

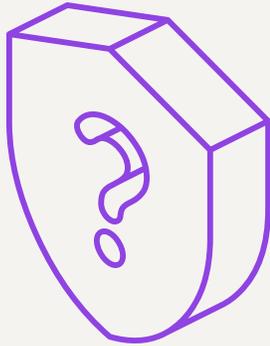


WELCOME TO

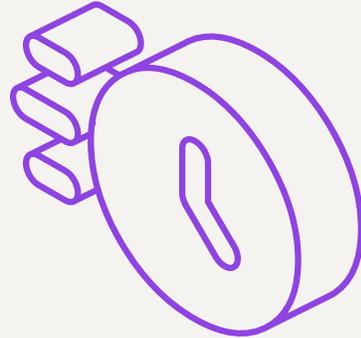
# The New AML REQ & Beyond



# Objectives for today



Explain what's changing  
with AML REQ



Share deadlines + practical  
steps to comply



Signpost other 2026  
changes to watch

# You'll be hearing from



**Fiona Jelly**

CEO, Complyfirst  
AML REQ overview (09:15)



**Dan Jelly**

CTO, Complyfirst  
How to comply (09:30)



**Pamela Crilly**

EU COO, TrueLayer  
Industry perspective (09:40)



**Chris Jessup**

Partner, DLA Piper  
Regulatory changes in 2026 (09:45)

## Panel & Peer Discussion

Industry perspectives +  
preparation (10:05)



**Kevin Nolan**

EU Head of Compliance,  
Currenxie



**Colin Sloan**

Head of Compliance EU,  
TrueLayer



**Fred McDowell**

Associate Director,  
fscm



# Housekeeping

**01** Industry sessions  
= Chatham House

**02** Comfort break  
at 10:00

**03** CPD certificates  
will be emailed

**04** Survey + goody bag  
before you leave

# Here's the plan

08:30 Coffee + networking

08:55 Welcome

09:00 Breakfast served

09:15 AML REQ overview

09:30 Practical steps to comply

09:40 Industry perspective

09:45 Regulatory changes coming in 2026

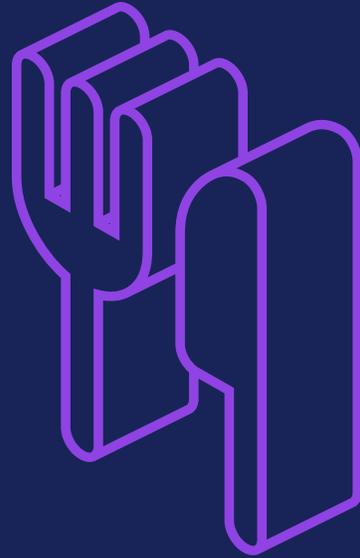
10:00 Comfort break + coffee

10:05 Panel & peer discussion (Chatham House)

10:30 Close + networking

10:30-10:35 Complyfirst AML REQ demo





# Breakfast

09:00 - 09:15

BRIEFING 1:

# AML REQ Overview



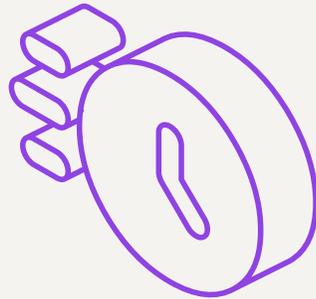
**With Fiona Jelly**  
CEO, Complyfirst



# Why the AML REQ matters



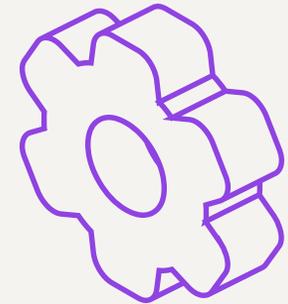
New AMLA wants a data-led supervision approach



First filing: Feb 2026  
(using 2024 data)



CBI have said it's a hard deadline, no extensions granted



Big change from Excel to XML format



<b>Who</b>	PI, EMI, Credit Institutions
<b>What</b>	Sector-specific returns, XML only
<b>When</b>	PI/EMI: 13 Feb 2026 CI: 27 Feb 2026
<b>Where</b>	CBI portal (opens ~2 weeks before)

# Before

- ☰ 1 template
- ❓ 8 sections
- 📘 20 pages of guidance
- 📊 Excel-based

## AML REQ

1. Firm details
2. Governance
3. Risk profile 1
4. Risk profile 2
5. RBA monitoring
6. Suspicious activity



# After



- ☰ Sector-specific templates
- ❓ PI/EMI: 13 sections  
CI: 12 sections
- 📘 120+ pages of guidance
- >\_ XML only

## CI REQ

1. General
2. Inherent r
3. Mitigation
4. Physical p
5. Residenc
6. Beneficia

## PI/EMI REQ

1. General
2. Inherent risk
3. Mitigation & control
4. Physical presence





# The clock is ticking...



\*Note: testing on the test portal is possible after these dates, but the CBI won't be monitoring it full time and may be slow to respond.



