

Case Study 2 — EU Travel Rule Implementation

European Union (with UK · UAE · Singapore comparators) — Practitioner case file derived from primary regulatory sources.

Version	v1.0 — June 2026
Last Updated	June 2026
Jurisdictions	European Union (with UK · UAE · Singapore comparators)
Primary Sources	FATF R.16 · Regulation (EU) 2023/1113 · UK MLTFR 2022 · VARA · MAS
Document Class	Research Brief — Non-binding

This document is for informational purposes only and does not constitute legal advice. Requirements are subject to change. Verify all details against primary regulatory sources before relying on this content.

Executive Summary

Purpose. Document the regulatory pathway, deliverables and timeline for the EU Travel Rule Implementation engagement archetype.

Jurisdictions covered. European Union (with UK · UAE · Singapore comparators)

Key findings.

- Counterparty due diligence framework — including beneficiary VASP risk classification
- Travel Rule protocol selection (Notabene, Sygna, VerifyVASP or equivalent)
- Sunrise issue playbook for counterparties in non-Travel Rule jurisdictions
- Unhosted (self-hosted) wallet policy including verification of ownership above EU TFR thresholds

How to use this document. Use as a reference scope for procurement, internal planning, or supervisory engagement briefings.

Framework

FATF Recommendation 16 transposed into EU law via the Transfer of Funds Regulation (TFR) — Regulation (EU) 2023/1113, effective 30 December 2024 for crypto-asset service providers (CASPs).

Source: FATF R.16 · Regulation (EU) 2023/1113 · UK MLTFR 2022 · VARA · MAS

Key Deliverables

- Counterparty due diligence framework — including beneficiary VASP risk classification
- Travel Rule protocol selection (Notabene, Sygna, VerifyVASP or equivalent)
- Sunrise issue playbook for counterparties in non-Travel Rule jurisdictions
- Unhosted (self-hosted) wallet policy including verification of ownership above EU TFR thresholds
- Supervisory reporting templates for competent national authorities
- Originator / beneficiary data quality controls and exception handling

Key Parameters

EU threshold (TFR)	EUR 0 — no de minimis; all CASP transfers require originator/beneficiary data
UK threshold	EUR 1,000 equivalent for cross-border transfers (MLTFR 2022, effective 1 Sep 2023)
UAE / VARA threshold	AED 3,500
Singapore / MAS threshold	SGD 1,500
Primary instrument	Regulation (EU) 2023/1113
Effective for CASPs	30 December 2024

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