"ANTI-MONEY LAUNDERING AND SUSTAINABLE DEVELOPMENT: LEGAL ASPECTS AND TECHNOLOGICAL POSSIBILITIES"

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Abstract: The presentation will focus on anti-money laundering issues, presented from the perspective of the Sustainable Development Goals. Although the UN document lacks a direct reference to the AML (Anti-Money Laundering) policy, money laundering is crucial from the perspective of the Sustainable Development Goals. Newly introduced EU regulations (the AML Package) can support their implementation, but they can also pose a threat. As such, they deserve to be presented in this context. The presentation will also discuss modern technologies that can support anti-money laundering efforts and sustainable development efforts.
Keywords: money laundering, sustainability, AML, DGs

1. Introduction

The issue of money laundering and its prevention has been a subject of academic discussion for many years. In Poland, the literature on the subject highlighted the threats it poses as early as the early 1990s[2], when, along with the opening of borders and the transformation of the country's political and economic system, new opportunities emerged related to the development of trade relations typical of a free-market economy[3]. Poland's accession to the European Union opened up a new legal and economic reality in this

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[2] Emil W. PŁYWACZEWSKI, „Pranie brudnych pieniędzy. Możliwości przeciwdziałania z uwzględnieniem roli systemu bankowego", TNOiK, Torun 1993; Emil W. PŁYWACZEWSKI (ed.), „Proceder prania brudnych pieniędzy. Studia i materiały", TNOiK, Torun 1993.
[3] Specific forms of underground circulation also existed in the planned economy. Profits generated within this system most often came from craft workshops, often run by individuals who were also employed full-time at state-owned enterprises and who performed specific tasks as part of so-called "jobs". Another form of such income was that earned from symbolic "Pewex" outlets, i.e., individual foreign trade outlets – cf. Ryszard ZAKRZEWSKI, Wiesław JASIŃSKI, "Prawno- organizacyjne problemy przeciwdziałania „praniu brudnych pieniędzy", in: Ruch Prawniczy, Ekonomiczny i Socjologiczny 1995, Issue 1, p. 33.

regard, the most striking result of which is the alignment of national regulations with EU regulations. These, especially in the last two years, have undergone significant changes due to legislative reform in this area, resulting in the adoption of a set of legal acts known as the „AML Package" (Anti-Money Laundering Package). The very idea of regulations moving in this direction remains unchanged, however, as it aims to combat this practice, whose negative consequences affect not only the economy (globally) and the country, but also, indirectly, society and financial stability. Money laundering is not just a single, specific process, but also criminal activities that underlie the generation of „dirty profits". This perspective raises the obvious question of how (and whether at all) the fight against money laundering has been incorporated into the goals set for the concept of sustainable development. In addition, the question arises whether the contemporary reality, inseparable from dynamic technological development, particularly in the area of modern technologies, can support the achievement of such goals. Can it be helpful in counteracting money laundering and to what extent? This study will address these questions. It should also be noted that certain issues related to the criminal aspects of money laundering, as well as those related to modern technologies, primarily artificial intelligence, will be presented only briefly, due to the limited space available in this manuscript.

2. Several remarks on the nature of money laundering and the justification for its regulation in international law

First, it would be appropriate to briefly recall what money laundering is. This will also highlight the seriousness of the threat, which is supported by the scale of the problem. One of the first definitions of money laundering was presented in the United Nations Convention on the combating illicit trafficking in narcotic drugs and psychotropic substances, signed in Vienna on 20 December 1988. This Convention introduced the concept of "illicit proceeds", meaning: "any property obtained or received, directly or indirectly, in connection with the commission of an offence referred to in article 3, paragraph 1" (art. 1p of the Convention)[4]. A separate definition, although without binding

[4] Journal of Laws of 20 February 1995, No. 15, item 69.

