

Portable (customer-invariant) layer	Internal (business-model-dependent) layer
Customer type (natural person, legal entity, legal arrangement, other organisation with legal capacity) acc. to Art. 22(1) AMLR	Product / service type (account, loan, insurance, e-money, crypto service, investment service, correspondent account) acc. to Annex I(b) AMLR
Identity data (name, legal form, date/place of birth or country of creation, registered office / residence) acc. to Art. 22(1), Art. 2(1)(33) AMLR	Purpose of the account or relationship (intended use, economic rationale) acc. to Annex I(b)(i) AMLR
Constitutional basis (instrument of constitution, statutes, trust deed, governing powers) acc. to Art. 2(1)(33) AMLR	Regularity and duration of the relationship (one-off vs ongoing, short- vs long-term) acc. to Annex I(b)(ii) AMLR
Ownership and control structure (shareholders, members, control chains) acc. to Art. 2(1)(33), Annex I(a) AMLR	Expected asset levels / transaction size (limits, thresholds, volume expectations) acc. to Annex I(b)(iii), (vi) AMLR
Beneficial owners (identity, control, majority ownership) acc. to Art. 22(1), Annex I(a) AMLR	Transparency or opaqueness of the product or transaction (traceability, audit trail) acc. to Annex I(b)(iv) AMLR
Jurisdictional anchoring (country of birth/creation, residence, registered office, place of administration, main place of business) acc. to Annex I(a)(iv)-(vi) AMLR	Complexity of product or transaction structure (layering, structuring options) acc. to Annex I(b)(v) AMLR
UN financial sanctions (incl. control or >50 % ownership by sanctioned persons) acc. to Art. 27 AMLR → Knock-out	Delivery channel (face-to-face vs non-face-to-face onboarding, digital vs physical) acc. to Annex I(c)(i) AMLR
Prohibition of correspondent relationships with shell institutions acc. to Art. 39 AMLR → Knock-out	Use of introducers or intermediaries (agents, distributors, referrers) acc. to Annex I(c)(ii) AMLR
High-Risk Third Countries (HRTC) acc. to Arts. 29-31 AMLR → Higher risk per default	Lower-risk product design factors (low-premium insurance, non-redeemable pensions, financial-inclusion products, e-money with purse limits) acc. to Annex II(2) AMLR
Politically Exposed Person (PEP), family member, close associate acc. to Arts. 42-46 AMLR → Higher risk per default	Higher-risk product or channel factors (private banking, anonymity-favouring products, new technologies, payments from unknown third parties) acc. to Annex III(2) AMLR
Residence-by-investment applicant acc. to Art. 41 AMLR → Higher risk per default	Sector exposure via product offering (oil, arms, precious metals, art, cultural artefacts, protected species, etc.) acc. to Annex III(2)(e) AMLR
Self-hosted address involvement acc. to Art. 40 AMLR → Higher risk per default	Technology and operational setup (new delivery mechanisms, innovative products, platform architecture) acc. to Annex III(2)(d) AMLR
Cross-border correspondent relationship (as a legal category) acc. to Arts. 36-38, 34(1) AMLR → Higher risk per default	Risk mitigants embedded in the business model (limits, controls, transparency features specific to the institution) acc. to Annex II(2) AMLR