18 September 2026

EBF response to AMLA's public consultation on the draft Implementing Technical Standards specifying the format to be used for the reporting of suspicions and for the provision of transaction records under Article 69(3) of Regulation (EU) 2024/1624

1. Section B – Overall impact of the draft ITS

B1 – Expected level of one-off investment costs

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

o Nontangible one-off costs

o Limited

o Manageable

o Disruptive (please provide further details and evidence)

Response: Disruptive

The draft ITS introduces a very large number of data points. Annex I lists more than 160 data points for financial and credit institutions, with additional requirements in the transaction-record templates of Annex II. A substantial proportion of these fields are neither subject to collection obligations under the AMLR or the CDD framework, nor relevant from a risk perspective. Mandating their collection would require banks to build systems and procedures to collect, structure and transmit categories of personal data that they are not otherwise required, and in some cases not permitted, to hold. As a result, it will be difficult to reconcile these actions with the GDPR principles of purpose limitation and data minimisation.

Adapting core reporting and IT systems to capture, validate and transmit this volume of additional data, together with the associated staff training and the necessary updates to internal policies and procedures, represents a substantial one-off investment. The phased approach compounds these challenges, as it may require several significant system changes within a short period. Successive changes of this kind are operationally burdensome and can substantially increase one-off implementation costs. Banks may have to prepare for evolving FIU

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requirements while, in the interim, continuing to maintain existing national reporting processes. The format should therefore be reduced to what is demonstrably necessary and proportionate.

From a technical and organisational perspective, the impact of these requirements may be considerable. Much of the requested information may already exist within banks, but not in the structured fields required by the ITS. Converting it into structured data points will require significant changes to core systems and processes, which can only be implemented reliably once the relevant definitions and data fields have been finalised. Moreover, systems will need to be developed, tested and stabilised before first- and second-line staff can be trained. While structured fields may support a better FIU feedback loop, the benefits will materialise only if such feedback is actually delivered and provides tangible added value. The investment required from obliged entities should therefore be matched by more structured and valuable FIU feedback.

The overall scale of these costs is however difficult to quantify precisely, as it will vary considerably from one entity to another depending on their existing reporting infrastructure and organisational set-up. For entities with a less mature reporting infrastructure, the impact is expected to be significant.

B2 – Expected impact on ongoing (recurrent) costs

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

o Increase

o Decrease

o No impact

Response: Increase

Ongoing reporting costs are expected to increase substantially unless the final data set is made significantly more proportionate and stable. The sheer number and granularity of data points, combined with the operational need to determine for each report which of the numerous “mandatory if available”, dependent and conditional fields apply, will increase the effort required per report, even where a high degree of automation can be achieved.

The extent of this increase will vary considerably between groups, and even within the same group between entities, depending on their geographic / reporting maturity: entities already accustomed to a detailed, structured reporting format are likely to face a comparatively smaller uplift, while others will face a more significant increase in the data points they must newly collect and report. Overall, and in the context of a broadly stable volume of reports to be submitted, the EBF expects a material increase in the costs generated by the reporting process across its membership.

This burden is compounded by the absence of a clear definition of “availability” for “mandatory if available” fields. Without such clarity, FIUs and reporting entities may interpret the requirement inconsistently, undermining both data quality and legal certainty. It also creates a recurring compliance burden: even where a field is classified as dependent, conditional, or “mandatory if available,” staff and systems must still determine whether the information is actually held, whether the information may lawfully be reported, and whether its collection or reporting could give rise to avoidable privacy or discrimination risks.

AMLA should clarify that reporting entities are not expected to report information that they are not required to collect or do not otherwise hold in the course of fulfilling their CDD obligations. More generally, a risk-based approach should be applied when determining which data points are mandatory or technically required, based on a careful assessment of what information is genuinely necessary for the effective submission and processing of a report of suspicion (“need-to-have rather than nice-to-have”).

AMLA should also encourage early engagement and alignment with national FIUs to promote consistent interpretation and implementation of these requirements. The need to determine the applicability of numerous fields for each report is, in itself, a time-consuming exercise and is likely to increase the recurring operational costs associated with reporting. Such clarification is therefore essential, as the operational and legal burden imposed on reporting entities will depend directly on whether these fields are intended to be populated solely on the basis of information already available to the reporting entity or whether the reporting entity is expected to actively obtain such information from the customer.

B3 – Main drivers of the expected change in costs

- What are the main drivers of the expected change in costs?
  - Changes in reporting format complexity
  - Degree of harmonisation across jurisdictions
  - IT system adaptation requirements
  - Staff training and procedural changes
  - Volume of required data fields
  - Automation opportunities
  - Other (please specify)

Response: Volume of required data fields; IT system adaptation requirements; degree of harmonisation across jurisdictions; changes in reporting format complexity; staff training and procedural changes

The main cost drivers are the complexity and volume of the proposed data points, the number of fields that are not part of the AML/CDD data collection, the technical work required to adapt reporting IT systems, the complexity of the reporting format, procedural changes and the staff training needed to apply the new classifications consistently. The proposed structured reporting of roles, relationships and persons or entities involved should be further assessed from a proportionality and feasibility perspective. The processing of high volumes of data points is itself a cost driver: as the number of data points increases, additional staff will be required simply to handle the volume of information, over and above the system-adaptation costs described above.

A further cost driver is the need to assess the data protection, data-minimisation and non-discrimination implications of fields relating to categories such as gender, employment status, occupation, contact details, digital identifiers and location data.

Conversely, a genuinely harmonised, stable format, together with greater automation, could help contain recurring costs over time. However, these benefits will materialise only if the requirements are applied consistently across FIUs.

The EBF therefore supports maximum harmonisation and cautions against country-specific fields that would erode it.

B4 – Implementation timeframe

B4a. What would be the timeframe needed for you to adapt to the new framework?

o Less than 1 year

o 1 to 2 years

o 2 to 3 years

o More than 3 years

Response: More than three years for obliged entities

B4b. While the exact timeframe needed for technical implementation and full application of the ITS is not determined yet, it is envisaged to provide five years (three for FIUs and two for obliged entities integrating the reporting schemes into their internal systems, with a possible overlap). Is this timeframe:

o Adapted to the respective needs of FIUs and obliged entities

o Too short (please provide explanation)

o Too long (please provide explanation)

Response: Too short

The implementation timeframe will depend heavily on the final scope of the data set, the stability of the final reporting format, the timing of FIU implementation and the extent to which national formats continue to apply in parallel. Significant IT changes, data model changes, data protection assessments, discrimination risk assessments and staff training cannot be implemented efficiently if the required fields remain subject to substantial change during the FIU testing phase.

Given the scale of the required IT developments, testing and staff training, an indicative three-year window for obliged entities would be realistic only if the final data set is confirmed and stable. It would also depend on avoiding dual or parallel reporting requirements during the transition, and the introduction of any substantive changes in the short term. The EBF notes that this assumption may not hold during the first phase, which itself consists of the assessment of the data points by FIUs; AMLA should clarify how obliged entities are expected to plan IT implementation where the data set is, by design, not yet confirmed as stable during that phase.

The consultation materials describe an initial phase during which FIUs will assess the completeness and accuracy of the data points. It should be clarified when the format will be sufficiently stable for banks to commence IT implementation, how changes resulting from FIU testing will be managed, and whether banks will face dual reporting during the transition period. In this respect, the “possible overlap” between the FIU and obliged-entity implementation periods referred to in the consultation paper appears unrealistic unless a tight deadline is strictly observed and coordination with FIUs is well optimised: there is an interdependent relationship between FIUs and obliged entities, and obliged entities can only move forward once the FIU's own platform is stable.

A two-year implementation window for OEs would be particularly challenging if it overlaps with the FIU implementation and testing phase, given the scale and complexity of the required IT changes. Article 10 of the ITS under Article 69(3), point 2(a), provides that the first phase of the adaptation period shall be carried out within 2 years following publication of the Regulation, during which FIUs will assess the completeness and accuracy of the Annexes. Against this background, the EBF would recommend an overall 5-year adaptation period, with two years dedicated to FIU assessment and stabilisation, followed by three years for obliged entities to implement the stable end-state framework.

More fundamentally, the phased and periodic review design risks requiring repeated system changes over a short period: the two-phase process, the potential expansion of the data set, and the four-yearly periodic review under Article 7 could each result in successive changes to banks' systems and processes.

The EBF therefore seeks clarity on whether, during the transition, banks would be required to report under both the new harmonised format and the FIUs' existing formats, or otherwise face changing reporting requirements while FIUs are still finalising their readiness assessments or deploying the necessary systems. Repeated changes and dual reporting would undermine the ITS' stated objectives of reducing administrative burden and simplifying reporting. The phased implementation approach should also not result in technical specifications creating de facto new or divergent substantive reporting requirements before the long-term reporting framework and end-state operating model have been finalised. The EBF therefore calls for a single, stable migration, with a clear and sufficiently long implementation period and no dual reporting during the transition.

A realistic implementation timeline also depends on the readiness of FIUs to receive and process the data, and on consistent implementation across the EU based on clear and stable definitions. The EBF seeks further clarification regarding the phased implementation strategy detailed in recitals 12 - 15, as the specific expectations for obliged entities during the initial FIU assessment phase and the subsequent implementation preparation phase remain unclear. AMLA should therefore provide greater clarity regarding the target implementation model and roadmap to enable firms to plan and invest appropriately, avoid unnecessary implementation costs and duplication of effort, and ensure that obliged entities are not required to implement requirements that may subsequently change. A workable timeframe requires FIUs to provide the necessary technical specifications well in advance and to be operationally ready to receive and process the new format before obliged entities are expected to implement it. Banks will then need sufficient time to adapt their systems, processes and staff training.