force, was also introduced by the FATF (Financial Action Task Force)[5]. In its light: "Money laundering is the processing of these criminal proceedings to disguise their illegal origin. (…) Illegal arms sales, smuggling, and the activities of organised crime, including, for example, drug trafficking and prostitution rings, can generate huge sums. (…) Embezzlement, insider trading, bribery and computer scheme frauds can also produce large profits and create the incentive to »legitimise« the ill-gotten gains through money laundering"[6]. This organisation has also developed a model for three-stage course procedure "washing" money. Thus, it consists of three phases, i.e.: placement, the essence of which is creating conditions for allowing funds originating from criminal activities or undisclosed sources into legal circulation; layering, which is intended to „break the bond", in other words, to separate from the source of illegally obtained income, which is most often done by the accumulation of a large number of financial operations. In other words, the key at this stage is to erase the traces leading to the so-called predicate crimes (the underlying acts of laundering, i.e. those from which illegal financial benefits are derived) and, finally, integration, i.e., giving the "dirty" money the appearance of legality.

Criminal activities involving "washing dirty money" seriously damage the economy, destroying confidence in the financial system, and undermining the stability of economic activity[7]. According to the United Nations Office of Drugs and Crime (UNODC), between 2 and 5% of global GDP is laundered each year. That's between EUR 715 billion and 1.87 trillion each year[8]. It is therefore not surprising that the European Union has also been adopting regulations since the 1990s, so far in the form of five successive detectives, the aim of which was to counteract the use of the financial system

[5] The FATF is an intergovernmental organisation whose purpose and mandate is to establish legal standards for combating money laundering (AML) and combating the financing of terrorism (CFT). It accomplishes this goal by developing recommendations (primarily the Forty Recommendations) designed to protect the global financial system from money laundering. More at: https://www.fatf-gafi.org/en/home.html (accessed: 2.12.2025).

[6] Financial Action Task Force, *Money Laundering*, Observer OECD- Policy Brief, Jyly 1999, p. 1 at: https://www.bahamasb2b.com/b2b/big_picture/download/FATF_Laundering.pdf (accessed: 3.12.2025).

[7] Friedrich G. SCHNEIDER, Ursula WINDISCHBAUER, "Money laundering: some facts", in: European Journal of Law and Economics 2008, vol. 26, pp. 387–404. https://doi.org/10.1007/s10657-008-9070-x (accessed: 5.12.2025).

[8] More at: https://www.europol.europa.eu/crime-areas/criminal-finances-and-money-laundering (accessed: 5.12.2025).

for money laundering and terrorism financing[9]. As mentioned at the beginning of the manuscript, at the EU level, in the current legal status, the basis for regulations is the AML Package[10] (AML- Anti -Money Laundering)[11]. This term refers to a set of regulations that[12], in the current legal state, constitute the anti-money laundering system[13]. This "Package" consists of three regulations of the European Parliament and of the Council (EU)- i.e. Regulation (EU) 2024/1624 of the European Parliament and of the Council (hereinafter: AMLR)[14], and Regulations 2024/1620[15] and 2023/1113[16], as well as two directives, i.e. Directive (EU) 2024/1640 of the European Parliament and of the Council (hereinafter referred to as the VI AML Directive or Directive 2024/1640)[17], and Directive 2024/1654 - concerning access by competent authorities to centralised bank account

[9] The last one was Directive (EU) 2015/849 of the European Parliament and of the Council of 20 May 2015 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, amending Regulation (EU) No 648/2012 of the European Parliament and of the Council, and repealing Directive 2005/60/EC of the European Parliament and of the Council and Commission Directive 2006/70/EC (OJ EU L 141, 2015, p. 7). See also: AML Watcher/ by Hamza SOHAIL, "Tracing the evolution of AML Directives in the EU", September 29, 2025 https://amlwatcher.com/blog/aml-directives/#:~:text=The%20First%20AML%20Directive%20(AMLD1,from%20exploitation%20by%20money%20launderers; Nitish KUMAR, "Understanding the Complexity of Compliance: The Development and Influence of the European Union's Anti-Money Laundering Directives on Worldwide Finance" (January 9, 2024). Available at SSRN: https://ssrn.com/abstract=4800714 or http://dx.doi.org/10.2139/ssrn.4800714 (accessed: 6.12.2025)

[10] Anna GOLONKA, "The EU project of the 'AML package' - reform or revolution in the field of counteracting of money laundering", in: Ius Novum 2024, vol. 18, Iss. 2, p. 2-6.

