AML/CTF TRANCHE 2 CHEAT SHEET

For Australian Real Estate Principals

Every date, duty and penalty — on one page.

management can be delegated to a compliance officer — ultimate responsibility cannot. It stays with the

1. DOES THIS APPLY TO YOU?

From 1 July 2026 you are a reporting entity under the AML/CTF Act if you broker property sales, act as a buyer's agent, or develop and sell property direct to purchasers. Conveyancers are also captured. If unsure, **take the free 2-minute assessment: amlhq.com.au/#quiz**

2. THE DATES THAT MATTER

- **31 March 2026** — AUSTRAC enrolment opened
- **1 July 2026** — All obligations commence — CDD, reporting, program in force
- **29 July 2026** — Final deadline to complete AUSTRAC enrolment
- **1 Jul 2026 – 30 Jun 2027** — First annual compliance reporting period
- **1 Jul – 30 Sep 2027** — First annual compliance report due to AUSTRAC
- **At least every 3 years** — Independent evaluation of your AML/CTF program

3. YOUR CORE OBLIGATIONS — AUSTRAC CAN ASK YOU TO PRODUCE EVERY ONE

- **Enrol with AUSTRAC** as a reporting entity (ABN, structure, services, compliance officer named)
- **Appoint a compliance officer** — a fit and proper senior person responsible for day-to-day oversight
- **Document a risk assessment** specific to your agency, customers, services and channels
- **Adopt a written AML/CTF program** approved by senior management — not a template left in a drawer
- **Run customer due diligence** on buyers and sellers: identity, beneficial owners, PEP & sanctions screening
- **Report suspicious matters** to AUSTRAC — and threshold transaction reports for cash of $10,000+
- **Train your staff** to recognise red flags — and keep records proving the training happened
- **Keep records for 7 years** on every transaction, decision and escalation

4. WHAT NON-COMPLIANCE COSTS

Civil penalties of up to $7.28 million for individuals and $36.4 million for a body corporate. Day-to-day

5. THE $6-A-MONTH TRAP

An ID-check subscription satisfies one slice of one obligation. It is not a risk assessment, not a written program, not a trained compliance officer, not staff training, and not an independent review. When AUSTRAC reviews a file, **"the software said it was fine" is not a defence. A defensible, documented program is.**

6. FIX IT FAST · THE AML HQ PATH

ASSESS

We map your exposure: designated services, risks, and what AUSTRAC will expect from your agency.

IMPLEMENT

Program, risk assessment, compliance officer, training and the SENTINEL platform — set up, done for you.

DEFEND

Ongoing due diligence, reporting and records — so if AUSTRAC ever asks, your file answers for itself.

And ask us about the two strategies our clients use to make the whole program cost-neutral.

Where do you stand? Find out in 2 minutes — free.

amlhq.com.au/#quiz

Talk to a real person: 1300 330 644 · admin@amlhq.com.au