If these conditions are not met, the proposed implementation timeframe will not be workable.

Further clarification is also needed on how the proposed phased approach aligns with the review timeline set out in Article 87a of the AMLR, which provides for a review by 10 July 2032. In particular, the timing for the conclusion of Phase 2 and its interaction with the Commission's review of STR formats, as referred to in Recital 21 and Article 87a, is currently unclear.

The EBF would therefore welcome greater clarity on the sequencing and interdependencies between these timelines, including whether the outcome of the Article 87a review could result in changes to the reporting formats or requirements following the completion of Phase 2. This is particularly important given the significant investments that obliged entities will need to make in systems, processes and data capabilities to implement the new requirements. Clear visibility on the expected timelines and any potential transition arrangements would enable OEs to plan their implementation effectively and mitigate the risk of substantial system redesign shortly after Phase 2 has been implemented.

B5 – Balance between harmonisation, quality and efficiency (Articles 3 and 4)

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

- o *Fully agree*
- o *Agree to some extent (please provide explanation)*
- o *Disagree to some extent (please provide explanation)*
- o *Fully disagree (please provide explanation)*

Response: Disagree to some extent

The EBF strongly supports maximum harmonisation of the reporting format as the guiding principle. A uniform data format can generate substantial savings for internationally operating banks, improve communication and data exchange between FIUs, and strengthen interoperability between national systems, the effectiveness of the reporting chain and the feedback loop. National specificity should remain possible, but only where there is a clear and compelling reason. At the same time, harmonisation should not be pursued by requiring excessive, insufficiently relevant or privacy-intrusive data points. As currently drafted, the ITS appears to favour a very extensive data set with many country-specific and FIU-required fields, without consistently demonstrating an alignment with proportionality or the simplification objective.

In addition, the ITS does not appear to prescribe a common file format, technical language or exchange standard. As a result, FIUs may implement the common data model through different technical interfaces and formats. This could significantly reduce interoperability and undermine the efficiency gains expected from harmonisation. To realise the intended benefits of harmonisation, further clarity and alignment at EU level would be needed to limit national divergence and avoid a fragmented reporting landscape.

Should AMLA nonetheless decide to specify a file format, the EBF proposes that this be XML or, at minimum, that XML be included among a limited set of permitted formats – noting that some national FIUs already mandate XML for the upload of reporting data points, and that building on existing national practice would reduce implementation cost and complexity relative to introducing an entirely new format. Should a common technical format be requested, the EBF would nevertheless recommend retaining the existing flexibility for obliged entities to provide reports through manual channels, in addition to the proposed format, as structured XML upload has in practice presented technical challenges for some institutions.

It is essential that the format be limited to data that obliged entities are actually required to collect under the AMLR. Requiring data points that fall outside AMLR collection obligations forces banks to gather and process personal data they otherwise have no legal basis to hold, in direct tension with the GDPR principles of purpose limitation and data minimisation; and certain fields (e.g., gender (DP0122) and employment status/occupation (DP0124/DP0125)) additionally create a tangible risk of discrimination against the persons concerned. The EBF therefore urges that every data point which is not required under the AMLR be removed, and that the remaining set be genuinely risk-relevant, so that harmonisation delivers the intended reduction in burden without disproportionately encroaching on fundamental rights.

More fundamentally, the reporting format should be guided by the principles of proportionality, effectiveness and a clear focus on outcomes. Additional or more granular data points should be required only where they demonstrably improve effective outcomes in the fight against money laundering and terrorist financing. A proportionate data request that is combined with a valuable feedback loop from FIUs to obliged entities is more likely to improve the quality and efficiency of reporting than an extensive data set.

The EBF also emphasises the importance of genuine European harmonisation. Options for local deviation risk undermining the intended uniformity and generate additional complexity and cost for obliged entities; the benefits of harmonisation for internationally operating banks can only be fully realised where the reporting format is truly uniform and consistently applied across FIUs.

In addition, further clarification is needed on the distinction between suspicious activity reports and suspicious transaction reports. While Article 2 separately refers to reports of suspicions and transaction records, and specifies that transaction records may relate to completed, scheduled, attempted, rejected, cancelled, suspended, refrained or frozen transactions, the practical boundary between a “transaction” and an “activity” remains unclear.

In practice, an atypical transaction may form part of a broader pattern of unusual or suspicious behaviour, meaning that the same case could potentially fall within both categories. The availability of a “Both” option may therefore result in obliged entities selecting this option as a precautionary measure to avoid misclassification, which could create additional reporting complexity rather than achieving the intended simplification.

AMLA should therefore provide clear criteria distinguishing "activity" from "transaction", including clarification as to whether "activity" is intended to cover situations in which no transaction is recorded in the books or systems of the obliged entity. Further guidance should also specify when a transaction record or suspicious transaction report is expected to be completed, including how these requirements should apply where the FIU requests information under Article 69(1)(b), where a transaction record is provided as an attachment to a suspicious activity report submitted under Article 69(1)(a), or in any other defined reporting context. Clear rules on the relationship between these reporting elements would be essential to ensure consistent implementation across obliged entities and avoid duplicative or unnecessary reporting.

B6 – Grouping of obliged entities for template purposes

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

o Yes

o No (please provide explanation)

Response: Yes, in principle, subject to clarification

While we agree with the principle of grouping obliged entities to support the use of differentiated templates, the current grouping does not sufficiently reflect the material differences in business models within the "Financial institutions and credit institutions" dataset in Annex 1. In particular, the specific characteristics of asset management are not adequately reflected, including differences in products and transaction types, operating models, the availability and nature of client and transaction-level data, and the role of intermediaries and distributors.

Applying the Annex 1 dataset uniformly across these different business models may therefore result in data points that are not relevant to asset management or that cannot be provided consistently by asset managers. This could increase implementation and reporting burdens without necessarily improving the quality or usefulness of the information provided to FIUs, while also creating a risk of inconsistent data quality across obliged entities.

We would therefore welcome further calibration of the proposed grouping and datasets to better reflect the specificities of different business models. This could, for example, include an asset management-specific subset or template, or clearer applicability rules identifying which data points are relevant and expected for each business model. Such an approach would help ensure that reporting requirements remain proportionate and operationally feasible, while supporting greater consistency in the quality of reported information.

Sector-based grouping is, in principle, a sensible way to tailor reporting to the nature of the activity concerned. However, the EBF asks AMLA to clarify the intended scope of the banking templates, in particular whether composite or combined reports are possible, whether the Annex II transaction-record template is intended to be used for that purpose, and whether the transaction-record format is also intended to apply to information reported under Articles 74(2) and 80(4) AMLR.

B7 – Need for further clarification on definitions, processes or legal aspects

- Does the ITS need further clarification on definitions, processes or legal aspects?
  - Yes (please provide explanation)
  - No

Response: Yes

The EBF asks AMLA to provide further clarification on the following points:

- Definitions and terminology: Clarify key concepts such as "urgency", "freedom to provide services", "adverse information" and PEP status within adverse information. Clarify whether "suspicious transaction report" (STR) and "suspicious activity report" (SAR) are interchangeable or distinct, and apply terminology consistently throughout the ITS and templates.
- "Mandatory if available" and data availability: Clarify whether "mandatory if available" requires OEs to actively obtain information not otherwise available through standard processes, or only report information already held in the ordinary course of business and AML/CFT processes. Data already held in structured form and available without customer enquiry should be the relevant standard. Guidance is also needed where information is unavailable in core systems or difficult to obtain, including in correspondent banking. Alternative information should be permitted and unavailable DPs should not be mandatory.
- Population rules and dependencies: Provide guidance on population rules and dependencies, including where DPs rely on FIU-provided labels or information unavailable to OEs at reporting. Clarify the level of national implementation and readiness required for such dependencies.
- Legal basis and scope: Clarify the legal status of references to Recitals 139 and 140 of the AMLR and whether the format is mandatory for transactions reported under Arts. 80(4) and 74(2). Clarify "FIU-required" fields, including criteria for their use and whether their number can be limited.
- Reporting models: Clarify whether composite reports are permitted and whether the Annex II transaction-record template applies. The format should accommodate future group-wide reporting, including by a central entity or AML function. A single group-wide suspicion should not need to

be reported separately by several entities. Clarify how reporting and linked group entities should be identified to avoid duplication.

