

Advancing the Fight Against Money Laundering: Outlook for 2026

17.03.2026 3 min read

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In 2026, the fight against money laundering stands as a core pillar of global governance. The current environment points to a decisive phase in which prevention frameworks and economic sanctions policies are being strengthened, alongside the growing integration of advanced technological tools. In particular, artificial intelligence and techniques such as machine learning and process mining are increasingly being deployed for continuous monitoring, the detection of atypical patterns, and third-party screening, enhancing the ability to identify suspicious activity.

At the 23rd Plenary Meeting of the National Strategy to Combat Corruption and Money Laundering (ENCCLA – *Estratégia Nacional de Combate à Corrupção e à Lavagem de Dinheiro*), held in late 2025, a set of measures aimed at strengthening both prevention and enforcement was approved, including initiatives focused on curbing the infiltration of criminal organizations into the real estate sector, developing strategies to detect and suppress laundering linked to sensitive supply chains—such as the fuel sector—and reinforcing mechanisms for financial traceability and transparency.

The Central Bank has also tightened the regulatory framework applicable to fintechs and payment institutions, mandating the closure of irregular so-called "omnibus accounts." Under the revised rules, institutions are now required to implement more robust monitoring mechanisms, ensure effective identification of beneficial owners, meet heightened cybersecurity standards, and comply with regulatory requirements applicable to virtual asset service providers (VASPs).

Against this regulatory backdrop, the Brazilian Financial and Capital Markets Association (ANBIMA), has issued the 2025 ANBIMA AML/CFT Guide as part of its self-regulatory framework. The guide reflects market-driven standards and best practices for preventing money laundering in the financial and capital markets and places particular emphasis on sound governance, active engagement by senior management, and the adoption of a risk-based approach, supported by formal policies, verifiable internal controls, and continuous monitoring processes.

The guide expands on standards for KYC (know-your-customer) procedures, as well as on the assessment and reporting of atypical transactions, extending the preventive approach across the entire ecosystem of employees, service providers, and business partners. As part of this enhanced approach to KYC and transaction monitoring, identifying complex artificial corporate structures designed to shield assets and conceal beneficial ownership assumes a central role.

At the international level, the European Union's creation of the Anti-Money Laundering Authority (AMLA), which is expected to be fully operational by

2028, represents a significant step toward more centralized supervision of high-risk institutions, particularly those involved in complex financial flows and digital assets. At the same time, the United States has stepped up its use of sanctions to disrupt criminal organizations, cyber fraud schemes, and cartels, placing increased responsibility on institutional gatekeepers, under the oversight of authorities such as Financial Crimes Enforcement Network (FinCEN), a bureau of the U.S. Department of the Treasury.

Heightened regulatory scrutiny of digital assets and stablecoins has become a clear point of global convergence. International legal analyses indicate that enforcement activity is increasing, with regulators paying closer attention to third parties and financial service providers, as well as making broader use of advanced technological tools. In parallel, data-sharing initiatives and incentives for cross-border reporting are expected to continue gaining importance.

The anti-money laundering agenda gains even greater prominence heading into 2026, particularly in light of recent scandals. Looking ahead, AML efforts are likely to converge around several core priorities: the expanded use of technology and data analytics to detect illicit activity; the strengthening of national legal frameworks through regulatory action and transnational cooperation; and the continued maturation of AML/CFT regulatory and supervisory frameworks applicable to fintechs and digital assets, particularly in response to risks associated with organized crime.

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