Licentium

MLRO and compliance officer appointments

Money laundering reporting officer (MLRO) appointment models and continuity across selected jurisdictions

Understand who can hold the office, how employee, external and group arrangements differ, and what must happen when an officer is absent or leaves.

17	5	EU
Selected jurisdictions	United Arab Emirates settings	Common framework

For boards, founders, legal teams and compliance leaders

Edition 25 November 2026. The law is stated as at 24 November 2026.

Sector-specific rules and scope limits are explained alongside the conclusions.

Clickable contents, bookmarks and source links

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CHAPTER 01

How to use this guide

An appointment works when the correct person holds the correct office for the regulated entity and can exercise it in practice. Employment terms, an outsourcing agreement or a group reporting line are only part of that arrangement. The office's legal conditions, the institution's retained responsibilities and the means of keeping the function operating all matter.

This guide explains how to select an appointment model, establish authority and manage absence or departure. It brings together selected rules across North America, Europe, Oceania, Asia, the Middle East, Africa and Latin America. The jurisdiction chapters identify the activities and regulatory categories to which their conclusions apply. They do not describe every regulated business in each country.

The guide is intended for boards, founders, legal teams and compliance leaders planning or reviewing an arrangement. It provides explanations, comparisons and worked reasoning. Its interactive features are navigation and links. The guide contains no fields to complete and does not collect or submit information.

Start with the decision you need to make

For a new appointment, read the chapters on roles, appointment models and putting the appointment into operation, then the relevant jurisdiction profile. For a resignation or prolonged absence, begin with continuity and the comparison of time limits, then return to the applicable local rule. For a cross-border group, read the group model and each entity's profile separately.

Source references in square brackets link to the source catalogue. Each source entry identifies the official document and relevant provision, with an external link. The contents and PDF bookmarks provide direct access to chapters. The footer returns to the contents. These navigation features depend on the capabilities of the PDF reader; the full text is also suitable for printing.

Read legal status and source limits together

A later publication date, amendment date, commencement date and date of application are different facts. Where a change has been made but has not yet taken effect, the guide separates it from the rules currently applicable. Proposals and consultations are identified as such.

The affected profiles and source catalogue state the guide's coverage and limits, including where it uses dated provisions. A precise deadline or outsourcing permission should not be extrapolated beyond the source that establishes it. Entity-specific licence conditions and supervisory correspondence are outside the guide's scope.

The Financial Action Task Force (FATF) provides an international standard that countries implement through their own frameworks. Its Recommendation 18 framework addresses management-level compliance arrangements, training, independent testing and group information safeguards. It does not itself approve a proposed appointment or displace a domestic employment, residence or authorisation requirement. [R-FATF-01] [R-FATF-02]

Appointment principles

Choose the legal office before selecting the provider. A consultant who can perform useful compliance work may not be eligible to hold the required office. The same person can hold more than one role only where the applicable rules permit that combination and the arrangement remains workable.

Treat outsourcing as a set of separate permissions. External advice, operational support, appointment of an external individual, delegation of reserved decisions and transfer of data abroad raise different questions. Permission for one does not establish the others.

Keep entity responsibility visible. The organisation, its governing body and senior management may retain duties even where an individual or provider performs the work. A contract should allocate work and escalation rights clearly; it should not assume that statutory responsibility has transferred.

Plan continuity before the appointment begins. A deputy's name has little value without lawful authority, access, capacity and a route for urgent decisions. A temporary-cover period may address an absence, a particular controlled function or a particular filing. It is not a general allowance for every vacancy.

CHAPTER 02

Understand the roles

Commercial titles often compress several responsibilities into the label money laundering reporting officer (MLRO). The terminology in legislation and supervisory rules is more specific. A useful analysis separates the following functions before deciding whether they can be combined. This is a comparative analytical model; the jurisdiction chapters establish the local legal position.

Function	What the function does	Implication for the appointment
Governing body and senior management	Set direction, approve the programme and oversee its effectiveness where local rules assign those duties.	Identify the decisions and oversight that remain with the institution.
AML compliance officer	Oversees the AML programme, its implementation and compliance monitoring within the applicable mandate.	Establish the required level, eligibility, reporting line and access.
Reporting officer or nominated officer	Receives internal concerns and performs the statutory reporting role where the local regime assigns it to an individual.	Confirm who may decide, submit and receive protected reports.
General regulatory compliance officer	Oversees broader licensing and conduct obligations, which may extend beyond AML.	Do not assume approval for the AML role also covers this office.
Operational team or service provider	Supports screening, due diligence, monitoring, investigation preparation or administration within a permitted scope.	Define the decisions that remain reserved and the escalation boundary.
Group compliance function	Coordinates policy, oversight and information across entities.	Establish a lawful route for every local appointment and information flow.
Deputy or temporary appointee	Performs specified responsibilities when the principal cannot act.	Check the triggering event, eligibility, approval and duration separately.

Titles do not establish legal authority

A person may be described as head of compliance in an employment contract without being approved for a controlled function. A board member may oversee the programme without being the reporting officer. A group officer may supervise local teams without holding the local statutory office. The practical starting point is the instrument creating the role, followed by the rules governing the person and the entity.

The profiles illustrate the differences. Australia's anti-money laundering and counter-terrorism financing (AML/CTF) compliance-officer framework, Germany's officer-and-deputy structure and Brazil's responsible-director model should not be rewritten as a universal pair of offices called compliance officer (CO) and MLRO. Hong Kong's additional Manager-In-Charge and responsible-officer frameworks require their own analysis. The terminology used in this guide follows each source where that distinction matters.

Authority has an operational dimension

For design purposes, assess authority through the decisions the person must make. Can the officer obtain the relevant transaction and customer information, challenge business decisions, escalate unresolved concerns and communicate with the appropriate authority? Can the officer use the reporting systems without relying on the person whose conduct is under review? Does management have a mechanism to address a resource or access problem promptly?

These are recommended operating tests, not a single statutory test that applies everywhere. They make a legal appointment usable. A senior title without access creates an avoidable execution risk; broad access without defined responsibility creates a different accountability problem.

CHAPTER 03

Choose an appointment model

The most useful comparison is between the legal requirements of the office and the actual arrangement proposed for the individual. Price, availability and group convenience become relevant after that comparison. The four models below describe operating structures; none is a universal legal permission.

Model	Where it can be useful	What needs particular attention
Employee of the regulated entity	Integrates the officer with the business and its systems; may satisfy an express employment requirement.	Independence, seniority, competing duties, sufficient time and the ability to challenge management.
External individual holding the office	May provide specialist capability where the applicable regime permits an external appointment.	The specific legal route, individual approval, location, access, conflicts, capacity and replacement arrangements.
Group officer or shared team	Can support consistent standards and specialist expertise across related entities.	Each entity's legal office, local accountability, reporting lines, permitted information sharing and conflicting demands.
Internal officer supported by external specialists	Allows an eligible officer to obtain additional operational or technical support.	Reserved decisions, supervision of the provider, service scope, information security and retained expertise.

Employment and engagement are different legal facts

An employment requirement cannot be satisfied simply by naming a supplier's employee in a service agreement. Conversely, where legislation expressly permits a person to be otherwise engaged, it is still necessary to examine seniority, location and other qualifications. The Australian and New Zealand profiles provide a useful comparison because their statutory formulations differ.

The analysis should identify the individual, the contracting parties, the employer where relevant, and the legal capacity in which the person will act. If the person changes employer or moves country, review whether the original basis for the appointment still holds. The same applies when the service provider substitutes personnel.

Separate appointment from outsourced support

An external appointment concerns who holds the office. Outsourced support concerns which activities another person performs. A rule permitting research, monitoring support or preparation of a report does not necessarily allow a provider to make the final reporting decision. A rule permitting an external officer does not necessarily permit unrestricted subcontracting or offshore processing.

The practical allocation should be intelligible to both parties. A provider may prepare analysis, while a named officer owns a reserved decision. An internal analyst may obtain information, while the reporting officer controls external disclosure. Where a function cannot be delegated, the service scope must stop at that boundary. Brazil and India's selected frameworks show why this distinction has operational consequences.

Build the group model entity by entity

A group policy can set a common standard, but the local appointment still needs a legal basis. For each entity, establish the office, the eligible individual, the authority line and the obligations to its supervisor. Group management should understand when a local officer must act independently of a group preference or commercial instruction.

As a design recommendation, allocate capacity according to real demands: transaction volume, risk, licensing activity, reporting work, remediation and time zones. A group title alone does not show that the person can meet simultaneous deadlines. Cover arrangements should also account for the possibility that several entities need the shared person at once.

Information sharing requires its own analysis. Group membership does not remove confidentiality, secrecy, reporting-protection, data-protection or transfer restrictions. The FATF group framework itself recognises safeguards around sensitive information and tipping-off. Establish access according to function and lawful need, including restrictions that apply to reporting material. [R-FATF-02]

Read a provider proposal as an operating arrangement

A useful proposal explains the named person's duties, the supporting team, escalation channels, access arrangements and service continuity. It distinguishes appointment conditions from commercial delivery promises. It should also explain how the institution can obtain its records and maintain operations if the relationship ends.

As practical recommendations, address substitution, subcontracting, incident escalation, evidence of work, confidentiality, access for authorised oversight and exit assistance in the agreement. Preserve the institution's ability to make decisions and obtain information. A service-level target is not a substitute for a legal reporting deadline, and a contractual termination date does not determine when a regulated office becomes vacant.

CHAPTER 04

Put the appointment into operation

The following sequence applies the differences across the jurisdiction profiles to putting an appointment into operation. The legal obligations are those in the applicable jurisdiction profile and underlying sources. The sequence is designed to keep a sound legal conclusion connected to a functioning arrangement.

Establish the regulatory perimeter

Start with the legal entity and the activities it performs. Identify the licence or registration category, the territory in which the relevant business is carried on and the supervisory authority. A country-level label can hide several regimes. The United Arab Emirates (UAE) chapter therefore separates federal requirements, central-bank exchange-house rules, the Virtual Assets Regulatory Authority (VARA), Abu Dhabi Global Market (ADGM) and Dubai International Financial Centre (DIFC).