- Governance and amendments: The emergency-amendment mechanism under Art. 8 should be exceptional, necessary, proportionate and time-limited, with AMLA oversight. A separate process should allow FIU-required and country-specific DPs to be periodically reviewed. Emergency additions involving personal data must have a legal basis and comply with Art. 52 of the Charter and relevant CJEU case law.
- Reporting speed: The increase in DPs risks slowing reporting and undermining freezing and other urgent measures. The format should not require information that would materially delay submission of a report of suspicion.
- Transaction and event reporting: Clarify the treatment of intended or attempted transactions subsequently executed, including whether separate reporting would create duplication. Reports concerning events rather than transactions should not require artificial or non-applicable transaction data.
- Technical standards and FIU support: A single country-coding standard should apply throughout. FIUs should make the format available as soon as possible, including electronically, and provide guidance for completing mandatory and optional fields.
- FIU feedback: Clarify how transaction- and report-level feedback from FIUs to OEs will operate under the AMLR and be referenced under the new regime. This is important for transaction monitoring, internal controls and reporting quality.
- Implementation and transition: Clarify what is expected of banks and by when, particularly during the FIU implementation period. No dual reporting should apply during the transition. Clarification is also needed on unusual transactions reported before the AMLR applies, including subsequent qualification as suspicious and implications for systems, record keeping and feedback.
- Data protection and discrimination: Many proposed DPs do not correspond to AMLR collection obligations or appear risk-relevant. Requiring them could compel banks to process personal data without sufficient legal basis and create tension with GDPR principles of purpose limitation and data minimisation. Gender (DP0122) and employment status/occupation (DP0124/DP0125) also create discrimination risks. The EBF asks AMLA to remove DPs not required under the AMLR and conduct data protection and non-discrimination assessments of the remaining set.
- Proportionality and predicate offences: The detailed classification of predicate offences should be proportionate. OEs may identify ML/TF suspicions without reliably determining the underlying offence. The format should therefore retain “unknown” or “not applicable” and should not

imply responsibility for establishing the predicate offence or its definitive legal classification.

- Optional and conditional fields: Clarify the status of optional and conditional fields. Optional fields should be avoided or specifically justified, particularly where reporting may raise GDPR questions on lawfulness and proportionality. Consider adding a column to the Annexes explaining the legal basis and purpose of each DP and the consequences of non-reporting.
- Complex relationships and networks: The format should allow reporting of complex relationships among individuals, transactions and entities involved in a single suspicion, including broader networks or schemes not adequately captured by structured fields. Individuals should also be reportable independently where no relevant legal entity is involved.

5. Section C – Impact stemming from the proposed set of data points

C1 – Country-specific data points

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

C.1. How would you rate the addition of country-specific data points?

Response: Country-specific data points pose challenges

Country-specific and "FIU-required" data points should remain exceptional. While they may be necessary in limited circumstances, their use reduces harmonisation and can create significant additional costs and complexity for cross-border institutions.

Beyond fragmenting the harmonisation objective and increasing implementation costs and complexity, several of these data points raise serious privacy and discrimination concerns and fall outside the AMLR's collection obligations. Gender (DP0122), for example, is not collected in all countries and, according to the Interpretative Note, is required only in certain Member States as determined at Member State level by the FIU. It is not an AMLR collection obligation. Mandating the collection and reporting of gender would create a direct and foreseeable risk of discrimination and would be difficult to reconcile with the GDPR principles of purpose limitation and data minimisation. Employment status and occupation (DP0124/DP0125) raise similar concerns. These data are frequently not held by banks, are not consistently required under the AMLR, and may be particularly sensitive from a discrimination perspective, including where they are used as proxies for socio-economic status.

Furthermore, jurisdiction-specific language and translation requirements may impose substantial operational and compliance burdens on obliged entities, thereby diminishing the benefits of a harmonised EU reporting framework. In particular, entities operating across multiple jurisdictions may be required to translate, locally adapt and review reporting information to meet different linguistic or formatting requirements, resulting in additional costs, manual processes and potential inconsistencies in the information reported.

These burdens would be further exacerbated if FIUs retain national reporting templates or introduce additional jurisdiction-specific requirements alongside the AMLA framework. Such divergence could lead to duplication of reporting processes and undermine the objective of establishing a consistent and streamlined reporting framework across the EU.

We therefore encourage AMLA to promote maximum consistency in reporting requirements, including with respect to language, templates and data specifications, and to clarify the extent to which national variations will be permitted. Where translation is required, a clear and proportionate approach should be established to minimise duplication and avoid placing disproportionate operational burdens on obliged entities operating cross-border.

The EBF therefore urges AMLA to:

- remove any data point that is not required under the AMLR
- permit country-specific fields only where there is a clear, compelling and documented basis in national law, and never make such fields unconditionally mandatory
- subject each country-specific or “FIU-required” field to a prior data protection and non-discrimination impact assessment.

C2 – Comprehensiveness and clarity of the data point lists (Annexes I and II)

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

C.2. How would you rate the established list of data points for the various sector categories, as established in Annexes I and II, in terms of comprehensiveness and clarity?

No.	Please select the list you wish to comment on	Please rate the list in terms of comprehensiveness; are all required data points included? The list is:	Please rate the list in terms of clarity; are the data points defined clearly without ambiguity? The list is:	Provide comments if you choose major adjustments needed in either category
1	Annex 1 - Financial institution and credit institutions	major adjustments needed	sufficiently clear	The list is very extensive for banks (more than 160 data points). Many fields are not currently recorded by banks and are not required to be collected under the AMLR/CDD framework or are not risk relevant. The list includes reporting of gender, employment and occupation, detailed contact data, digital identifiers, location information, and other data that may directly or indirectly reveal protected characteristics, socio-economic status, or online behaviour. In line with data-minimisation, proportionality and the ITS' own simplification objective, the data set should be reduced to what is necessary, useful and proportionate to the purpose of an FIU report. The EBF would welcome an impact analysis identifying which fields are new, which are already reported, and which are mandatory under the AMLR or other frameworks. The EBF also asks AMLA to clarify, for each data point, whether it is operationally necessary for the assessment and processing of the report itself, or whether it serves a primarily informational or statistical purpose for FIUs.

No.	Please select the list you wish to comment on	Please rate the list in terms of comprehensiveness; are all required data points included? The list is:	Please rate the list in terms of clarity; are the data points defined clearly without ambiguity? The list is:	Provide comments if you choose major adjustments needed in either category
2	Annex 1 - Financial institution and credit institutions	sufficiently comprehensive	major adjustments needed	The method for specifying countries is inconsistent across data points: an ISO 3166 code is required in some places, a UN website (which also contains ISO codes) is referenced in others, and elsewhere only ‘enumeration’ or ‘list of countries' is stated (e.g. DP0408). A single, consistent standard should be applied throughout, and city/town fields (e.g. DP0120, DP0306) should not reference a country-only list.
3	Annex 2 - Banking	major adjustments needed	sufficiently clear	The transaction record template contains many data points. The time required to complete them is substantial and, even where several are only 'mandatory if available', determining their applicability still takes time. The set should be limited to what is necessary and proportionate for transaction records. The list should be aligned more closely with information that banks actually hold in structured transaction systems.

C.3. - Please comment on the individual data points of your selection.

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

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

No.	Datapoints list version your comment pertains to	Ref. No. of the datapoint you would like to comment on. To ensure the processing of your comment, please provide the full reference number: "DPXXXX"	Particular field of the selected datapoint the comment pertains to:	The body of the comment
1	Annex 1 - Financial institution and credit institutions	**DP0113**	Definition / Treatment	Identification Document - Date of Issuance. This is not a data point required under the AMLR: Article 22 AMLR and Article 6 CDD RTS do not include it, so obliged entities are not required to collect or record the date of issuance of the identification document. Mandating it therefore exceeds AMLR collection obligations and would force banks to collect and process additional data with no AMLR basis. A clear operational definition of this notion is needed, together with guidance on how it should be identified and applied by obliged entities in practice. In particular, practical criteria and examples would help ensure a consistent approach across obliged entities and jurisdictions. At the same time, we question the relevance and added value of this information for FIU analysis and would welcome clarification on the specific FIU use case intended to justify its collection and reporting. Recommendation: delete DP0113, or at most make it 'optional' where available.
2	Annex 1 - Financial institution and credit institutions	**DP0120 / DP0306 / DP01022**	Definition / Treatment	Place of Birth - City. The reference link provided only lists countries, not cities, so the attribute source is inappropriate for a city-level field. Recommendation: provide a correct value list for city-level fields and apply a consistent country standard elsewhere. Apply the expected source and format for country and city consistently across Annex I and Annex II.

No.	Datapoints list version your comment pertains to	Ref. No. of the datapoint you would like to comment on. To ensure the processing of your comment, please provide the full reference number: "DPXXXX"	Particular field of the selected datapoint the comment pertains to:	The body of the comment
3	Annex 1 - Financial institution and credit institutions	**DP0122**	Definition / Treatment	Gender. The EBF strongly objects to this data point. It is not a collection obligation under the AMLR and is not collected in all countries; per the Interpretative Note it is FIU-required and applies only in some Member States. Mandating the collection and reporting of gender creates a serious risk of discrimination against the persons concerned and is very difficult to reconcile with the GDPR principles of purpose limitation and data minimisation. Recommendation: delete DP0122; if it is retained at all, it must not be mandatory, must have an explicit national law basis, and must be preceded by a documented data protection and non-discrimination impact assessment.

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4	Annex 1 - Financial institution and credit institutions	**DP0124 / DP0125**	Definition / Treatment	Employment status (DP0124) and Occupation (DP0125). Under Article 18 CDD RTS, obliged entities must obtain, in relation to the business activity or occupation of the customer, at least one of 8 listed items; an obliged entity may therefore have selected a different item and hold no employment/occupation information; these fields are therefore not always required under the CDD RTS. Moreover, this information may only become available upon data actualisation, which under Article 26(2)(b) AMLR may not take place until 2032. Beyond that, employment status and occupation are sensitive personal data on socio-economic status; mandating their collection and reporting creates a real discrimination risk. Requiring in addition a detailed classification based on ISCO-08 is not the called-for simplification. Recommendation: do not require these fields; at most interpret 'mandatory if available' strictly and impose no specific classification standard.

