LES CONSULTANTS
CONSEIL & FORMATION

EN

AML / KYC · AMLR 2027

AMLR 2027: KYC, Beneficial Ownership & Control

▲ 8 chapters ▲ ≈ 80 min ▲ Identify, verify and document who really owns or controls

8 CHAPTERS

▲ Training programme

1 Opening and Analytical Method

1.1 Objectives of the training

1.2 KYC as a decision-making process

1.3 Five-step analytical method
- Map
- Calculate
- Control
- Verify
- Document

2 AMLR KYC Architecture and Role Classification

2.1 Customer due diligence – Art. 20 AMLR

2.2 Role classification
- Legal representatives and signatories
- Directors and authorised persons
- Beneficial owners

2.3 Risk-based approach

3 Building the KYC Evidence Model

3.1 Hierarchy of sources

3.2 Central beneficial ownership registers

3.3 Consistency testing
- Shareholder registers
- Constitutional documents and agreements

3.4 Updates and event-driven reviews

4 Ownership Interest: Thresholds, Indirect Holdings and Aggregation

4.1 25% threshold and ownership interest

4.2 Indirect holdings
- Multiplication across layers
- Aggregation across parallel chains

4.3 Control through ownership (50% + 1)

4.4 Persons acting in concert

5 Control via Other Means

5.1 Significant influence – Art. 53 AMLR

5.2 Governance rights
- Appointment and removal
- Veto rights and reserved matters

5.3 Contractual control

5.4 Nominees and de facto control

6 Foundations, Trusts, Funds and Listed Structures

6.1 Foundations

6.2 Express and discretionary trusts
- Settlor, trustee, protector
- Classes of beneficiaries

6.3 Collective investment undertakings

6.4 Listed entities and hybrid structures

7 Verification, Discrepancies and Quality Assurance

7.1 Four-tier evidence hierarchy

7.2 Discrepancy management

7.3 Senior managing official fallback

7.4 Inability to complete CDD

8 Case Studies and AMLR Readiness

8.1 Six case studies
- Listed parent company
- Equal shareholdings
- Parallel indirect chains
- Foundation
- Discretionary trust
- Closed-ended investment fund

8.2 Decision tree and conclusion memo

8.3 Roadmap to 10 July 2027

REFERENCE FRAMEWORK

Person, interest, power, proof.