Shufti

SHUFTI RESEARCH

AMLR Readiness Survey 2026

Readiness claims and readiness evidence among 300 EU compliance leaders, eight months before the Anti-Money Laundering Regulation applies

2% of EU firms surveyed reported meeting all five AMLR proof-point criteria

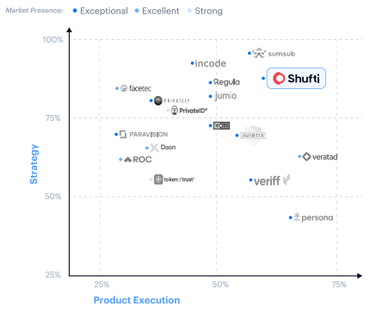


FIELDWORK BY CENSUSWIDE, COMMISSIONED BY SHUFTI

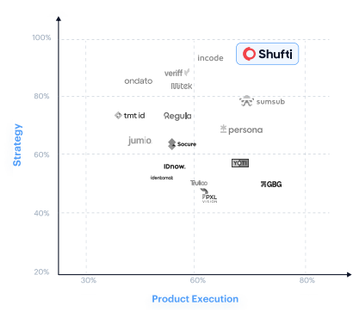
Industry Recognition 2025–2026

Recognised by leading analyst firms, government bodies and independent research organisations

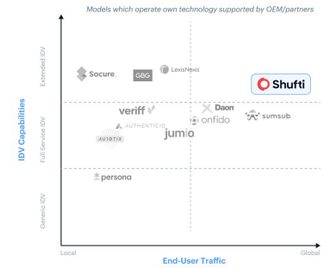
Ranked Exceptional in Liminal's 2026 Age Estimation Index



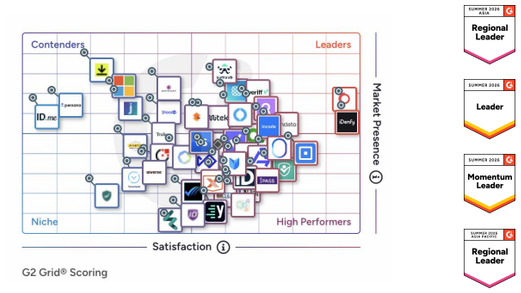
Ranked Exceptional in Liminal's 2026 Age Verification Index



Broadest global reach in the 2025 KuppingerCole Extended IDV report



Recognised as a Leader across four G2 Summer 2026 reports



Differentiated by Gartner on document diversity and country coverage



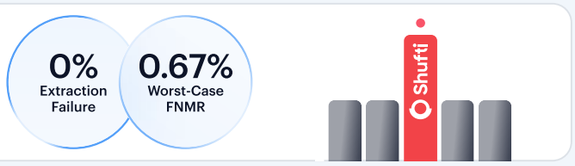
First EU company to achieve iBeta Level 3 Conformance to ISO/IEC 30107-3, with 0% APCER

iBeta Level 3 Conformance

0% APCER



Ranked Top 5 in the DHS RIVR 2025 for identity validation



SHUFTI AMLR READINESS SURVEY 2026

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PUBLISHED
10 November 2026

VERSION
v1.0

REGION
European Union, all 27 member states

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Survey of 300 senior compliance decision makers at EU obliged entities, 17 August to 2 October 2026, commissioned by Shufti

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SHUFTI AMLR READINESS SURVEY 2026

Executive summary

The Anti-Money Laundering Regulation (AMLR) applies across all 27 EU member states from 10 July 2027, and Article 20(4) obliges firms to "at all times be able to demonstrate to their supervisors" that their measures fit the risks they have identified. To measure how close firms are to that standard, Shufti commissioned Censuswide to survey 300 senior compliance decision makers in every member state between 17 August and 2 October 2026.

The survey found a wide distance between what firms believe about their AMLR readiness and what they can evidence. This report calls that distance the AMLR Proof Gap and measures it with the AMLR Proof Index, which gives each surveyed firm one point for every one of these five proof-point criteria its answers meet.

1. **Beneficial ownership checks that have been tested**
2. **A full customer record produced without manual assembly**
3. **A customer's risk rating explained within the same working day**
4. **A counted population of customers that need re-verification**
5. **A dated, scoped AMLR commitment from AML vendors**

ABOUT THE SURVEY

300
senior compliance decision makers at EU obliged entities

27
member states, at least 4 respondents in each

17 Aug to 2 Oct
survey fieldwork, 2026

HEADLINE FINDINGS AMONG SURVEYED FIRMS

Met all five proof-point criteria

2%

of surveyed firms reported meeting all five AMLR proof-point criteria

Met one criterion or none

49%

of surveyed firms met one AMLR proof-point criterion or none at all

Have finished remediation

10%

have finished or nearly finished their AMLR remediation*

Expect to be compliant on time

95%

expect full compliance by 10 July 2027,† yet 55% plan to finish immediately before the deadline

Need days to explain a risk rating

33%

would need two to five working days to explain a customer's risk rating to a supervisor

Customers to re-verify, on average

24%

of existing customers that surveyed firms expect to re-contact for new identity verification

Have no dated vendor commitment

87%

of surveyed firms confident in their AML vendors hold no dated, scoped AMLR commitment

Plan to accept the EUDI Wallet

71%

plan to accept the wallet, and 44% have budget approved or integration underway‡

* Combines "Complete and independently validated" and "Remediation largely complete, testing and assurance underway".
† Combines "Already compliant", "By the end of 2026", "By the first half (H1) of 2027" and "Immediately before the July 2027 application date".
‡ 71% combines "We already accept it, or integration is underway", "It is planned and a budget has been approved" and "It is planned, but a budget has not yet been approved". 44% combines the first two.

Most of the missing evidence sits in work that firms control directly, so the gap can narrow before July 2027 for firms that start that work now. The report sets out six proof drills that compliance teams can run against their own files.

> “From July 2027, supervisors will ask firms to prove their customer checks, and few can today. Shufti gives firms that proof now, on one platform, with each check mapped to the AMLR obligation behind it.”
>
> **SHAHID HANIF · CEO · SHUFTI**

SECTION 01 · WHAT FIRMS MUST PROVE

What the AMLR requires firms to prove

In its fifth Opinion on money laundering and terrorist financing risks, dated 28 July 2025, the European Banking Authority (EBA) reported that 61% of breaches across all sectors are caused by customer due diligence shortcomings, based on the responses of 52 AML/CFT competent authorities. The most common weakness in the EU's financial sector therefore sits in the routine work the AMLR now standardises across the Union.

(01)

SHUFTI AMLR READINESS SURVEY 2026

Regulation (EU) 2024/1624 applies directly in every member state from 10 July 2027 (Article 90) and answers that weakness by making demonstrable practice the test. Six obligations decide what a firm must be able to show its supervisor, and the survey questions behind this report were built around them.