Do not infer that one regulator's acceptance applies to another entity or another office. An individual may need different approvals for a compliance role and a broader senior-management function. A group service arrangement may also involve more than one supervised institution, each with its own conditions.

Evaluate the individual against the actual office

Consider the qualifications the rule requires and the capabilities the role needs. The legal test may specify employment, nationality, residence, experience, seniority, fitness or independence. A licence condition may add requirements. Evidence of eligibility should relate to the proposed office and activities, rather than a generic professional biography.

For practical evaluation, examine time availability, other mandates, reporting experience, technical knowledge and the person's ability to challenge the business. A qualification or training certificate may be useful evidence of knowledge, but it is not automatically a regulator's approval or a statutory licence to practise.

Address conflicts and combinations of roles

Where a combination is legally available, consider whether it remains effective in the business concerned. Someone responsible for generating revenue may face pressure when challenging a profitable customer. Someone responsible for operating a control may have difficulty independently testing it. A provider serving competing firms may have confidentiality and capacity conflicts.

The response can include separating decisions, changing reporting lines, adding independent review or choosing a different individual. These are practical design options, not a presumption that every conflict can be cured by disclosure. Where a rule prohibits the combination or assigns the role elsewhere, follow the rule.

Separate approval from notification

Prior approval, a no-objection process, notification and registration of contact information are different mechanisms. A submission acknowledgement may establish receipt without establishing permission to start. A statutory determination period may begin only after a complete application or the latest information has been supplied. Mauritius illustrates why that trigger matters.

A sound implementation sequence identifies the act requiring permission, the proposed start date, the competent authority and the evidence that the relevant condition has been met. If an appointment may begin while a notification is pending, that conclusion must come from the applicable rule. It should not be inferred from the existence of an online filing system.

Make the mandate usable from the first day

The appointment instrument and internal governance documents should describe the role consistently. As a practical matter, the individual needs the relevant policy, systems access, reporting channel, training, management support and escalation rights when the responsibility begins. Staff should know where to raise concerns and how to reach cover during absence.

An effective induction also explains unresolved issues. Pending internal disclosures, monitoring backlogs, supervisory commitments and remediation actions require ownership. Transfer of responsibility should preserve the context needed to make a decision without distributing protected reporting information more widely than permitted.

Keep evidence that explains the decision

The useful record is evidence of reasoning and implementation. It ordinarily includes the applicable rule and version, the person's suitability, the allocation of duties, any approval or notice, the effective date and the continuity arrangements. The required legal records and retention period depend on the regime; this guide does not prescribe a universal retention term.

For ongoing oversight, review changes that could undermine the basis of the appointment: a new activity, increased workload, relocation, altered group structure, competing mandates, an adverse suitability event or changes in the law. A review should lead to a decision about the arrangement, not merely repeat the original appointment description.

CHAPTER 05

Maintain continuity when circumstances change

Continuity has two distinct dimensions: the function must keep operating, and the entity must comply with any appointment, approval or notification requirements. A deadline to notify a resignation does not establish permission to leave the function unperformed until that deadline. A period allowed for proposing a successor is also not necessarily permission to stop operating the controls.

Classify the event before applying a period

Planned short absence. Determine whether the current officer remains appointed and whether the regime permits an operational cover arrangement. Establish who can make urgent decisions, access current matters and escalate concerns. Australia's recent guidance expressly distinguishes some short absences from a fresh designation, subject to the actual circumstances.

Unexpected or prolonged absence. Reassess whether an operational cover arrangement remains sufficient or a temporary appointment is required. Where an exception is limited by duration or unforeseeability, monitor those conditions from the relevant start. Avoid treating an exception for a specific controlled function as a general suspension of other duties.

Resignation, removal or a permanent vacancy. Identify when the person ceases to hold the office and which obligations arise on that event. Departure notifications, replacement appointments, approval applications and changes to contact information may each have their own trigger. The old officer's ongoing availability as an adviser does not by itself fill a vacancy.

Loss of eligibility or authority. A change in residence, employer, suitability, access or licence status may require action even without a resignation. Assess whether the appointment still meets its conditions and whether the event itself is reportable. The corrective action should address the loss of capability as well as the formal designation.

Read every time limit with its conditions

A time limit needs a subject, event, unit and reference period. Twelve weeks in a consecutive twelve-month period differs from ninety calendar days aggregated within a calendar year. Five business days from accepted resignation differs from five days from a replacement's first day. A deadline measured from a completed application differs from one measured from the first submission.

For practical scheduling, preserve the event date and the reason for the calculation, apply the relevant calendar and holidays, and set earlier internal milestones. The comparison table later in the guide is an aid to reading the profiles. It is not a calendar or a substitute for the full local conditions.

Give cover the means to act

Recommended continuity arrangements connect the legal route to operational capability. The acting person needs current information, appropriate system credentials, a route to decision makers and access to the required reporting channel. Use individual, authorised access rather than sharing the departing officer's credentials.

Capacity is especially important where the deputy already has another demanding role. Establish how urgent work will be prioritised and who will provide support. If the arrangement depends on external personnel, consider provider failure or a conflict affecting both the principal and substitute.

Make the handover specific

A useful handover explains outstanding decisions, the age and urgency of cases, filing commitments, supervisory correspondence, control failures and the reasons for unresolved judgments. Reporting confidentiality and restrictions on disclosure continue to matter during the transition. The objective is controlled continuity, not unrestricted copying of all records to everyone involved.

After a change, confirm that authority and access work in practice. Update authorised contacts and internal escalation routes where required. Recover institutional records from a departing provider and remove access that is no longer authorised. Review whether the event exposed a weakness in staffing, governance or succession planning.

Three examples of applying the guide

A group wants one officer for several entities. Begin with each entity's local office and eligibility requirements. Then evaluate the named person's capacity, local decision rights and permitted information flows. A central policy can coordinate the work, while the legal appointment remains an entity-specific conclusion.

A provider offers an outsourced compliance package. Separate the proposed office holder from the activities performed by the provider's team. Identify any required employment relationship and approval. Define which decisions remain with the appointed individual or institution. Resolve that allocation before relying on the package to meet a licensing requirement.

An officer leaves before a successor is approved. Identify the legal vacancy date, activate the permitted continuity route and perform required notifications. Pursue the successor's approval using the relevant process. Do not assume that a deadline for filing the application is a grace period for performing the function.

These examples illustrate the guide's method. They are not conclusions about any reader's particular arrangement.

CHAPTER 06

Read time limits correctly

These comparisons summarise selected provisions explained in the profiles. Each period belongs to a particular entity category, event and procedure. Read the profile and source before using a number in a live appointment. Periods for cover, designation, application and notification are not interchangeable.

Regime and event	Selected period	Condition that changes the result
UK qualifying senior management function (SMF) cover	Less than 12 weeks in a consecutive 12 months.	Revised rules apply to absences beginning after 24 April 2026. A qualifying complete, timely application can extend cover to final determination. Temporary-absence cover ends no later than the incumbent's return. [W-UK-03; W-UK-04]
Ireland Temporary Officer	Up to six months with prior written agreement.	A permanent-vacancy application is due within three months of appointment; without a timely application, agreement lapses three months from its date, absent exceptional circumstances. [W-IE-03]
Australia designation and notice	Specified 28-day designation triggers; notice within 14 days after designation.	These are separate events under sections 26K and 26M, not one combined period. [W-AU-01]
Central Bank of the United Arab Emirates (CBUAE) exchange business	Two working days after commencement; five after resignation or vacancy; 90 calendar days from vacancy to propose replacement.	Alternate cover continues. After rejection, use the letter's deadline or 90 calendar days from its date. The guide covers the selected appointment provisions. [EM-UAE-04]
DIFC qualifying temporary cover	Up to 26 weeks in a consecutive 12 months.	Temporary or reasonably unforeseen absence, suitability, written notice and function-specific exclusions apply. [EM-UAE-13]
Saudi specified senior positions	Complete request at least 20 business days before proposed start; specified event notice within five business days.	Prior no-objection is distinct from submission. Board nominations have their own lead time. [EM-SA-01]
Mauritius officer approval	Conditional 15-day non-objection period; removal or resignation notice forthwith.	The later receipt of the application or required additional information controls the statutory period. Prior approval remains the starting rule. [S-MU-03]

Regime and event	Selected period	Condition that changes the result
Mexico financial technology institution (ITF) transition	Next-business-day designation; 90 calendar days of interim cover in a calendar year; 10-business-day notice.	Interim days run from inability to act, within the annual cumulative cap. The profile discloses the consolidation limit. [S-MX-02]

Limits that should not become general grace periods

Germany's advance notice for the officer and deputy is a notification rule. South Africa's 90-day update of registered particulars is a different kind of administrative obligation. Neither establishes a universal permission to leave the relevant compliance function uncovered. [W-DE-01] [S-SA-01]

For ADGM, the guide states the immediate replacement or cover obligation but does not state the current GEN maximum duration. Bahrain's 120-calendar-day reference is limited to the dated, licence-specific material described in its profile. The Brazil comparison concerns the 30-day period following final refusal of an administrator's approval, rather than every resignation; the guide does not establish that period under the current consolidated text. [EM-UAE-08; EM-UAE-10; EM-BH-01; EM-BH-02; S-BR-04]

As an operating recommendation, identify the event first, then the applicable period and any condition for using it. Set internal milestones early enough to leave time for missing information, approval questions and handover. The law's outer period is not a forecast of the regulator's response time.

CHAPTER 07

North America

These profiles distinguish the selected federal, national and sector regimes. Their practical implications are recommendations derived from the cited rules.