No.	Datapoints list version your comment pertains to	Ref. No. of the datapoint you would like to comment on. To ensure the processing of your comment, please provide the full reference number: "DPXXXX"	Particular field of the selected datapoint the comment pertains to:	The body of the comment
5	Annex 1 - Financial institution and credit institutions	**DP0203**	Definition / Treatment	Risk classification. This data point appears in the 'Legal entity' category (1.3) but not in the 'Natural person' category (1.2). The reason is unclear, since a customer can also be a natural person and in that case will have a risk classification. This datapoint appears of limited relevance in the explanation of the suspicion and therefore of limited added value for FIUs. Indeed, the purpose of customers risk assessment / classification is to adapting due diligences applied to them depending on their risk characteristics, which is a process different from the detection of unusual transaction and the characterization of suspicions, based on transaction features). Explanation on the suspicion would generally not need to mention the customer's risk classification, and the report of suspicion should not lead to situations where the FIU would challenge the risk classification applied to customers of obliged entities.

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6	Annex 1 - Financial institution and credit institutions	**DP0208**	Definition / Treatment	Further clarification and alignment of the permitted values for "Entity form" would be welcome. The current value "Foundation/NPO" appears to conflate two distinct concepts: a foundation is a legal form, whereas "NPO" describes an organisation based on its purpose or status and is not necessarily a specific legal form. These concepts should therefore not be combined into a single value. In addition, "Association" appears to be missing from the list of legal forms. The list of permitted values should be reviewed and aligned with the AMLR and the customer types and legal-form classifications used in the CDD RTS, as applicable. We therefore recommend: • separating "Foundation" and "NPO" into distinct values, where both are intended to be captured; • adding "Association" as a separate value; and • clarifying whether DP0208 is intended to be populated only where the entity is a direct client, and how the field should be treated for entities or actors that are not direct clients.

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7	Annex 1 - Financial institution and credit institutions	**DP0219**	Treatment	Status of the entity. The value 'active' appears to be missing from the list of possible entity statuses. Further clarification and alignment of the permitted values for DP0219 would be welcome. In particular, the value **"**Active**"** appears to be missing and should be added to the list of permitted values. We also note that some of the proposed values appear to constitute new reportable data requirements that may not currently be captured in obliged entities' systems. Their implementation would therefore require additional system and process changes. AMLA should ensure that the permitted values are appropriately aligned with the applicable AMLA reporting requirements and that the implementation burden is proportionate. In addition, not all values will necessarily be known or available to the reporting entity, particularly where the information can only be obtained in the context of a direct business relationship. AMLA should therefore clarify whether DP0219 is intended to apply only to direct business relationships and how obliged entities should report where a particular value is not known or cannot reasonably be obtained. The use of "unknown" or another appropriate treatment should be considered where the information is not available to the reporting entity.

8	Annex 1 - Financial institution and credit institutions	**DP0023 / DP0024 / DP0126 / DP0127 / DP0222 / DP0223**	Definition / Treatment	Further clarification is needed regarding the data points on actions taken in response to the suspicion. DP0023/DP0024 appear to overlap with DP0126/DP0127 for natural persons and DP0222/DP0223 for legal entities. If the action taken relates to the suspicion report as a whole, it is unclear why the same information would also need to be reported at actor level. Requiring the same information to be entered across multiple categories could create unnecessary duplication, increase reporting complexity and introduce inconsistencies. AMLA should therefore clarify the rationale for replicating these data points across the different categories and whether they are expected to be completed multiple times. We would suggest that actions should generally be reported at the report level, unless there is a specific action relating to an individual natural person or legal entity that is materially different from the action taken in respect of the suspicion as a whole. AMLA should also consider whether the different actor-level fields could be consolidated, where appropriate, to reduce redundant data entry. In addition, DP0023/DP0024 require clarification as to the timing of the information to be reported. In practice, many actions arising from a suspicion - such as account closure or termination of a business relationship - are taken only after the SAR has been submitted. It is therefore unclear whether AMLA expects obliged entities to report actions already taken at the time of filing, or whether visibility of actions envisaged or planned following the submission of the SAR is also expected. AMLA should clarify the applicable reference point and, where planned actions are relevant, how these should be distinguished from actions already taken. Further guidance would also be welcome on the expected level of detail and degree of standardisation when reporting actions taken or envisaged, to support consistent

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				reporting and avoid unnecessary narrative information.
9	Annex 1 - Financial institution and credit institutions	**DP0302**	Name / Treatment	Type of street. This field is unnecessary, is not recorded and does not appear useful; the Interpretative Note even lists values such as ditch, bridge or mall. Such data is not collected, is not a collection obligation under the AMLR and is not risk-relevant. Mandating it adds unnecessary data collection and processing. Recommendation: remove DP0302 or make it strictly optional with proper justification.
10	Annex 1 - Financial institution and credit institutions	**DP0312 / DP0313 / DP0314**	Definition / Treatment	Contact information: contact type (DP0312), email address (DP0313) and phone number (DP0314). The usefulness of providing a 'type of contact' is unclear, and email and phone are personal data whose blanket collection for FIU reporting is not an AMLR collection obligation and adds to the volume of fields without clear necessity. This is not simplification and is in tension with data minimisation. Recommendation: remove DP0312, DP0313, DP0314 or make it strictly optional with proper justification.

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11	Annex 1 - Financial institution and credit institutions	**DP0315**	Definition / Treatment	Electronic banking data. IP addresses and device identification numbers are personal data. They are not recorded as standard per transaction, and not generally available for older business relationships. Requiring them is not an AMLR collection obligation, exceeds what is available, and raises significant privacy concerns under the GDPR principles of purpose limitation and data minimisation. Recommendation: remove DP0315, or make it strictly optional, and confirm no retroactive collection is expected.

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12	Annex 1 - Financial institution and credit institutions	**DP0405**	Definition	PEP status. The Interpretative note guidance states the field 'shall be completed for any natural person known or suspected to be a PEP'. Obliged entities are not required under the AMLR to determine whether someone is 'suspected' to be a PEP; this goes beyond the AMLR PEP-determination obligation and would require banks to record an unfounded, speculative and stigmatising label about an individual, which is disproportionate. A PEP status is should not be categorized as an adverse information. Extracting this information, such as an IP address, may also be complex and the data may not be consistently stored across all channels and scenarios. We would therefore welcome clarification on the scope of the requirement, including whether it relates to transaction IP addresses, onboarding IP addresses or device identifiers, as well as the expected source of the information. Clarification is also needed on whether this datapoint should be optional where the information is not captured or retained as part of standard business processes. Recommendation: delete 'or suspected' and align the description strictly with the AMLR.

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13	Annex 1 - Financial institution and credit institutions	**DP0409**	Definition	Sanctions status. The Interpretative note guidance refers to any natural person 'known or suspected to be subject to sanctions'. Recording a person as merely 'suspected' of being subject to sanctions is not an AMLR obligation, is a speculative and stigmatising label with serious consequences for the individual. It should be limited to actual matches. There is also no equivalent data point for a legal entity subject to sanctions. Recommendation: remove the 'suspected' standard (limit to confirmed matches) and clarify/confirm equivalent coverage for legal entities subject to sanctions.

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14	Annex 1 - Financial institution and credit institutions	**DP0506 / DP0507**	Treatment / Dependency	Suspension end date (DP0506) and Suspended Amount (DP0507). These are marked 'Mandatory' in Annex I, whereas they are only relevant where the account status is suspended/frozen/blocked (dependency on DP0505). In many cases no suspension, freezing or blocking measure will be relevant. EBF assumes they would be optional because they are not always relevant. It should also be clarified whether the 'Suspended' account status is intended to cover actions taken at the request of a competent authority (e.g. an asset-seizure request), and how DP0506 (suspension end date) should be completed where the relevant authority has not indicated an end date. We further note that AMLA's own consultation materials are internally inconsistent on this point: DP0506/DP0507 are marked 'Mandatory' in some instances of the Annex II template and 'Optional' in others, for the same data points. Recommendation: confirm they are conditional (required only where applicable), not unconditionally mandatory.

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15	Annex 1 - Financial institution and credit institutions	**DP0515**	Definition	Name of the account. The definition links to the EPC Verification of Payee Scheme Rulebook; it should be verified whether that naming convention is used for all types of accounts, as it may not be. Recommendation: clarify the scope and applicability across account types.

