

Meet the Speakers



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1

How serious do you need to take **AML obligations?**

2

Are you ready for the **BIG changes with AMLR in 2027?**

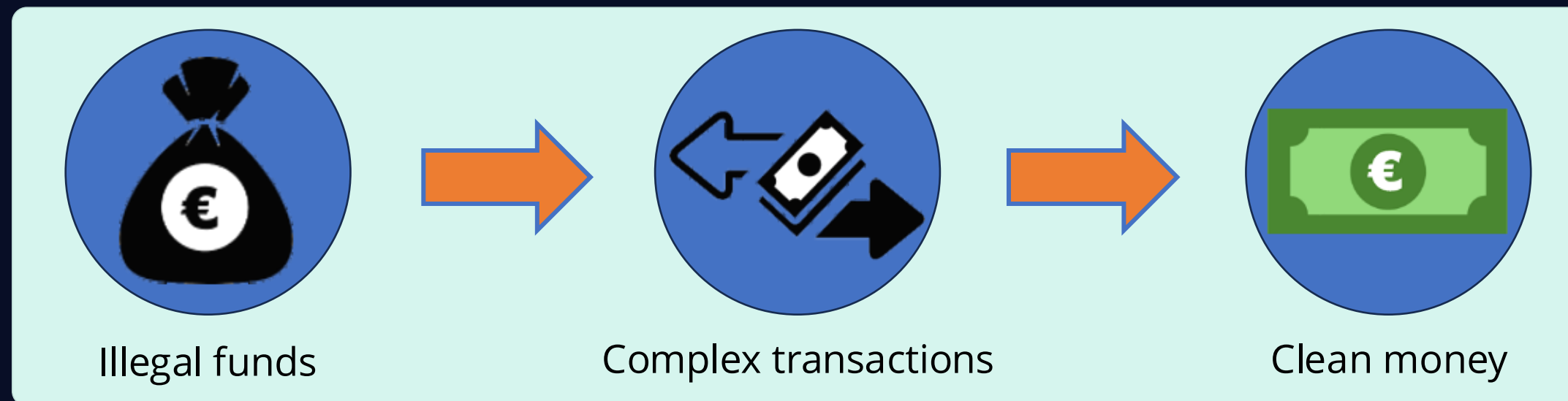
...or is that even the question?



Real Estate agencies: obliged entities since December 2001
(Second EU Money Laundering Directive (2001/97/EC))

What is **Money Laundering** exactly?

...and why (especially residential) Real Estate is a target market for criminals



1. Placement

Introducing dirty money in the financial system:

e.g. cash deposits, casino winnings

2. Layering

Illicit funds are moved around to disguise their origine.

3. Integration

Money reenters the legitimate economy through 'clean' investments.

Past – Present – Future



Obligations for every single real estate professional

Current Obligations

- The Transfers of Funds Regulation (Regulation (EU) 2023/1113)
- The AMLA Regulation (Regulation (EU) 2024/1620)
- The EU AML Regulation (AMLR – Regulation (EU) 2024/1624)
- The 6th Anti-Money Laundering Directive (AMLD6 Directive (EU) 2024/1640)

Future: What AMLR Introduces

- **Stricter Due Diligence (10 July 2027):**
 - verify both parties to a transaction
 - identify beneficial owners with increased scrutiny.
- **Real Estate Register Access (by 10 July 2029):**
 - A single access point for authorities to access:
 - property ownership information
 - transaction prices and encumbrances.
- **Cash Payment Limit:** a maximum of €10,000 for cash payments.
- **Foreign Entities:** must report their beneficial owners in the national transparency register.
- **One single rulebook** for all 27 EU-members.
- **Higher Fines & Supervision:** AMLA will oversee high-risk entities & coordinate enforcement, with max. penalties increasing significantly (up to €10 million / 10% of annual turnover).

Transposition Deadlines

10 July 2025

Access to Beneficial Ownership (UBO) registers.

10 July 2027

Full transposition of AMLD6 into national law and application of the new AML Regulation.

10 July 2026

Further UBO register developments.

10 July 2029

Single access point to real estate information.