Demonstrate at all times

ARTICLE 20(4)

Firms must be able to show their supervisor at any moment that their customer due diligence measures fit the risks they have identified.

Verify identity by an accepted route

ARTICLE 22(6)

Online, an electronic ID or qualified trust service comes first. A document checked remotely is the fallback, with safeguards proving the person is its holder. In person, an identity document is also a default route.

Keep customer data current

ARTICLE 26(2)

Customer information must be updated at least once a year for higher-risk customers and at least every five years for all others.

Monitor every relationship

ARTICLE 26(1)

Each business relationship and its transactions must be monitored on an ongoing basis against what the firm knows of the customer and its risk profile.

Stay liable for outsourced work

ARTICLE 18(2) AND 18(4)

The firm stays fully liable for outsourced due diligence, including work its provider passes to sub-processors, and must make sure each one applies the firm's policies. Every extra sub-processor is one more party to control.

Accept the EUDI Wallet

REGULATION (EU) 2024/1183

Banks and other firms that must use strong user authentication must accept the European Digital Identity Wallet by 24 December 2027.

The detail sits in regulatory technical standards from the Anti-Money Laundering Authority (AMLA). AMLA sent its final draft standards on customer due diligence to the European Commission with a final report dated 30 September 2026, and they apply six months after they enter into force. They keep the two routes in Article 22(6) as the default and allow other remote checks only for a customer who can use neither, case by case and with a justification the firm can show its supervisor. AMLA's guidelines on ongoing monitoring are due in the fourth quarter of 2026.

The obligations are fixed while the detailed standards are still arriving. When Shufti launched its AMLR solutions on 17 August 2026, CEO Shahid Hanif put the shift in one line, saying "The AMLR raises the standard of proof, not just the rules." The EBA measured the gap from the supervisor's side, and this survey measures it from the firm's side.

SECTION 02 · METHODOLOGY

Methodology of the Shufti AMLR Readiness Survey 2026

The survey reached 300 senior compliance decision makers aged 30 and over at EU obliged entities between 17 August and 2 October 2026, each of whom makes the final compliance decision or helps reach it. Respondents come from all 27 member states, with at least 4 in each. Sector quotas set minimums of 40 each for neo-banks, payment and e-money institutions, non-bank lenders, foreign exchange (FX) providers and crypto-asset service providers (CASPs), 25 for iGaming and gambling operators and a ceiling of 75 for traditional banks.

(02)

SHUFTI AMLR READINESS SURVEY 2026

Most firms in the sample sit in the mid-market of EU financial services, as the respondent profile below shows. Fieldwork was run by Censuswide, which is a member of the Market Research Society (MRS) and the British Polling Council (BPC), a signatory of the Global Data Quality Pledge, and follows the MRS Code of Conduct and ESOMAR principles.

RESPONDENT PROFILE · BASE 300

Firm revenue

85%

of respondents work at firms with annual revenue of €50m to €500m

Monthly onboarding

49%

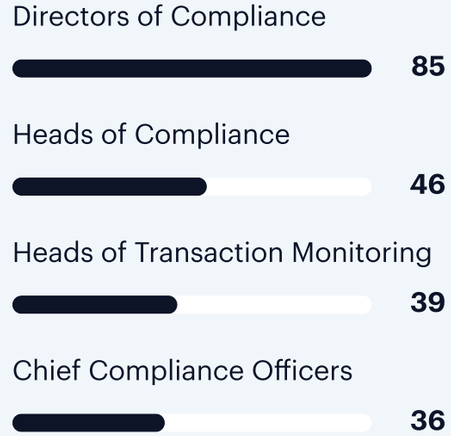
of respondents' firms onboard 5,001 to 50,000 customers a month

EU footprint

59%

of respondents' firms operate in four to nine member states

RESPONDENTS BY ROLE



About the data: All figures are self-reported by respondents. Shufti designed the questionnaire with the research agency and analysed the anonymised responses, and figures marked "Shufti analysis" combine answers to more than one question. The margin of error on the full base of 300 is about 5.7 percentage points at the 95% confidence level.

Bases: Most figures use the full base of 300. The AMLR Proof Index uses a base of 296, because the 4 firms already compliant with AMLR were not asked about re-verification. Comparisons between groups are reported only where each group has at least 50 respondents, and averages for cost and re-verification share use the midpoint of each answer band.

Adjusted figures: Only Figure 8 is adjusted, for sector and country, and the method is explained beneath it. All other figures are reported as collected, without adjustment or weighting by Shufti.

SECTION 03 · PROOF INDEX

What is the AMLR Proof Index and how is it calculated?

The AMLR Proof Index turns five survey questions into one score from 0 to 5. Each question asks about a piece of evidence a supervisor could ask to see, and each maps to an AMLR obligation. A firm earns a point only when its answer meets that proof point's criterion.

03

SHUFTI AMLR READINESS SURVEY 2026

HOW THE INDEX WORKS

Proof point	What we asked	Scores a point only if the firm said	What the AMLR requires
Tested beneficial ownership checks	Can your organisation today identify ultimate beneficial owners to the threshold AMLR requires, across the ownership chains it actually encounters?	"Yes, and we know so, as we have tested this"	Identify and verify the beneficial owners of every corporate customer
Full customer record	Can your systems produce the full record AMLR requires for any customer, without manual assembly?	"Yes, for all customers"	Complete customer records, kept up to date
Same-day risk-rating explanation	If your supervisor asked tomorrow why a customer was risk-rated as they were, how quickly could you fully produce the reasoning?	"Immediately" or "later the same working day"	Show at all times that measures fit the risk
Sized re-verification population	Have you assessed whether existing customers would need re-verification or remediation to meet AMLR standards?	"Yes, and we have fully sized our affected customer population"	Update customer data within one year for higher-risk customers and five years for others
Dated vendor commitment	Have your AML technology and compliance vendors given you a written, dated commitment on AMLR support?	"Yes, with specific dates and scope"	The firm stays fully liable where vendors carry out due diligence tasks

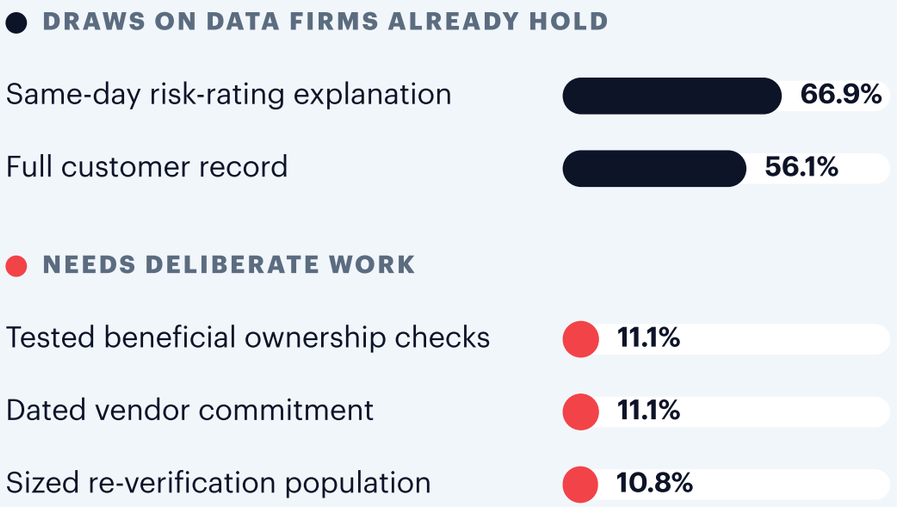
How a firm scores: Answers such as "we believe so, but have not tested this" or "general assurances only" do not meet the index's criteria for tested capability or a dated, scoped vendor commitment, so they score zero. The index covers the 296 surveyed firms asked all five questions.