[11] The article uses English abbreviations in cases where they are commonly used - also in translations of official EU documents.

[12] See recital 3 of the preamble to Regulation (EU) 2024/1624 of the European Parliament and of the Council.

[13] These regulations also cover counter-terrorism financing (CFT), as well as the area of WMD (Weapons of Mass Destruction) or, more precisely, CPF (Countering the Proliferation of Weapons of Mass Destruction). In this paper, considerations will be limited to the key area of the regulations under discussion: anti-money laundering.

[14] Regulation (EU) 2024/1624 of the European Parliament and of the Council of 31 May 2024 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing (OJ L 1624, 2024).

[15] Regulation (EU) 2024/1620 of the European Parliament and of the Council of 31 May 2024 establishing the Office for the Prevention of Money Laundering and Terrorist Financing and amending Regulations (EU) No 1093/2010, (EU) No 1094/2010, and (EU) No 1095/2010 (OJ L 1620, 2024).

[16] Regulation (EU) 2023/1113 of the European Parliament and of the Council of 31 May 2023 on information accompanying transfers of funds and certain crypto-assets and amending Directive (EU) 2015/849 (OJ L 150, 2023, p. 1).

[17] Directive (EU) 2024/1640 of the European Parliament and of the Council of 31 May 2024 on the mechanisms that Member States should have in place to prevent the use of the financial system for the purposes of money laundering or terrorist financing, amending Directive (EU) 2019/1937, and amending and repealing Directive (EU) 2015/849 (OJ L 1640, 2024, item 1640).

registries[18]. The above-mentioned Regulation 2024/1620 establishing the Authority for the Prevention of Money Laundering (hereinafter referred to as the Authority or AMLA) with its registered office in Frankfurt am Main, Germany (Article 4 of Regulation 2024/1620) entered into force, to a large extent, on 1 July 2025. Based on this document, the Authority began operating[19]. It is intended to serve as a central authority in the EU AML system, a kind of "glue" for the authorities and institutions of EU member states, with the intention of supporting and coordinating their activities. The purpose of establishing the AMLA is protecting the stability and integrity of the EU financial system and the proper functioning of the internal market, among others, by developing a framework for assessing the risks and threats related to money laundering, ensuring high-quality supervision in the area of counteracting this practice, including contributing to the convergence of supervisory practices of national entities supervising obligated institutions, creating a foundation for the harmonisation of activities of Financial Intelligence Units (FIUs[20]) in detecting suspicious cash flows or suspicious activity, as well as supporting and coordinating the exchange of information between these units (Article 1(3) of the Regulation) 2024/1620).).

This is ensured, firstly, by defining the AMLA's competences in the EU regulation, and secondly, by the relatively broad scope of powers granted to this Authority, particularly in the area of regulatory oversight and compliance with AML regulations by obliged entities (referred to as obligated institutions in Poland) and public authorities operating in this area in member states. Moreover, given the comprehensive nature of the regulation that constitutes the "AML Package", references to the powers and role of AMLA in the AML system are also found in the AML Regulation and the Sixth AML Directive. Both legal acts entered into force on 9 July 2024. The former will apply from 10 July 2027 (with the exception of the provisions on football clubs and agents, which will apply from 10 July 2029), while Directive 2024/1640 imposes on EU Member States the