# Classic pitfalls to avoid



**Not reading questions properly**



**Bad file naming**  
(e.g. firm code\_YYYYMMDD\_REQ)



**Forgetting to “sign off” in portal**



**Not understanding definitions**  
(misreporting SDD and customer types)



**Misreporting financials**  
(was €000's, now in units)



# Resources you can lean on

## CBI Resources



- Guidance + files: [here](#)
- CBI Workshop: 09:45am - 12.15 | 17 Oct 2025 (RSVP by 8 Oct to [anita.skelly@centralbank.ie](mailto:anita.skelly@centralbank.ie))
- Contact: [AML\\_Analytics@centralbank.ie](mailto:AML_Analytics@centralbank.ie)
- Technical support: [onlinereturns@centralbank.ie](mailto:onlinereturns@centralbank.ie) | 01 224 4545

## Complyfirst Resources



- Guides + files: [Blog](#), [1 page guide](#), improved PI/EMI template
- Briefing pack: Slides + video (to follow)
- Contact: [fiona@complyfirst.co](mailto:fiona@complyfirst.co) | [dan@complyfirst.co](mailto:dan@complyfirst.co)

BRIEFING 2:

# Practical steps to comply



**With Dan Jelly**  
CTO, Complyfirst



# Your compliance checklist

Assign ownership (compliance, ops, data)

---

Review CBI guidance and templates

---

Extract required data, check automation

---

Run gap analysis for missing data

---

Notify CBI of any missing data

---

Implement processes to capture missing data

---

Attend the CBI AML REQ workshop

Decide XML approach (build or buy)

---

Prepare 2024 data for Q4 testing

---

Participate in CBI testing cycle

---

Run QA checks on final report

---

Upload, finalise, sign-off in portal

---

Maintain audit trail and approvals

---

Document run-book for annual repeat

# Filling it in: the non-negotiables



**01** Select the correct sector-specific PI/EMI or Credit Institution REQ.

**02** Follow these rules:

- Customer risk ratings use ratings at the reference date (even if things have changed)
- Report all amounts in euro units, not thousands (e.g. 10,000 not 10)
- Exchange rate at the time of transaction or the reference date – just be consistent
- Every field is mandatory, even if not relevant to your business model
- No blanks If not applicable, use the official codes.

**03** Important: The CBI sample Excel file does not match the XSD schema. You can use Complyfirst's updated file.

## Official not applicable codes

Integer = 0

Decimal = 0

Date = 2000-01-01

String = N/A

LEI = 00000000000000000000

Country = 00

Other enums = N/A



# XML: Strict + unforgiving

**01** Reports must be in XML  
(machine-readable only)

**03** Tables must be filed in the  
exact order - or file is rejected

**02** Two tables in this report  
Table A = numbers  
(balances, counts, values)  
Table B = descriptions  
(business model, yes/no, LEIs)

**04** Every field is mandatory & strict rules  
REF codes, LEIs, text limits, ISO country  
codes, decimals, integers, % as 0.047,  
dropdown enums

**05** **Validation errors are inevitable**  
you need compliance + tech expertise to fix them



# Six things your vendor should deliver



CBI guidance  
+ definitions built in



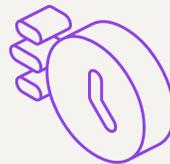
Works off CBI files  
(no proprietary templates,  
no double work)



Validation errors + XML  
generation in real-time



Approvals and  
audit trail



Task scheduling +  
reminders



1:1 support  
(even on deadline day)



# If you take one thing away: start early



With the DORA return 90%+ firms failed the dry run



Biggest pain: troubleshooting error messages



Multiple rounds of CBI follow-up



Vendors without tech + compliance knowledge failed



EBA guidance notes and CBI validation rules had errors



Winners = teams who started early + could tap expertise

BRIEFING 3:

