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Germany – legal and regulatory updates

BaFin – Updated AML/CFT Guidance

Germany's financial regulator BaFin has published an updated version of its AML/CFT Guidance (Auslegungs- und Anwendungshinweise, AuA) outlining the requirements of the German Money Laundering Act (Geldwäschegesetz, GwG). Following its publication on 29 November 2024 the guidelines are applicable to all obliged entities that fall under the supervision of BaFin as of 1 February 2025.

The main amendments are summarised in the following:

Risk assessment – as of February 2025, a clear distinction must be made between the specific risks of money laundering and those of terrorist financing. These should be outlined separately in the risk assessment, taking into account specific risk factors, relevant sources of information, adverse media screening and a clear analysis of current developments. Analysing and evaluating the residual risk remains an important part of the risk assessment. When analysing the residual risk, the effectiveness of the control measures, in terms of mitigating the inherent risk, must be taken into account. Understanding and mitigating the residual risk is key. In addition, the risk assessment methodology must be outlined in detail. Following identification, senior management must document and approve relevant changes impacting the risk assessment without due delay.

Internal safeguards – the outsourcing of internal safeguards including the function of the Anti-Money Laundering Officer always constitutes a material outsourcing as per the German Banking Act. The obliged entity must therefore, ensure that the outsourcing company avails of adequate resources in order to meet its regulatory obligations. The responsibility for the appropriate implementation of controls remains with the obliged entity.

In addition, the Guidance requires that the specific roles and responsibilities of the anti-money laundering officer and the deputy money laundering reporting officer are clearly defined and set out in writing.

Control plan – the anti-money laundering officer must maintain a control plan in which the scope, responsibilities and due dates, as well as the frequency of the individual monitoring and control activities are clearly set out in writing. The control plan should clearly document the appropriateness and effectiveness of the control measures. The results of the monitoring activities and any need for further action must be documented and reported to senior management.

Whistleblowing – the internal AML/CFT reporting channel as set out in the German Money Laundering Act can be integrated into the internal whistleblowing reporting channel as required under the Whistleblower Protection Act.

Customer due diligence (KYC)

- Data collected to identify legal entities should be verified on the basis of current official company filings (no older than three months).

- Politically exposed persons (PEPs) – the PEP list published by the European Commission does not restrict the scope of application as set out in Section 1 para. 12 no. 1 GwG.

This means that public officials of comparable rank, below the national level may still be categorised as PEPs. In principle, the use of subscription databases to screen PEP lists is acceptable, provided there are no concerns regarding the data quality or functionality of the database.

- Updating of customer data – shorter update cycles. The deadlines for updating customer data will be shortened when the new AML Regulation comes into force on 10 July 2027 as follows:
 - Simplified due diligence: risk-based until further notice (previously: after 15 years)
 - Enhanced due diligence: yearly (previously: after two years at the latest)
 - General due diligence: every five years (previously: every ten years at the latest).

Beneficial ownership register – the notification of receipt of registration is not acceptable as proof of registration, as there is no guarantee that the details listed therein will be entered in the Transparency Register.

Suspicious transaction reports – the submission of a suspicious transaction report does not automatically have to result in a termination of a business relationship.

- Enhanced due diligence obligations must be applied for at least six months (up from three months) following the submission of a suspicious transaction report in relation to suspected terrorist financing.
- In other cases that are not linked to terrorist financing where the FIU has not responded within 21 calendar days, the application of enhanced due diligence obligations can be terminated.
- In order to improve the quality and value of suspicious transaction reports, additional guidance published by the FIU and must also be taken into account (see Infobrief 10). The most recent 'Joint Guidance' (see below) on the terms 'immediacy' and 'completeness' should be consulted in this regard..

