



### Introduction

Under the current EU anti-money laundering (AML) framework, implemented through EU directives, real estate professionals are required to comply with rules set at EU level and transposed and further specified by each Member State.

2026 is a transition year from the current rules to the application of the new 6<sup>th</sup> EU AML package in July 2027. The newly established Anti-Money Laundering Authority (AMLA) is working to prepare for the new requirements for 2027. At present, many real estate professionals are not generally aware of their current obligations, and the forthcoming changes will increase operational complexity.

Immosurance is an initiative by CEPI and its digital partner OPTIMASYS and was established in response to a need identified by professional real estate associations across Europe.

### Purpose of the AML solution

The objective is to provide real estate businesses with a central, secure platform in which the required AML Compliance Officer (Admin) controls access and manages the platform content, enabling the organisation to demonstrate to authorities and auditors that the company and its working individuals comply with AML legislation.

The platform provides digital tools, for example to:

- Import data from external systems (such as a CRM) via an import wizard (XLS/CSV) or via API (fully automated).
- Store data securely in encrypted AWS, including compliance with legal document-retention periods and the deletion policy for cancelled transactions.
- Expose data only to users who are entitled to access it, in line with GDPR rules.
- Apply real estate-specific risk factors to properties, transactions, clients, geographical areas, and related elements.
- Perform digital identity verification, both biometric and documentary.
- Conduct digital checks against sanctions lists, PEP (politically exposed persons), and adverse media for both natural persons and legal persons, through WorldCompliance (LexisNexis) covering 2,000+ sources.
- Automatically determined risks on these digital checks with the ability to complete compliance through self-evaluation of these automated risk outputs (these checking tools by themselves are not considered complying with AML requirements by the lawmaker).
- Document findings by adding comments and uploading documents.
- Automatically determine potential reporting requirements (STR/SAR) and document actions taken (e.g., upload proof).
- Provide continuing education through an integrated e-learning and certification platform.



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- Maintain documentation relevant to the compliance officer's AML responsibilities over time.
- Provide central storage of the organisation's AML internal policy and AML procedures specific to the business.
- Invite internal and external users (including auditors) to the platform.
- Create organisation-specific AML e-learning curricula and certification levels and questionnaires for continued education, or use the global curricula.
- Participate in e-learning training and complete qualification tests to obtain training certificates.

In addition, the platform supports configuration and administrative capabilities, for example:

- Work in any of the 14 languages (with additional languages added frequently).
- Configure relevant settings (e.g., define which property types the business handles as to make it easier for users to use the platform).
- Define organisation-specific risk factors in addition to generally applied risk factors (built-in real estate risk module).
- Use CRM-like functions such as calendar and email integration, workflow automation, and template generation.
- Control user access and individual usage.
- Access audit trails for key elements and activities.

## Evolution of legislation & impact on Immosurance

Immosurance has been designed to operate in a fast-changing regulatory environment, enabling updates to reflect legal changes and requirements within short timeframes. The support team behind Immosurance works closely with legislators and bodies such as AMLA and FATF.

Immosurance is implemented in phases. Phase 1 includes the most extensive set of functions. Phase 2 includes improvements to Phase 1 functions and additional processes and functions, such as the introduction of QES (Qualified Electronic Signatures) and eIDAS-compliant identity verification (IDV) updates.

## Risks, challenges & opportunities

Across Europe, awareness of AML obligations among real estate professionals is often limited, which has contributed to generally low levels of compliance under current directives (with variation by local market). This creates potentially negative exposure to audits by national control authorities, alongside increased pressure from the European Commission for these authorities to significantly scale up audits from 2026 onwards.



With current AML obligations already described as complex, the future rules which are expected to substantially increase the number of articles and compliance requirements are likely to be even more challenging.

### *Risks*

Increasing audits may lead to increasing fines.

Real estate associations that do not inform their members of these issues and obligations may increase the likelihood that members are fined. In case of members being misled to believe that a so-called existing 'AML solution' (not offering a comprehensive solution to comply with all legal obligations) is sufficient to comply, this may create legal, financial, and reputational exposure for members and for the association.

### *Challenges*

Obtaining a complete and accurate understanding of the requirements can be difficult, particularly where products currently marketed as 'AML solutions' cover only limited elements of the obligations and are not comprehensive solutions in practice.

### *Opportunities*

With guidance from experts within the European AML work group in the non-financial sector, awareness-building within an association can provide a framework to improve understanding of:

- the substantive requirements of the currently applicable rules and the changes introduced by the new 6<sup>th</sup> EU AML package that will soon take effect,
- how to transfer this information to members in a simplified & clear manner,
- how to provide association members with access to specific configurations and e-learning, delivered by the association

## Essential differentiators between so called 'AML solutions' & Immosurance

The following points summarise selected reasons Immosurance is presented as the first and only European AML solution for real estate that addresses the full set of AML obligations:

- A comprehensive solution delivered through a secure platform that centralises data to support upcoming & highly probably audits.
- Built in the language of the user (currently in 14 languages).
- Aligned with GDPR requirements and data integrity principles.



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- A full Know Your Business (KYB) section and storage of mandatory data (e.g., internal AML policy, AML procedures, compliance officer history, e-learning with certification).
- Identity verification through IDVerse to support due diligence, including biometric and documentary verification.
- For natural and legal persons: sanctions list checks, PEP (politically exposed persons for clients and their relatives), and adverse media checks using WorldCompliance (LexisNexis) with over 2,000 sources.
- Automated risk determination for both IDV and Know Your Customer (KYC).
- Self-assessment/interpretation of these automated risk determinations (required by law), including documentation of agreement or disagreement and supporting rationale.
- A real estate-specific risk module applying additional risk factors relevant to real estate transactions.
- Readiness for the additional 50+ articles of the new AML rules scheduled to take effect in 2027.
- A support team for assistance in platform usage.
- Tutorial videos on how to use the platform.
- Onboarding methods.
- A global AML e-learning curriculum is available.
- A highly configurable platform designed to adapt to small, mid-sized, and large organisations.

## Pricing

Annual low licence fees which are adapted to the size of the business, with first-year conditions described as particularly attractive.

Thanks to the platform's high volumes, negotiated transactional costs are estimated to be about 50% of prevailing market costs for comparable services.

Free e-learning and certification licences for up to 3 users are included with the license.