[18] Directive (EU) 2024/1654 of the European Parliament and of the Council of 31 May 2024 amending Directive (EU) 2019/1153 as regards access by competent authorities to centralised bank account registries through the interconnection system and as regards technical measures facilitating the use of transaction records (OJ L 1654, 2024).
[19] According to Article 107 of the AMLA Regulation, the European Commission is responsible for the establishment and initial operation of the Authority until 31 December 2025.
[20] The Polish financial intelligence unit is the General Inspector of Financial Information (GIIF).

obligation to bring into force the laws, regulations, and administrative provisions necessary to comply with it by 10 July 2027 (Article 78 of the aforementioned Directive).

3. Anti-money laundering in the context of sustainable development goals: legal basis for combating the practice from the perspective of the European Union and Polish legislation

However, first of all, it would be necessary to establish what sustainable development is, as stated in the literature: "Attempts to define sustainable development are doomed to failure"[21]. We can agree with this statement, especially in the context of the issues discussed here. Similarly, with the statement that: "It should be a general clause"[22]. "The UN thus adopted sustainable development, which aims to meet the needs and aspirations of the present without compromising the ability to meet those of the future"[23]. It is known that sustainability consists of three pillars, i.e.: environmental, social and economic[24]. Similarly, as are the well-known goals set by the United Nations on the path to achieving sustainable development[25].

The EU Anti-Money Laundering (AML) package does not explicitly refer to the UN Sustainable Development Goals (SDGs)[26], but several SDG targets and objectives are indirectly supported by its provisions on financial integrity, transparency, anti-corruption and environmental crime.

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[21] Bartosz RAKOCZY [in:] Zbigniew BUKOWSKI, Ewa Katarzyna CZECH, Karolina KARPUS, Bartosz RAKOCZY, „Prawo ochrony środowiska. Komentarz", Warsaw 2013, article 3. https://sip.lex.pl/?_gl=1*16e9rxa*_ga*MTMxOTc5OTEwOC4xNzY0OTY3OTM4*_ga_TRNTF04CYF*czE3NjU0OTE2MDAkbzQkZzAkdDE3NjU0OTE2MDAkajYwJGwwJGgw#/commentary/587387566/185006?tocHit=1 (accessed: 12.12.2025).

[22] *Ibidem*.

[23] Ralf HANSMANN, "Sustainability Learning: An Introduction to the Concept and Its Motivational Aspects", in: Sustainability 2010, vol. 2(9), p. 2873-2897. https://doi.org/10.3390/su20928732874.

[24] Ben PURVIS, Yong MAO, and Darren ROBINSON, "Three pillars of sustainability: in search of conceptual origins", in: Sustainability Science 2019, vol. 14 (3). p. 681-682.

[25] https://www.un.org/sustainabledevelopment/sustainable-development-goals/ (accessed: 6.12.2025).

[26] *Ibidem*.

But how can the EU AML Package be linked to the Sustainable Development Goals? In the economic aspect[27]- firstly, it protects financial stability, secondly, it reduces the shadow economy, thirdly, it increases tax revenue, and fourthly, it encourages legitimate investment (including green finance). In a social context, sustainable development helps educate about corruption and inequality, certainly serves to strengthen the law, protect individual rights, and thus protect citizens and businesses from criminal infiltration. However, in terms of environmental, sustainability simply means penalising "laundering" linked to environmental crimes. In addition, it weakens illegal wildlife trade, logging, and waste trafficking, so it supports climate, biodiversity, and resource-protection initiatives.