16	Annex 1 - Financial institution and credit institutions	**DP0601**	Treatment	Transaction type. There should be an explicit 'Other' value linked to a free-text field. Recommendation: confirm DP0601 includes an 'Other' value connected to the free-text precision field (DP0602). It should also be clarified how reports covering multiple transactions of different types are to be handled, in particular whether multiple values may be selected for DP0601 in a single report, or how such cases should otherwise be reported, given that a report may concern a set of transactions without a single, clearly identifiable transaction type. Further clarification is needed on the permitted values for transaction type. Not all SARs will necessarily relate to a specific transaction; certain investigations may concern suspicious activity or other circumstances where no transaction has taken place. DP0601 should therefore provide for a clear "Not applicable" value where no transaction is involved. The transaction types and related terminology should also be aligned, to the extent possible, with the AMLR, AMLA reporting requirements and relevant EBA reporting classifications, in order to promote harmonisation and standardisation and avoid the need for obliged entities to maintain different classifications for similar information. In addition, there should be an explicit "Other" value linked to the free-text precision field (DP0602), allowing obliged entities to provide further details where the applicable transaction type is not adequately captured by the predefined values. We therefore recommend confirming that DP0601 includes both "Not

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				applicable" and "Other" values, with "Other" appropriately linked to DP0602

17	Annex 1 - Financial institution and credit institutions	**DP0610**	Definition / Treatment	DP0610 is currently presented as a mandatory data point, but further clarification is needed on its purpose, applicability and calculation. In particular, it is unclear which exchange rate obliged entities are expected to use and at which point in time the rate should be determined. Moreover, where the transaction currency and the account currency are the same, no currency conversion takes place and therefore no exchange rate applies. Consistent with the stated dependency on DP0608/DP0609, the field should not be required where the relevant currencies are the same. More fundamentally, we question the need for DP0610 to be mandatory. DP0608/DP0609 already provide the relevant currency information, and the exchange rate may in many cases be derived from other information available to the FIU. Requiring obliged entities to provide this as a separate data point could therefore create an additional implementation and data-quality burden without a clear corresponding analytical benefit. We therefore recommend that DP0610 be made optional. If AMLA considers the data point necessary, it should at a minimum clarify the applicable exchange rate methodology, including the relevant source and reference time, and confirm that the field is not required where no currency conversion applies, including euro-denominated or other same-currency transactions.
18	Annex 1 - Financial institution and	**DP0615**	Definition / Treatment	For transactions that take place online or remotely, it is unclear what should be entered as the "transaction address". In

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	credit institutions			such cases, there may be no physical address associated with the transaction, and it is unclear whether AMLA expects the customer's address, the merchant's address, the location from which the transaction was initiated, or another form of location information. In addition, location data can be privacy-sensitive and may reveal patterns of movement, behaviour or association. We therefore question whether this information should be mandatory where it is not ordinarily captured as part of the transaction. Recommendation: clarify the expected content for online/remote transactions and, where no physical transaction address exists, provide for an appropriate "not applicable" or "not available" treatment. We also support marking DP0615 as an Optional data point.

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19	Annex 1 - Financial institution and credit institutions	**DP0801 / DP0802 / DP0803 / DP0804 / DP0805 / DP0806**	Treatment / Dependency	Activity type (DP0801) and DP0802-DP0806. Where the report concerns only a payment transaction, completing the non-transactional 'activity type' (technically required) does not appear useful, and DP0802-DP0806 would duplicate the transaction information already provided. Recommendation: confirm these non-transactional activity fields are not required where the report concerns an ordinary payment transaction, to avoid double entry.

20	Annex 1 - Financial institution and credit institutions	**DP0901-DP0903**	Treatment / Dependency	**DP0901 – Object type** This data point is technically required; however, its relevance to payment-transaction reporting is limited. It appears to be primarily relevant to transactions involving real estate, vehicles, boats/aircraft, high-value goods, or other asset-based suspicious transactions. In many payment transactions, banks do not have sufficient information to identify the underlying object or asset to which the payment relates. Making DP0901 a technically mandatory, submission-blocking field is therefore not appropriate for payment-transaction reports.In addition, for payment transactions processed by an intermediary service provider, the underlying purpose or asset may not be identifiable from the information available to the reporting entity. For example, a natural person may make payments relating to the purchase and cross-border movement of luxury vehicles, but the intermediary may not have access to the underlying transaction documentation or sufficient information to establish the specific asset involved. **DP0901–DP0903** These data points appear to be linked to the requirements under Article 74, while potentially covering a broader range of underlying assets. We would welcome clarification as to whether reporting under Article 74 is expected to be performed through this reporting channel. Where the underlying asset cannot be identified from the information available to the reporting entity, it may also be difficult or disproportionate to obtain

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				supporting documentation solely for the purpose of completing these fields. We therefore request clarification on the level of evidence expected to support the reported information and whether values such as "unknown" or "not available" are acceptable where the information cannot reasonably be obtained. **Recommendation:** DP0901 should not be treated as a blocking/technically mandatory field for payment-transaction reports. Where the underlying object or asset cannot reasonably be identified based on the information available to the reporting entity, "unknown/not available" should be permitted.

1	Annex 1 - Financial institution and credit institutions	**DP0001**	Treatment / Dependency	For Annex 1: The list is very extensive for FIs (more than 160 data points). Many fields are not currently recorded by banks and are not required to be collected under the AMLR/CDD framework or are not risk relevant. The list includes reporting of gender, employment and occupation, detailed contact data, digital identifiers, location information, and other data that may directly or indirectly reveal protected characteristics, socio-economic status, or online behaviour. In line with data-minimisation, proportionality and the ITS's own simplification objective, the data set should be reduced to what is necessary, useful and proportionate to the purpose of an FIU report. We request an impact analysis identifying which fields are new, which are already reported, and which are mandatory under the AMLR or other frameworks.

2	Annex 1 - Financial institution and credit institutions	**DP0002**	Treatment / Dependency	The available options should be limited to Mandatory and Optional, with implementation of the selected classification being required. A standardised and comprehensive list of activities should be established and applied consistently across all Member States. The list should be aligned with the relevant industry classification codes and the EBA Reporting Framework to ensure consistency and comparability. The dropdown should be designed to be fit for purpose, sufficiently granular to capture the relevant activities, while avoiding unnecessary duplication or ambiguity. Correspondent Services should be explicitly included as one of the available activities.
3	Annex 1 - Financial institution and credit institutions	**DP0003**	Definition / Treatment	This will be the official identifier assigned by the FIU. The EBF asks AMLA to clarify whether this field can be pre-populated by the FIU rather than completed by the reporting entity.

4	Annex 1 - Financial institution and credit institutions	**DP0005**	Attributes / Values	The EBF notes that SARs may in some cases be submitted for non-customers, and asks AMLA to clarify: (i) whether the list of values is intended to be presented in drop-down, checkbox or multi-select format; and (ii) how this data point relates to the existing goAML functionality allowing a report to reference another already-submitted FIU report as "supplementary information" or an "initial report", noting that this functionality has to date been used for cases 2, 3 and 4 of the Interpretative Note. The EBF further notes that system build would be required to implement this data point.

5	Annex 1 - Financial institution and credit institutions	**DP0007**	Definition	The interpretative guidance relating to DP0007 (Report Type) appears to indicate that the Transaction category should not be completed for SARs; read together with Articles 3 and 4, this could imply that transaction-related information may only be reported through STRs. The EBF requests that AMLA clarify the distinction between "STR" (Suspicious Transaction Report) and "SAR" (Suspicious Activity Report) in the context of this ITS, including whether these terms are used interchangeably across Member States or refer to distinct legal or reporting concepts. This distinction is not neutral: per the Interpretative Note (Section 1, paragraph 1.1), it determines which categories of data points are mandatory – for STR, the "products and services" and "non-transactional activity" categories need not be completed; for SAR, the "transaction" category is not to be completed and only certain "account" fields apply; for "Both", either may be selected. An unclear or inconsistent classification could result in the omission of information that would otherwise be expected. The interpretative guidance relating to DP0007 (Report Type) appears to indicate that the Transaction category should not be completed for SARs; read together with Articles 3 and 4, this could imply that transaction-related information may only be reported through STRs. The EBF requests that AMLA clarify the distinction between "STR" (Suspicious Transaction Report) and "SAR" (Suspicious Activity Report) in the context of this ITS, including whether these terms are used interchangeably across Member States or refer to distinct legal or reporting concepts. This distinction is not neutral: per the Interpretative Note (Section 1,

				paragraph 1.1), it determines which categories of data points are mandatory – for STR, the "products and services" and "non-transactional activity" categories need not be completed; for SAR, the "transaction" category is not to be completed and only certain "account" fields apply; for "Both", either may be selected. An unclear or inconsistent classification could result in the omission of information that would otherwise be expected.
6	Annex 1 - Financial institution and credit institutions	**DP0008**	Attributes / Values	The reference to DP 'R07' is unclear and the high-level attribute is missing. The EBF asks AMLA to clarify whether this data point is a simple Yes/No indicator of whether the FIU should react urgently, together with the reason where the value is 'Yes' (swift reaction).
7	Annex 1 - Financial institution and credit institutions	**DP0009**	Attributes / Values	The EBF asks AMLA to confirm that this data point applies to pre-execution SARs only, to clarify which types of reports are triggered by the different values, and to confirm whether it is also applicable to hits against national terrorist lists
8	Annex 1 - Financial institution and credit institutions	**DP0010**	Definition / Treatment	This should be prepopulated by the FIU Application based on the legal requirement.

9	Annex 1 - Financial institution and credit institutions	**DP0012**	Definition / Treatment	This should be prepopulated by the FIU Application based on the legal requirement.
10	Annex 1 - Financial institution and credit institutions	**DP0013**	Definition	This may be difficult to apply in practice, and its relevance to the assessment of suspicion is not sufficiently clear. In particular, it is unclear how investigators within obliged entities would be expected to determine whether the subject has the freedom to provide services, particularly where such information may not be available to the institution through its ordinary customer due diligence or transaction monitoring processes. The EBF therefore requests AMLA to provide a legal opinion clarifying the basis for this requirement.
11	Annex 1 - Financial institution and credit institutions	**DP0014**	Definition / Treatment	This should be included in **DP0002**. The data point should also capture the role of the reporting entity, where relevant (e.g. **Intermediary Service Provider**).