United States

Start with the institution category

The federal framework uses sector-specific programme rules rather than a single universal MLRO office. For banks regulated by a federal functional regulator, 31 CFR 1020.210(a)(2)(iii) of the Code of Federal Regulations requires designation of the individual or individuals responsible for coordinating and monitoring day-to-day compliance. For money services businesses (MSBs), 31 CFR 1022.210(d)(2) requires a person responsible for day-to-day programme compliance; the responsibilities include reporting, records, updates and training. The MSB rule separately requires independent review, which the designated compliance person cannot conduct. These are separate regulatory perimeters even where a group uses a shared compliance team. [W-US-01; W-US-02]

The Federal Financial Institutions Examination Council (FFIEC) Bank Secrecy Act (BSA) examination manual focuses on the substance of the appointment: board designation, competence, authority, independence, access to resources and regular reporting. The board retains ultimate responsibility. Delegation to staff does not remove the designated officer's oversight responsibilities, and an impressive job title does not compensate for weak authority. For a banking appointment, the useful question is therefore whether the person can influence decisions affecting financial-crime risk and obtain the resources needed to discharge the role. [W-US-03]

Location and reform status

31 USC 5318(h)(5) of the United States Code is enacted legislation: responsibility for establishing, maintaining and enforcing the required programme must remain with persons in the United States who are accessible to, and subject to supervision by, the relevant authorities. This provision must be assessed separately from regulatory proposals about how programme requirements should be revised. It does not justify treating every supporting activity performed abroad as automatically prohibited, nor does it establish blanket permission to appoint an offshore officer. [W-US-04]

The Financial Crimes Enforcement Network (FinCEN) announced a new programme proposal on 7 April 2026, published on 10 April. It expressly superseded the July 2024 proposal, which was withdrawn. The cited official materials identify the 2026 measure as a proposal. Its proposed changes must not be presented as operative appointment requirements. [W-US-05; W-US-06]

Practical implications for appointment and continuity

Identify the federal rule, supervisor and state licensing conditions before selecting the model. For continuity, distinguish delegated work from replacement of the designated individual and address board action and licence-specific notices. No single federal vacancy grace period is established for all sectors. The guide does not cover the current New York Part 200 virtual-currency requirements or establish an exemption from them.

Canada

Designation and retained responsibility

For reporting entities within the federal regime, the current Proceeds of Crime (Money Laundering) and Terrorist Financing Regulations place compliance-programme requirements in section 156. Paragraph 156(1)(a) requires appointment of a person responsible for implementation, or an individual reporting person's own acceptance of that responsibility. The programme also requires current written policies, risk assessment, training arrangements and effectiveness review. The current official consolidation is stated to be current to 29 October 2026 and last amended on 26 March 2026. Older references to section 146 should not be copied into a new appointment analysis without checking the version. [W-CA-01]

Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) guidance expects the appointee to understand the business and sector, hold adequate authority and resources, and have effective access to decision-makers. In larger businesses it recommends independent oversight and separation from receiving, transferring or paying funds. Certain duties may be delegated to employees, but the officer remains responsible for programme implementation and the reporting entity remains responsible for compliance. A sole proprietor can act personally or appoint another individual. These statements do not establish a general FINTRAC approval of contracted officers for every entity and sector. [W-CA-02]

Practical implications for external and group models

An external proposal should explain who owns implementation, can approve changes and receives relevant information. Separate the service contract, individual designation and reporting entity's responsibility. A group policy can standardise controls; each reporting entity still needs its own required appointment.

Continuity and the provincial overlay

Transfer open matters, reporting access and supervisory communications when the designated person changes. No universal federal approved-absence period is established here. Check registration updates, licence conditions and provincial rules. A Quebec money-services-business respondent is a distinct provincial role. This guide does not cover its current requirements, merge it with the FINTRAC officer or state a deadline for it.

CHAPTER 08

Europe

European Union framework

Apply the common framework through national rules

European Banking Authority (EBA) guideline EBA/GL/2022/05 has applied since 1 December 2022 to the relevant credit and financial institution framework. Its guidelines distinguish management responsibility from the anti-money laundering and countering the financing of terrorism (AML/CFT) compliance officer. Paragraphs 28-29 normally contemplate working in the establishment country, but allow a risk-proportionate foreign location where national law permits, with effective information access and availability to local authorities. This is a conditional route, not an EU-wide residence waiver. Paragraphs 68-73 permit operational outsourcing only within national law and relevant outsourcing rules. Management responsibilities and strategic decisions remain internal; the institution retains ultimate responsibility, including for suspicious-transaction reporting. Group outsourcing receives the same regulatory framework as external outsourcing. Paragraph 71 addresses institutions with no officers or employees other than a management body; it must be read with the surrounding safeguards rather than as a general permission for every institution to outsource its entire function. [W-EU-01]

Regulation (EU) 2024/1624, the AML Regulation, is already adopted but generally applies from 10 July 2027, with a later application date for specified football-related entities. Its articles 11 and 18 concern compliance management and outsourcing. They belong in transition planning, not in a description of a uniform operative rule under the law stated in this guide. National implementation of the existing framework and sector requirements remain central to a 2026 appointment. [W-EU-02]

Practical implications

For a group spanning Member States, the most reliable architecture is a common operating model with a separate legal assessment for each regulated entity. Separate the location of the officeholder, the location of supporting staff, and the location of data. Each can raise a different legal or supervisory question. If a service centre performs research and prepares reporting materials, the governance arrangement should still make clear who decides, who can challenge, who supervises the provider, and which institution bears the obligation.

A group title or the future AML Regulation is not a substitute for the German, Irish or other national requirements described here. Likewise, an outsourcing contract does not itself resolve the host country's employment, presence, approval, confidentiality or reporting restrictions. The following national profiles illustrate why the common framework must be applied at entity and role level.

United Kingdom

Separate the statutory roles and FCA requirements

Regulation 21 of the Money Laundering Regulations 2017 distinguishes the board or senior-management officer responsible for compliance, where appropriate to the business's size and nature, from the nominated officer. The nominated officer must be an individual within the firm and considers internal disclosures. Subject to the provision's scope and exceptions, the supervisor must be informed of first and subsequent appointments within 14 days. The exception for an individual who neither employs nor acts in association with another person must be considered before assuming that every sole practitioner requires separate appointments. [W-UK-01]

For firms within the relevant FCA application, SYSC 6.3.8 allocates overall systems-and-controls responsibility to a director or senior manager; that person may also be MLRO. The allocation cannot be made to a person approved to perform the other overall responsibility function. SYSC 6.3.9 requires an MLRO with sufficient authority, independence, resources and information. SYSC 6.3.10 states the FCA's expectation that the MLRO be based in the United Kingdom. This is guidance expressed as an expectation, not a universal immigration or nationality rule. The cited SYSC sourcebook states that it was last updated in June 2026. Applicability still depends on the firm's category and the Handbook application provisions. [W-UK-02]

Temporary cover under the revised senior managers regime

SUP 10C.3A, effective 24 April 2026, permits qualifying conduct-rules staff to cover an individual's SMF where the absence is temporary or reasonably unforeseen, for less than 12 weeks in a consecutive 12-month period. For a reasonably unforeseen absence, or an unexpectedly longer absence, a valid and complete approval application submitted before that period expires can extend qualifying cover until the application is finally determined. That defined endpoint addresses withdrawal, grant, and the applicable refusal, Tribunal and appeal stages. For cover of a temporarily absent manager, the disapplication ends no later than that manager's return. The replacement must be fit and proper. Prescribed responsibilities ordinarily move to another SMF manager; they cannot simply be allocated to an unapproved stand-in. This route does not eliminate applicable absence notifications or exceptional supervisory disclosure. [W-UK-03]

The transitional provision applies the revised cover rules to absences beginning after 24 April 2026. An absence already under way needs its own transition analysis. [W-UK-04]

Practical implications

Assess the officer's statutory function, regulatory function and employment position separately, even if one person holds all three. When planning leave, a deputy can support operational continuity, but the firm still needs to determine whether that person is performing an SMF and whether the exemption actually applies. Count cumulative cover accurately. A foreseeable departure should trigger succession and approval work promptly; calling a gap an emergency does not establish that it was reasonably unforeseen.

This profile does not certify that a particular payment, e-money, cryptoasset or other non-bank business falls within the same SMF approval route as a bank. Its own registration and permission framework must be mapped before applying the cover rules.

Germany

Appointment presence and deputy

For the categories specified in the Money Laundering Act (GwG), section 7(1), the law requires a management-level money-laundering officer and a deputy; supervisors can impose the appointment requirement on other specified categories and grant qualifying exemptions. Management responsibility remains unaffected. Section 7(4) requires advance notice of appointment and removal of the officer and deputy. Under section 7(5), the officer must perform the activity in Germany, have adequate powers and resources, receive unrestricted access to relevant information and systems, and report directly to management. The supervisor can require revocation where qualification or reliability is inadequate. These requirements are not satisfied merely by providing a German correspondence address. [W-DE-01]

GwG section 6(7) provides for contractual performance of internal safeguards by a third party following prior notification. The authority can prohibit the arrangement if proper performance, the entity's control or supervision is impaired. The notifying entity must explain why those grounds are absent and remains responsible for fulfilment. Thus the outsourcing analysis concerns the actual safeguards and oversight arrangement; it is not a release from the regulated entity's duties. [W-DE-02]

Practical implications

An external appointment proposal should address the domestic performance requirement and deputy coverage directly. A group specialist based elsewhere may contribute expertise without satisfying the statutory officeholder's German activity requirement. Separate the notice concerning the person and deputy from the notice concerning outsourced safeguards; one should not be assumed to substitute for the other.

Continuity is built around a capable deputy and timely regulatory communications. A deputy should be able to access the relevant systems and handle urgent matters while maintaining appropriate independence. A business should not treat the existence of a deputy as a licence to leave a permanent vacancy unresolved. The guide states the advance-notice rule. It does not give a universal number of days that every German sector may operate with a vacant primary office. Sector legislation and the competent authority's current guidance can add requirements to the GwG baseline.