However, if we were to address the issue more specifically, i.e., in fact, to specific Sustainable Development Goals, then SDG 16 (Peace, Justice and Strong Institutions) should undoubtedly be considered the basic and most fully implemented one. This is the primary goal of sustainable-development aligned with AML. The AML Package directly combats illicit financial flows and organised crime in all forms: objective: 16.4: "Reduce illicit financial flows and combat all forms of organised crime"- by the "AML Package" directly combats illicit financial flows and money laundering; objective 16.5: "Reduce corruption and bribery in all their forms", why favours the requirement regarding transparency, due diligence and reporting mechanisms of the Beneficial-ownership system; objective 16.6: "Develop effective, accountable, and transparent institutions", which is achieved because the "AML Package", harmonises AML supervision and establishes AMLA (EU Anti-Money Laundering Authority). Interestingly, the new legal solutions move away from free access to beneficiary ownership registers (currently, access is limited to categories of entities/institutions that have unlimited access, and with respect to trading participants, a requirement to demonstrate a legal interest has been introduced[28]). Thus, the objective indicated in 16.10: "Ensure public access to information" is no longer fully implemented.

[27]See also: Stefan BAUMGAERTNER, Martin QUAAS, "What is sustainability economics?" in: Ecological Economics 2010, vol. 69, Iss. 3, p. 445-450. https://doi.org/10.1016/j.ecolecon.2009.11.019.

[28] See judgment of the Court of Justice of the EU of 22 November 2022, in Joined Cases C-37/20 and C-601/20 WM and Sovim SA Luxembourg Business Registers, ECLI:EU:C:2022:912; LEX No. 3433353.

In addition, however, the following objectives could be identified as relevant and therefore implemented by the EU AML Package: SDG 8 (Decent Work and Economic Growth), SDG 10 (Reduced Inequalities), SDG 12 (Responsible Consumption and Production), SDG 13, 14, 15- Climate, Life Below Water, Life on Land- basically supported through VI AMLD's environmental crime provisions) and SDG 17 (Partnerships for the Goals).

What specific objectives can be considered to be implemented by the provisions contained in the set of EU legal acts in question?

With respect to "Decent Work and Economic Growth", the objectives will be as follows: 8.3: "Promoting development-oriented policies that support productive activity, decent job creation, and formalisation," as the AML system aims to uncover "dirty" financial assets and thus ensure that economic turnover is legally fueled; 8.4: "Improving global resource efficiency and decoupling economic growth from environmental degradation"- mainly the 6th AML Directive, which extends predicate offenses to environmental crimes; and 8.10: "Strengthening the capacity of financial institutions to increase access to banking and financial services", as transparency and anti-crime controls improve trust in the financial system[29]. Simply put, the AML "Package" supports a transparent, stable, and equitable economic environment.

In turn, within the framework of reduction of inequalities, it should be remembered that illicit financial flows increase inequality, and the AML system helps to reduce them. Strictly speaking about the implementation of objectives: 10.4: "Adopt fiscal and social policies to progressively achieve greater equality" - AML increases tax fairness by reducing tax-evasion-related laundering; 10.5: "Improve regulation and monitoring of global financial markets"- basically all EU AML and AMLA Regulations, because they harmonise supervision and reduce regulatory arbitrage.

To some extent, the AML Package also supports the implementation of SDGs 12-15. In relation to responsible consumption and production, this in the sense that it

[29] On the subject of the obligation for financial market participants to demonstrate ESG-related activities – see: Wojciech KAPICA [in:] "Komentarz do ustawy o nadzorze nad rynkiem finansowym" [in:] *Nadzór nad rynkiem finansowym. Nadzór nad rynkiem kapitałowym. Komentarz*, ed. Robert ZAWŁOCKI, Warsaw 2025, art. 3; and also: art. 3 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on disclosure of information related to sustainability in the financial services sector (OJ EU L 199, No. 317, p. 1).