12	Annex 1 - Financial institution and credit institutions	**DP0016**	Attributes / Values	The EBF asks AMLA to clarify whether this data point will include a checkbox list of red flags for selection, together with a free-text field. The list of red flags should be appropriately designed, optimised and harmonised across the Union to ensure consistency in reporting and application.
13	Annex 1 - Financial institution and credit institutions	**DP0017**	Definition / Treatment	In practice, reporting entities are frequently able to identify a suspicious participant or transaction without being able to determine the underlying predicate offence. For example, a large payment between two P.O. box addresses in a given jurisdiction with no reference text could equally indicate sanctions circumvention, money laundering or terrorist financing, and the reporting entity has no reliable means of distinguishing between them at the point of reporting. The EBF asks AMLA to confirm that reporting entities are not expected to determine the specific predicate offence in such cases, and that an ‘unknown’ or equivalent value remains available.

14	Annex 1 - Financial institution and credit institutions	**DP0018**	Definition / Treatment	In practice, reporting entities are frequently able to identify a suspicious participant or transaction without being able to determine the underlying predicate offence. For example, a large payment between two P.O. box addresses in a given jurisdiction with no reference text could equally indicate sanctions circumvention, money laundering or terrorist financing, and the reporting entity has no reliable means of distinguishing between them at the point of reporting. The EBF asks AMLA to confirm that reporting entities are not expected to determine the specific predicate offence in such cases, and that an 'unknown' or equivalent value remains available.
15	Annex 1 - Financial institution and credit institutions	**DP0019**	Definition / Treatment	This is a new requirement and implementation will therefore be required. The start date should not be technically mandatory, as it may be difficult to determine accurately depending on the activity being reported. The EBF therefore recommends that this field be classified as Optional.
16	Annex 1 - Financial institution and credit institutions	**DP0020**	Definition / Treatment	This is a new requirement and implementation will be required.

17	Annex 1 - Financial institution and credit institutions	**DP0021**	Definition / Treatment	**STR:** The aggregated transaction amount is currently calculated automatically in goAML. The EBF expects FIUs to perform any required aggregation themselves and not require obliged entities to provide or calculate this information. **SAR:** For other reported activities, the system should be designed to automatically calculate the aggregated amount based on the activities reported.

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18	Annex 1 - Financial institution and credit institutions	**DP0022**	Definition / Treatment	This is a new data point, and the relevant list should be provided by AMLA in advance of implementation, integrated and aligned with the themes/typologies list to ensure consistency and avoid duplication. The EBF also requests confirmation as to whether this data point is intended to be implemented and identified at FIU level, given that it appears to rely on labels to be provided by the FIU.

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19	Annex 1 - Financial institution and credit institutions	**DP0102**	Definition / Treatment	**STR:** We understand that this refers to the account opening date. **SAR:** For large institutional clients with multiple touchpoints across the obliged entity, it may be technically challenging to determine the relationship start date. This may also not be feasible where the obliged entity acts as an Intermediary Service Provider. The EBF therefore recommends that the treatment for SARs relating to non-transactional activity be changed to **"Optional"**.
20	Annex 1 - Financial institution and credit institutions	**DP0103**	Definition / Treatment	This can only be provided where this is a direct business relationship.

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1	Annex 1 - Financial institution and credit institutions	**DP0104**	Attributes / Values	Some of these represent new reportable data values and will therefore require implementation. Such information can only be provided where there is a direct business relationship with the customer. The EBF therefore requests that these requirements be aligned with the AMLA reporting requirements to ensure consistency and avoid unnecessary reporting burdens.
2	Annex 1 - Financial institution and credit institutions	**DP0105**	Definition	It is unclear why this data point is required by the FIU, given that it is an internal identifier chosen by the obliged entity. The EBF recommends changing the treatment to 'Optional', and asks AMLA to clarify whether any restriction applies to the length of this free-text field and what reporting entities should do where the value to be reported exceeds that length.

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3	Annex 1 - Financial institution and credit institutions	**DP0106 / DP0107 / DP0108 / DP0109 / DP0110 / DP0111 / DP0114 / DP0116 / DP0117 / DP0118 / DP0119 / DP0121 / DP0123 / DP0209 / DP0210 / DP0211 / DP0212 / DP0213 / DP0214**	Definition / Treatment	These customer- and person-level identification fields can only be provided in relation to a direct customer, and not in scenarios involving underlying clients, such as correspondent banking arrangements with an intermediary service provider. For the free-text fields among these (DP0106, DP0107, DP0108, DP0109, DP0111, DP0116, DP0209, DP0210, DP0211), the EBF also asks AMLA to clarify whether any length or character restriction applies, and what reporting entities should do where the value to be reported exceeds that length. The EBF further recommends that identification fields not required under the AMLR be made optional. On DP0123 specifically, the EBF is not in a position to provide further feedback until AMLA clarifies the relevant value list and its scope.

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4	Annex 1 - Financial institution and credit institutions	**DP0112**	Attributes / Values	Further clarification is needed on the applicability of certain country and location datapoints. In particular, it should be confirmed that information that can only be obtained in the context of a direct customer relationship is not expected to be provided where the reporting entity does not have a direct relationship with the underlying client or party. This is particularly relevant in correspondent banking and other intermediary service provider scenarios, where the reporting entity may have limited or no access to information relating to underlying clients. For Annex I, the method for specifying countries also appears to be inconsistent across datapoints. In some cases, an ISO 3166 country code is required, while in others a UN website, which also contains ISO codes, is referenced. Elsewhere, the requirement refers more generally to an "enumeration" or "list of countries" (e.g. DP0408). No clear rationale or consistent logic for these different approaches is apparent. A single, clearly defined and internationally recognised standard should be applied consistently throughout the reporting requirements, preferably using ISO 3166 country codes. In addition, city/town fields (e.g. DP0120 and DP0306) should be clearly distinguished from country fields and should not reference a country-only list.

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5	Annex 1 - Financial institution and credit institutions	**DP0115**	Definition / Treatment	There is no clear legal basis for collecting this information under Article 22 of the AMLR. The EBF therefore recommends changing the treatment of this data point to **"Optional"**.

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6	Annex 1 - Financial institution and credit institutions	**DP0128 / DP0129 / DP0130 / DP0131 / DP0132 / DP0133 / DP0134 / DP0135 / DP0136**	Definition / Treatment	The EBF recommends that the treatment of these data points be marked as 'Optional', and asks AMLA to clarify whether they are intended to apply to indirect clients, parties, or other unidentified persons. For DP0133, DP0134, DP0135 and DP0136 specifically, this information can only be provided in relation to a direct customer and should not apply to scenarios involving underlying clients such as correspondent banking arrangements with an intermediary service provider. On DP0134 (deceased) and DP0135 (date of death) in particular: as a general principle, obliged entities do not record or report information on deceased persons except where they are the victim of the suspected activity; this information is not systematically available or verifiable, and these fields should not be mandatory.
7	Annex 1 - Financial institution and credit institutions	**DP0202**	Attributes / Values	The EBF questions the added value of this data point, noting that the county of the suspicious activity is already provided elsewhere, and asks AMLA to clarify its intended purpose.

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8	Annex 1 - Financial institution and credit institutions	**DP0204**	Definition / Treatment	**STR:** We understand that this refers to the account opening date. Please confirm. **SAR:** For large institutional clients with multiple touchpoints across the obliged entity, it may be technically challenging to determine the relationship start date. This could, for example, refer to the date on which the customer first established a relationship with the obliged entity, which may not be readily identifiable where there are multiple touchpoints. The EBF therefore recommends changing the treatment for SARs relating to non-transactional activity to **"Optional"**.

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9	Annex 1 - Financial institution and credit institutions	**DP0205**	Treatment / Dependency	This data point should only apply to customer relationships. Its treatment should be dependent on the selection made for DP0206 and should only be **Mandatory** where the information is available for terminated business relationships. The EBF therefore suggests placing this data point after DP0206.
10	Annex 1 - Financial institution and credit institutions	**DP0206**	Attributes / Values	Some of these are new reportable data values. Their implementation will therefore require system development and they can only be provided where there is a direct business relationship with the customer. The EBF also requests that these requirements be aligned with the AMLA reporting requirements.

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11	Annex 1 - Financial institution and credit institutions	**DP0207**	Attributes / Values	Based on our understanding, this would mean that the possible list of values is **"Victim / Suspect"**. The EBF can provide further feedback once the relevant list of values has been published by AMLA.
12	Annex 1 - Financial institution and credit institutions	**DP0215**	Definition / Treatment	The EBF asks AMLA to clarify whether any restriction applies to the length of this free-text field, and what reporting entities should do where the value to be reported exceeds that length.
13	Annex 1 - Financial institution and credit institutions	**DP0216**	Treatment / Dependency	This data point should not be mandatory, as it is an internal reference number used only by the obliged entity; the EBF questions its benefit to FIUs and recommends changing the treatment to 'Optional'. The EBF also asks AMLA to clarify whether any restriction applies to the length of this free-text field, and what reporting entities should do where the value to be reported exceeds that length.

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14	Annex 1 - Financial institution and credit institutions	**DP0217 / DP0224 / DP0406 / DP0407 / DP0408 / DP0512**	Definition / Treatment	These data points are applicable to customers only and can only be provided for customer relationships; they should not be required, or should be treated as not applicable, where the party concerned is not a direct customer of the reporting entity.
15	Annex 1 - Financial institution and credit institutions	**DP0218**	Definition / Treatment	There is no clear legal basis for collecting this information under Article 22 of the AMLR. The EBF therefore recommends changing the treatment of this data point to **"Optional"**.
16	Annex 1 - Financial institution and credit institutions	**DP0220**	Attributes / Values	The EBF requests AMLA to reconsider the inclusion of this data point, taking into account its added value from a financial crime compliance (FCC) risk mitigation perspective.
17	Annex 1 - Financial institution and credit institutions	**DP0221**	Attributes / Values	There should be a standardised dropdown aligned with the EBA Reporting Framework and harmonised across the EU, rather than defined at national level.