Links:

[Geldwäschegesetz: BaFin aktualisiert Auslegungs- und Anwendungshinweise \(BaFin, 29 November 2024\)](#)

[Geldwäscherprävention: Orientierungshilfe von BaFin und FIU zu Verdachtsmeldungen \(BaFin, 29 November 2024\)](#)

[See also Infobrief 10 – October 2023 – FIU issues guidance to minimise unnecessary suspicious activity reports](#)

Joint BaFin/FIU Guidance on Suspicious Transaction Reports

On 29 November 2024, Germany's financial regulator BaFin and the Financial Intelligence Unit (FIU) jointly published a paper outlining the conditions under which suspicious transaction reports (Verdachtsmeldungen) should be submitted. The guidance aims to provide more clarity in relation to the terms 'immediacy' (Unverzögerlichkeit) and 'completeness' (Vollständigkeit) as set out in the AML/CFT regulation.

Immediacy – according to German Civil Law, immediately means "without undue delay". According to the guidance, obliged entities should report immediately (within 1 day) based on the following two-stage review process:

1. Confirmation of facts underlying the suspicion.
2. Assessment of whether sufficient facts have been collected that will enable the drafting of a comprehensible suspicious transaction report.

Completeness – aims to ensure the quality of suspicious transaction reports, i.e. that business relationships and transactions have been sufficiently and precisely described in the report so that the FIU can understand and further analyse them.

Link:

[Geldwäscheprävention: Orientierungshilfe von BaFin und FIU zu Verdachtsmeldungen \(BaFin, 29 November 2024\)](#)

BaFin's AML/CFT conference – 2024

On 5 December 2024, the sixth BaFin symposium on the prevention of money laundering and terrorist financing took place. In her opening speech, Executive Director Birgit Rodolphe spoke about BaFin's expectations regarding effective money laundering prevention and the current challenges linked to combating terrorist financing.

She noted that BaFin has updated its guidance (see above) highlighting the amended monitoring cycles for customer data.

As a result of its supervisory activity, BaFin noted that credit institutions under its supervision have not sufficiently scrutinised suspicious transactions. Rodolphe said that institutions should be particularly vigilant in view of the increasing number of political crises and tensions and clearly differentiate between the risks of money laundering and terrorist financing when drafting their company-wide risk assessment. She underlined that BaFin expects obliged entities to ensure that they do not act as conduits for terrorist financing and highlighted the risk attached to associations and religious organisations that collect donations noting that they could also be used to finance terrorism.

Links:

[Rede von Exekutivdirektorin Birgit Rodolphe bei der Fachtagung Prävention von Geldwäsche- und Terrorismusfinanzierung \(BaFin, 5 December 2024\)](#)

[Verdächtige Zahlungen: „Manche Spenden erreichen Millionenbeträge“ \(BaFin, 4 December 2024\)](#)

Future of German Federal Financial Crime Agency

The Federal Financial Crime Agency (Bundesamt zur Bekämpfung von Finanzkriminalität, BBF), which was planned following the results of the FATF Mutual Assessment report, and widely discussed by the German coalition government, is on the brink of cancellation. The necessary legal basis for the establishment of the new federal agency is still lacking and unlikely to be met following the collapse of the current coalition government in December.

Links:

[Großer Wurf im Kampf gegen Geldwäsche bleibt aus \(Tagesschau, 21 November 2024\)](#)

[Erste Lesung zum Finanzkriminalitätsbekämpfungsgesetz \(Deutscher Bundestag, 14 December 2023\)](#)

[For more details on the BBF see Infobrief 10 \(October 2023\) – Legal measures under way to establish an integrated Federal Financial Crime Agency.](#)

FIU – Annual Report 2023

The Financial Intelligence Unit's (FIU) 2023 annual report explains its activities in the fight against money laundering and terrorist financing.

Although the FIU received 322,590 suspicious transaction reports, a decrease of 4.3 per cent compared to 2022, the FIU submitted around 82,000 operational analysis reports to the relevant authorities, an increase of 116 per cent compared to the previous year.

The FIU received a total of 49 suspicious transaction reports from investment funds, down from 69 in 2022.

