



Public consultation on the draft guidelines on Business-wide risk assessment under Article 10 (4)

Fields marked with * are mandatory.

Draft guidelines on Business-wide risk assessment under Article 10 (4) – AMLR

Objective of the consultation

AMLAR would like to receive feedback on provisions of the draft guidelines under article 10(4) 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 AMLAR should consider.

Such comments should be sent by **15 July 2026, 23:59 (CET)**.

Personal data protection:

The protection of individuals with regard to the processing of personal data by the AMLAR 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.

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.

Respondent profile

* This contribution is made by:

An organisation

* Name of the organisation

200 character(s) maximum

Spelbranschens Riksorganisation/Swedish Gambling Association

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

100 character(s) maximum

Eva

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

100 character(s) maximum

Sjöberg

* Email (note that your email address will not be published)

100 character(s) maximum

eva.sjoberg@sper.se

* 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).

* Which of the following best describes your activity or organisation? Obligated entities are those listed in Article 3 of [Regulation \(EU\) 2024/1624](#).

Maximum 1 selection(s)

- Obligated entity in the non-financial sector
- Obligated entity in the financial sector
- Self-regulatory body in the sense of Regulation (EU) 2024/1624 Article 2(1) point (47)
- Industry association representing non-financial sector obliged entities
- Industry association representing financial sector obliged entities
- Civil society organisation/non-governmental organisation
- Other

* Non-financial sector

- Auditors, external accountants, tax advisors, other independent professionals that provide assistance or advice on tax matters
- Notaries
- Lawyers, other independent legal professionals
- Trust or company service providers
- Estate agents, other real estate professionals
- Traders in precious metals and stones
- Traders in high-value goods

- Gambling service providers
- Crowdfunding service providers and crowdfunding intermediaries
- Traders or intermediaries in the trade or storage of cultural goods
- Credit intermediaries for mortgage and consumer credits (other than credit and financial institutions)
- Investment migration operators
- Non-financial mixed activity holding companies
- Football agents
- Football clubs

* Please select the country from which you or your organisation carry out your main activities:

SE - Sweden

Public consultation questions

Question 1: Do you agree that the proposals set out in these draft GLs can be applied across all obliged entities and allow for an effective application of a risk-based and proportionate approach towards compliance with AML/CFT requirements?

If not, please:

(i) specify the provision concerned with clear reference to the paragraph; and

(ii) provide concrete drafting proposals and explain why the specific measures you propose would be more appropriate.

| | Provision/ Guidelines paragraph | Comment |
|----------------------|--|--|
| Co mm ent 1 | <p><i>Only values between 1 and 32 are allowed</i></p> <div style="border: 1px solid black; padding: 2px;">6</div> | <p><i>3000 character(s) maximum</i></p> <p>SPER agrees that the proposed Guidelines are sufficiently principles-based to be applied across different categories of obliged entities while supporting a proportionate and risk-based approach. The proposed clarification would support consistent implementation across the broader approach described in paragraphs 6–11. To promote consistent implementation across sectors, AMLA could consider developing non-binding sector-specific examples illustrating how the principles may be applied in practice. For example, such examples could demonstrate how different obliged entities may identify relevant products, services, delivery channels, customer categories and geographic risk exposures depending on their business model and risk profile. This would improve supervisory convergence while preserving the principle-based nature and flexibility of the Guidelines.</p> |
| Co mm ent 2 | <p><i>Only values between 1 and 32 are allowed</i></p> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> | <p><i>3000 character(s) maximum</i></p> |