Ireland

Preapproval follows the function

The replacement pre-approval controlled function (PCF) schedule in Statutory Instrument (SI) 20/2026 took effect on 10 February 2026 and includes PCF-12, Head of Compliance, and PCF-52, Head of Anti-Money Laundering and Counter Terrorist Financing Compliance. The schedule's entity and territorial conditions matter. The labels should not be used to assert that every Irish business is subject to the Central Bank's PCF regime. [W-IE-01]

For relevant regulated financial service providers, the Central Bank requires written approval before appointing an individual to a PCF. The proposing firm must complete suitability due diligence before submitting the individual questionnaire. Regulator assessment does not replace the firm's own assessment. An external contract or group nomination therefore cannot, by itself, authorise someone to commence a PCF. [W-IE-02]

Temporary officers and outsourcing

Current Central Bank guidance permits a suitable Temporary Officer for no more than six months with prior written agreement and the required suitability confirmations. For a permanently vacated role, a PCF application must be submitted within three months of the Temporary Officer's appointment. If none is submitted in that period, the agreement lapses three months after the date of the agreement, absent exceptional circumstances. Timely submission permits continuation pending the decision within the six-month period. Cumulative or consecutive cover exceeding six months requires exceptional treatment. Temporary acceptance is not permanent approval. The guidance also describes narrowly conditioned exemptions involving outsourcing to a similarly regulated financial service provider; a generic consultancy should not be assumed to qualify. [W-IE-03]

On 17 November 2026 the Central Bank issued CP175 proposing changes to the PCF list. Consultation closes on 17 February 2027, with implementation intended to align with the outcome of the Individual Accountability Framework review in 2027. These proposals do not displace the existing requirements. [W-IE-04]

Practical implications

Use the actual responsibilities to determine the PCF category, then establish whether the proposed arrangement requires individual preapproval or meets a specific exemption. For planned replacement, work backwards from the intended start date to allow for due diligence, application review and any questions. For sudden absence or vacancy, seek the required written agreement instead of treating the six-month period as automatic permission. Keep the three-month application milestone separate from the outer temporary period. The guide does not establish a universal Irish residence rule for every compliance-related office; sector authorisation and substance requirements require separate attention.

CHAPTER 09

Oceania

Australia

Current law permits employment or engagement

The AML/CTF Act compilation dated 1 October 2026 contains the current governance provisions in sections 26H-26M. The compliance officer must be an individual employed or otherwise engaged at management level with adequate authority, independence, resources and information. Australian residence is required where designated services are supplied at or through an Australian permanent establishment. Fitness and propriety and any applicable Rules requirements also matter. The governing body retains ongoing oversight duties. Section 26K sets 28-day designation triggers for commencing designated services without an officer and for loss of eligibility; section 26M separately requires notification within 14 days after designation. These clocks address different events. [W-AU-01]

Australian Transaction Reports and Analysis Centre (AUSTRAC) guidance confirms that an external officer need not be an employee, but must have real authority and expertise. A reporting-group member's officer may serve another member if eligibility is met for each. For absence, AUSTRAC says functions can sometimes remain fulfilled without designating a replacement, depending on duration, the oversight and communication arrangements, and the business's nature, size and complexity. It recommends readiness to designate an eligible replacement for lengthy absence or ineligibility. Its guidance also describes appointment and notification requirements when an officer leaves. [W-AU-02]

Practical implications

An external engagement can be a legally available model, but management-level status must be reflected in how the business operates. A consultant who can only advise informally, lacks access to records, or cannot communicate effectively with the governing body may not satisfy the role despite a suitable contract title.

Short leave, permanent departure and loss of eligibility require different analysis. Short leave may be handled through effective arrangements established by the existing officer. Permanent departure calls for a replacement plan; loss of required residence or fitness can create an eligibility event even though the person remains employed. Do not combine the designation and notification periods into an invented 42-day period, and do not treat the designation deadline as permission to suspend the underlying compliance functions. A group appointment should be tested against each member's establishment and eligibility circumstances, not just the parent's location.

New Zealand

The employee baseline and express alternatives

Section 56 of the AML/CFT Act requires a reporting entity to designate an employee to administer and maintain its programme. Where there are no employees, it must appoint an individual. Following the amendments effective 19 May 2026, the officer must be a senior manager or report to one. A partnership can designate a partner whether or not it has employees; that partner must report to another designated partner. The no-employee route should not be expanded into a general permission for an entity with employees to appoint any external provider. [W-NZ-01]

Since 1 July 2026, the Department of Internal Affairs has been the sole AML/CFT supervisor. Firms should therefore ensure their supervisory arrangements reflect the transfer rather than assume their previous sector supervisor remains responsible for AML/CFT. [W-NZ-02]

Shared officers and the approaching transition

The current designated-business-group class exemption has an expiry date of 31 December 2026. Amendment Notice 2026/245 is made but not yet in force under the law stated in this guide. Its replacement shared-officer provisions commence on 31 December 2026 and run to the close of 30 December 2031. The selected provisions specify a group-member employee, or a person where the group has no employees, domicile in New Zealand or Australia, maintenance of each appointing entity's programme, and reporting to each entity's senior manager. The guide does not set out every term of the replacement instrument. The made amendment must be distinguished from any separate legislative proposal. [W-NZ-03; W-NZ-04]

Practical implications

A group sharing one officer should understand exactly which entities qualify for the exemption and which remain outside it. Shared staff and common ownership do not alone prove that the designated-business-group conditions are met. Transition review should address the current exemption and its replacement as separate legal bases, with the commencement and expiry dates stated expressly.

For absence or departure, preserve a capable individual and clear reporting line rather than assume the group appointment automatically survives a change of employment or location. The guide does not state a universal approved-vacancy period or a general officer preapproval process for all New Zealand reporting entities. Loss of the factual basis for a no-employee, partnership or group route should trigger a fresh appointment analysis, even if the same individual continues to provide informal assistance.

CHAPTER 10

Asia

These chapters are deliberately sector-specific. A payment institution, a bank and a virtual asset service provider in the same country may face different appointment rules.

Singapore

Payment service providers

The Monetary Authority of Singapore (MAS) distinguishes compliance support from the appointment of the person responsible for the local function. Appendix 2 of PS-G01, revised 8 October 2025, allows support from an independent, dedicated team in a holding company or overseas related entity when the applicant demonstrates adequate oversight. It nevertheless expects a digital payment token (DPT) service provider to maintain an in-house local compliance officer. The management-level officer must have relevant expertise and authority; if not already employed, the candidate must be identified at application and employed and appointed before business begins. Senior management retains responsibility for the arrangements. [EA-SG-01]

The binding notices provide a separate foundation. For DPT services, PSN02 paragraphs 17.3-17.4 require a management-level AML/CFT compliance officer who is suitably qualified, adequately resourced and able to obtain customer records and relevant information promptly. Paragraphs 17.5-17.6 add independent audit and staff/officer screening. [EA-SG-02] The equivalent appointment and access provisions for specified payment services appear in PSN01 paragraphs 19.3-19.4. Its defined perimeter concerns account issuance, domestic and cross-border money transfer, and money changing, subject to its application provisions and exclusions. It should not be described as a notice applying identically to every payment service. [EA-SG-03]

What this means for the operating model

For a DPT provider, the sensible starting architecture is a local employed officer with enough authority to challenge operations, supported by specialist group or external resources where permitted. A regional compliance team can provide expertise and production capacity; it does not itself explain who makes decisions for the Singapore licensee. A proposal that describes only a remote service subscription leaves that essential governance question unanswered.

The appointment decision should therefore be linked to the actual business. Token custody, transfers and trading present different operational demands from a small money-changing business. Practical capacity depends on alert volumes, hours of operation, escalation needs and the number of other duties the individual holds. These are implementation considerations, not extra numerical staffing thresholds imposed by this guide.

Continuity planning must preserve both decisions and information access. A colleague able to monitor a shared inbox may still lack access to the transaction system or authority to make a reporting decision. Plan cover before an absence and determine whether a changed appointment requires action under the licensee's applicable authorisation arrangements. The cited provisions do not establish a universal Singapore grace period after a vacancy, and this guide supplies none.

Hong Kong

Separate four distinct roles

For Securities and Futures Commission (SFC) licensed corporations and SFC licensed virtual asset service providers (VASPs), the AML Guideline's paragraphs 3.5-3.9 distinguish the Compliance Officer, who oversees the AML/CFT system, from the MLRO, who is the central reporting contact. The CO is a senior-management appointment; the MLRO is a senior staff member. Depending on the firm's size, the same staff member may perform both functions. The guideline expects appropriate independence, authority, information access and resources; the officers are normally based in Hong Kong. Absence cover should be available through an alternate or deputy, where practicable with equivalent status. An AML/CFT Manager-In-Charge may also be the CO if the relevant requirements are met. [EA-HK-01]

A Manager-In-Charge (MIC) and a Responsible Officer (RO) are separate regulatory concepts. The MIC framework identifies accountable management of core functions. An MIC need not necessarily be an employee, but must hold real authority and be accountable to the corporation; a vendor with no such authority is unsuitable. Board approval and the MIC's acknowledgement are expected. For a temporary acting MIC appointment lasting no more than a few months and not expected to become permanent, the SFC's frequently asked questions (FAQ) page provides a notification concession. If it becomes permanent, notification is required within seven business days. That concession concerns MIC information, not every MLRO or RO obligation. [EA-HK-02]

The SFC's licensing guidance separately explains that an employment relationship is not a prerequisite to RO approval. It also generally expects MICs of Overall Management Oversight and Key Business Line functions to seek RO approval for the regulated activities they oversee. These statements must not be converted into blanket permission to outsource every compliance office. [EA-HK-03]

Practical reading

A useful governance description names the legal role, its authority and its reporting line individually. Calling one person a "compliance consultant and MLRO" does not establish that the person satisfies the senior-staff and local-operating expectations, is a suitable MIC, or has any required RO approval. Each proposition needs its own answer.

Where roles are combined, test the combined workload and the decisions the person would review. The central issue is whether that person can identify problems, reach management, obtain records and act without a competing commercial responsibility defeating the control. A group title or a senior job grade provides limited reassurance if local systems and escalation routes are inaccessible.

During a handover, treat the MIC notification analysis, any RO approval analysis and AML operational cover as parallel workstreams. The seven-business-day MIC rule should never be used as a general deadline for all three. A transition can be administratively recorded yet still fail operationally if internal reports arrive at the departed officer's mailbox.

India

Commercial banks within the selected Reserve Bank of India (RBI) directions

The instrument discussed is the RBI Commercial Banks Know Your Customer Directions 2025, updated 1 October 2026. Its direct definition of commercial banks excludes small finance banks, payment banks and local area banks. Other sectors require their own application analysis.

