

AML/CTF Program

Your Company Name Here

06 May 2026

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1. Version Control

1.1 Document History

Version	Date approved	Approved by	Summary of changes	Next review due
1.0	Click or tap to enter a date.			Click or tap to enter a date.
	Click or tap to enter a date.			Click or tap to enter a date.

When we update this **Policy**, we keep the previous version for 7 years.

2. AML/CTF Program Scope

2.1 Business Description

Your business description here

2.2 Designated Services

Our business has anti-money laundering and counter-terrorism financing (AML/CTF) obligations, which apply when we provide certain services under table 6 of subsection 6(5B) of the *Anti-Money Laundering and Counter-Terrorism financing Act 2006*, including:

- Brokering the sale, purchase or transfer of real estate on behalf of a customer.

We call these regulated services 'professional services' throughout this document, although AUSTRAC calls them 'designated services' generally.

2.3 ML/TF/PF Risk

This section outlines the outcomes from the ML/TF risk assessment that was conducted.

2.3.1 We understand our ML/TF Risk Assessment Obligations

We will conduct and maintain a business-wide risk assessment to identify and assess the ML/TF risks it may reasonably face when providing, or planning to provide, designated services. The ML/TF risk assessment will consider risks arising from our customer types, the products and services we offer (including new and emerging technologies), delivery channels and geographic exposure, including any planned changes that may increase risk. We will also consider relevant regulatory guidance and information provided by AUSTRAC to ensure its risk assessment remains current, comprehensive and aligned with regulatory expectations.

2.3.2 Scope of the ML/TF Risk Assessment

The following ML/TF risk factors were considered in scope of the ML/TF risk assessment:

- Customer Risk
- Product and Services Risk
- Channel Risk
- Country Risk

2.3.3 ML/TF Risk Assessment Methodology

The ML/TF risk assessment methodology is based on AUSTRAC guidance and us defined across three risk levels:

Rating	Risk Rating Logic	Definition	Controls required
High	1 or more	Significant potential ML/TF impact, major damage or effect. Requires strong and proactive controls.	Enhanced customer due diligence Gathering more customer information Ongoing monitoring Annual customer identity reviews
Medium	2 or more	Moderate potential ML/TF impact with a potential for adverse outcomes if controls do not appropriately manage and mitigate the risk.	Gathering more customer information Ongoing monitoring Customer identity reviews every 2-years
Low	No medium or high	Minor or negligible ML/TF impact with limited inherent risk exposure that can be easily maintained.	Standard policies including simplified CDD at onboarding, monitoring and periodic customer identity reviews every 3-years

2.3.4 Tailoring our ML/TF Risk Assessment

Where appropriate, we will endeavour to tailor our ML/TF risk assessment to reflect the size, nature and complexity of our business, ensuring that the level of detail and analysis is proportionate to the ML/TF risks faced. The ML/TF risk assessment will be documented in a clear and practical manner to support understanding and use by the governing body, senior management, the AML/CTF Compliance Officer and relevant personnel.

2.3.5 Overall ML/TF Risk Rating

The overall ML/TF risk rating for our business has been assessed as follows:

Overall Inherent Risk Rating	Control Effectiveness Rating	Overall Residual Risk Rating
High	Not Assessed	High

Your businesses overall inherent ML/TF risk has been assessed as High, based on the following risk category ratings: customer risk – High; product and service risk – High; channel (delivery) risk – High; and geographic risk – High. The overall inherent risk rating reflects the highest rating across the four risk categories. Residual risk will be assessed following implementation of the controls described in this program.

2.3.6 ML/TF Risk by Risk Category and Sub-Category

The Inherent Risk Rating by Risk Category and Sub-Category is assessed as follows

Risk Category	IRR Rating
Customer Risk	High
Customer Type Risk	High
Customer Location Risk	Low
Customer Industry Sector / Occupation Risk	High
Customer Activity and Behaviours	High
Product and Service Risk	High
Designated Service 1	High
Designated Service 2	High
Designated Service 3	Medium
Channel Risk	Medium
Onboarding Channel Risk	Medium
Transaction Channel Risk	Medium
Country Risk	Low

2.3.7 ML/TF Risk Appetite

This agency will accept higher-risk customers, Politically Exposed Persons, foreign customers, customers from higher-risk countries, customers who display unusual or suspicious behaviours and cash transactions exceeding \$10,000. AML/CTF training will be delivered to all staff Quarterly. We will accept higher-risk customers; Politically Exposed Persons (PEPs); foreign customers; customers from higher-risk countries; customers displaying unusual or suspicious behaviours; cash transactions exceeding \$10,000.