Link:

[Die Financial Intelligence Unit veröffentlicht ihren Jahresbericht 2023 \(Zoll, 6 November 2024\)](#)

German prosecutors drop probe against Russian-Uzbek billionaire Usmanov

German prosecutors in Frankfurt have dropped a money-laundering investigation into Russian-Uzbek billionaire Alisher Usmanov, following a settlement whereby he would pay EUR 4 million split between donations to charities and the German state. Usmanov's lawyers said that after more than two and a half years, the investigation had failed to prove the main accusations against him, including that of money laundering. According to an expert quoted in the media, because it would have difficult to prosecute the case the prosecutor's office most likely decided to impose the highest possible fine and to close the investigation.

Links:

[German Prosecutors Drop Probe Against Russian-Uzbek Billionaire Usmanov \(RadioFreeEurope/RadioLiberty, 18 November 2024\)](#)

[See also Infobrief \(13\) October 2024 – Prominent German law firm under investigation due to links to a Russian oligarch](#)

BKA Situation Report on corruption in Germany – 2023

On 10 September 2024, the German Federal Crime Police Office (Bundeskriminalamt, BKA) published its latest Federal Situation Report (Bundeslagebild) on corruption in Germany for the year 2023.

The figures for criminal offences linked to corrupt practices went up by 6.7%, reaching a total of 3,841. The amount of damage increased by 111,1% to EUR 57 million. The report also stated that while corrupt practices are common across all businesses they are particularly prevalent in the construction sector.

Link:

[BKA Bundeslagebild Korruption 2023 \(BKA, 10 September 2024\)](#)

BaFin imposes fine on C24 Bank GmbH

BaFin has imposed a fine of EUR 1,250,000 on C24 Bank GmbH for systematically submitting suspicious money laundering reports late between March 2021 and June 2023.

Link:

[Geldwäscheprävention: BaFin setzt Geldbuße gegen C24 Bank GmbH fest \(BaFin, 1 October 2024\)](#)

EU and international – regulatory developments

EBA Guidance on AML/CFT for the crypto-assets sector

On 18 December 2024, the European Banking Authority (EBA) published Guidance on reporting requirements under the Markets in Crypto-Assets Regulation (MiCAR).

It is aimed at competent authorities responsible for supervising compliance of issuers with MiCAR requirements, and providing the EBA with the information necessary to conduct a significance assessment under MiCAR.

With regard to AML/CFT, the guidance requires that relevant checks be performed, including customer due diligence (CDD) checks on token holders that have submitted a redemption claim. The guidance also requires that, if a issuer is not subject to ML/TF obligations, CDD must be performed by an intermediary that is an obliged entity.

The new EU framework is applicable as of 2024. It introduces four key AML/CFT rules for CASPs.

- CASPs, issuers of asset-referenced tokens (ARTs), and issuers of e-money tokens (EMTs) have been awarded a license in order to operate in the EU. This requires them to demonstrate that they have adequate controls and risk management procedures in place.
- Following authorisation, all CASPs and issuers of EMTs have to ensure compliance with EU AML/CFT rules. This includes assessing and understanding the ML/TF risk to which they are exposed, and putting in place internal policies, controls and procedures that are adequate and commensurate to that risk.
- Issuers of ARTs that are not CASPs or other obliged entities that are not 'subject to specific AML/CFT systems and controls still have to ensure that the issuer or the sector as a whole are not exposed to serious ML/TF risks and that financial crime is not facilitated.
- CASPs are required to include specific information pertaining to the originator and beneficiary when crypto-assets are transferred in order to make them traceable. In addition, CASPs also have

to apply specific measures in relation to the transfer of crypto-assets involving self-hosted addresses.

Links:

[The EBA provides further guidance on reporting requirements under the Markets in Crypto-Assets Regulation \(EBA, 18 December 2024\)](#)

[EBA's AML/CFT Newsletter Issue 14 \(EBA, 17 December 2024\)](#)

[Preventing money laundering and terrorism financing in the EU's cryptoassets sector](#)

[See also Infobrief 13 \(Oktober 2024\) – New AML requirements for crypto transactions](#)

[Markets in Crypto-Assets Regulation \(MiCAR\)](#)

Outcomes of the FATF Plenary – 23-35 October 2024

On 25 October, the plenary of the Financial Action Task Force (FATF) concluded its three day session on key money laundering, terrorism financing and proliferation financing issues. It was the first plenary under the presidency of Elisa de Anda Madrazo of Mexico.