| | | |
|-----------------------|---|----------------------------------|
| Co mm ent 3 | <i>Only values between 1 and 32 are allowed</i> <input type="text"/> | <i>3000 character(s) maximum</i> |
| Co mm ent 4 | <i>Only values between 1 and 32 are allowed</i> <input type="text"/> | <i>3000 character(s) maximum</i> |
| Co mm ent 5 | <i>Only values between 1 and 32 are allowed</i> <input type="text"/> | <i>3000 character(s) maximum</i> |
| Co mm ent 6 | <i>Only values between 1 and 32 are allowed</i> <input type="text"/> | <i>3000 character(s) maximum</i> |
| Co mm ent 7 | <i>Only values between 1 and 32 are allowed</i> <input type="text"/> | <i>3000 character(s) maximum</i> |
| Co mm ent 8 | <i>Only values between 1 and 32 are allowed</i> <input type="text"/> | <i>3000 character(s) maximum</i> |
| Co mm ent 9 | <i>Only values between 1 and 32 are allowed</i> <input type="text"/> | <i>3000 character(s) maximum</i> |
| Co mm ent 10 | <i>Only values between 1 and 32 are allowed</i> <input type="text"/> | <i>3000 character(s) maximum</i> |

Question 2: Do you agree with the proposed minimum requirements for the content of the BWRA set out in these draft GLs?

If you do not agree, please specify:

- (i) the provision(s) concerned, with clear reference to the paragraph; and*
- (ii) the rationale for your position.*

Please provide concrete drafting proposals to resolving the issue and explain why the measure you propose would be more appropriate.

| | Provision/ Guidelines paragraph | Comment |
|--|---------------------------------|---------|
|--|---------------------------------|---------|

| | | |
|--------------------------------|---|---|
| <p>Co mm ent 1</p> | <p><i>Only values between 1 and 32 are allowed</i></p> <input data-bbox="220 376 647 443" type="text" value="4"/> | <p><i>3000 character(s) maximum</i></p> <p>SPER agrees that the proposed minimum content requirements provide an appropriate basis for preparing a business-wide risk assessment. To further strengthen the practical application of the Guidelines, AMLA could consider clarifying that the outcome of the BWRA is intended to support risk-based management decisions. Insert after paragraph 32: “The outcome of the BWRA should provide a basis for prioritising risk mitigation measures and support risk-based decision-making within the obliged entity.” This clarification would not introduce any additional requirements regarding the content of the BWRA. Rather, it would clarify how the completed assessment is intended to be used and promote a more consistent implementation across obliged entities.</p> |
| <p>Co mm ent 2</p> | <p><i>Only values between 1 and 32 are allowed</i></p> <input data-bbox="220 734 647 801" type="text"/> | <p><i>3000 character(s) maximum</i></p> |
| <p>Co mm ent 3</p> | <p><i>Only values between 1 and 32 are allowed</i></p> <input data-bbox="220 920 647 987" type="text"/> | <p><i>3000 character(s) maximum</i></p> |
| <p>Co mm ent 4</p> | <p><i>Only values between 1 and 32 are allowed</i></p> <input data-bbox="220 1106 647 1173" type="text"/> | <p><i>3000 character(s) maximum</i></p> |
| <p>Co mm ent 5</p> | <p><i>Only values between 1 and 32 are allowed</i></p> <input data-bbox="220 1290 647 1357" type="text"/> | <p><i>3000 character(s) maximum</i></p> |
| <p>Co mm ent 6</p> | <p><i>Only values between 1 and 32 are allowed</i></p> <input data-bbox="220 1473 647 1541" type="text"/> | <p><i>3000 character(s) maximum</i></p> |
| <p>Co mm ent 7</p> | <p><i>Only values between 1 and 32 are allowed</i></p> <input data-bbox="220 1659 647 1727" type="text"/> | <p><i>3000 character(s) maximum</i></p> |
| <p>Co mm ent 8</p> | <p><i>Only values between 1 and 32 are allowed</i></p> <input data-bbox="220 1843 647 1910" type="text"/> | <p><i>3000 character(s) maximum</i></p> |
| <p>Co mm ent 9</p> | <p><i>Only values between 1 and 32 are allowed</i></p> <input data-bbox="220 2027 647 2094" type="text"/> | <p><i>3000 character(s) maximum</i></p> |

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| Comment 10 | Only values between 1 and 32 are allowed | 3000 character(s) maximum |
| | | |

Question 3: Do you agree with the proposals for additional sources of information to be taken into account when carrying out the BWRA set out in these draft GLs?

If you do not agree, please specify:

(i) the sources you disagree with; and

(ii) the rationale for your position;

(ii) the sources that should be included.