Vincent Gaudel
LexisNexis Risk

Risk Exposure is **Real**



EU Supranational Risk
Assessment, 2022

*"The real estate sector is **significantly exposed to money laundering risks** and **particularly vulnerable for tax crime purposes**"*



U.S. Treasury – Alert Real
Estate investments by
Sanctioned Russian Elites

*Sanctioned Russian elites and their proxies may seek to **evade sanctions through the purchase and sale of commercial or high-end residential real estate**. Real estate may offer an attractive vehicle for storing wealth or laundering illicit gains.*

Info Le Parisien **Immobilier**

Gel des avoirs russes : 13 agences immobilières du luxe de Saint-Tropez dans le viseur de Bercy

26 NOVEMBER 2025

OFAC ANNOUNCES \$4.7 MILLION PENALTY ON REAL ESTATE INVESTOR FOR DEALING IN BLOCKED PROPERTY LINKED TO RUSSIAN OLIGARCH

AML, COMPLIANCE, REGULATORY, UK

LATEST: UK's HMRC fines 170 real estate agents for AML breaches

★ PREMIUM February 4, 2026

Real Estate is **attractive to Financial Criminals**:

✓ Possibility to invest significant amounts in a single transaction

✓ Stable asset class, likely to appreciate over time

✓ Use of complex corporate vehicles to obfuscate beneficial owners

Gatekeepers are on the Radar



The 10 “Burning Issues” in AML/CFT Regimes

R.08	Non-profit organisations	34,80%
R.15	New technologies	35,20%
R.24	Transparency and beneficial ownership of legal persons	37,76%
R.28	Regulation and supervision of DNFBPs	40,00%
R.07	Sanctions related to proliferation	43,88%
R.25	Transparency and beneficial ownership of legal arrangements	43,88%
R.06	Sanctions related to terrorism & terrorist financing	48,47%
R.22	DNFBPs: Customer due diligence	48,98%
R.35	Sanctions	51,63%
R.23	DNFBPs: Other measures	51,73%

Designated Non-Financial Businesses and Professions (DNFBPs), including Real Estate Professionals:

- ✓ Must be bound to stricter regulatory requirements
- ✓ Must be subject to adequate supervision
- ✓ Must apply effective measures including CDD, and report suspicions.

Transparency & Beneficial Ownership of Legal Persons & Arrangements

- ✓ Complete, accurate, up to date information about BO of legal entities and arrangements
- ✓ Availability of BO information for Competent Authorities
- ✓ Key transparency requirements for adequate Due Diligences on Legal Entities & Arrangements.

FATF calls for **stricter scrutiny** on **Real Estate Professionals**

From Rules to Outcomes

The EU AML/CFT Package is a **paradigm change**:

Streamline AML/CFT Rules



Risk-Based Supervision



Dissuasive Sanctions



Three complementary objectives to
Improve Effectiveness against Financial Crime

Screening Controls

At **LexisNexis Risk Solutions**, we deliver market-leading Financial Crime Compliance Screening Solutions

Watchlist Data



- Sanctions Lists
- Politically Exposed Persons
- Negative News
- Enforcement

Screening Technology



- Powerful fuzzy matching logic
- Fast, high-availability engines
- Configurability
- False Positive Reduction tech

Unmatched Expertise



- Serving the world's largest banks & corporates for decades
- Ongoing innovation to stay ahead of constant reg changes

Screening controls are the foundation of an **effective AML/CFT Compliance Program**



The Problem

Assuming you are already aware of your current obligations, continued complex changes and additions require **more work** for your business and **adding processes** to every transaction.

For this you may have some **tools**, either **automated or manual**, typically **decentralised** and operated by different persons.

What ***is not*** the problem:

Your people / team:
they work hard & do their job well.

The effort you put into it already.

The real problem is:

ARCHITECTURE

...and AMLR is going to expose it.



Why the **Architecture** is the **Problem**

Compliance systems grow organically — and that's exactly the issue.



Tools are not integrated and you end up with fragmented workflows. The law requires a **360° view all-in-one** which is ready to be audited (instant auditability), including not only transactional KYC, but also all the company obligations within KYB. AMLR is here (too) soon.