How 296 surveyed firms scored

Only 2% of surveyed firms, 6 of the 296, reported meeting all five AMLR proof-point criteria. Just under half (49%) met one criterion or none, and 22% met none at all. The average firm met 1.6 criteria and the median firm met two.

FIGURE 1

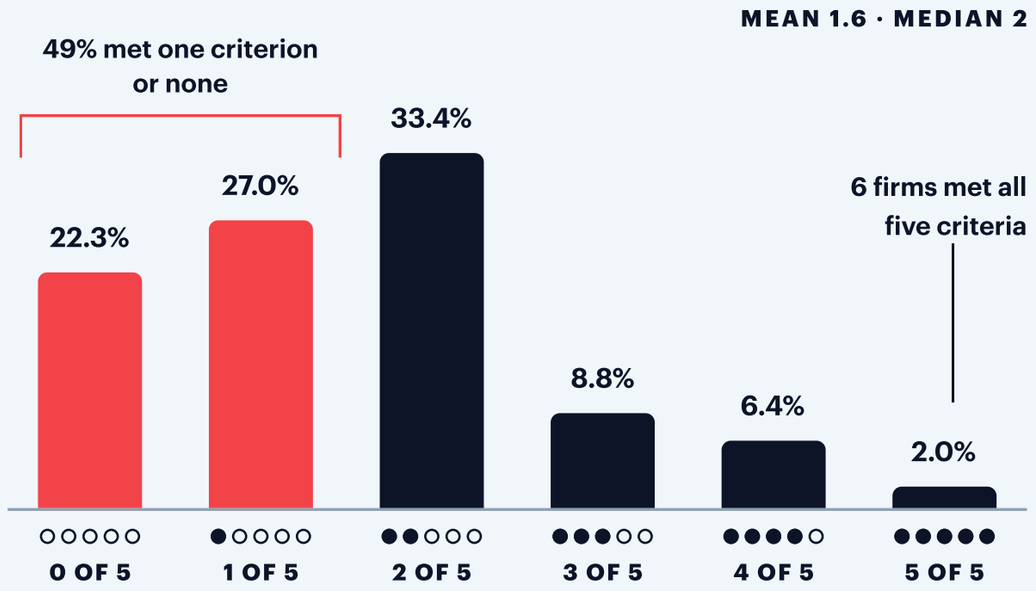
Share of surveyed firms meeting each AMLR proof-point criterion



Base 296. Shufti analysis of survey responses, Aug to Oct 2026.

FIGURE 2

Distribution of surveyed firms by AMLR Proof Index score, 0 to 5



Base 296. Shufti analysis of survey responses, Aug to Oct 2026.

The proof points split into two groups. Most surveyed firms met the two that draw on data they already hold, with 67% able to explain a customer's risk rating within the same working day and 56% able to produce the full AMLR record without manual assembly. Only about one firm in nine met each of the three that need deliberate work, which are a tested beneficial ownership process, a sized re-verification population and a dated, scoped vendor commitment.

A typical firm scores two, and for 95 of the 99 firms on that score the two points are the same pair, a full customer record and a same-day risk-rating explanation. Those firms can show what they hold and explain it, but their responses did not meet the criteria for tested ownership checks, a fully sized re-verification population or a dated, scoped vendor commitment.

SECTION 04 · EXPECTATIONS AND PROGRESS

AMLR readiness expectations against programme progress

95% of surveyed firms expect full AMLR compliance by 10 July 2027,* yet that expectation is concentrated at the end, with 55% planning to finish immediately before the application date and 5% already expecting to run late. AMLA's due diligence standards apply six months after they enter into force and still await adoption by the Commission, so firms expecting to finish immediately before the application date are working to a start date that is still moving.

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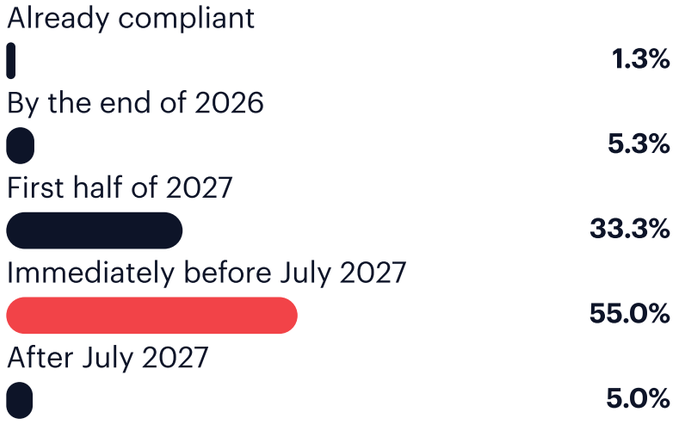
SHUFTI AMLR READINESS SURVEY 2026

FIGURE 3

When surveyed firms expect full AMLR compliance against where their programme stands today

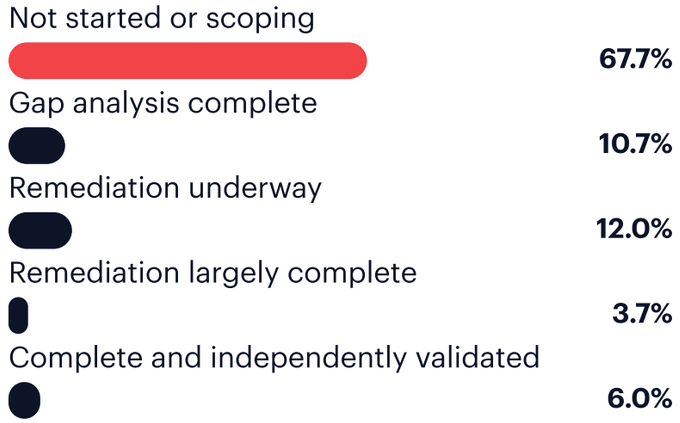
QUESTION 1

When do you expect to be fully compliant with AMLR?