Paragraph 13 prohibits outsourcing decision-making on compliance with KYC norms. Under paragraphs 14-15, the Designated Director and Principal Officer perform different functions: the former is the Board-nominated person responsible for overall compliance with the specified Prevention of Money Laundering (PML) Act and Rules obligations; the latter handles compliance, monitoring and required reporting. The Principal Officer cannot also be nominated Designated Director. The bank communicates both officers' prescribed details to the Financial Intelligence Unit-India (FIU-IND) and RBI. The Principal Officer is defined as a management-level nominated officer. [EA-IN-01]

A separate RBI circular dated 28 November 2025 replaced references to the repealed 2016 master direction in payment-system instructions with references to these commercial-bank directions. That cross-reference is important for payment businesses, but does not justify assuming that every sector's governance and appointment requirements are identical. [EA-IN-02]

Why the distinction matters

An external screening or document-processing service may support a bank's work without taking over the bank's KYC decision. The contract and operating procedure should describe the boundary between producing information and determining whether the legal standard is met. An arrangement that automatically accepts a vendor's conclusion without an accountable internal decision deserves particular scrutiny.

The Designated Director's governance responsibility also cannot be addressed merely by renaming the Principal Officer. The legal separation has practical consequences for escalation: a serious unresolved control weakness should have a route to a person responsible for overall compliance, while the reporting function continues to operate.

A departure therefore requires both a functioning successor arrangement and correct institutional records. The guide does not state a general post-vacancy grace period or a universal outsourced Principal Officer route. A firm should resolve the applicable sector rules, internal delegation and reporting-channel access before relying on either proposition.

CHAPTER 11

Middle East

United Arab Emirates federal framework

Start with the federal foundation and identify the supervisor

Federal Cabinet Resolution 134 of 2025 is recorded on the official legislation portal as effective from 14 December 2025. Articles 21-22 require appropriate compliance management arrangements and a management-level Compliance Officer with competence, experience and independent decision-making. The institution remains responsible. Article 49(18) requires supervisory authorities to maintain officer lists and require supervised entities to obtain prior approval before appointing their Compliance Officers. This is an important approval requirement, but the filing mechanism and detailed conditions still depend on the relevant supervisor. The official English text is subordinate to the Arabic original for interpretation. [EM-UAE-01; EM-UAE-02]

The 2026 joint supervisory guidance addresses governance, resourcing and the CO/MLRO function across several UAE supervisory settings. Section 4.2 expresses a broad restriction on outsourcing the office or entire function, while allowing specified tasks with supervisory no-objection. Section 1.1 says the guidance does not replace legislation or regulation and that operative legal and regulatory requirements prevail in a discrepancy. Accordingly, the guidance cannot be read in isolation from the specific rulebooks and regulator notices discussed below. [EM-UAE-03]

How to read overlapping requirements

Begin with the licensed entity and its actual supervisory setting. The same group may have a CBUAE-supervised business, a VARA VASP and an ADGM entity. A single group procurement decision does not settle all three appointments. Each entity needs a permissible office-holder, suitable authority, required approval and workable continuity arrangements.

The distinction between appointing an external individual and buying support is especially consequential. Where a rule permits an external MLRO, it still governs a responsible natural person. A consulting company's service agreement does not itself identify that person or prove the person's capacity. Conversely, a regime may permit specialist support while requiring the actual Compliance Officer to remain a full-time employee.

CBUAE exchange business

The CBUAE exchange-business appointment provisions require a full-time employed, UAE-resident Compliance Officer; foreign nationals must be on the licensee's employment visa. Other employment and outside consultancy are prohibited, and the office must be confined to AML/CFT compliance without combination with other functions. A prior no-objection and fit-and-proper process applies.

The page distinguishes three clocks: notification within two working days after employment starts; notification within five working days after resignation or another vacancy; and proposing a permanent replacement within 90 calendar days after vacancy. An Alternate Compliance Officer must preserve continuity meanwhile. After a rejected candidate, the rejection letter's deadline governs, with a default of 90 calendar days from the date of the Letter of Rejection if it specifies none. Outsourcing the office or whole function is prohibited. Specific AML compliance tasks may be

outsourced only in permitted circumstances after obtaining the Banking Supervision Department's Letter of No Objection. These are exchange-business rules, not UAE-wide deadlines. [EM-UAE-04]

In practice, the replacement-proposal period is not permission to leave the control unattended. Treat the alternative officer's readiness as a day-one dependency: records, internal reports, regulatory communications and decision authority must continue while the permanent appointment is processed. Also distinguish a duty to propose a candidate from a requirement that approval already be obtained by the same date.

Dubai VARA

VARA's Compliance and Risk Management Rulebook I.C.1 requires the CO to have at least five years' relevant compliance experience, be fit and proper as approved by VARA, be UAE resident or hold a UAE passport, work full-time for the VASP, and report directly to its Board. Delegating activities does not remove the CO's accountability. Multiple non-client-facing roles are possible only where the relevant requirements are satisfied and duties do not conflict. [EM-UAE-05]

The MLRO has a separate minimum of two years' AML/CFT experience and must be fit and proper. The appointment is reviewed annually. Delegated AML activities remain the MLRO's responsibility. [EM-UAE-06]

Company Rulebook IV.A.3 expressly permits outsourcing the MLRO role, subject to Part IV, the individual's personal responsibility to VARA and assessment of multiple mandates. VARA can impose separation measures and can require an in-house full-time employee. The VASP retains responsibility for outsourced functions. Company Rulebook I.D.5 prevents the CO from holding a Board position; reporting to the Board does not mean sitting on it. [EM-UAE-07]

These differences make a combined CO/MLRO appointment a substantive design choice. If one person holds both offices, the arrangement must satisfy the conditions of both. Permission to outsource an MLRO does not remove the full-time employment requirement attached to the CO role. Similarly, someone serving several VASPs needs a credible allocation of time and clear information separation; a generic assurance of availability is weak evidence of either.

The guide does not state a universal VARA vacancy deadline for every officer. A change must be assessed against the office, licence conditions, approval requirements and any regulator direction. The CBUAE exchange-house 90-day period and the DIFC temporary-cover period do not supply that deadline.

Abu Dhabi Global Market

ADGM AML Rulebook VER11.210526, Chapter 12, requires an individual MLRO with appropriate seniority, experience and independence and regulatory approval through the prescribed process. The MLRO, including an external appointee, must be UAE resident; guidance permits a limited-period waiver in appropriate circumstances. Rule 12.1.6 permits an external individual who remains suitable. Rule 12.1.3 requires immediate replacement or temporary cover when the incumbent leaves employment. A deputy is required except for a Representative Office; the guidance says the deputy does not separately require approval. Adequate cover and retained institutional responsibility remain essential. [EM-UAE-08]

Financial Services Regulatory Authority (FSRA) Notice FSRA/FCCP/69/2026, dated 24 April 2026, explicitly resolves the hierarchy point raised by the joint guidance: where its requirements conflict with the AML Rulebook, Relevant Persons should follow the AML Rulebook. The guide therefore

recognises the conditional external-MLRO route; it does not treat the joint guidance as abolishing it. [EM-UAE-09]

The guide does not state the current GEN temporary-cover period. The supervision FAQ describes an ordinarily applicable 12-week period, but its GEN link points to an older compilation, and the FSRA announced further rule changes in September 2026. The FAQ does not establish the current ADGM limit for this guide. [EM-UAE-10; EM-UAE-11]

Planning must address the immediate-cover obligation without assuming a maximum permissible duration. Prepare a qualified deputy, establish the individual's operational access and obtain regulator confirmation of the applicable approval and temporary-cover route. An external MLRO arrangement should be assessed on the individual, the precise services, available time, competing mandates and firm access. The affirmative outsourcing rule establishes that a route exists; it does not approve a particular proposed arrangement.

Dubai International Financial Centre

Dubai Financial Services Authority (DFSA) AML Rules 11.2-11.3 require a suitable, sufficiently senior and independent individual MLRO. UAE residence generally applies, with exceptions for a Registered Auditor or Representative Office. For a Representative Office, the MLRO must be the same person as the Principal Representative. An Authorised Firm other than a Representative Office must have a deputy. Rule 11.2.5 permits an external individual who remains suitable; supporting guidance emphasises effective authority and capacity across multiple mandates. The Relevant Person remains responsible when AML tasks are outsourced. [EM-UAE-12]

GEN 11.6.1 contains a specific temporary-cover route for an Authorised Firm. It requires temporary or reasonably unforeseen absence and an assessed suitable substitute; cover is limited to 26 weeks in any consecutive 12 months. It excludes Licensed Director and Licensed Partner functions, requires written notification of the substitute's name and contact details, and requires reasonable steps towards an Authorised Individual resuming or taking the function afterwards. It is not an unconditional vacancy grace period. [EM-UAE-13]

The distinction between deputy appointment, temporary cover and permanent approval should remain visible in the transition plan. An external provider's change of staff can be just as important as an employee's resignation if the named responsible individual changes. The firm should establish which individual has authority throughout the transition and whether the proposed interim route satisfies every condition, including the rolling cumulative limit. A calendar expiry reminder alone does not establish that a lawful appointment exists.

Saudi Arabia

Saudi Central Bank (SAMA) supervised institutions and senior positions

The Arabic SAMA senior-position requirements distinguish prior no-objection, temporary assignment and event notification. Chapter III.4 requires complete requests at least 20 business days before the proposed assumption of a senior-management position; Board nominations have a separate lead time of at least 30 business days before the general assembly at which the election occurs. Chapter IV.10 requires notice within five business days of commencement, accepted resignation, leaving employment or termination. Chapter II.3 restricts specified heads, including compliance and AML/CFT, to Saudi nationals. These are sector- and position-scoped requirements, not a rule that every junior AML employee must be Saudi. This guide's English summary of the Arabic original is not an official translation. [EM-SA-01]

Appointment planning

The practical sequence is to resolve eligibility before committing to an operating model. A candidate's experience or membership of a strong international compliance team does not answer a nationality requirement for a particular head-of-function role. The relevant institution's sector annex must identify whether the position falls within the no-objection regime.

