HOGAN LOVELLS
CADWALADER

AML and Sanctions

2026

Anti-Money Laundering

We advise on all aspects of money laundering investigations and AML compliance - including drafting internal policies and procedures, designing training programs and together with our consulting team, preparing workflows and conducting gap analyses and controls testing.

Anti-money laundering is a key part of the fight against financial crime. When money laundering is suspected, we advise you on your reporting requirements, including whether payments can be made and how to manage the risk of "tipping off".

We can handle internal investigations as well as criminal and regulatory enforcement investigations and supervisory reviews.

We regularly advise clients like you on related civil claims by affected customers or potential victims.

How we can help you:

- Carry out risk assessments, prepare policies and design customer and counterparty due diligence procedures.
- Advise on complying with guidance from relevant regulatory bodies and on police and investigatory agency powers, data protection, whistleblowing issues and legal privilege.
- Advise on money-laundering risk and on obtaining 'consent' to transact.
- Undertake internal investigations and represent clients in external investigations.
- Defend companies and their officers in regulatory and criminal enforcement actions involving money-laundering and other illicit finance issues.
- Conduct ‘look backs’, compliance uplifts and KYC refresh exercises.
- Train companies and their employees on a range of topics, including illicit finance typologies for transaction monitoring; the overall AML regulatory requirements; and efficient ways to meet such rules in a cost-effective, low-disruption manner.



> “The team has excellent and commercially savvy lawyers who are able to quickly and efficiently understand and handle complex situations.”
>
> **Chambers & Partners UK 2025**

Selected anti-money laundering credentials

Cflox GmbH

Advising in connection with the preparation for a § 44 KWG special audit (routine audit) in the area of money laundering prevention.

Various financial institutions

Advising in relation to onboarding, 3 LODs, CDD, EDD, TM systems, KYC refresh, UBO identification issues and governance arrangements.

European payments service provider

Advising on money laundering prevention and payment transactions.

Several EU banks and payment institutions

Drafting AML manuals and the AML procedures for several EU banks and payment institutions following inspections for AML violations.

Global bank

Advising an investigation into breaches of AML and sanctions laws by an overseas subsidiary, including reporting to regulators in the UK and US.

Bank of Italy and Ministry of Economy and Finance

Cooperating with the Bank of Italy and the Ministry of Economy and Finance on the implementation of 4AMLD in Italy. Attended a Roundtable with the relevant officers.

EU payment institutions

Advising leading EU payment institutions in relation to AML sanctioning procedures.

VR Payment GmbH

Advising on money laundering prevention and data protection.

EU payment service providers

Guiding leading EU payment service providers on the establishment of a central contact point in Italy for using agents.

REWE Group

Advising on money laundering prevention, IT security (DORA, including DORA contract annexes) and data protection.

Selected anti-money laundering credentials cont.



Number of regulated firms

Advising on FCA financial crime supervisory issues including Skilled Person Reviews.



Global cryptocurrency exchange

Advising in the context of their virtual asset service provider application to the FCA under the UK MLRs.



Luxembourg bank

Advising on money laundering prevention and data protection



International bank

Advising an international bank in connection with an FCA and SFO investigation into alleged money-laundering.



Mobile Business Engine GmbH

Advising on the application for a license as a payment institution and in particular the preparation of documentation for money laundering prevention (risk analysis, money laundering organization manual, money laundering employee guidelines)



Sports betting provider

Advising in connection with the distribution of e-money in Germany and in particular the associated money laundering prevention requirements



Federal Association of Payment Institutions Germany

Ongoing support for the money laundering prevention working group.



Prepaid online payment method

Advising on the effects of the 6. AMLD on e-money Transactions.

Sanctions

It’s becoming increasingly challenging for companies operating internationally to navigate the ever-changing landscape of economic sanctions.

Sanctions are imposed by the US, regional bodies such as the EU and global organisations like the UN. A compliance failure can put your company at risk of civil, monetary or criminal penalties.

Our sanctions lawyers are here to help you. We work with you to advise you on compliance with the US and non-US sanctions, OFAC laws and regulations, and applicable blocking statutes, while pursuing legitimate commercial activities. We work as one team with colleagues from the US, Europe, and China/Hong Kong. We address your problems as they arise and help design reporting and compliance structures that anticipate and reduce the associated risks.

Our team helps you understand which of your global affiliates, officers and employees are required to comply with sanctions and how your corporate and governance structures will impact you. Our aim is to reduce your sanctions risk by assessing your compliance programs and suggesting operational changes. Additionally, we can support you in getting licenses and ensuring that otherwise-sanctioned transactions are permissible.

Our team advises you in all aspects of tackling potential violations, including voluntary disclosures and penalty assessments.

We monitor developments in the sanctions daily. We have experience working with agencies that implement sanctions and assist clients across a variety of industries. Our clients are major multinational companies in electronic, internet/technology, telecommunications, banking, insurance, food, pharmaceutical, medical device, media, travel, retail, energy, infrastructure, aviation, automotive, and education industries.

We’re at the forefront of addressing the US sanctions and measures on China, Hong Kong and the Chinese counter-sanctions laws. Our US offices work cross-border with the Chinese and Hong Kong offices to advise you on the complexities of the US human rights sanctions targeting Xinjiang province and Hong Kong. We also advise on navigating conflicts of laws issues and mitigating risk under Chinese counter-sanctions measures.



Selected sanctions credentials



European banks

Advising a leading European banks on all aspects of their European, UK, US and global sanctions compliance obligations as their global sanctions counsel.



Various payments clients

Advising various clients in the payments sector in connection with their European sanctions screening and reporting obligations.



International investors

Advising two international investors on their potential liability for breaches of EU and US sanctions and export control laws by companies in which they had invested.



Stonepeak

Advising Stonepeak, a leading alternative investment firm specialising in infrastructure and real assets, on sanctions laws.



Global bank

Advising a global bank on potential breaches of sanctions caused by the way in which its screening systems operate.



Various clients

Advising on significant investigations and enforcement matters before European, UK and US financial and trade sanctions regulators.



Leading private equity firm

Advising a leading private equity firm on European and US sanctions risks arising out of investment decisions.



A global commodities exchange

Advising a global commodities exchange on the full range of EU, UK and US sanctions matters across multiple jurisdictions.



Numerous clients

Advising numerous clients on implementing effective sanctions compliance programmes with a recent emphasis on Russia sanctions.



Various clients

Advising multiple clients on managing conflicts between US sanctions relating to Iran and Cuba and the EU and UK Blocking Regulations.

Our team in Europe



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