QUESTION 2

Where is your organisation's AMLR programme today?



Base 300. Survey commissioned by Shufti, Aug to Oct 2026.

The documentary base behind those expectations is thin. Only 43% of surveyed firms have documented AMLR analysis, such as an impact assessment or a gap analysis. Asked what their readiness answers were based on, 58% said work in progress or personal judgement rather than documented assessments or plans. The firms still expect the work to be costly, with an average one-off estimate of almost €1.5 million.

Programme progress lags well behind the timing expectations. 68% of surveyed firms are still scoping or have not started, and 22% have reached remediation or beyond. Within the same firms, 67% of those expecting to finish on time are still scoping or have not started, and 57% of them have no documented AMLR analysis.

Only one surveyed firm in ten (10%) has reached the late stages of an AMLR programme, with testing underway at 4% and the programme independently validated at 6%.

* Combines "Already compliant", "By the end of 2026", "By the first half (H1) of 2027" and "Immediately before the July 2027 application date".

SECTION 05 · OWNERSHIP, RECORDS, RISK

Beneficial ownership, customer record and risk-rating evidence under AMLR

94% of EU compliance leaders surveyed say their organisation can identify ultimate beneficial owners (UBOs) to the AMLR threshold,* yet only 12% have tested that capability. The other 82% believe it works without having tested it, and a supervisor can check that belief quickly by sampling a firm's most complex files.

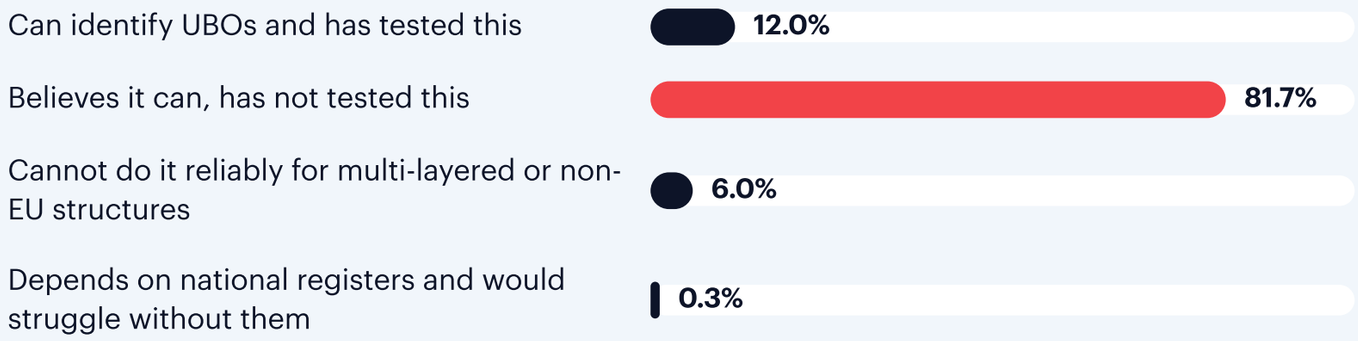
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SHUFTI AMLR READINESS SURVEY 2026

FIGURE 4

Surveyed firms' beneficial ownership identification capability against the AMLR threshold

Question asked Can your organisation today identify ultimate beneficial owners to the threshold AMLR requires, across the ownership chains it actually encounters?



Base 300. Survey commissioned by Shufti, Aug to Oct 2026.

Customer records show a split between new and older customers. 56% of surveyed firms can produce the full AMLR record for every customer without manual assembly, while 25% can do so only for recently onboarded customers because older records are patchier. Article 26(2) obliges firms to keep customer information up to date, so a gap in older records becomes part of the remediation programme.

The speed of risk-rating evidence varies widely between firms. 8% of surveyed firms could fully evidence a customer's risk rating immediately and 58% later the same working day, while 33% would need two to five working days. Article 20(4) obliges firms to demonstrate their measures at all times, so a third of surveyed firms would be explaining their decisions after the supervisor has asked.

* Combines "Yes, and I/we know so, as we have tested this" and "Yes, but I/we only believe so, as we have not tested this".

SECTION 06 · RE-VERIFICATION

The AMLR re-verification wave across EU customer books

Surveyed firms expect to re-contact 24% of their existing customers, on average, for new identity verification as a result of AMLA's customer due diligence standards, and 37% expect it to touch more than a quarter of their customer base. Each re-contact sends a customer who has already passed onboarding through verification again, with operational cost and a risk of drop-off.

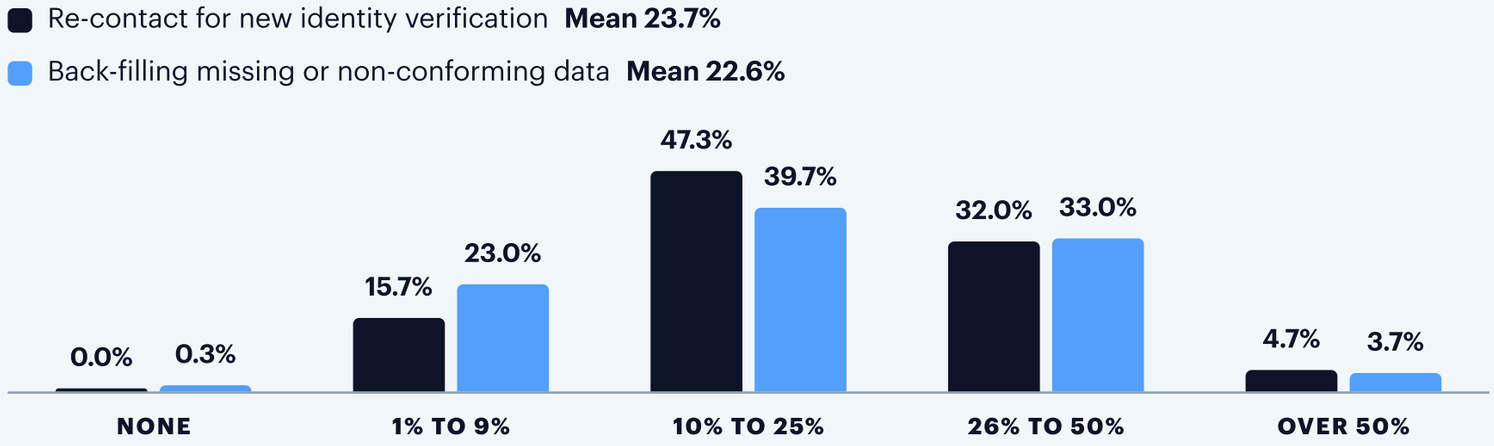
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SHUFTI AMLR READINESS SURVEY 2026

FIGURE 5

Share of existing customers surveyed firms expect to need re-verification or data back-filling under AMLA's customer due diligence standards

Question asked Thinking about the draft regulatory technical standards specifically, roughly what share of your existing customer base do you expect would require each of the following?