The lead time is a filing requirement, not a promise that SAMA will decide in 20 business days. Build the timetable around complete information, assessment and the regulator's decision. A proposed start date should remain conditional where prior no-objection is required.

Departure and cover also require distinct analysis. An employment event can trigger notification while a temporary assignment remains subject to separate conditions. Assess temporary assignments separately under Chapter III.3. An accepted resignation and the later end of systems access are different events. The exact event matters to the clock, while effective AML operations must continue throughout.

Bahrain

Crypto-asset licensees and outsourced support

The Central Bank of Bahrain (CBB)'s October 2023 Crypto-asset Module contains a specific boundary between reserved functions and support. CRA-6.6.4 prohibits outsourcing compliance and AML/CFT functions, among other listed functions. CRA-6.6.5 permits certain supporting activities, processes and systems, subject to CRA-6.6.7, while strategic decisions and management and bearing of the principal risks remain with the licensee. This supports distinguishing an external screening or systems service from outsourcing responsibility for the function. The relevant section carries a July 2022 revision footer. The guide does not set out the complete current module or the current CRA-6.6.7 conditions. [EM-BH-03]

Scope of the dated module

The available CBB Volume 5 Financial Crime material treats MLRO appointment as a controlled function requiring prior CBB approval and fit-and-proper assessment. Dated FC-4.1 text also requires seniority, information access, adequate resources and Bahrain residence. Its vacancy provision requires immediate approved interim arrangements and a permanent approved replacement within 120 calendar days. The guide does not set out the complete current module or determine every applicable licence category. The 120-day statement describes the dated provision and does not state a current operational deadline for all Bahrain firms. [EM-BH-01; EM-BH-02]

Practical implications

Bahrain illustrates why a rulebook volume is part of the legal citation. A bank, specialised licensee, investment business or crypto-asset service provider cannot assume that another category's chapter applies unchanged. The guide does not set out the current volume, all incorporated amendments, approved-person provisions or any individual licence conditions.

Preparation should include a candidate assessment, explicit authority, access to transaction and customer information, and an identified person capable of keeping the function operating. These preparation measures do not substitute for CBB approval or prove that a particular external or group arrangement is permitted. If a vacancy is imminent, obtain the current authoritative route promptly instead of treating an old numeric limit as a safe harbour.

CHAPTER 12

Africa

These profiles concern the identified regimes. English explanations of non-English provisions are working summaries; the official language text controls.

South Africa

The institution keeps the legal responsibility

The Financial Intelligence Centre Act applies to accountable institutions within Schedule 1. Section 42A places responsibility for compliance on a corporate institution's board or, where there is no board, senior management. A legal person must have a compliance function and assign a sufficiently competent and senior person to make it effective. Different provisions address institutions that are not legal persons, including a sole-practitioner exception to the additional assistance requirement. Appointing an officer therefore supports governing-body oversight; it does not transfer the institution's statutory obligations to that individual. The Financial Intelligence Centre (FIC)-hosted Act also requires changes to registered particulars to be notified within 90 days under section 43B(4). That registration provision should not be presented as a 90-day permission to leave the compliance function uncovered. [S-SA-01, sections 42A and 43B]

External support has defined limits

Public Compliance Communication (PCC) 12A, issued on 24 March 2021, distinguishes assistance from the performance of reserved obligations. The compliance officer must belong to the institution, for example as an employee or director. A provider may support appropriate compliance activities but must understand the business, internal arrangements and applicable duties. The institution retains approval of its risk-management and compliance programme. A provider can help collect or process customer information; the institution must still determine that its customer due diligence obligations are satisfied. The communication also restricts outsourcing reporting, relevant goAML access, and investigation or analysis undertaken to form suspicion. Its treatment of qualifying intragroup activity differs from third-party outsourcing. [S-SA-02, paragraphs 2.2, 2.8-2.9, 3, 4, 7-9; S-SA-03]

Practical implications

As a practical recommendation, allocate support deliverables separately from decision rights. Identify the person who evaluates material, makes decisions and escalates concerns. For succession, establish the incoming person's authority, access, competence and secure reporting arrangements from the first day. A contractual title alone does not resolve the statutory position.

The guide does not state a universal South African pre-approval procedure, residence requirement or temporary-cover maximum for every sector. Additional licensing and supervisory rules remain relevant. It covers the FIC-hosted consolidated Act but does not provide a complete account of subsequent amendments and commencement provisions.

Mauritius

Distinguish compliance oversight from suspicious-transaction reporting

Under regulations 22 and 26 of the Financial Intelligence and Anti-Money Laundering Regulations 2018, a reporting person needs senior-management compliance oversight and an MLRO reporting arrangement. Regulation 22 gives the compliance officer necessary access to books, records and employees. Regulation 26 requires a deputy to perform the MLRO's duties during absence, with sufficient seniority or experience and authority, board access, time and resources. A limited alternative applies to relevant professions or occupations unable, because of their nature and size, to appoint both officers; it concerns compliant reporting procedures, not a general exemption for small financial firms. [S-MU-01, regulations 22 and 26]

For financial institutions within the Financial Services Commission (FSC) framework, the handbook describes the CO and MLRO as natural persons approved under section 24 of the Financial Services Act. The handbook permits one individual to hold both positions when the demands and available time and resources make that appropriate. It expects the CO to remain independent of core operating activities and not solicit business. Other duties require identified and managed conflicts. The MLRO needs day-to-day availability and customer-information access, and the deputy should have comparable status and experience. These are distinct considerations from whether a person has signed a service agreement. [S-MU-02, sections 3.4.1-3.4.2]

Approval and departure are separate events

Section 24 requires prior FSC approval for an officer's appointment, without displacing other enactments or licence conditions. An appointment contrary to that rule has no effect. The statutory non-objection mechanism is conditional: the relevant 15-day period runs from receipt of the application or the required additional information, whichever is later. An incomplete submission is therefore not a reliable starting point. Removal or resignation must be notified forthwith, with particulars the FSC requires. Section 24 also preserves potential liability for a person acting under an appointment made contrary to the approval requirement. [S-MU-03, section 24]

FSC Circular CL240426 (24 April 2026) encourages FSCOne filing and requires each licensee to apply separately when an officer serves multiple licensees. It addresses profiles and appointment/resignation filings without approving every shared or outsourced model. Section 87D, effective 1 September 2026, leaves the form and manner of required notifications and approval applications to the FSC. [S-MU-03, section 87D; S-MU-04]

Practical implications

Treat competence assessment, approval, assumption of office and access activation as connected but separate events. A deputy's absence cover does not automatically establish approval of a permanent successor. Where CO and MLRO roles are combined, plan how both responsibilities will continue after departure.

These sources establish neither unrestricted outsourcing permission nor a universal residence rule. Sector conditions and the individual's approved status remain relevant. The guide covers government-hosted Act Version 11, the FSC handbook and the April 2026 circular. The Financial Intelligence Unit (FIU) regulations copy is dated June 2019. Current portal requirements and later directions are outside the guide's scope.

CHAPTER 13

Latin America

Brazil

Start with the regulator and institution type

For institutions within Banco Central do Brasil (BCB) Circular 3,978, article 9 requires formal designation to the BCB of the director responsible for compliance with the circular. Other duties are possible if conflicts are avoided. Responsibility remains at each institution even when specified group-level arrangements are used. Articles 43-46 distinguish suspicious-activity analysis from auxiliary support: the analysis cannot be outsourced to a third party or performed abroad, and the institution needs the necessary resources and competence in Brazil. Defined centralisation within a prudential conglomerate or cooperative credit system is available with formal governance approval. These provisions do not create a general permission to relocate analysis to any overseas group company. [S-BR-01, articles 1, 9 and 43-46]

This profile uses the BCB's version 6 consolidated PDF, which includes amendments dated 30 September 2026. A separate authorisation instrument must be considered for payment institutions. Resolution BCB 81 addresses appointment or election to management positions and requires residence in Brazil for director positions. Approval, technical competence and integrity are therefore relevant in addition to assignment of AML responsibilities. Those provisions are described in the original official gazette text. The sources also identify the instrument's amendment history. [S-BR-02, articles 3(VII), 9-11; S-BR-03]

Keep replacement triggers precise

The article 12 comparison concerns the 30-day replacement mechanism following a final refusal to approve an elected or appointed administrator. It does not describe a general 30-day grace period following every resignation. The guide does not establish that mechanism under the complete current consolidated Resolution 81 or supply a current deadline for a particular appointment. [S-BR-04]

Practical implications

A regional operating model should describe where substantive analysis occurs, which institution owns the decision, and what a shared service actually supplies. Software, data preparation and specialist assistance should not be described as equivalent to taking over a reserved decision. Management succession and operational cover also need separate treatment: substituting someone in a work queue is different from changing an authorised director. The guide does not state a universal Brazilian temporary-MLRO rule, and the payment-institution authorisation provisions should not be generalised to securities businesses, insurers or every other obliged sector.

Mexico

A specific regime for financial technology institutions

The selected regime concerns institutions regulated under the Law to Regulate Financial Technology Institutions, including the financial-technology AML provisions issued under its article 58. The Comisión Nacional Bancaria y de Valores (CNBV) describes these provisions as the minimum measures, procedures and timing requirements for the sector. It should not be treated as a country-wide appointment rule for all Mexican obliged entities. [S-MX-01]

The 2018 official provisions require appointment through the ITF's governing arrangements. Article 50 addresses seniority, separation from commercial functions and internal audit, and certification. Group arrangements require the specified conditions. [S-MX-02, articles 49-50]

Three clocks serve different purposes

Article 49 requires designation by the next business day after departure, removal or inability to act. Article 52 permits interim cover for inability to act for up to 90 calendar days, cumulatively within a calendar year and counted from that inability; the interim cannot perform internal audit. Article 53 separately requires notice of permanent or interim designation and revocation within 10 business days. The notice period does not replace the designation obligation; each absence does not restart the annual allowance. [S-MX-02, articles 49, 52-53]

The CNBV's 2026 certification FAQ confirms that ITF compliance officers must be certified. It describes a five-year certificate and a renewal process, including conditional transitional arrangements for specified 2026 expiries and accepted renewal applications. The certificate belongs to the individual and is not transferable. Certification therefore needs its own continuity planning; an application, scheduled assessment or another employee's credential should not be equated with a valid certificate. The precise transitional condition must be checked against the person's expiry and accepted application, rather than applied as a general extension. [S-MX-03, questions 1, 3-7 and 15]

Practical implications

The recommended handover approach starts with the actual event. An unexpected period of incapacity, an agreed departure and a refusal or revocation can require different actions. Operational managers should know who receives urgent internal alerts during the transition; governing-body action, valid credentials and regulator-facing notification should follow the correct sequence for that event. A handover timetable is stronger when it identifies dependencies explicitly, rather than presenting a single undifferentiated deadline.

