

# Europe's AML Reform:

## *The Main 10 Changes Every Real Estate Professional Must Know Today*

The EU AML Package fundamentally reshapes compliance obligations for real estate agencies, developers, brokers, and intermediaries across Europe. immosurance is the only European platform purpose-built to address every one of these changes for the real estate sector.

**Key Deadline: 10 July 2027**



# The Real Estate Sector Under the AML Spotlight

## High-risk by definition

Real estate is consistently classified as a high-risk sector in EU Supranational Risk Assessments.

## Cash & complexity

Large values, opaque ownership structures, and cross-border capital flows make real estate a primary Money Laundering vector.

## Deadline pressure

July 2027 is closer than most compliance teams realise. Remediating large client portfolios takes 12-18 months. Midsize and smaller businesses face 6 to 12 months preparation time!

## Supervisory cascade

AMLA peer-reviews national supervisors. That pressure cascades to every real estate firm they oversee.

## **immosurance — natively built for this**

The only European AML platform designed exclusively for real estate agencies, developers, mortgage brokers, and intermediaries.

European Real Estate – Compliance - AMLR

**Implementing** immosurance  
**for Real Estate Cannot Wait**

# Unified Updating Intervals

*Structured KYC refresh cycles replace ad-hoc practice*

- Medium/low-risk clients: KYC refresh every 5 years
- High-risk clients (offshore buyers, cash-intensive investors): annual refresh
- Trigger-based updates required on any material change — new deal, ownership restructure, change of residence
- Effective 10 July 2027; high-risk updates must be complete by 10 July 2028
- No exemptions for dormant accounts or simplified due diligence clients

**immosurance** — The Only European Solution for Real Estate

Automates risk-tiered KYC cycles and deal-event triggers across your full client portfolio — no manual calendar reminders.



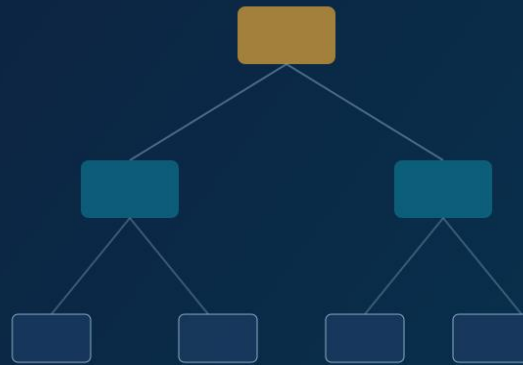
## KYC Cycles



- Beneficial Ownership threshold: 25% (tightened to 15% for high-risk entities – offshore SPVs, trusts)
- New look-through methodology: full ownership chain must be documented end-to-end
- EU central BO registers expanded, interconnected, and publicly accessible
- 14-day deadline to report and correct inaccurate BO register entries

## **immosurance** – The Only European Solution for Real Estate

Automates look-through BO mapping for real estate entities and integrates with EU BO registers – meeting the 14-day correction deadline without manual effort.



## Beneficial Ownership

25%

BO threshold

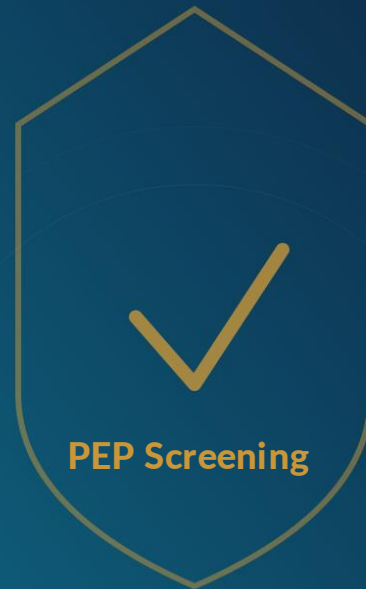
## Redefinition of Politically Exposed Persons

*Local officials and siblings now in scope – including real estate buyers*

- PEP definition extended to regional and local officials in municipalities of 50,000+ inhabitants
- Siblings now formally classified as PEP-connected family members
- Enhanced due diligence applies to one-off transactions with PEPs – not only ongoing relationships
- National supervisors may apply broader local definitions

**immosurance** – The Only European Solution for Real Estate

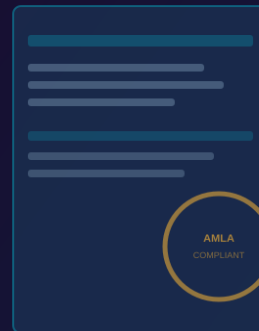
Continuously updated PEP database reflecting the expanded EU definition – instant screening at client onboarding and transaction initiation, including local officials and siblings.



PEP

- Sanctions risk assessment now mandatory within the institutional risk framework
- Screening required at every transaction stage – from mandate to deed signing
- Clearer internal accountability: escalation and reporting lines must be documented
- Applies to all real estate obliged entities: agents, developers, notaries, intermediaries

**immosurance** – The Only European Solution for Real Estate  
Embeds real-time sanctions screening at every transaction milestone – no duplication of effort across compliance and operations teams.