At this plenary, the FATF added Algeria, Angola, Côte d'Ivoire and Lebanon to the list of jurisdictions subject to increased monitoring. Senegal was removed from the list due to the successful elimination of identified strategic deficiencies within agreed timeframes.

Links:

[Outcomes FATF Plenary, 23-25 October 2024 \(FATF, 25 October 2024\)](#)

[Jurisdictions under Increased Monitoring \(FATF, 25 October 2024\)](#)

[See ALL AML Podcast – AML/CFT 2024 Regulatory Roundup – Minutes 15:40 – for more details on high risk countries](#)

Fintech Wise rebuked over money laundering controls

European regulators have rebuked the London-listed fintech Wise over its anti-money laundering controls, forcing the payments group to draw up a formal remediation plan.

The case illustrates the challenges for fintechs looking to expand their anti-financial crime capabilities while balancing user experience with appropriate risk controls.

Link:

[Wise rebuked by European watchdog over money laundering controls \(Financial Times\)](#)

FCA fines Metro Bank GBP 16 million for financial crime failings

As announced by the Financial Conduct Authority (FCA) on 11 December 2024, it fined Metro Bank PLC (Metro) GBP 16,675,200 for failing to implement adequate systems and controls to monitor over 60 million transactions, with a value of over GBP 51 billion, for money laundering risks. Metro Bank would have been fined GBP 23,821,700, but it agreed to resolve these matters, qualifying for a 30 percent discount under the FCA's processes.

Link:

[FCA fines Metro Bank £16m for financial crime failings \(FCA, 11 December 2024\)](#)

Terrorist financing

Europol – Terrorism Situation and Trend Report – 2024

Europol report on the situation and trends of terrorism in the EU for the year 2023 gives a situational overview, presenting figures and terrorism trends across the EU in 2023. Some key facts are as follows:

- 120 terrorist attacks (98 completed, 9 failed and 13 foiled) carried out in 7 EU member states.
- 388 arrests on suspicion of terrorist offences in EU.

Jihadist terrorism is a key security concern for the EU. In 2023, it had the most harmful direct impact on victims. Events both in the EU and beyond exacerbated the threat to the EU and provided a fertile ground for propaganda and radicalisation. The jihadist threat stems from a fragmented landscape of foreign terrorist groups, online networks and individual actors. In the dynamic right-wing terrorist context, lone actors or small groups, often motivated by accelerationist ideas, pose the highest threat.

Young right-wing terrorists and violent extremists are taking up a more active role as creators of propaganda, recruiters and organisers of attacks and active incitement. New right-wing violent extremist groups are emerging online and seeking to act in real life.

Left-wing and anarchist terrorist and violent extremist groups continued to coalesce around anti-state, anti-capitalism, anti-fascism, anti-racism, anti-militarism and climate-related narratives. Solidarity with imprisoned anarchists remained a strong catalyst for violent acts in a number of countries.

Ethno-nationalist and separatist terrorist groups remain active in the EU. The Fronte di Liberazione Nazionale Corsu (FLNC) and Ghjuventù clandestina Corsa (GcC) continued to perpetrate attacks in Corsica, France. The Partiya Karkerên Kurdistanê (PKK), continued their fundraising, recruitment and propaganda activities in some EU Member States.

One attack categorised as **other form of terrorism** was foiled, and one failed. 27 arrests in the EU in 2023 pertained to other or not specified forms of terrorism, including the Reichsbürger movement with its anti-government and anti-system narratives.

Links:

[European Union Terrorism Situation and Trend report 2024 "EU TE-SAT" \(Europol, 6 January 2025\)](#)

[The EU's work to tackle terrorism \(European Council, 3 August 2022\)](#)

EU approves anti-terror strategy

On 1 December 2024, the EU's ministers of justice and interior approved a comprehensive union-wide counter-terrorism strategy.

