumer credits other than credit and financial institutions ●			

10	Annex 1 - Crowdfunding service providers and intermediaries ☐ Annex 1 - Notaries ☐ Annex 1 - Real estate agents ☐ Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs ☐ Annex 1 - Persons trading in precious metals and stones, in high-value goods and in cultural goods ☐ Annex 1 - Providers of gambling services ☐ Annex 1 - Football agents and professional football clubs ☐ Annex 2 - Banking ☐ Annex 2 - Money remittance ☐ Annex 2 - Correspondent banking ☐ Annex 2 - CASPs		☐ Category ☐ Sub-category ☐ Name of the datapoint ☐ Definition ☐ Treatment ☐ Dependency	
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			● Category ● Sub-category ● Name of the datapoint ● Definition ● Treatment ● Dependency	

	professional football clubs Annex 2 - Banking Annex 2 - Money remittance Annex 2 - Correspondent banking Annex 2 - CASPs			
12	Annex 1 - Financial institution and credit institutions Annex 1 - Credit intermediaries for mortgage and consumer credits other than credit and financial institutions Annex 1 - Crowdfunding service providers and intermediaries Annex 1 - Notaries Annex 1 - Real estate agents Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs		Category Sub-category Name of the datapoint Definition	

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● Annex 1 - Financial institution and credit institutions ● Annex 1 - Credit intermediaries for mortgage and consumer credits other than credit and financial institutions ●			

- Annex 1 - Crowdfunding service providers and intermediaries
- Annex 1 - Notaries
- Annex 1 - Real estate agents
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- Annex 1 - Persons trading in precious metals and stones, in high-value goods and in cultural goods
- Annex 1 - Providers of gambling services
- Annex 1 - Football agents and professional football clubs
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	professional football clubs Annex 2 - Banking Annex 2 - Money remittance Annex 2 - Correspondent banking Annex 2 - CASPs			
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16	Annex 1 - Crowdfunding service providers and intermediaries ☐ Annex 1 - Notaries ☐ Annex 1 - Real estate agents ☐ Annex 1 - Auditors, external accountants, tax advisors, lawyers, TCSPs ☐ Annex 1 - Persons trading in precious metals and stones, in high-value goods and in cultural goods ☐ Annex 1 - Providers of gambling services ☐ Annex 1 - Football agents and professional football clubs ☐ Annex 2 - Banking ☐ Annex 2 - Money remittance ☐ Annex 2 - Correspondent banking ☐ Annex 2 - CASPs		☐ Category ☐ Sub-category ☐ Name of the datapoint ☐ Definition ☐ Treatment ☐ Dependency	
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			☐ Category ☐ Sub-category ☐ Name of the datapoint ☐ Definition ☐ Treatment ☐ Dependency	

	professional football clubs Annex 2 - Banking Annex 2 - Money remittance Annex 2 - Correspondent banking Annex 2 - CASPs			
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● Annex 1 - Persons trading in precious metals and stones, in high-value goods and in cultural goods ● Annex 1 - Providers of gambling services ● Annex 1 - Football agents and professional football clubs ● Annex 2 - Banking ● Annex 2 - Money remittance ● Annex 2 - Correspondent banking ● Annex 2 - CASPs		Treatment ● Dependency	
● Annex 1 - Financial institution and credit institutions ● Annex 1 - Credit intermediaries for mortgage and consumer credits other than credit and financial institutions ●			

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