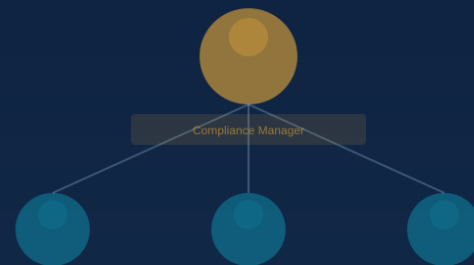


## Sanctions

- "Compliance Manager" role: a designated board member accountable for AML adequacy
- Fit & Proper assessments for all AML-relevant staff and distribution partners
- Assessments required prior to onboarding and periodically thereafter
- Mandatory processes to identify, prevent, and manage conflicts of interest

**immosurance** – The Only European Solution for Real Estate

Role-based compliance dashboards, Fit & Proper assessment tracking, and conflict-of-interest registers – real-time governance visibility for your Compliance Manager.

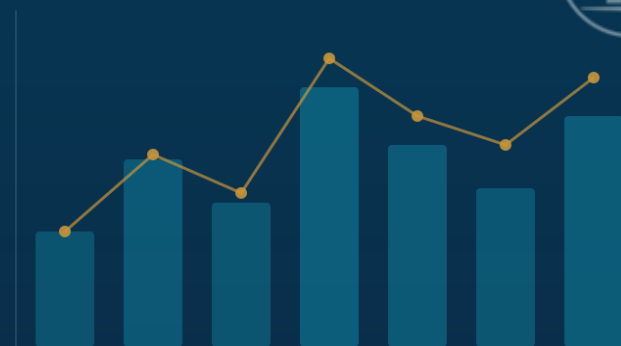


**Governance**

- AMLA supports FIUs in joint analysis of cross-border suspicious activity reports (SARs)
- FIU must respond to reported transactions within 3 working days
- AMLA manages FIU.net – the central EU operational intelligence platform
- Cross-border real estate deals will face coordinated multi-jurisdiction scrutiny
- 250+ data points – AMLA Framework

## **immosurance** – The Only European Solution for Real Estate

Built-in SAR filing and FIU submission workflows, pre-formatted to national and EU standards – enabling your team to meet the 3-day deadline without manual report drafting.



## Data Collection

250+

data points - AMLA framework

- EUR 3,000: identification required for all occasional cash transactions – no exceptions
- EUR 10,000: commercial cash payment ban effective EU-wide
- Mandatory FIU reporting: luxury vehicles  $\geq$  EUR 250K; watercraft/aircraft  $\geq$  EUR 7.5M
- High-value goods in scope: private jets  $\geq$  EUR 7.5M; watches, jewellery, gold  $\geq$  EUR 10K
- Direct impact on high-end residential and mixed-use real estate transactions

**immosurance** – The Only European Solution for Real Estate

Applies threshold logic automatically to every deal in your pipeline, generates mandatory FIU reports, and flags cash payment anomalies in real time.



**High-Value  
Assets**

250+ data points – real estate is a named high-risk sector

- AMLA Calibration Exercise (March–April 2026): data collected from ~5,000 institutions
- 250+ standardised data points: customers, products, countries, distribution channels
- Data feeds directly into EU-wide and national supervisory risk frameworks
- Firms unable to provide structured, comparable data face intensified supervisory scrutiny

**immosurance** – The Only European Solution for Real Estate

Structured around AMLA's 250+ data fields – real estate firms can export regulatory-ready datasets at any point. When supervisors ask, the data is already prepared.



€3K

ID requirement - cash

€10K

Commercial cash ban

€250K

Luxury vehicle reporting

€7.5M

Aircraft / watercraft

## New Thresholds

- AML applied directly as a regulation – no more national transposition gaps or inconsistencies
- Strong harmonisation of CDD and EDD obligations across the entire EU
- New unified methodology for determining beneficial ownership
- Narrow national discretions reduce cross-border compliance arbitrage

## **immurance** – The Only European Solution for Real Estate

The only European AML platform covering all EU jurisdictions in one interface – consistent due diligence standards, unified BO data management, and Single Rulebook compliance without per-country processes.



Compliance

## AMLA Direct Supervision

*~40 entities under direct AMLA supervision; pressure cascades to all others*

- AMLA directly supervises ~40 high-risk obliged entities with significant cross-border relevance
- Uniform inspection, sanction, and oversight standards published and applied EU-wide
- AMLA peer-reviews national supervisors — pressure flows down to all firms they oversee
- Real estate is a named high-risk sector in EU supervisory frameworks

**immosurance** — The Only European Solution for Real Estate

Positions real estate firms for supervisory readiness — audit-ready documentation, complete transaction histories, and a real-time compliance dashboard that demonstrates genuine AML maturity under inspection.



**AMLA**  
**Supervision**

**Change #10**

immosurance.net

# The real risk is not AMLA direct supervision.

*It is being caught underprepared when AMLA starts peer-reviewing national supervisors and the pressure cascades down to every real estate firm in Europe.*

---

**Position yourself now — well ahead of 2027.**

**immosurance**

**The European AML Compliance Platform for Real Estate**

immosurance.net

immosurance - 2027