Base 300, means base 299. Survey commissioned by Shufti, Aug to Oct 2026.

Data back-filling adds a second stream of work, covering 23% of existing customers on average, for fields such as every declared nationality, all documented names or a complete address. AMLA's final standards make no exceptions to the identification requirements in AMLR Article 22(1), so older files that lack those fields have to be completed from records the firm already holds or collected again.

The scale of that work is mostly unmeasured. Only 11% of surveyed firms not already compliant with AMLR have fully sized the affected population, while 73% have looked only at a high level. Article 26(2) caps update intervals at one year for higher-risk customers and five years for others, and AMLA's final standards apply those periods to existing customers from the day the standards enter into force, six months before they apply. An unsized back book is therefore also an unsized calendar of deadlines.

Among respondents whose organisations were not already compliant with AMLR, the changes most often expected to need new systems point in the same direction, led by new customer data fields (36%), risk-scoring methodology (32%) and screening and monitoring rules (30%).

SECTION 07 · VENDORS

Vendor dependency and written AMLR commitments

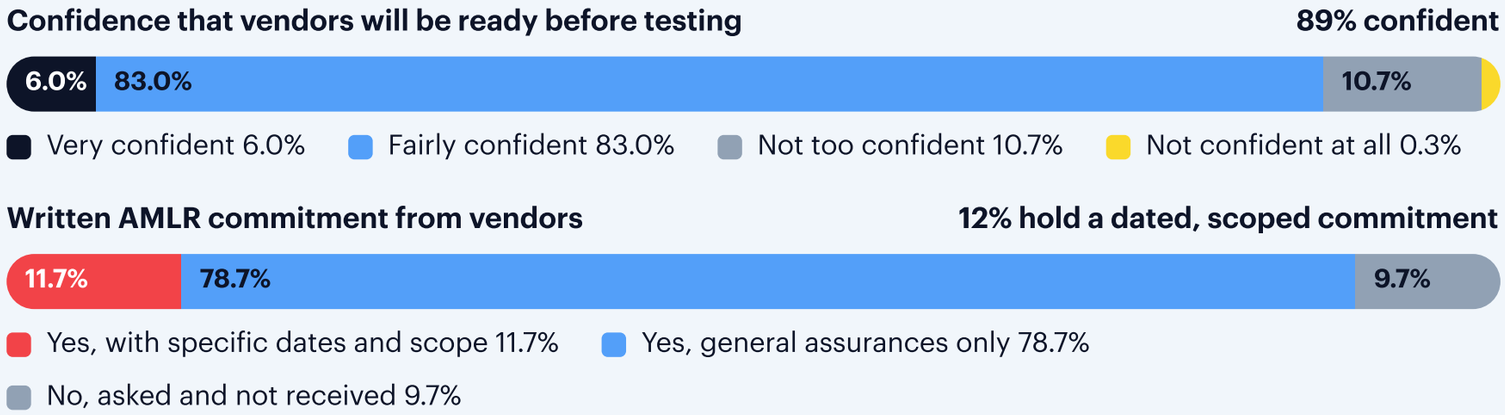
89% of surveyed firms not already compliant with AMLR say at least some of their AMLR readiness depends on changes their vendors must make,* and 24% say a great deal or more depends on them.† Confidence is high, since 89% of vendor-dependent firms expect their vendors to be ready before testing begins,‡ although only 6% of all surveyed firms are very confident.

SHUFTI AMLR READINESS SURVEY 2026

FIGURE 6

Confidence in AML vendor readiness set against written AMLR commitments held

Question asked How confident are you that your vendors will be ready before you need to test? Have your AML technology and compliance vendors given you a written, dated commitment on AMLR support?



Base 300. Survey commissioned by Shufti, Aug to Oct 2026.

Few surveyed firms hold a commitment specific enough for a supervisor to examine. Only 12% have a written commitment with specific dates and scope, 79% hold general assurances only and 10% asked and received nothing, and 87% of the firms confident in their vendors hold no dated, scoped commitment. Where vendors carry out due diligence tasks for a firm, Article 18(2) keeps the firm fully liable, so a general assurance transfers none of that responsibility.

The speed at which firms can change their controls compounds the dependency. 27% of surveyed firms would wait on a vendor's roadmap for a change to their screening or risk logic, and only 10% could make it the same day. 20% of all surveyed firms would wait on a roadmap and also plan to finish at the deadline or later, which leaves them no margin for a late change.

Many surveyed firms expect to add suppliers, with 37% planning to bring in a new vendor to close their AMLR technology gaps.

* Combines "Some", "A great deal", "Almost all" and "All". † Combines "A great deal", "Almost all" and "All". ‡ Combines "Very confident" and "Fairly confident".

SECTION 08 · EUDI WALLET

EUDI Wallet acceptance plans in AMLR customer due diligence

71% of surveyed firms plan to accept the European Digital Identity (EUDI) Wallet,* and 44% have budget approved or integration underway,† while 2% do not plan to accept it and 1% would accept it only where other legislation requires them to.

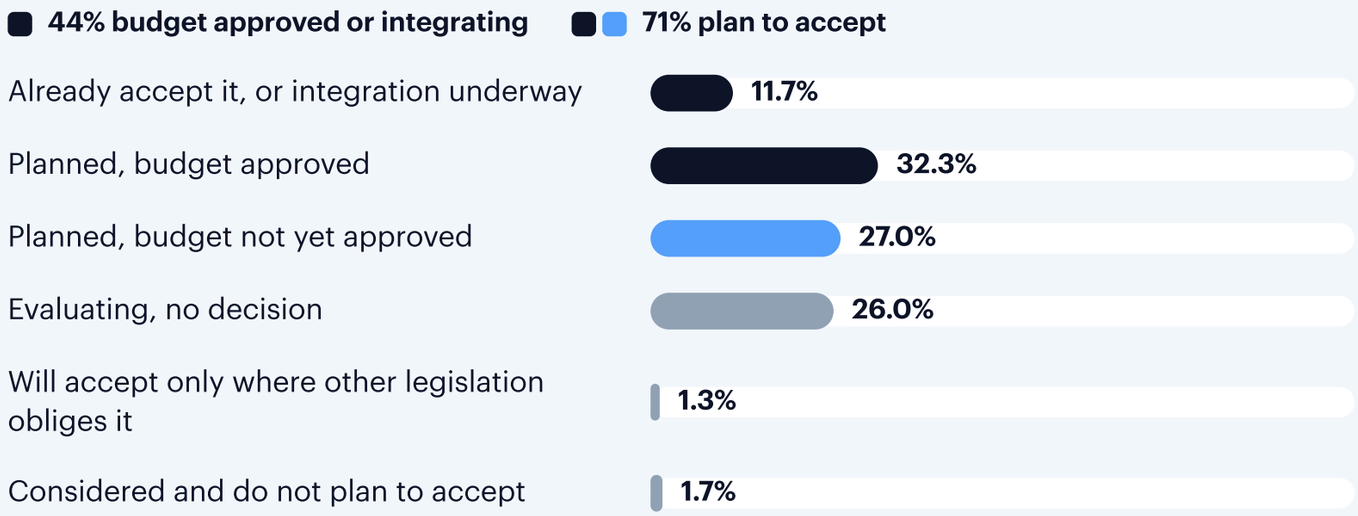
(08)

SHUFTI AMLR READINESS SURVEY 2026

FIGURE 7

EUDI Wallet acceptance status among surveyed firms preparing for AMLR

Question asked Where is your organisation currently at in regards to the EUDI Wallet? Respondents first read a short note on the wallet's possible role in AMLR identity checks. No certified EUDI Wallet was live during fieldwork.