3. AML/CTF Policy

3.1 What's in our AML/CTF Policy

This AML/CTF Policy document details what we do and when, to meet our AML/CTF obligations. There are three main parts to our AML/CTF policy:

- **Part 1:** Personnel
- **Part 2:** Clients
- **Part 3:** Maintain our AML/CTF program

3.2 How this works

This AML/CTF Policy document is supported by the:

- ML/TF risk assessment
- Process documents and forms describing the steps we take to comply on a day-to-day basis

These documents work together to meet our obligations to:

- manage the personnel we have in AML/CTF roles (such as our AML/CTF compliance officer)
- manage and mitigate the ML/TF risks posed by our clients
- report to AUSTRAC
- maintain our AML/CTF program to make sure it remains effective and stays up to date as ML/TF risks change.

3.3 Oversight of the AML/CTF Program

3.3.1 Governing Body

The governing body is responsible for oversight of this AML/CTF program and approval of all program amendments.

The governing body exercises ongoing oversight of our ML/TF risk assessment including appropriately identifying, assessing, managing and mitigating ML/TF risks; ensuring compliance with the AML/CTF Act, Rules and Guidance and ensures our business is taking reasonable steps to comply with our AML/CTF policies and our AML/CTF obligations.

The governing body receives reports from the AML/CTF Compliance Officer at least once every 12 months about compliance with your AML/CTF policies and obligations and ML/TF risk mitigation and management.

The governing body also receives written notification of any updates to the ML/TF risk assessment after updates have been applied and the governing body has an active role in AML/CTF compliance.

What will be included in the report to the Governing Body

We will ensure that the AML/CTF Compliance Officer provides regular written reports to the governing body outlining the organisation's compliance with AML/CTF policies, the effectiveness of those policies in managing and mitigating ML/TF risks, and compliance with applicable legislation, rules and regulations. These reports will be maintained in English (or readily convertible into English) and will provide sufficient detail to enable effective oversight of AML/CTF obligations.

The reports will include information on any non-compliance, deficiencies or gaps in policies or controls, associated ML/TF risks and the status of remediation actions, as well as relevant updates such as resourcing issues, process backlogs, improvements to compliance frameworks and regulatory communications. This ensures the governing body is informed of the organisation's risk and compliance position and can take appropriate actions, including allocating resources and providing strategic direction.

3.3.2 Senior Manager Oversight

Our AML/CTF program is approved and overseen by Anthony Quinn, Big Wig Senior Manager. The senior manager is responsible for approving this AML/CTF program and any subsequent updates, and for making decisions to continue providing services to high-risk customers.

Once approved, our business follows these policies.

3.3.3 Ongoing Oversight

Our governing body engages with various stakeholders across the business to oversee AML/CTF compliance by:

- questioning and reviewing matters, including reports presented and discussed at regular meetings
- taking reasonable steps to address the failure to identify and assess risks and areas of non-compliance
- encouraging ongoing dialogue with the AML/CTF compliance officer
- requesting independent evaluation reports outlining the level of compliance and identifying gaps
- challenging the business about risks, controls and actions they plan to take to address adverse findings
- gaining a deep understanding of the ML/TF risk assessment and how it has been designed
- monitoring the progress of actions to address unacceptable risks, weak controls or non-compliance

3.3.3 Reasonable Steps

Our governing body takes reasonable steps to appropriately identify, assess, mitigate and manage ML/TF risk and comply with our AML/CTF obligations, we do this by:

- appointing a suitably qualified AML/CTF compliance officer and ensuring they have the support, authority and resources to properly execute their function
- ensuring our AML policies apply to ML/TF risks identified in our business
- reviewing ML/TF risk assessments to identify and assess new or changed risks at least annually
- updating our policies and procedures to reflect any changes in the ML/TF risk assessment
- ensuring appropriate assurance and monitoring processes are built into the AML/CTF program
- putting in place independent reviews of AML/CTF capabilities and compliance at appropriate intervals
- encouraging, promoting and adopting a strong AML/CTF culture
- ensuring appropriately qualified and resources are available to support AML/CTF compliance
- engaging openly with AUSTRAC and ensuring feedback is incorporated into the AML/CTF Program

4. Personnel

In this section, we describe the steps that we take to ensure our personnel are:

- appointed to AML/CTF roles
- eligible for those roles
- able to carry out the key duties of those roles.