The guide covers the original 2018 AML provisions and the 2026 certification FAQ. It does not provide a complete consolidation of subsequent amendments or set out the current operational submission procedure.

CHAPTER 14

Changes that affect planning

The date on a document does not necessarily establish when its requirements apply. The following points distinguish current requirements from future changes and proposals covered by the guide.

Development	Position described in this guide	Planning consequence
EU AML Regulation 2024/1624	Adopted; general application begins 10 July 2027, with a later date for specified football entities.	Continue to apply the current national framework while preparing for the future compliance-management and outsourcing provisions. [W-EU-02]
New Zealand shared-officer exemption	Existing exemption expires on 31 December 2026; made amendment 2026/245 introduces replacement shared-officer provisions from that day through the close of 30 December 2031.	The guide covers selected shared-officer conditions; it does not set out every term of the replacement instrument. [W-NZ-03; W-NZ-04]
US programme reform	The 2026 proposal supersedes the withdrawn 2024 proposal; the cited materials identify it as proposed.	Keep the proposal distinct from the existing sector rules and enacted US-location provision. [W-US-04; W-US-05; W-US-06]
Irish PCF review	CP175 was issued on 17 November 2026; consultation closes on 17 February 2027.	Current appointment requirements remain the basis while the proposed changes are considered. [W-IE-04]
UK SMF cover transition	Revised cover rules apply to absences beginning after 24 April 2026.	An earlier-starting absence requires a separate transition analysis. [W-UK-04]

Review the arrangement when its basis changes

The recommended response to regulatory change is a focused assessment of the existing arrangement. Determine which entity, office, person or activity the change affects and whether any existing permission or exemption continues. Distinguish changes to eligibility from changes to filing mechanics. If a future rule requires a different operating model, allow time for recruitment, contracting, approval and access arrangements before it applies.

The same discipline applies to business changes. A new licence, business line, country of operation or group structure can change the governing perimeter without any amendment to the legislation. A relocation or added mandate can change an individual's ability to meet an existing appointment condition. These are reasons to revisit the conclusion, not assumptions that the appointment has automatically ceased.

CHAPTER 15

Coverage and limits

Coverage and selection

The guide presents selected appointment regimes in the United States, Canada, United Kingdom, Germany, Ireland, Australia, New Zealand, Singapore, Hong Kong, India, United Arab Emirates, Saudi Arabia, Bahrain, South Africa, Mauritius, Brazil and Mexico, together with the EU framework. It distinguishes five UAE settings: the federal foundation, CBUAE exchange business, VARA, ADGM and DIFC.

The selection enables comparison of employee requirements, external appointments, group arrangements, reserved decisions, approval and continuity. It is not an exhaustive worldwide survey or a ranking of jurisdictions. The guide does not provide complete profiles or appointment clearance for Switzerland, Japan, South Korea, Qatar, the Qatar Financial Centre, Nigeria, Kenya, Egypt, Chile or Colombia.

Legal status of sources

The legal discussion prioritises legislation, official rulebooks and regulator guidance. A binding provision, a regulator's expectation, an international standard and this guide's operating recommendation have different status. Practical implications explain how the stated rules affect design; they do not create additional legal requirements.

The source catalogue records titles, provisions, legal status, stated source dates and links. The guide uses working English explanations where necessary. The official language and legally authoritative text govern.

Limits of the jurisdiction profiles

Area	Limit relevant to use of the guide
United States and Canada	The guide does not cover current New York Part 200 requirements or the Quebec respondent role. The federal profiles do not displace those separate regimes.
New Zealand	The guide covers selected conditions and dates in the made 2026/245 replacement instrument, rather than every term.
CBUAE exchange business	The guide covers selected appointment provisions, rather than the complete exchange-business standards. The current provision numbering differs from older copies.
ADGM	The guide covers the external-MLRO route and priority notice. It does not state the current GEN temporary-cover period.

Area	Limit relevant to use of the guide
Bahrain	The discussion is limited to dated FC and CRA materials. It does not set out the complete current modules and conditions or determine licence-specific application.
South Africa	The guide covers PCC 12A. It does not provide a complete account of later Act amendments and commencement provisions.
Mauritius	The guide covers sections 24 and 87D of government-hosted Act Version 11, the FSC handbook, the April 2026 filing circular and a dated regulations copy. Current portal implementation and later directions are outside its scope.
Brazil	The guide covers Circular 3,978 version 6. It does not establish the complete current consolidated Resolution 81 position, including the article 12 mechanism.
Mexico	The guide covers the original 2018 ITF provisions and 2026 certification FAQ. The complete amendment history and current submission process are outside its scope.

These scope limits do not establish that an obligation is absent or that an external appointment is permitted. Individual licence conditions, regulator directions, waivers and supervisory correspondence may affect an arrangement; entity-specific requirements are outside the guide's scope.

What the guide does not establish

The guide does not determine whether a particular business is regulated, whether a candidate is fit and proper, whether an appointment has regulatory approval or whether a specific outsourcing contract is enforceable. It does not certify complete compliance with AML, sanctions, data-protection, employment, immigration or professional-practice requirements. Those questions depend on facts and rules beyond the comparative appointment analysis.

Where a profile states no numeric period, the guide gives no universal period for that context. It should not be read as unlimited time. Likewise, a statement that no universal residence rule is established does not remove a residence condition in another applicable instrument.

CHAPTER 16

Terms used in the guide

Term	Meaning in this guide
AML	Anti-money laundering.
CFT or CTF	Countering the financing of terrorism or counter-terrorism financing, following the source's terminology.
CPF	Countering proliferation financing.
CO	Compliance officer; its legal scope depends on the regime.
MLRO	Money laundering reporting officer; a convenient label whose duties are not identical across jurisdictions.
Governing body	The board or equivalent body responsible under the applicable framework.
External appointment	Appointment of an individual who is not employed by the regulated entity, where the applicable route permits it.
Outsourced support	Work performed by a service provider within an allowed scope, distinct from whether the provider's individual holds the office.
Deputy and temporary cover	Different continuity arrangements whose powers, appointment conditions and duration depend on local rules.
PCF	Irish pre-approval controlled function under the relevant Central Bank framework.
SMF	UK senior management function under the relevant regulatory framework.
MIC and RO	Hong Kong Manager-In-Charge and Responsible Officer; separate supervisory concepts.
DPT and VASP	Digital payment token and virtual asset service provider; their regulatory definitions and scope are source-specific.
ITF	Mexican financial technology institution within the selected statutory regime.
Designated Director and Principal Officer	Distinct roles within the selected Indian framework.
STR and SAR	Suspicious transaction report and suspicious activity report; terminology and the responsible reporter vary.

CHAPTER 17

Source catalogue

The following entries identify the selected sources used in this guide. Source identifiers in the text link to these entries. Each title links to the official publication. The entries state legal status, provisions, stated source dates and scope limits.

R-FATF-01 FATF Recommendations publication page

International standards and domestic implementation; June 2026 update | International standard; not an entity-specific appointment permission.

R-FATF-02 International Standards on Combating Money Laundering and the Financing of Terrorism and Proliferation

Recommendation 18 and its interpretive note; updated June 2026 | FATF international standard.

R-LIC-01 Licentium Terms of Use

Sections 2, 4, 9, 10, 12, 18 and 22; effective 24 November 2026 | Publisher website terms; not regulatory authority.

W-US-01 31 CFR 1020.210 Anti-money laundering program requirements for banks

1020.210(a)(2)(iii) and (a)(3) | Operative regulation; eCFR displayed current to 23 November 2026.

W-US-02 31 CFR 1022.210 Anti-money laundering programs for money services businesses

1022.210(d)(2) and (d)(4) | Operative regulation; eCFR displayed current to 23 November 2026.

W-US-03 FFIEC BSA AML Examination Manual BSA Compliance Officer

BSA Compliance Officer section | Supervisory examination guidance.

W-US-04 31 USC 5318 Compliance exemptions and summons authority

5318(h)(5) | Enacted statute; displayed laws through Public Law 119-120 of 7 October 2026.

W-US-05 FinCEN proposes reform of financial institution AML CFT programs

7 April 2026 announcement | Proposal; expressly supersedes and withdraws the July 2024 proposal.

W-US-06 Anti Money Laundering and Countering the Financing of Terrorism Programs Proposed Rule

91 FR 18704; FR Doc 2026-07033 | Proposed rule published 10 April 2026. The FinCEN overview identifies a notice of proposed rulemaking.

W-CA-01 Proceeds of Crime Money Laundering and Terrorist Financing Regulations

Section 156(1)-(4) | Consolidation current to 29 October 2026, last amended 26 March 2026.

W-CA-02 FINTRAC Compliance program requirements

Section 2 Who can be a compliance officer and what are their responsibilities | Regulatory guidance.

W-EU-01 EBA GL 2022 05 Guidelines on AML CFT compliance officers

Paragraphs 10, 24-31 and 68-73 | Guidelines applicable from 1 December 2022.

W-EU-02 Regulation EU 2024 1624 on prevention of money laundering and terrorist financing

Articles 11,18 and 90 | Adopted; generally applies 10 July 2027; specified football entities 10 July 2029.

W-UK-01 Money Laundering Regulations 2017 Regulation 21 Internal controls

Regulation 21(1),(3)-(7) | Operative revised provision.