supports the fight against illegal supply chains. It criminalises laundering from illegal extraction of resources and, by establishing due-diligence requirements, reinforces corporate transparency (which therefore completes the objectives: 12.2: "Sustainable management and efficient use of natural resources" and 12.6: "Encourage companies to adopt sustainable practices and report on sustainability"). When it comes to climate, life under water, life on land, these are supported through the VI AML Directive. This directive, requiring implementing resolutions regarding countermeasures "washing money" in terms of concerning combating crimes predicate offences), combats, e.g., trafficking in wildlife, illegal logging and associated trade, may be helpful by dismantling illegal pollution-based industries or with an against illegal fishing profits (being then "laundered"). However, under SDG 17 (Partnerships for the Goals), the AML Package demonstrates international cooperation, thus achieving the objectives: 17.1: "Domestic resource mobilization" - by reducing illicit flows, 17.3: "Mobilising financial resources" - by transparent capital flows, 17.14: "Policy coherence among EU member states" - thanks to the AMLA; 17.16–17.18: "Data transparency, statistical cooperation, and information-sharing" – as a duty to report on "suspicious transactions".

4. Possibilities of using artificial intelligence for money laundering prevention purposes

AI is finding increasing use in the fight against money laundering. This is also crucial in the context of striving to optimise the objectives of combating this practice and the underlying crimes. Thus, it can support the implementation of the sustainable development goals presented above. A growing number of companies are offering AI-powered AML compliance software[30].

There are at least several reasons why AML software can streamline and make anti-money laundering tasks more effective. Primarily, AI-based tools are used to generate some required documents, including risk assessments, implementing AML procedures,

[30] E.g.: MicroStrategy provides a comprehensive platform for businesses to implement AI- powered AML compliance solutions - more at: www.strategysoftware.com; similarly: https://www.neotas.com/ai-in-aml-compliance/; https://www.eastnets.com/products; https://www.flagright.com/ (accessed: 7.12.2025).

generating PEP (politically exposed person) declarations, breach reports, and crime notifications. They can be helpful in verifying customers and beneficial owners. Tools that also utilise machine learning (ML) are, of course, a priority. According to a report prepared by the Association of Certified Anti-Money Laundering Specialists (ACAMS) based on a global survey of 850 of its members, 58% of respondents recognize the need to use ML in AML systems, and 78% of respondents point to specific, expected benefits of AI-Powered AML Compliance in obligated entities and government institutions. They primarily cite improving the quality of investigation processes by minimizing „false positives"- suspected money laundering cases that did not provide sufficient grounds to initiate criminal proceedings. They also point to improved information flow, including feedback, and the relevance of recommendations and regulations to current needs, i.e., "tailored" to threats and risks identified on an ongoing basis.

It is also worth noting that ACAMS is a leading international organisation dedicated to providing financial crime prevention education, best practices, and networking opportunities for AFC professionals worldwide. It has over 115,000 members from over 200 jurisdictions and territories. Its primary goals are to combat financial crime by ensuring anti-money laundering measures, detecting financial fraud, disseminating knowledge in this area, and implementing new AML solutions. Its activities also include ESG initiatives (Environmental, Social and Governance) as well as public-private dialogue platforms[31].

However, the aforementioned report also showed a relatively low percentage of AI tools used by entities subject to AML obligations. Only 18% of respondents reported full-scale use of AI and machine learning (ML)-based solutions, and another 18% were conducting pilot projects. On the other hand, 25% of respondents declared their willingness to do so and planned to implement AI and ML within the next 12-18 months[32]. The situation is even worse when it comes to generative artificial intelligence (GenAI). Only 10% of respondents stated that they were currently conducting pilot projects, while 35% were analysing the possibility of using GenAI for AML purposes. However,

[31] https://www.acams.org/en/about ; https://www.acamstoday.org/ (accessed: 7.12.2025).

[32] See also : https://www.sas.com/pl_pl/news/informacje-prasowe-pl/2025/marzec/sztuczna-inteligencja-znajduje-coraz-szersze-zastosowanie-w-walce-z-praniem-pieniedzy-ale-tempo-jej-wdrazania-jest-za-wolne.html (accessed: 12.12.2025).

according to the report, as many as 55% of respondents had no plans to implement this technology in their internal AML procedures at all[33].