# Industry perspective



**With Pamela Crilly**  
EU COO, TrueLayer



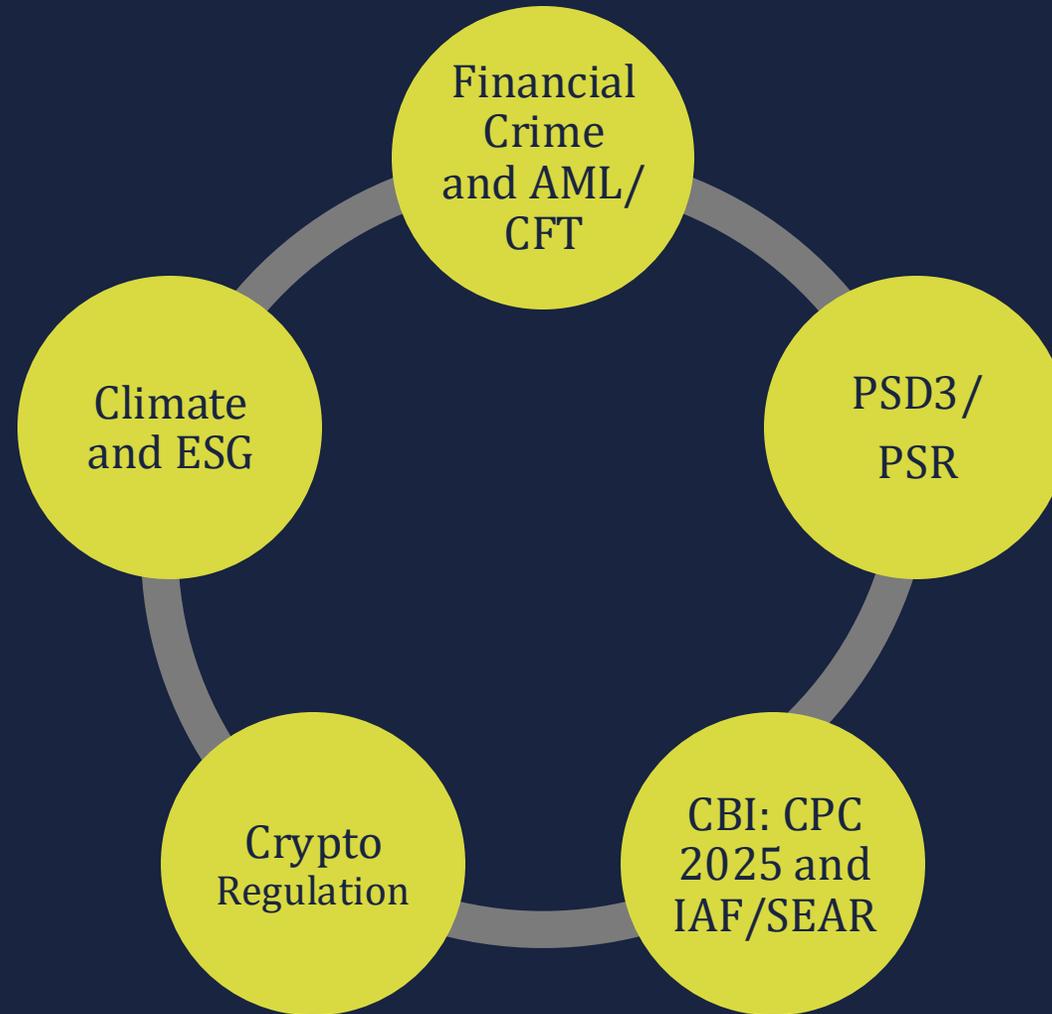
# Regulatory changes on the horizon - 2026

Chris Jessup, Financial Services Regulatory Partner

30 September 2025



# Agenda



# Financial Crime & AML/CFT Enhancements

# Strengthening Risk Frameworks

## **Financial Crime Risks**

Financial crime is a major structural risk in Ireland's financial services, including fraud and money laundering.

## **Supervisory and Enforcement Actions**

The CBI conducts inspections and AML/CFT reviews to strengthen firms' risk controls and collaborates with law enforcement to investigate and prosecute financial crime.

## **Risk-Based Frameworks**

Firms must adopt effective risk-based frameworks, governance, and controls aligned to their risk exposure.

## **Sanctions**

A constantly developing area and area of focus of regulators, resulting in increased investigations and reporting requirements.

# Payment Services Directive 3 (PSD3) & Payment Services Regulation (PSR)

# Enhancing Security and Innovation

## **New Regulatory Framework**

PSD3 and PSR will replace PSD2 in 2026, enhancing payment security and innovation across the EU.

## **Security Enhancements**

Verification of Payee and real-time consent management will reduce fraud and improve data sharing security.

## **Regulatory Alignment**

PSD3 aligns with GDPR, DORA, MiCA, and AI Act to create a unified and cohesive regulatory environment.

## **Industry Preparation**

Financial institutions must update systems and improve authentication to comply with new payment rules.

## **EU-UK Divergence**

The EU is advancing harmonized frameworks like the Instant Payments Regulation and MiCAR, while the UK pursues its own safeguarding reforms, Open Banking expansion, and cryptoasset rules—creating a complex landscape for cross-border compliance and innovation.

# Central Bank of Ireland Developments

Consumer Protection Reform, IAF & SEAR

# Modernisation and Implementation

## **Revised Consumer Protection Code**

The revised CPC effective March 2026 (with a 12-month transition period) enhances protections focusing on digitalisation and fraud prevention.