5000 character(s) maximum

Paragraph 20

SPER supports the proposed approach of requiring obliged entities to consider a range of relevant information sources when preparing the BWRA. The proposed list of additional sources provides useful guidance and contributes to a more comprehensive assessment of ML/TF risks.

To further strengthen the principle of proportionality and support consistent implementation across sectors, AMLA could clarify that the examples of information sources are intended to support professional judgement rather than constitute a mandatory checklist.

SPER suggests inserting the following sentence after paragraph 20:

"Obliged entities should determine, based on their business model, risk profile and operational characteristics, which information sources are relevant, reliable and proportionate for the purposes of the BWRA."

This clarification is consistent with the proportionality principle reflected throughout paragraphs 17–20 and would reinforce the risk-based approach by allowing obliged entities to select information sources that are appropriate to their specific circumstances, while promoting consistent implementation across sectors without reducing the overall quality of the BWRA.

Question 4: Do you foresee any operational challenges in implementing these GLs?

If so, please specify:

(i) the provision(s) concerned with clear reference to the paragraph; and

(ii) the rationale for your position.

| | Provision/ Guidelines paragraph | Comment |
|-----------|--|--|
| Comment 1 | Only values between 1 and 32 are allowed | 3000 character(s) maximum SPER wishes to highlight that some operational challenges may arise in practice. Effective implementation will depend on the BWRA being embedded within the obliged entity's overall risk management and governance processes rather than being treated solely as a standalone compliance exercise. |
| | 32 | |

| | | |
|-----------------------|--|---------------------------|
| Co mm ent 2 | Only values between 1 and 32 are allowed <input type="text"/> | 3000 character(s) maximum |
| Co mm ent 3 | Only values between 1 and 32 are allowed <input type="text"/> | 3000 character(s) maximum |
| Co mm ent 4 | Only values between 1 and 32 are allowed <input type="text"/> | 3000 character(s) maximum |
| Co mm ent 5 | Only values between 1 and 32 are allowed <input type="text"/> | 3000 character(s) maximum |
| Co mm ent 6 | Only values between 1 and 32 are allowed <input type="text"/> | 3000 character(s) maximum |
| Co mm ent 7 | Only values between 1 and 32 are allowed <input type="text"/> | 3000 character(s) maximum |
| Co mm ent 8 | Only values between 1 and 32 are allowed <input type="text"/> | 3000 character(s) maximum |
| Co mm ent 9 | Only values between 1 and 32 are allowed <input type="text"/> | 3000 character(s) maximum |
| Co mm ent 10 | Only values between 1 and 32 are allowed <input type="text"/> | 3000 character(s) maximum |

Question 5: Within the boundaries of the mandate as defined in Article 10(4) AMLR, do you identify any need to introduce additional provisions?

If so, provide concrete drafting proposals.

5000 character(s) maximum

Paragraph 32

Comment

SPER welcomes the proposed approach and considers that the Guidelines establish a robust framework for identifying, assessing and documenting ML/TF risks at the level of the obliged entity.

To further strengthen the effectiveness of the Guidelines, AMLA could make the intended purpose of the completed BWRA more explicit.

SPER suggests inserting the following sentence after paragraph 32:

"The completed BWRA should serve as a basis for risk-based decision-making, the prioritisation of mitigating measures, the allocation of appropriate resources and the continuous improvement of the obliged entity's policies, procedures, systems and controls."

This clarification would not introduce any additional regulatory obligations. Rather, it would clarify how the completed BWRA is intended to be used once prepared and reinforce the risk-based approach reflected throughout the Guidelines.

It would also support more consistent implementation across obliged entities while preserving the flexibility necessary to accommodate different business models, organisational structures and national governance frameworks.

The proposed clarification is also consistent with the objective described in paragraph 5(b) of the Consultation Paper, namely that the BWRA should support the implementation of appropriate controls and the allocation of resources based on the risks identified. Incorporating this objective into the Guidelines themselves would strengthen the link between the preparation of the BWRA and its practical application within the obliged entity.

Thank you very much for your feedback.

Contact

[Contact Form](#)