Base 300. Survey commissioned by Shufti, Aug to Oct 2026.

Member states must provide at least one wallet by 24 December 2026, and banks and other firms that must use strong user authentication must accept it by 24 December 2027 under Regulation (EU) 2024/1183. The wallet is an electronic identification means at assurance level high, which puts it on one of the two default verification routes in AMLR Article 22(6), and it arrives just as surveyed firms expect to re-verify almost a quarter of their customers.

* Combines "We already accept it, or integration is underway", "It is planned and a budget has been approved" and "It is planned, but a budget has not yet been approved".
† Combines "We already accept it, or integration is underway" and "It is planned and a budget has been approved".

SECTION 09 · EVIDENCE BASE AND ROLE

AMLR readiness by evidence base and role

The AMLR Proof Gap persists among the best-prepared firms in the survey. Among the 130 surveyed firms with documented AMLR analysis, 20% have tested their beneficial ownership identification, 18% hold a dated vendor commitment, and 44% of those asked every proof question met one proof-point criterion or none.

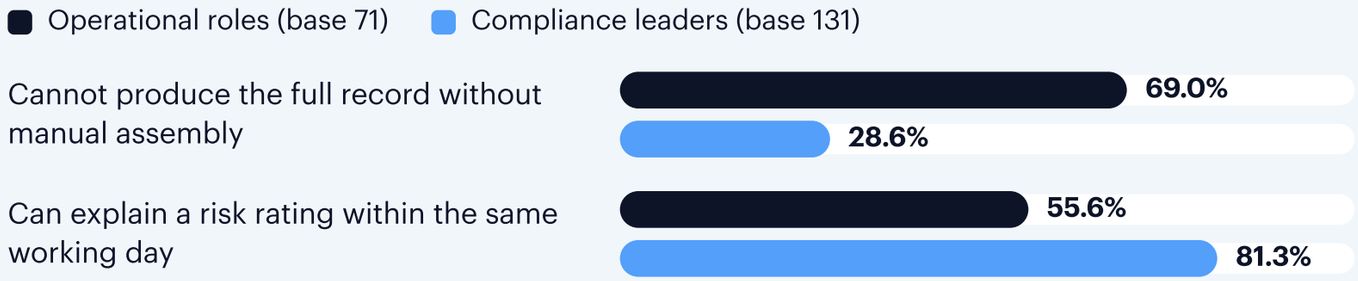
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SHUFTI AMLR READINESS SURVEY 2026

Respondents who said their answers rest on documented assessments or plans are less confident in their vendors than other respondents (84% against 92%) and more likely to expect to finish at the deadline or later (68% against 54%).

FIGURE 8

Evidence answers by role group, adjusted for sector and country*



Bases 71 and 131. Shufti analysis of survey responses, adjusted for sector and country.

Answers also differ by the respondent's role. Operational roles here are Heads of Transaction Monitoring, heads of financial crime or AML operations, onboarding product leads and data leads, and compliance leaders are Directors and Heads of Compliance. After allowing for sector and country, about 69% of respondents in operational roles say their organisation cannot produce the full AMLR record without manual assembly, against about 29% of compliance leaders, and about 56% could explain a risk rating within the same working day, against 81%.

The comparison partly reflects the country mix of the sample, because many respondents in operational roles are based in Sweden and Italy and many compliance leaders in Germany, so it is indicative rather than conclusive. Before adjustment the gaps are wider, at 80% against 22% and 39% against 89%.

* For each measure, a logistic regression allows for sector (the six quota sectors and all other sectors combined) and country (Germany, France, Sweden, Italy, Spain and the other 22 member states combined), with a mild ridge penalty because some role and country groups are small. Each group's figure is the model's average prediction across all 300 respondents, as if every respondent were in that group. Unadjusted figures are in the data appendix.

SECTION 10 · PROOF DRILLS

Six AMLR proof drills for the months before July 2027

The AMLR Proof Index points to six drills that a compliance team can run against its own files before the regulation applies. Firms can use drills one to five to assess the five proof-point areas, applying the original survey criteria when calculating their index score. Each drill produces a piece of evidence that can be shown to a supervisor, and each targets a gap that the survey found in at least a quarter of surveyed firms.

SHUFTI AMLR READINESS SURVEY 2026

DRILL 01

Beneficial ownership identification test

Identifies the UBOs of 20 complex files, multi-layered or non-EU, to the AMLR threshold without relying on national registers

VERIFY BENEFICIAL OWNERS
11% met the tested-process criterion (base 296)

DRILL 02

Customer record drill

Produces the full AMLR record for 10 randomly selected customers, half from the older back book, without manual assembly

COMPLETE, CURRENT RECORDS
44% did not meet the full-record criterion (base 300)

DRILL 03

Risk-rating explanation drill

Explains one high-risk customer rating to a mock supervisor within one working day

DEMONSTRATE AT ALL TIMES
33% would need two to five working days (base 300)

DRILL 04 RUN FIRST

Re-verification sizing exercise

Counts the customers who need new data or new identity verification, split by risk tier and update deadline

1-YEAR AND 5-YEAR UPDATES
11% have fully sized the population (base 296)

DRILL 05 RUN FIRST

Vendor commitment review

Obtains a dated, scoped AMLR commitment from every vendor in the AML stack

LIABLE FOR OUTSOURCED CDD
11% hold such a commitment (base 296)

DRILL 06

Verification route drill

Runs test customers through an electronic ID first, then a remote document check with holder safeguards, and logs where the workflow breaks

EID FIRST, THEN FALLBACK
56% have no EUDI budget or integration (base 300)

The order in which teams run the drills matters as much as the drills themselves. Re-verification sizing and the vendor commitment review come first, because they set the size of the remediation programme and the dates that depend on third parties. The verification route drill follows straight after, since it shows whether the current workflow can re-verify those customers by the routes AMLA's standards expect, and any route the current vendor cannot support belongs in the vendor review as a requirement for a new provider. The beneficial ownership test, the customer record drill and the risk-rating drill come next. A firm that repeats the full set in the spring of 2027 has a dated record of its readiness to show a supervisor when the regulation applies.