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18	Annex 1 - Financial institution and credit institutions	**DP0301**	Definition / Treatment	The address types should be aligned to the address types in CDD fields and optional. Only applicable for customer relationships.
19	Annex 1 - Financial institution and credit institutions	**DP0303 / DP0304 / DP0305 / DP0307 / DP0308**	Treatment / Dependency	Only information that is mandatory under the FATF Payments Transparency Recommendation and the AMLR should be classified as Mandatory (e.g. country information).Full address details are not always available for underlying parties, particularly where the relevant information is not required to be obtained under applicable funds transfer requirements. The EBF therefore recommends that such additional address data elements be treated as Optional. This treatment should be applied consistently across all five of these related data points.

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20	Annex 1 - Financial institution and credit institutions	**DP0309**	Treatment / Dependency	This field is applicable to customers only, and the EBF questions whether the treatment should be mandatory. More generally, the method for specifying countries is inconsistent across data points in Annex I: an ISO 3166 code is required in some places, a UN website (which also contains ISO codes) is referenced in others, and elsewhere only 'enumeration' or 'list of countries' is stated (e.g. DP0408). The EBF asks AMLA to apply a single, consistent standard throughout, and to ensure city/town fields (e.g. DP0120, DP0306) do not reference a country-only list.

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1	Annex 1 - Financial institution and credit institutions	**DP0310**	Definition / Treatment	The EBF recommends moving this data point to **"Optional".** Previous addresses are not separately recorded as reportable data fields and may therefore not be readily available for reporting purposes.
2	Annex 1 - Financial institution and credit institutions	**DP0311**	Definition / Treatment	The EBF recommends moving this data point to 'Optional': previous addresses are not separately recorded as reportable data fields and may not be readily available for reporting purposes, and collecting historical addresses would require additional steps, as address history is maintained in CDD/KYC records rather than the core banking system. The EBF requests clarification on the expected scope of address history (last known previous address vs. full historical record), and on the meaning of 'mandatory if available' in this context – whether it refers to information available in the core banking system or anywhere within the group's KYC/CDD repositories.

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3	Annex 1 - Financial institution and credit institutions	**DP0316**	Definition / Treatment	This should be left as optional.

4	Annex 1 - Financial institution and credit institutions	**DP0401 / DP0402 / DP0403 / DP0404**	Definition / Treatment	The EBF recommends considering the addition of further categories: it may not be permissible to disclose whether certain LEAs are aware of the underlying issue (e.g. where this cannot be shared without prior LEA consultation), and there is currently no explicit 'Unknown' option – this should be added as a separate category rather than requiring 'Other' where the information is simply not known. AMLA should also provide operational examples of what is intended to be covered by 'adverse information', and clarify how obliged entities would be expected to become aware of it in a reliable and auditable manner. On DP0403 (other actors involved and their contact details) specifically: obliged entities should not be required to systematically provide contact details of other stakeholders absent an express legal basis, particularly where information was obtained under an information-sharing arrangement subject to confidentiality obligations; relaying such information also creates data-quality risk (information may be altered or misinterpreted in transit) and potential confusion at FIU level. The EBF recommends that FIUs instead liaise directly with the relevant LEAs or other competent authorities where further information is required.
5	Annex 1 - Financial institution and credit institutions	**DP0410**	Definition	**Sanctions status:** The Interpretative Note guidance refers to any natural person "known or suspected to be subject to sanctions". The EBF considers that recording an individual as merely "suspected" of being subject to sanctions is not an obligation under the AMLR and may result in a speculative and potentially stigmatising classification, with serious

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				consequences for the individual concerned. The EBF therefore recommends removing the **"suspected"** standard and limiting this data point to **confirmed sanctions matches**. The EBF also notes that there does not appear to be an equivalent data point covering legal entities subject to sanctions. **Recommendation:** Remove the "suspected" standard and limit the requirement to confirmed sanctions matches. AMLA should also clarify and confirm that equivalent coverage applies to legal entities subject to sanctions.

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6	Annex 1 - Financial institution and credit institutions	**DP0411**	Treatment / Dependency	The treatment 'Conditional' is not defined in the draft ITS, and no triggering condition or dependency is specified; the EBF asks AMLA to clarify on which data point this treatment depends, and to confirm whether this data point may be further developed or divided, as suggested in the AMLA Guidance. It is also unclear whether obliged entities are expected to conduct additional adverse media or sanctions screening specifically to submit a report, or whether this data point is limited to information already available to them. AMLA should define the circumstances in which DP0411 is required and confirm that only reliable adverse media information already available and directly relevant to the suspicion need be reported – no additional screening or information-gathering should be required solely for reporting purposes.
7	Annex 1 - Financial institution and credit institutions	**DP0501**	Definition / Treatment	This type of AMLA guidance relating to non-customers should also be included in the section covering information on the obliged entity's customers, to ensure consistency and clarity across the reporting requirements.

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8	Annex 1 - Financial institution and credit institutions	**DP0502**	Attributes / Values	The list of possible values should be aligned with the AMLA reporting list of products and services and the relevant EBA Reporting Taxonomy lists, to ensure consistency and harmonisation. DP0502 (Account identification) already exists in the template used by some FIUs; however, obtaining this information can be challenging in a correspondent banking context. The EBF requests clarification on the expected approach where the reporting entity does not hold the full underlying account identification, and confirmation as to whether alternative identifiers may be provided, given the field is currently classified as 'Technically required'.
9	Annex 1 - Financial institution and credit institutions	**DP0503**	Definition / Treatment	The EBF suggests including other types of account identifiers for countries that do not issue IBANs, together with the relevant account number.

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10	Annex 1 - Financial institution and credit institutions	**DP0505**	Attributes / Values	Some of these represent new reportable data values. Their implementation will therefore require system development, and the information can only be provided in relation to direct business relationships. The EBF also requests that these requirements be aligned with the AMLA reporting requirements and the CDD RTS, including the relevant definitions and requirements.
11	Annex 1 - Financial institution and credit institutions	**DP0509**	Definition / Treatment	This information can only be provided in relation to customers. However, the account being reported may be different from the customer's own account.

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12	Annex 1 - Financial institution and credit institutions	**DP0510**	Definition / Treatment	This field can only be provided for customers; however, the account reported may differ from the customer's own account. The EBF requests confirmation as to whether this data point requires the date and time to which the reported account balance relates (the balance 'as of' timestamp) or the time of the activity, and clarification of the minimum time granularity required where an exact time is not available.

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13	Annex 1 - Financial institution and credit institutions	**DP0516**	Definition / Treatment	Further clarification is required regarding the scope and meaning of this data point. The EBF suggests aligning the terminology with the EU Funds Transfer Regulation, the AMLR and the relevant FATF Recommendations to ensure consistency with the existing regulatory framework.

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14	Annex 1 - Financial institution and credit institutions	**DP0517**	Attributes / Values	For Annex I: The method for specifying countries is inconsistent across data points. An ISO 3166 code is required in some instances, a UN website (which also contains ISO codes) is referenced in others, while elsewhere only "enumeration" or a "list of countries" is specified (e.g. DP0408). No clear rationale for these different approaches is apparent. The EBF recommends applying a single, consistent standard for identifying countries across all data points. In addition, city/town fields (e.g. DP0120 and DP0306) should not reference a country-only list, as this would not be appropriate for these data fields.
15	Annex 1 - Financial institution and credit institutions	**DP0519**	Definition / Treatment	This should be optional

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16	Annex 1 - Financial institution and credit institutions	**DP0602**	Definition / Treatment	This should be an optional field.
17	Annex 1 - Financial institution and credit institutions	**DP0604**	Definition	It is unclear why the FIU would require this internal identifier. The EBF therefore recommends changing the treatment of this data point to **"Optional"**.
18	Annex 1 - Financial institution and credit institutions	**DP0605**	Definition / Treatment	The EBF recommends that optionality be provided on the timestamp. This information may be technically difficult to collect, and the relevant transaction information is already provided in the transaction records attached to the suspicion report; the EBF therefore questions the added value of this data point for FIU analysis and requests clarification as to whether date-only reporting would be acceptable where the exact time is not available.

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19	Annex 1 - Financial institution and credit institutions	**DP0606**	Definition / Treatment	The EBF recommends that optionality be provided on the timestamp, and requests additional guidance on this data point. In a markets context, the EBF asks AMLA to clarify whether this refers to the trade date/time or the settlement date/time, noting that these can often be several days apart and that investigators may have less visibility of settlement dates/times than of trade dates/times.
20	Annex 1 - Financial institution and credit institutions	**DP0609**	Definition / Treatment	This is a new data point. The EBF notes that the currency in which the transaction was conducted is already provided as part of existing reporting. We therefore recommend that this data point be classified as **"Optional"**.

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1	Annex 1 - Financial institution and credit institutions	**DP0611**	Definition / Treatment	Further clarification is required. Based on our understanding, DP0611 and DP0612 would be relevant only to specific types of transactions and would therefore not apply in all scenarios. The EBF recommends clarifying the scope and applicability of these data points.
2	Annex 1 - Financial institution and credit institutions	**DP0612**	Definition / Treatment	The EBF requests that AMLA provide complete guidance on this data point. In particular, please clarify whether this field is intended to correspond to the payment reference or remittance information entered by the customer at the time the transaction was initiated.