The political guidelines of the European Commission foresee the development of a new EU agenda for preventing and countering terrorism and violent extremism, which is expected to be completed by the end of 2025. EU measures to tackle terrorism include:

- Establishment of the Schengen Information System to improve information flows between countries,
- Rules on the transfer and processing of personal data provided by air passengers,
- Creation of the European counterterrorism centre at Europol.

Links:

[EU approves anti-terror strategy \(Euractiv, 7 January 2025\)](#)

[Fighting terrorism: Council approves conclusions on future priorities for countering terrorism \(European Council, 12 December 2024\)](#)

Sanctions

EU adopts 15th package of restrictive measures against Russia

On 16 December 2024, the Council of the EU adopted its 15th package of economic and individual restrictive measures with the objective of further limiting Russia's ability to wage its illegal, unprovoked and unjustified war of aggression against Ukraine. These measures are designed to address the circumvention of EU sanctions through targeting Putin's shadow fleet and weakening Russia's military and industrial complex.

The Council agreed on a significant package of 84 listings consisting of 54 persons and 30 entities responsible for actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine. Another 52 vessels were added to the list of those subject to a port access ban and ban on provision of a broad range of services related to maritime transport, bringing the total of designated vessels to 79. The Council also added 32 new entities to the list of those directly supporting Russia's military and industrial complex in its war of aggression against Ukraine.

Links:

[Russia's war of aggression against Ukraine: EU adopts 15th package of restrictive measures \(European Council, 16 December 2024\)](#)

[Enhanced due diligence for operators manufacturing and/or trading with CHP items \(European Commission, 11 December 2024\)](#)

EU discusses ease of sanctions on Syria

Following the fall of the Assad regime, the EU is considering whether to lift the sanctions that were imposed at the start of the war and have been in place for around 14 years.

The EU's High Representative for Foreign Affairs, Kaja Kallas, is focussing on those sanctions that hindered the country's reconstruction, such as access to financial services.

By easing sanctions, the EU wants to approach the new rulers cautiously and strengthen democratic forces. However, the members of the HTS militia now in power are still on the EU's and the United Nations' terror list. At the end of January 2025, the EU foreign ministers want to decide whether and which sanctions against Syria will be lifted.

Link:

[Vorsichtige Annäherung an Syriens neue Machthaber \(tagesschau, 13 January 2025\)](#)

US cracks down on Russia's facilitators worldwide

On 30 October 2024, the US blacklisted around 400 companies and individuals from China, India and other countries. This is the latest attempt to restrict Russia's ability in obtaining key materials it needs to continue its war in Ukraine.

In the latest wave of designations, the US Treasury Department added more than 270 individuals and companies to its sanctions list, while the State Department listed another 120.

Individuals in third countries who assist sanctioned entities in circumventing sanctions could also be at risk of being sanctioned themselves.

The US Department of the Treasury's Office of Foreign Assets Control (OFAC) has for example added two Swiss lawyers to the sanctions list. They are said to have created companies and trusts to help Russian clients evade sanctions.

Links:

[US cracks down on Russia's facilitators worldwide \(Financial Times, 30 October 2024\)](#)

[Treasury Takes Aim at Third-Country Sanctions Evaders and Russian Producers Supporting Russia's Military Industrial Base \(US Department of the Treasury, 30 October 2024\)](#)

[New Measures Targeting Third-Country Enablers Supporting Russia's Military-Industrial Base \(US Department of State, 30 October 2024\)](#)

[Swiss Lawyers Hit by US Sanctions for Hiding Dirty Russian Money \(Bloomberg, 30 October 2024\)](#)

[US Treasury sanctions two Swiss lawyers for aiding Russian clients \(swissinfo.ch, 30 Oktober 2024\)](#)

Financial crime reports

Basel AML Index – 2024 – Ranking Money Laundering Risks around the World

In December 2024, the Basel Institute on Governance published its 13th edition of the Basel AML Index. It provides risk scores for countries and jurisdictions based on data from 17 publicly available sources such as the Financial Action Task Force (FATF), Transparency International and the Global Initiative against Transnational Organized Crime, and now also includes fraud indicators due to its growing role in money laundering, particularly in high-income countries and large financial centres.