SECTION 11 · SHUFTI'S APPROACH

How Shufti supports AMLR from onboarding to assurance

The findings point to three jobs for the year ahead. Firms must re-verify a large share of existing customers, keep screening and monitoring current, and show a supervisor the evidence behind each decision. Shufti's AMLR solutions, launched on 17 August 2026, cover all three on one platform, in the order a customer meets them.

(11)

SHUFTI AMLR READINESS SURVEY 2026

HOW A CUSTOMER MOVES THROUGH SHUFTI

STAGE 01

Onboard

1 DEFAULT ROUTE

EUDI Wallet credentials as member states launch them, 77+ eID schemes at assurance level substantial or high, and qualified electronic signatures in the same journey

AMLR ARTICLE 22(6)(B)

2 FALLBACK ROUTE

Document verification with NFC chip checks against the issuing authority, plus a face match with iBeta Level 3 tested passive liveness that confirms the person is the document holder

AMLA STANDARDS, ARTICLE 7

STAGE 02

Monitor

Sanctions, PEP and adverse media screening with continuous rescreening, transaction monitoring against what the firm knows of each customer, and review intervals enforced for every risk level

AMLR ARTICLE 26

STAGE 03

Assure

One record of every check, kept for five years after the relationship ends, a log of every change to rules and review intervals, and the evidence behind each alert assembled for the reviewer

AMLR ARTICLES 20(4) AND 77

Each customer's risk rating stays the firm's own decision, because Article 18(3) does not allow it to be outsourced. Shufti supplies the evidence behind it, so a firm can explain a customer's rating to a supervisor on the day it is asked, the question a third of surveyed firms would take two to five working days to answer.

All three stages run on one platform, and document checks cover 240+ countries and territories in 150+ languages.

SECTION 12 · OUTLOOK

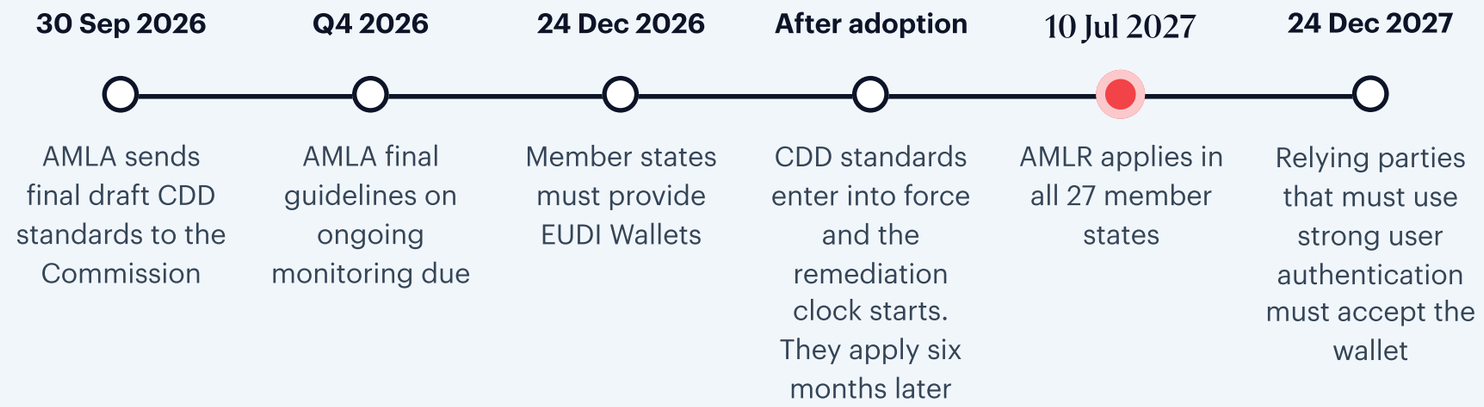
The outlook for AMLR readiness before 10 July 2027

The remaining pieces of the AMLR framework will fall into place over the next nine months, as the timeline sets out. Firms will therefore be building their evidence while the last standards are finalised, and the survey shows that most firms do not yet hold that evidence.

(12)

THE ROAD TO 10 JULY 2027

NOT TO SCALE



Dates from AMLR Article 90, eIDAS 2 Articles 5a and 5f, and AMLA's final report and press release on the CDD standards.

The AMLR Proof Gap closes through testing, counting and contracting, the three activities where fewer than one surveyed firm in eight met the index criteria. Shufti plans to repeat the survey with the same questions in spring 2027, before the regulation applies, to measure how far the gap has closed in the final months.

AMLR SOLUTIONS

Teams running the six AMLR proof drills can see how Shufti supports each stage at shuftipro.com/amlr-solutions.

EXPLORE AMLR SOLUTIONS ↗

DATA APPENDIX

Data appendix for the Shufti AMLR Readiness Survey 2026

All figures come from the survey of 300 senior compliance decision makers at EU obliged entities commissioned by Shufti and fielded from 17 August to 2 October 2026. Rows marked "Shufti analysis" combine answers to more than one question.

Figure 1. Share of surveyed firms meeting each AMLR proof-point criterion (Shufti analysis, base 296)

AMLR proof point	Firms	Share
Same-day risk-rating explanation	198	66.9%
Full customer record	166	56.1%
Tested beneficial ownership checks	33	11.1%
Dated vendor commitment	33	11.1%
Sized re-verification population	32	10.8%

Figure 2. AMLR Proof Index distribution (Shufti analysis, base 296)

Proof-point criteria met	Firms	Share
0	66	22.3%
1	80	27.0%
2	99	33.4%
3	26	8.8%
4	19	6.4%
5	6	2.0%

Figure 4. UBO identification capability (Q12), base 300

Answer	Share
Can identify UBOs to the AMLR threshold and has tested this	12.0%
Believes it can, has not tested this	81.7%
Cannot do it reliably for multi-layered or non-EU structures	6.0%
Depends on national registers and would struggle without them	0.3%

Figure 3. Expected compliance date (Q8) and programme stage (Q7), base 300

Q8 expected full AMLR compliance	Share	Q7 AMLR programme stage	Share
Already compliant	1.3%	Not started	5.7%
By the end of 2026	5.3%	Scoping what needs to change	62.0%
First half of 2027	33.3%	Gap analysis complete, remediation not started	10.7%
Immediately before the July 2027 application date	55.0%	Remediation underway	12.0%
After the July 2027 application date	5.0%	Remediation largely complete, testing underway	3.7%
		Complete and independently validated	6.0%

Figure 5. Share of existing customers expected to need re-verification or back-filling (Q19), base 300