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3	Annex 1 - Financial institution and credit institutions	**DP0613**	Attributes / Values	The EBF asks AMLA to confirm that this refers to the country of the debtor's payment service provider / originator's financial institution. More generally, the method for specifying countries is inconsistent across data points in Annex I: an ISO 3166 code is required in some places, a UN website is referenced in others, and elsewhere only 'enumeration' or 'list of countries' is stated (e.g. DP0408). The EBF asks AMLA to apply a single, consistent standard throughout.
4	Annex 1 - Financial institution and credit institutions	**DP0614**	Attributes / Values	The EBF asks AMLA to confirm that this refers to the country of the creditor's payment service provider / beneficiary's financial institution. More generally, the method for specifying countries is inconsistent across data points in Annex I: an ISO 3166 code is required in some places, a UN website is referenced in others, and elsewhere only 'enumeration' or 'list of countries' is stated (e.g. DP0408). The EBF asks AMLA to apply a single, consistent standard throughout.

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5	Annex 1 - Financial institution and credit institutions	**DP0616**	Attributes / Values	This will require system development to ensure alignment with all relevant values.
6	Annex 1 - Financial institution and credit institutions	**DP0617**	Treatment / Dependency	This is a mandatory field, but it is not always possible to specify the exact date, and especially time, at which the transaction will be carried out; requiring a future execution date may also not be practical for refused, rejected or suspended transactions, since in many such cases no future execution date exists and the transaction may never proceed. Recommendation: confirm this field is conditional (required only where applicable), not unconditionally mandatory.

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7	Annex 1 - Financial institution and credit institutions	**DP0618**	Definition	It is unclear what 'metropolitan EU' refers to in this field, and the EBF asks AMLA to define the expected content and consider marking it as 'Optional'. Please also clarify the intended territorial scope, including guidance for other territories where similar issues may arise (e.g. overseas territories linked to other Member States), and the definition of 'Location' more generally, given that transactions may cross multiple locations and obliged entities may not have visibility of the entire transactional chain.

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8	Annex 1 - Financial institution and credit institutions	**DP0701**	Attributes / Values	The EBF recommends aligning this list with the AMLR and AMLA reporting requirements, provided as a pre-populated checkbox selection with an 'Other' free-text option. More fundamentally, the EBF would like to highlight the tension between a 'free text' field and a 'technically required' data point: while the field is technically mandatory, no defined set of valid values is provided, and reliance on free text may not support consistent data quality, comparability or relevance. The EBF recommends introducing a controlled value list or, depending on the intended use case, classifying the field as 'Optional' or 'Mandatory if available'.

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9	Annex 1 - Financial institution and credit institutions	**DP0702**	Attributes / Values	It is unclear how the obliged entity should determine this date, as it could refer to, for example, the account opening date, the date on which the account opening agreement was signed, or the transaction date. The EBF therefore recommends marking this data point as **"Optional"**, as requiring a specific date would create an additional operational burden for obliged entities, while we do not consider that it would provide sufficient intelligence value.

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10	Annex 1 - Financial institution and credit institutions	**DP0807**	Definition / Treatment	The currency will generally be the local currency. However, further clarification is required on how this data point should be reported in cases involving foreign currency transactions, including transactions denominated in USD or involving foreign exchange (FX).
11	Annex 1 - Financial institution and credit institutions	**DP0808**	Definition / Treatment	Please confirm this is a free form field.
12	Annex 1 - Financial institution and credit institutions	**DP0814**	Treatment / Dependency	This data point should be dependent on DP0001 (Reporting entity activity) and only required if the activity relates to insurance.

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13	Annex 1 - Financial institution and credit institutions	**DP0902**	Treatment / Dependency	**Object information:** This data point is technically required but is primarily relevant in specific scenarios, such as real estate, vehicles, boats/aircraft, high-value goods, and other asset-based suspicious transactions. For payment transactions, obliged entities, particularly banks, may not have visibility of the underlying object or asset to which a payment relates. Making DP0901 technically mandatory and submission-blocking would therefore not be appropriate for payment-transaction reports. The EBF recommends that DP0901 should **not be treated as a blocking/technically mandatory field for payment transactions**. For example, from an Intermediary Service Provider perspective, the underlying purpose of a transaction may relate to the purchase of luxury vehicles for subsequent transport across the border to Russia. The intermediary may not have sufficient information or visibility to identify or investigate the underlying asset or purpose of the transaction

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14	Annex 1 - Financial institution and credit institutions	**DP0903**	Treatment / Dependency	**Object location:** This data point is technically required but is primarily relevant in specific scenarios, such as real estate, vehicles, boats/aircraft, high-value goods and other asset-based suspicious transactions. In the context of payment transactions, obliged entities, particularly banks and Intermediary Service Providers, may not have visibility of the underlying object or its location. Making DP0901 technically mandatory and submission-blocking would therefore not be appropriate for payment-transaction reports. The EBF recommends that DP0901 should **not be treated as a blocking/technically mandatory field for payment transactions**. For example, from an Intermediary Service Provider perspective, where a natural person purchases luxury vehicles with the intention of transporting them across the border to Russia, the intermediary may not have sufficient information or visibility of the underlying asset or its location to provide this information reliably.

15	Annex 1 – Financial institutions and credit institutions	**DP0008–DP0011**	Definition	The EBF would welcome greater clarity regarding the criteria for the use of emergency amendments, which we consider should be applied on an exceptional basis. In this context, clear and operational guidance is needed on the criteria for classifying a report as **"urgent"**, including whether suspected fraud cases should be included and, if so, under what conditions. AMLA oversight will also be important to ensure that emergency additions remain necessary, proportionate and appropriately time-limited. Obliged entities may wish to indicate the urgency of a matter in their explanation of why an activity or transaction is considered suspicious, but should not be required to do so. Requiring obliged entities to assess and formally characterise urgency would effectively transfer a prioritisation and processing responsibility to obliged entities that should normally remain with the FIU. Furthermore, the criteria for a **"swift reaction"** set out in the Interpretative Note (see DP0009) appear too broad to provide sufficiently reliable guidance. In particular, they do not include materiality criteria, such as the transaction amount, or considerations regarding the certainty of the predicate offence. Internal assessments of urgency are also likely to differ between obliged entities, potentially resulting in inconsistent classifications, gaps or misjudgements. The EBF therefore recommends that AMLA clarify that the provision of urgency information is **not required** from obliged entities.

16	Annex 1 – Financial institutions and credit institutions	**DP0101 (same for DP0201)**	Definition	**Connection to the obliged entity:** Further clarification is required regarding the scope of this data point, in particular: More generally, it should be possible to record an individual independently in the report, without requiring an association with a legal entity, in cases where no such entity is relevant to the reported suspicion. ❖ (i) whether information on all natural persons involved in the suspicious transaction or activity is required, including where they are not customers or prospective customers of the obliged entity (e.g. legal representatives, directors or UBOs of a corporate customer); ❖ (ii) if so, whether the relevant data points are mandatory for such non-customer natural persons, particularly where the obliged entity may hold only limited information or information that cannot be reliably verified. Applying the same reporting requirements to non-customers may create data-quality issues; and ❖ (iii) from a technical perspective, whether the obliged entity is expected to complete a separate **"natural person"** section for each natural person involved. If this section is intended to apply only to the main customer, AMLA should clarify that it is not required where the customer is a legal entity or legal arrangement.
17	Annex 1 – Financial institutions and	**DP0134–DP0135**	Treatment	As a general principle, obliged entities do not record or report information on

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	credit institutions			deceased persons, except where they are identified as victims. DP0134 (Deceased) and DP0135 (Date of death) relate to information that is not systematically available to or verifiable by obliged entities. The EBF therefore recommends that these data points should not be classified as mandatory. Similarly, DP0315 (Electronic banking data) appears to combine several distinct concepts, including the IP address linked to a transaction, the IP address used at onboarding and device identifiers. These data may not always be available to obliged entities or may be technically challenging to collect consistently. The EBF therefore recommends that the relevant elements be clarified and that they should not be treated as technically mandatory where the information is not available.
18	Annex 2 – Banking activities	**DP01016–DP01017**	Definition	AMLA should provide further clarification and practical examples, including how these data points are expected to relate to the transaction record structure and to other transaction identifiers.

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19	Annex 2 - Correspondent banking	**DP01004**	Treatment	The EBF requests clarification on the intended FIU use case and the added value of this data point for FIU analysis. In many cases, the reporting entity may not have reliable access to the respondent bank's account number, particularly in a correspondent banking context. The EBF therefore recommends clarifying the circumstances in which this information is expected to be provided and whether alternative identifiers may be accepted where the account number is not available.
20	Annex 2 - Correspondent banking	**DP01021/DP01022 DP01031/DP01032**	Treatment	In a correspondent banking context, this information is not available to the reporting entity and cannot be collected. Please clarify whether these data points should be optional for correspondent banking, or whether alternative identifiers are acceptable.

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1	Annex 2 - Banking activities	**DP01015 / DP01016 / DP01017**	Treatment / Dependency	Transaction type code. There are references to DP02008, DP02008a and DP02009, but these datapoints are not indicated in the documents. Recommendation: clarify the exact reference linked with these datapoints.
2	Annex 2 - Correspondent banking	**DP01030**	Treatment	This field is defined as mandatory; however, there may be instances where the reporting entity does not hold the required information, for example where the counterparty maintains the business relationship with a different entity. Recommendation: treat this field as conditional / mandatory if available rather than unconditionally mandatory.