The Index notes that technical compliance with the FATF's 40 Recommendations has improved by 12 percent since 2013, with significant progress in the areas of sanctions, customer due diligence and measures for politically exposed persons. This has been largely driven by lower-performing countries catching up.

Despite progress in these areas, the effectiveness of global anti-money laundering (AML) measures remains low (28%) with particularly weak performance in investigations, prosecutions, and asset confiscation, suggesting that compliance improvements are not yet translating into substantial outcomes in combating financial crime.

Link:

[Basel AML Index 2024 \(Basel Governance, December 2024\)](#)

Report on the responsibility of financial companies in the fight against right-wing extremism

On 10 September 2024, the two NGOs antifinancialcrime.org gGmbH and the Bundesarbeitsgemeinschaft „Gegen Hass im Netz“ (bag) published an analysis advocating the responsibility of financial institutions in the fight against right-wing extremism and supporting networks („Die gesellschaftliche Verantwortung von Finanzunternehmen bei der Bekämpfung des Rechtsextremismus und seiner Unterstützerszenen“).

According to antifinancialcrime.org, clear deficits in mitigating the exposure and risk linked to business connections and financial transactions with right-wing extremist actors and their supporters exist.

Link:

[Die Finanzindustrie muss mehr gegen Rechtsextremismus tun \(antifinancialcrime.org gGmbH, 10 September 2024\)](#)

[See Integrity Insights Podcast - Countering right-wing extremism with sanctions](#)

Cybercrime, information security and data protection

BaFin Documentation on DORA requirements

On 17 December 2024, BaFin published an overview of Digital Operational Resilience Act's (DORA) documentary requirements for obliged entities in the financial sector. These are applicable as of 17 January 2025.

Links:

[Dokumentationsanforderungen nach DORA leicht\(er\) gemacht \(BaFin, 17 December 2024\)](#)

[See also Infobrief 12 May 2024 – BaFin reminds companies of obligations under EU's new cyber-crime regulation amid growing number of attacks](#)

Recommendation – CyberRisikoCheck

In view of the increasing number of cyberattacks and information security incidents, including those affecting SMEs, the German Federal Office for Information Security (BSI) recommends benchmarking information and IT security.

The CyberRisikoCheck tool, developed by the BSI and other experts in accordance with DIN SPEC 27076 specifications, can support organisations in identifying gaps in their systems and developing an action plan to reduce their risk exposure. Berlin Risk Advisors, ALL AML's sister company is authorised by the BSI to use the tool, so please do reach out if you are interested in learning more.

Links:

[CyberRisikoCheck. Wirkungsvoller Schutz für kleine und Kleinstunternehmen nach DIN SPEC 27076 \(BSI\) Advisory \(Berlin Risk Advisors\)](#)

BSI and Cyberagentur study on cyber security start-up scene

The Federal Office for Information Security (Bundesamt für Sicherheit in der Informationstechnik, BSI) and the Agency for Innovation in Cybersecurity (Agentur für Innovation in der Cybersicherheit GmbH, Cyberagentur) have published a comprehensive study on the startup scene in the San Francisco Bay Area.

Core of the study is an analysis of the cybersecurity industry in the Bay Area highlighting the most important startups, trends and technologies.

Link:

[BSI und Cyberagentur veröffentlichen Studie zur Startup-Szene in der San Francisco Bay Area \(BSI, 16 September 2024\)](#)

Audio Recommendations



Integrity Insights is a podcast from Berlin Risk, a Berlin-based corporate intelligence and compliance advisory firm. In the podcast, we cover the latest developments in the fields of financial crime, political risk, sanctions, open-source investigations and much more. The podcast is hosted by Filip Brokes, consultant at Berlin Risk.

The latest episode deals with EU's **Travel Rule for crypto-asset service providers**. Lana Schwartzman, Head of Regulatory and Compliance at Notabene talks with Filip Brokes about the evolving landscape of crypto regulation.

The **AML/CFT 2024 Regulatory Roundup** summarises key topics outlined in the 2024 Infobriefs adding additional context.