4.1 Aligning personnel to key roles

We've appointed the following eligible personnel in each of the following roles:

Role	Full Name	Position	Responsibilities
Governing Body			<ul style="list-style-type: none"> • Governance and executive decisions • Setting the strategic direction of the AML/CTF Program • Appointing key AML/CTF roles • Reviewing and accepting compliance reports • Ensuring the AML/CTF compliance officer has the authority and resources to carry out their duties
Senior Manager(s)			<ul style="list-style-type: none"> • Make or influence decisions • Approving the AML/CTF Program and updates • Decide whether to continue providing services to high-risk customers
AML/CTF Compliance Officer			<ul style="list-style-type: none"> • Overseeing daily compliance tasks • Ensuring AML/CTF policies and procedures are followed • Managing complex or high-risk matters
Customer Facing Personnel			<ul style="list-style-type: none"> • Monitoring customers for unusual activity • Identifying and escalating high-risk or unusual matters to the AML/CTF Compliance Officer • Fulfill any other AML/CTF roles

We understand that a single person may hold one or more of these roles.

4.2 Conducting personnel due diligence

4.2.1 Why we conduct personnel due diligence

We conduct personnel due diligence to assess the suitability and integrity of individuals employed or engaged to perform AML/CTF roles, ensuring that only appropriate and trustworthy personnel are appointed. We do this to reduce the risk of internal fraud and misconduct. Personnel due diligence is undertaken prior to employment or engagement and is maintained on an ongoing basis throughout the individual's tenure to ensure continued fitness and propriety in performing AML/CTF responsibilities.

We undertake personnel due diligence to safeguard the integrity of the AML/CTF Program and to reduce the risk of internal misconduct, fraud or non-compliance.

4.2.2 How we conduct personnel due diligence

We appoint eligible personnel to these roles by completing the relevant [personnel due diligence forms](#) and maintain up-to-date records of role assignments using the [AML/CTF roles form](#). We assign responsibilities for each key role using the [Assign responsibilities form](#). We also ensure that personnel in each AML/CTF role meet their responsibilities on an ongoing basis.

4.2.3 Appointing the AML/CTF Compliance Officer

We appointed a suitably qualified and competent AML/CTF Compliance Officer within 28 days of commencing the provision of designated services from 1 July 2026.

If the AML/CTF Compliance Officer were to become ineligible, changes roles, or ceases to perform the function we will within 28 days appoint a new AML/CTF Compliance Officer and ensure the appointed individual meets all eligibility, capability and integrity requirements necessary to effectively oversee the AML/CTF Program. We will also notify AUSTRAC, via AUSTRAC Online within 14 days of their appointment.

The AML/CTF Compliance Officer is responsible for overseeing and coordinating day-to-day compliance with AML/CTF legislation, rules and regulations. While the AML/CTF Compliance Officer may delegate operational activities, they retain overall responsibility for ensuring that compliance obligations are effectively managed and performed.

When appointing the AML/CTF Compliance Officer we complete this [form](#).

Skills, knowledge and expertise

We will assess the skills, knowledge and expertise of personnel performing AML/CTF roles to ensure they can understand ML/TF risks, meet regulatory obligations, and effectively applying AML/CTF policies. This assessment may include reviewing qualifications, experience, technical capability, professional credentials and prior performance. Where capability gaps are identified, the organisation will implement appropriate measures such as targeted training, supervision or delayed assignment of responsibilities to ensure personnel are suitably equipped to perform their roles and mitigate ML/TF and compliance risks.

Integrity

We will conduct integrity assessments for personnel in AML/CTF roles to ensure they uphold appropriate ethical standards and do not pose undue ML/TF or compliance risk. These assessments may include identity verification, background and police checks, financial checks, screening (including sanctions and adverse media), reference checks, verification of qualifications, review of prior regulatory or disciplinary issues, and self-disclosures, as appropriate to the risk of the role.

AML/CTF Compliance Officer

We will appoint an eligible AML/CTF Compliance Officer within 28 days of commencing designated services and notify AUSTRAC within 14 days of the appointment, as well as any subsequent changes, including where the Compliance Officer leaves or becomes ineligible. We will maintain records evidencing the appointment and eligibility of the Compliance Officer, including details of the individual, the period of appointment and the assessments undertaken to confirm their suitability, such as background checks, qualifications and ongoing reassessments.

We will also ensure that the AML/CTF Compliance Officer meets all regulatory eligibility requirements, including being employed or engaged at a management level, residing in Australia where services are provided through an Australian permanent establishment and are assessed as a fit and proper person.

We will ensure that our AML/CTF Compliance Officer is appointed at an appropriate management level, with sufficient authority, resources and expertise to effectively perform the role, having regard to the size and nature of the business. The role may be fulfilled by an internal or external individual, including across reporting group entities, provided all eligibility requirements are met, and the individual has appropriate oversight and decision-making authority within the organisation.

REDACTED CONTENT – SIGN UP TO COMPLETE

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