Such statistics do not inspire optimism from the perspective of the opportunities created by modern technologies (mainly AI and ML), forcing us to ask why these tools are used to such a small extent.

Citing data from the report, reasons for this include budget constraints (according to the ACAMS report, this was indicated by 39% of respondents), the lack of a regulatory imperative (37% of respondents), and limited confidence in process automation (often resulting from a lack of knowledge). The issue of competence of those operating the system is itself cited as an obstacle to using AI for AML purposes (according to the ACAMS report, this was indicated by 11% of respondents). Another limitation in the use of AI for AML purposes mentioned in the cited report is system limitations (this refers to comprehensive IT platforms as AML tools/AML systems consistent with Fiu.net, a system for handling information exchange between the Polish Financial Intelligence Unit and obligated institutions, which is only just being implemented in Poland).

Meanwhile, the fact remains that AI systems can provide tools for advanced data analytics, ensuring near-instant verification of customers and beneficial owners, without the delays associated with, for example, the need to manually search multiple registers, including the National Court Register (NCR), Central Register and Information on Economic Activity (CRIEA) or Central Register of Beneficial Owners (CRBO), and then submit reports generated on this basis to the FIU or, further on, to the AMLA. A similar situation exists with transaction monitoring, which can be conducted in real time, eliminating the significant problem of delays in reporting suspicions and responding to reports from the FIU, which is crucial for combating this phenomenon. Furthermore, process automation and data analysis streamline due diligence procedures. diligence and money laundering investigations (indicated by 25% of respondents). AI and ML are also technologies that, in this respect, provide the ability to detect new threats thanks to advanced modelling techniques (as indicated by 23% of ACAMS survey participants).

5. Summary and final conclusions

[33]Data from the report from: https://bank.pl/ai-znajduje-coraz-szersze-zastosowanie-w-walce-z-praniem-pieniedzy-ale-tempo-jej-wdrazania-jest-za-wolne/ (accessed: 12.12.2025).

In summary, money laundering is one of the crimes which, due to its complex structure and its connexion with other prohibited acts (predicate crimes), has serious consequences in the sphere of economic transactions. Its cross-border nature and the dynamics of its development, as well as the consequences it has for the financial system—both at the individual (state) level and at the European Union level- have led the EU to place significant emphasis on preventing this practice for years. This is clearly demonstrated by the adoption of a comprehensive set of legal acts in 2024, which ultimately aims to promote the harmonisation of EU regulations in this regard and, consequently, contribute to the effective combating of money laundering. However, this "overarching" goal does not have to conflict with the principles of sustainable development, which determines many international actions undertaken, among others, in the area of economic development and social life. However, in light of the comments presented above, the basic conclusion is that the EU AML policy does not provide for a direct reference to the Sustainable Development Goals. Nevertheless, a careful analysis of these goals allows us to conclude that many of the solutions provided for in the "AML Package" actually achieve these goals. Moreover, it can be argued that the use of artificial intelligence systems – or more precisely AI-powered AML compliance software – would contribute significantly to this. Their use in AML activities, at the level of obliged entities and FIUs, would not only improve and accelerate their work and mutual cooperation between these entities, but also ensure efficient communication with AMLA (including without false alarms regarding suspicious transactions). As a result, this would improve the effectiveness of the fight against money laundering. Unfortunately, in light of the results of the cited study conducted by ACAMS, the use of such tools in the AML system is relatively low. The reasons for this are rational (and understandable), such as financial constraints, and less justifiable. The latter concerns a lack of knowledge and (unjustified) fear of using modern technologies for anti-money laundering purposes. Meanwhile, AI in AML procedures would also ensure the implementation of the SDGs and thus ensure inclusive economic growth, i.e., one in which the benefits of economic growth are available to all social groups, support innovation by facilitating access to financial services for small businesses in order to improve their competitiveness, and also serve to promote strong and equitably functioning institutions supporting social life.

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