[The Integrity Insights episodes are available on all podcast channels](#)

Coming soon

ALL AML and Berlin Risk at FIBE

We are thrilled to announce that ALL AML and Berlin Risk will be part of the FIBE Conference 2025, the fintech festival hosted at CityCube in Berlin from 9 to 10 April 2025. FIBE bridges traditional banking with the disruptive fintech sector and offers curated networking formats.

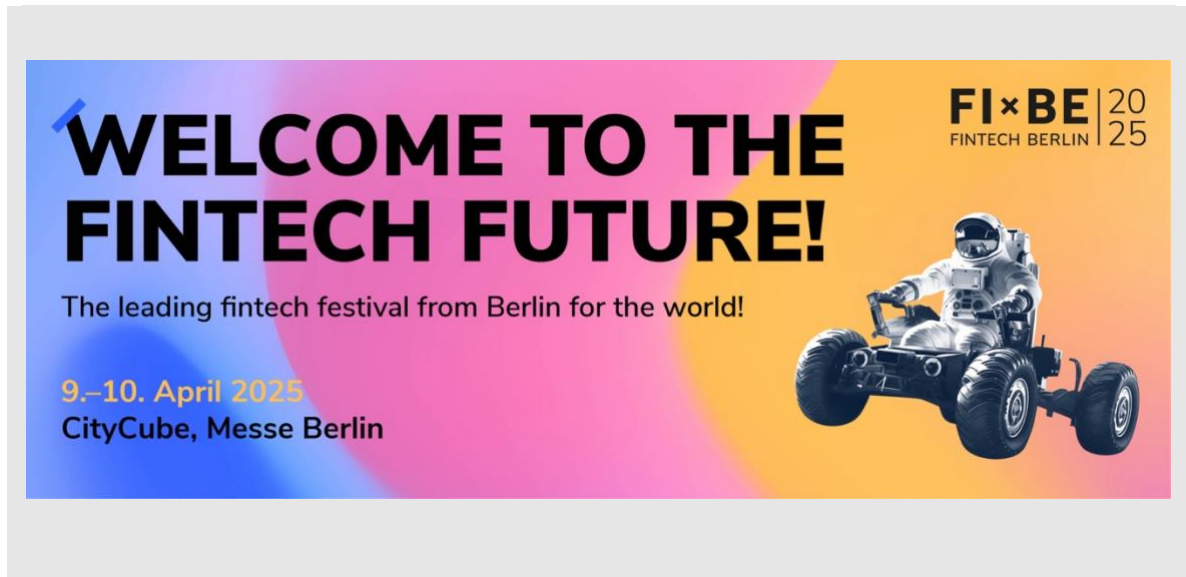
We will be part of the program contributing to the current discussions around on cyber security and AML/CFT regulation. Our podcast channel Integrity Insights will produce another episode on geopolitical risks on site during the conference.

As FIBE sponsors and members of the Berlin Finance Initiative network, we would like to share a **special discount on the tickets**, available between **20 and 26 January 2025**. During this “savings week”, tickets are available for a reduced price of EUR 300. Please use the link to the ticket shop provided below and enter the code “FIBE_Savings” under “Redeem Voucher”. After 27 January, tickets prices will increase to EUR 700 and can be booked with the code “FIBE_Media”.

Links:

[FIBE Conference 2025: Program](#)

[FIBE Conference 2025: Ticket shop](#)



Imprint

ALL AML GmbH
Hamburger Bahnhof 1
10557 Berlin
www.allaml.eu

Amtsgericht Charlottenburg HRB 219815
Managing Directors: Dr. Carsten Giersch, Jennifer Hanley-Giersch

For more information see: <https://allaml.eu/impressum/>

Right of objection and data protection notice

You are receiving this information letter because you are our clients.

This newsletter aims to keep you informed about the latest developments in the area of anti-money laundering and terrorist financing.

For this purpose, we process your personal data on the basis of Art. 6 (1) p. 1 lit. f) DSGVO or, in case you have given your consent, on the basis of Art. 6 (1) p. 1 lit. a) DSGVO.

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