Share of customer base	Re-contact for new identity verification	Back-filling missing or non-conforming data
None	0.0%	0.3%
1% to 9%	15.7%	23.0%
10% to 25%	47.3%	39.7%
26% to 50%	32.0%	33.0%
Over 50%	4.7%	3.7%
Unsure	0.3%	0.3%
Mean (base 299, band midpoints)	23.7%	22.6%

Figure 6. Vendor confidence (Q23) and written commitments (Q21), base 300

Q23 confidence that vendors will be ready before testing	Share	Q21 written AMLR commitment from vendors	Share
Very confident	6.0%	Yes, with specific dates and scope	11.7%
Fairly confident	83.0%	Yes, general assurances only	78.7%
Not too confident	10.7%	No, asked and not received	9.7%
Not confident at all	0.3%		

Figure 7. EUDI Wallet acceptance status (Q27), base 300

Status	Share
Already accept it, or integration underway	11.7%
Planned, budget approved	32.3%
Planned, budget not yet approved	27.0%
Evaluating, no decision	26.0%
Will accept only where other legislation obliges it	1.3%
Considered and do not plan to accept	1.7%

Figure 8. Operational roles against compliance leaders (Shufti analysis)

Measure	Operational roles (base 71)	Compliance leaders (base 131)	Adjusted for sector and country
Cannot produce the full record without manual assembly	80.3%	22.1%	about 69% against 29%
Can explain a risk rating within the same working day	39.4%	88.5%	about 56% against 81%

Other figures cited in the text

Measure	Value	Base	Question
Remediation largely complete or complete and independently validated	9.7%	300	Q7
Documented AMLR analysis (impact assessment or gap analysis)	43.3%	300	Q6
Readiness answers based on work in progress or personal judgement	57.7%	300	Q25
Average expected one-off AMLR implementation cost (band midpoints)	€1.49 million	300	Q9
Full record without manual assembly only for recently onboarded customers	25.0%	300	Q15
Risk rating evidenced immediately / same day / 2 to 5 days	8.3% / 58.3% / 33.3%	300	Q17
Fully sized the affected customer population	10.8%	296	Q18
Assessed the affected population at a high level only	72.6%	296	Q18
At least some readiness depends on vendors	88.9%	296	Q20
A great deal or more of readiness depends on vendors	24.3%	296	Q20
Would wait on a vendor's roadmap for a logic change	27.3%	300	Q22

Measure	Value	Base	Question
Plan to bring in a new vendor	37.3%	300	Q16
No EUDI Wallet budget or integration yet	56.0%	300	Q27
Vendor-dependent firms confident their vendors will be ready (Shufti analysis)	89.4%	263	Q23 by Q20
Confident firms without a dated, scoped commitment (Shufti analysis)	86.9%	267	Q21 by Q23
Wait on vendor roadmap and finish at the deadline or later (Shufti analysis)	20.3%	300	Q22 by Q8
Firms expecting on-time compliance still scoping or not started (Shufti analysis)	67.4%	285	Q7 by Q8
Firms expecting on-time compliance without documented AMLR analysis (Shufti analysis)	56.8%	285	Q6 by Q8
Firms with documented analysis evidencing one proof point or none (Shufti analysis)	43.7%	126	Index by Q6
Documented basis against others, confident in vendors (Shufti analysis)	84.3% against 92.5%	127 and 173	Q23 by Q25
Documented basis against others, finish at the deadline or later (Shufti analysis)	67.7% against 54.3%	127 and 173	Q8 by Q25

SOURCES

Sources for the Shufti AMLR Readiness Survey 2026

1. Censuswide for Shufti, AMLR Readiness Benchmark, job J18717CW. Data tables and anonymised respondent-level file, fieldwork 17 August to 2 October 2026, received 12 October 2026.

2. European Banking Authority, Opinion of the European Banking Authority on money laundering and terrorist financing risks affecting the EU's financial sector, EBA/Op/2025/10, 28 July 2025, paragraphs 3 and 19. https://www.eba.europa.eu/sites/default/files/2025-07/13ae2f94-dc04-4a50-9f24-af2808e78944/Opinion%20and%20Report%20on%20ML%20TF%20risks.pdf (accessed 13 October 2026)

3. Regulation (EU) 2024/1624 of the European Parliament and of the Council of 31 May 2024 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, OJ L, 2024/1624, 19.6.2024, Articles 18, 20, 22, 26 and 90. http://data.europa.eu/eli/reg/2024/1624/oj (text checked against the Official Journal PDF, 13 October 2026)

4. Regulation (EU) 2024/1183 of the European Parliament and of the Council of 11 April 2024 amending Regulation (EU) No 910/2014 as regards establishing the European Digital Identity Framework, OJ L, 2024/1183, Articles 5a and 5f. http://data.europa.eu/eli/reg/2024/1183/oj (text checked against the Official Journal PDF, 13 October 2026)

5. Anti-Money Laundering Authority (AMLA), Final Report - Draft Regulatory Technical Standards under Article 28(1) of Regulation (EU) 2024/1624, 30 September 2026, Articles 5, 6, 7, 25, 28 and 29 and section 4.2.1. https://www.amla.europa.eu/document/download/e15ab2e5-4074-4de8-bb9d-613dd8b7fdd1_en?filename=Final%20Report%20-%20draft%20RTS%2028%281%29%20AMLR.pdf (accessed 23 October 2026)

6. Anti-Money Laundering Authority (AMLA), "Press Release: AMLA finalises key standards for the private sector", 1 October 2026. https://www.amla.europa.eu/press-release-amla-finalises-key-standards-private-sector_en (accessed 23 October 2026)

7. Anti-Money Laundering Authority (AMLA), Consultation Paper on draft Guidelines on ongoing monitoring of a business relationship under Article 26(5) of Regulation (EU) 2024/1624, 3 June 2026, section 2.1. https://www.amla.europa.eu/policy/public-consultations/consultation-draft-guidelines-ongoing-monitoring-business-relationship_en (accessed 23 October 2026)

8. Shufti, "Shufti Helps Obliged Entities Get Ready for the EU AMLR Ahead of the July 2027 Deadline", press release, 17 August 2026. https://shuftipro.com/press-release/shufti-helps-obliged-entities-prepare-for-eu-amlr-2027-deadline/ (accessed 12 October 2026)

HOW TO CITE THE SHUFTI AMLR READINESS SURVEY 2026

Shufti AMLR Readiness Survey 2026 (Shufti, version 1.0, November 2026). Survey of 300 senior compliance decision makers at EU obliged entities, fieldwork 17 August to 2 October 2026. https://shuftipro.com/resources/whitepapers-reports/amlr-readiness-survey/

Version 1.0, 10 November 2026. Change log: none.

Shufti

SHUFTI RESEARCH

AMLR Readiness Survey 2026

Run the six AMLR proof drills against your own files.

EXPLORE AMLR SOLUTIONS

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