## **Goals of CPC Reform**

The reform fosters consumer trust, transparency, and promotes a customer-focused culture in finance.

## **Individual Accountability Framework (IAF) and SEAR**

- In application since July 2024, from July 2025.
- IAF and SEAR extend to Independent Non-Executive Directors (INEDs) and Non-Executive Directors (NEDs).
- Firms must define senior management responsibilities and embed a culture of accountability.

# Crypto Regulation: MiCA & CASP Authorisation

# MiCA Implementation in Ireland

## **MiCA Framework Launch**

Ireland adopts MiCA in 2026, introducing a regulatory framework for crypto-asset service providers.

## **Authorisation Process**

Two-phased authorization includes preliminary engagement followed by formal application and compliance checks.

## **Compliance and Consumer Protection**

MiCA mandates governance, safeguarding, stress testing, and consumer protection to ensure responsible crypto services.

## **Market Integration and Innovation**

MiCA integrates crypto-assets into regulated finance, promoting innovation while safeguarding consumers.

# Climate & ESG Regulation

# Sustainability and Disclosure

## **Regulatory Expectations**

The Central Bank of Ireland mandates firms to address climate risks and improve ESG disclosures to ensure accountability.

## **Governance and Risk Management**

Firms must integrate climate risk into governance frameworks and conduct scenario analyses for resilience.

## **Transparency and Stakeholder Engagement**

Transparent reporting and stakeholder engagement are key to building trust with consumers and investors.

## **Alignment with EU Initiatives**

Expectations align with EU regulations like SFDR and the EU Green Bond Standard, promoting sustainable finance.

Presented by:

# Chris Jessup

## Partner

Dublin, Ireland

T +353 1 487 6678

chris.jessup@dlapiper.com

## Education

BA, Trinity College, Dublin

## Professional Qualifications

Solicitor regulated by the Law Society of Ireland (2016)

Solicitor, Law Society of Northern Ireland (2015)

Solicitor, Law Society of England & Wales (2011)

## Languages

English

Chris advises banks, international payment systems, card issuers, payment service providers, investment firms, fund managers, intermediaries and fintechs on Irish, EU and UK financial services regulation.

Chris has a particular focus on the FinTech and payments sector. He is regularly called on to support firms with product launches, commercial partnerships, business expansion, and regulatory implementation projects. He advises on the full-range of payments and fintech regulation.

He has advised on numerous cross-border transactions involving regulated financial institutions in addition to his previous work with FinTech trade associations that have actively engaged with EU and UK policymakers and regulators.

BRIEFING 5:

# Panel & Peer Discussion



**Kevin Nolan**  
EU Head of Compliance,  
Currenxie



**Colin Sloan**  
Head of Compliance & CRO (EU),  
TrueLayer



**Fred McDowell**  
Associate Director,  
fscm

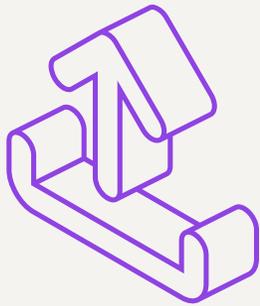
# Closing Remarks



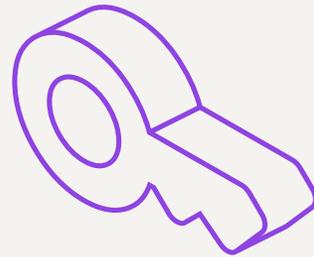
**With Fiona Jelly**  
CEO, Complyfirst



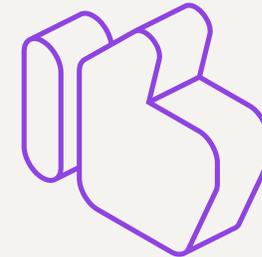
# Practical support during CBI test cycle



**Free test submission**  
AML REQ covered



**Full access**  
platform + 1:1 support



**No strings**  
zero obligation

**Already have a vendor? You can still test with us.**  
No obligation to switch – but if you choose to later, we'll cut your Year 1 price to cover the overlap



# Thank you

BEFORE YOU GO:



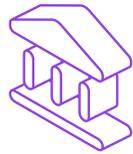
Fill out our  
1 min survey



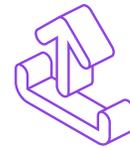
Grab your  
goody bag



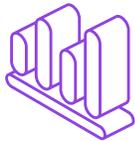
# Got 15 minutes to see how Complyfirst does AML REQ?



CBI guidance built in



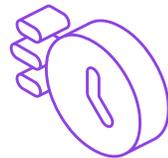
Upload CBI files directly



Real-time validation + XML



Approvals + audit trail



Task reminders + scheduling