Failure of Compliance

The Main Reasons

(Beyond being aware of the obligation details)

1

Fragmentation

Non-centralised data via use of multiple systems & manual processes leads to decisions based on partial data, duplicated effort, inconsistent decisions.

2

False Positive Alerts

90% of all alerts cause to overlook the real risks & lead to regulatory exposure (and fines).

3

Invisibility

Not ready for an audit with data due to lack of one secure & GDPR-compliant central environment, leading to time-loss and lots of extra work.

4

Saturation

Increasing requirements on checks for the ultimate beneficial owners, publicly exposed persons, sanction lists, and adverse media, as well as increasing complex requirements on documental checks.

 **The vicious circle:** Rules → Alerts → Manual Processing → Fatigue of staff → Increased risks → Rules

Coming **Back to the Initial Question**

The question is not "Are we ready today and AMLR compliant?"

But rather: "Can our model & architecture survive tomorrow?"

The Answer:

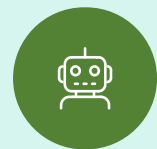
No. This is a major issue, but luckily **one that can be resolved.**

Why This Matters

Current architectures were built reactively — layer by layer — and are not designed to meet the harmonised, traceable, and integrated requirements that AMLR demands from 2027 onwards.

The **4 Cornerstones** of a Successful Solution

To deal diligently and efficiently with your AML obligations, a successful solution must be built on these four cornerstones:



1. Automation

Up to **70% reduction in manual entry** + analyst intervention becomes an exception.



2. Orchestration

Reduction of workload hence also labour costs + **Centralised management** of all obligations (KYB + KYC + Risk).



3. Reduction

Lower workload hence also labour costs by **reducing false positives** and research work.



4. Traceability

Immediate audit readiness (<1 hour to reconstruct a full case audit) making audit a normal and controlled event.

Conclusions

1 The Right Question

The question is indeed: **how can we implement a model and architecture that helps us being compliant with the least amount of effort and cost?**

3 More Tools ≠ Solution

Adding more point tools or hiring staff **only deepens complexity and costs**, which we all want and need to avoid.

2 Current Systems Cannot Scale

Current fragmented, layered AML systems **cannot scale or satisfy AMLR's harmonised, traceable requirements.**

4 The New Model

A new **all-in-one secure integrated model** based on automation, orchestration, AI and traceability delivers efficiency, consistency and audit readiness.
Central, secure & GDPR-compliant.

INTRODUCING

Immosurance

The 1st European all-in-one AML solution for Real Estate businesses.



Built for Real Estate

Designed specifically for real estate agents and property developers facing AML® obligations.



European Initiative

Bringing together European real estate expertise and compliance technology.



All-in-One

A single integrated platform delivering automation, orchestration, AI and traceability in one secure environment, GDPR-compliant.



All-In-One Secure GDPR-Compliant Solution

KYB – Know Your Business

- Internal AML Policy & Risk Analysis
- AML Procedures
- AML Compliance Officer & Back-Up Documentation
- AML Training for ALL Employees + Certification

KYC – Know Your Client

- **ID Verification**
 - ID data collection
 - Biometric & Documental Verification
 - Automated + Self-Assessed Risk Determination
- **Sanction Lists - PEP Checks – Adverse Media**
 - Apply to Natural + Legal Persons
 - Eliminate False Positives
 - Automated + Self-Assessed Risk Determination
- **Real Estate-Specific Risk Analysis**
 - The Property is the Central Object
 - Intention, State of Property, Location, Price Changes...



Information / Data

- **Stored in ONE Central Place**
 - Central 360° Visibility
 - Instant Auditability
- **Document Deletion & Expiration Policies**
- **Audit Trails of ANY Updates**
- **GDPR-Compliant: Access on As-Needed Basis Only**
- **Access to ALL Relevant Risk Components & Actions**

Assistance / Support

- **Onboarding Guides Built-In**
- **Tutorial Videos**
- **On-Screen Contextual Help / FAQ's / AI Assistant**
- **A Global AML Training Curriculum is Available**
 - Association & Businesses can create own curricula
- **Support Ticket System + Support Team**
- **Automated Data Entry: Import Wizards + API**



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