W-UK-02 FCA SYSC Senior Management Arrangements Systems and Controls

SYSC 6.3.8 R, 6.3.9 R, 6.3.10 G; PDF page 147 | Rulebook PDF states last updated June 2026; apply relevant application provisions.

W-UK-03 FCA SUP 10 C 3 A The 12-week rule

SUP 10C.3A.6R, .8R, .10G, .13R, .18G and .20G | Revised provisions effective 24 April 2026.

W-UK-04 FCA SUP TP 5 Miscellaneous transitional provisions for the SMCR

SUP TP 5.3.2 and 5.3.3 | Operative transitional provision.

W-DE-01 Geldwaeschegesetz Section 7 Geldwaeschebeauftragter

Section 7(1)-(5) | Consolidated GwG last amended 29 June 2026.

W-DE-02 Geldwaeschegesetz Section 6 Interne Sicherungsmassnahmen

Section 6(7) | Operative statute.

W-IE-01 SI 20 of 2026 Central Bank Reform Act Amendment Regulations 2026

Regulations 3-4 and replacement Schedule 2, Part 1, paragraph 4(b),(h) | Effective 10 February 2026.

W-IE-02 Central Bank Legislative Requirements and Guidance for Regulated Financial Service Providers

Gatekeeper role; due diligence and disclosure requirements | Current regulatory guidance.

W-IE-03 Central Bank Population of CFs and PCFs

Paragraphs 2.36-2.44 and 2.45 table | Current regulatory guidance.

W-IE-04 CP 175 Amendments to the List of Pre Approval Controlled Functions

Consultation and implementation overview | Proposal published 17 November 2026; closes 17 February 2027.

W-AU-01 Anti Money Laundering and Counter Terrorism Financing Act 2006 Compilation 63

Sections 26H-26M | Compilation C2026C00447 of 1 October 2026.

W-AU-02 AUSTRAC AML CTF compliance officer

Appointment, eligibility and absence sections | Guidance updated 18 November 2026.

W-NZ-01 Anti Money Laundering and Countering Financing of Terrorism Act 2009

Section 56(2)-(5) | Version as at 1 July 2026; section 56 amendments effective 19 May 2026.

W-NZ-02 DIA AML CFT Homepage

Sole supervisor announcement | DIA sole AML/CFT supervisor from 1 July 2026.

W-NZ-03 AML CFT Class Exemptions Notice 2018, version as at 1 November 2025

Schedule Part 7, clauses 1-8, printed pages 18-19 | Current shared-officer exemption expiry 31 December 2026.

W-NZ-04 AML CFT Class Exemptions Amendment Notice 2026 SL 2026/245

Schedule replacement Part 7 clauses 1-8 | Made 25 August 2026; future shared-officer provisions 31 December 2026 to close 30 December 2031.

EA-SG-01 MAS Guidelines on Licensing for Payment Service Providers PS-G01

Appendix 2, printed pages 15-16 | Supervisory licensing guidance.

EA-SG-02 MAS Notice PSN02 for digital payment token services

Paragraphs 17.3-17.6, printed page 40 | Binding notice.

EA-SG-03 MAS Notice PSN01 for specified payment services

Paragraphs 2.1, 3 and 19.3-19.4, printed pages 6-7 and 46 | Binding notice.

EA-HK-01 SFC Guideline on Anti-Money Laundering and Counter-Financing of Terrorism for Licensed Corporations and SFC-licensed Virtual Asset Service Providers

Paragraphs 3.5-3.9 and footnote 8, printed pages 23-26 | Regulatory guideline.

EA-HK-02 SFC FAQ on measures for augmenting senior management accountability in licensed corporations

Questions 11, 36 and 37 | Regulatory explanatory guidance.

EA-HK-03 SFC Types of intermediary and licensed individual

Responsible officers and Managers-In-Charge sections | Regulatory licensing guidance.

EA-IN-01 RBI Commercial Banks Know Your Customer Directions 2025

Paragraphs 3, 5(1)(xvii), 13, 14 and 15 | Binding sector directions.

EA-IN-02 RBI Compliance with Know Your Customer norms circular

Circular paragraphs 1-3 and annex | Payment-system direction.

EM-UAE-01 Cabinet Resolution 134 of 2025 official legislation status

Status, commencement and interpretation notice | Active executive regulation, official portal status.

EM-UAE-02 Cabinet Resolution 134 of 2025 on the CMA official rulebook

Articles 21, 22 and 49(18) | Executive regulation reproduced by official supervisor.

EM-UAE-03 Joint Guidance on the AML/CFT/CPF Compliance Officer and MLRO Function in the UAE

Sections 1.1 and 4.2 | Joint supervisory guidance; legal/regulatory requirements prevail.

EM-UAE-04 CBUAE Standards for Exchange Business appointment of the Compliance Officer

16.4.5-16.4.11 | Sector standards.

EM-UAE-05 VARA Compliance and Risk Management Rulebook Part I

I.C.1-4 | Binding regulator rulebook.

EM-UAE-06 VARA Appointment and Duties of Money Laundering Reporting Officer

Compliance and Risk Management Rulebook III.A.1-4 | Binding regulator rulebook.

EM-UAE-07 VARA Company Rulebook

I.D.5; IV.A.3-5 | Binding regulator rulebook.

EM-UAE-08 ADGM Anti-Money Laundering and Sanctions Rulebook

12.1.1-12.1.6 and guidance; printed pages 85-86 | Binding regulator rulebook and accompanying guidance.

EM-UAE-09 FSRA Notice FSRA/FCCP/69/2026 on the joint CO and MLRO guidance

One-page notice, conflict paragraph | Regulator notice.

EM-UAE-10 ADGM Additional Obligations of Financial Services Entities supervision FAQ

Temporary-cover FAQ and GEN link | Explanatory guidance linked to an older GEN compilation. The guide does not state the current GEN temporary-cover period.

EM-UAE-11 FSRA Regulatory Update on enhancements to its funds framework

Announcement and current-rules links | Official announcement of made changes.

EM-UAE-12 DFSA Anti-Money Laundering module

AML 11.2.1-11.2.5 and 11.3.1 with guidance | Binding regulator rulebook and guidance.

EM-UAE-13 DFSA GEN11.6.1 Temporary cover

GEN 11.6.1(1)-(5) | Binding regulator rule.

EM-SA-01 SAMA Requirements for Appointments to Senior Positions Arabic current rulebook

Chapters II.3, III.4 and IV.10; sector annexes | Regulator requirements; English summary is not an official translation.

EM-BH-01 CBB Volume 5 Financial Crime module January 2024

FC-4.1.1-4.1.3 | Dated regulator rulebook reference.

EM-BH-02 CBB Volume 5 Financial Crime module dated official copy

FC-4.1.7-4.1.9; relevant page footer October 2019 | Dated regulator rulebook. The guide does not state its complete current position.

EM-BH-03 CBB Volume 6 Crypto-asset Module October 2023

CRA-6.6.4-6.6.5, with cross-reference to CRA-6.6.7; section CRA-6.6 page 1 of 3 | Dated official regulator rulebook. The guide does not cover the latest consolidation or current CRA-6.6.7 conditions.

S-SA-01 Financial Intelligence Centre Act 38 of 2001, FIC-hosted consolidation

Sections 42A and 43B(4) | Binding legislation; hosted consolidated copy. The guide does not cover the complete later amendment history.

S-SA-02 FIC Public Compliance Communication 12A on outsourcing

Paragraphs 2.2, 2.8-2.9, 3, 4 and 7-9 | Regulator guidance issued 24 March 2021.

S-SA-03 FIC notice publishing final PCC 12A

Publication notice dated 24 March 2021 | Official publication notice.

S-MU-01 Financial Intelligence and Anti-Money Laundering Regulations 2018, FIU June 2019 updated copy

Regulations 22 and 26 | Binding regulations; dated official updated copy. The guide does not provide a complete 2026 consolidation.

S-MU-02 FSC AML/CFT Handbook

Sections 3.4.1-3.4.2 and 10.2 | Regulator guidance. The guide does not state a 2026 edition date.

S-MU-03 Financial Services Act, government portal Version 11

Sections 24 and 87D; printed pages 34 and 109 | Binding legislation; government-hosted Version 11 contains amendments effective 1 September 2026. The guide covers selected provisions, rather than the complete amendment history.

S-MU-04 FSC Circular CL240426: FSCOne applications for approval of officers and related filings

24 April 2026; Stakeholder Management and Additional Information 3-6 | Official regulatory filing circular; separate approval applications for each licensee.

S-BR-01 BCB Circular 3,978 of 23 January 2020, consolidated version 6

Articles 1, 9 and 43-46 | Binding regulation; PDF includes amendments dated 30 September 2026.

S-BR-02 Resolution BCB 81 of 25 March 2021, original Official Gazette page 71

Articles 3(VII), 9-11 | Original binding instrument, not a current consolidated text.

S-BR-03 Resolution BCB 495 of 5 September 2025

Amendment history for Resolution 81 | Binding amendment.

S-BR-04 Resolution BCB 81, consolidated source

Article 12; consolidation dated 8 September 2025 | Regulatory instrument. The guide does not establish the complete current consolidated position or a current deadline for a particular appointment.

S-MX-01 CNBV overview of financial technology institutions

Sector and AML framework overview | Regulator explanatory source.

S-MX-02 General provisions under article 58 of the Financial Technology Institutions Law, 10 September 2018

Articles 49-53 | Original official publication. The guide does not cover the complete subsequent amendment history.

S-MX-03 CNBV certification frequently asked questions 2026

Questions 1, 3-7 and 15 | Regulator guidance for 2026 certification procedures.

CHAPTER 18

Important notices

Purpose and professional advice

This guide provides general information for professional and business readers. It is not legal, regulatory, financial, tax or other professional advice about a particular appointment. Use does not create a professional, fiduciary or client relationship with Licentium. Agreed professional services require a separate written engagement. [R-LIC-01]

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Dates and updates

Edition 25 November 2026. The law is stated as at 24 November 2026. Laws, guidance, forms, interpretations and supervisory practices can change. A source may be amended, replaced or moved after publication. This edition is not a monitoring service and does not promise continuing updates or notice of later developments.

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