



AML/CTF at scale:

How large firms can build and maintain an AML/CTF program using technology



Richard Storey,
Partner-Risk
Consulting,
Grant Thornton



Ashish Patil
Product Lead,
InfoTrack



Taylah Morrison
Account Manager,
InfoTrack

Agenda

- AML/CTF: AUSTRACs requirements of Tranche 2 entities
- **Live Training:** Managing an effective AML/CTF Program using the InfoTrack's AML/CTF Compliance Centre
- Live Q&A Panel



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Partner-Risk
Consulting

AML/CTF Programs for larger firms

29 April 2026



Getting Ready for AML

With only 2 months left, now is the time to get ready for AML/CTF

01

Assign AML/CTF Roles

Identify who will be your:

- Governing Body
- Senior Manager(s)
- Anti-Money Laundering Compliance Officer

Make sure they are aware of what they need to do in that role

Do this as soon as possible

02

Enrol with AUSTRAC

If you will be providing one or more of the Designated Services after 1st July 2026 you must enrol with AUSTRAC.

Enrolment opened 31st March 2026 and must be done by 29th July 2026

03

AML/CTF Program

Using the Starter Kits, develop and implement :

- An ML/TF Risk Assessment
- An AML/CTF Policy
- AML/CTF Processes
- Implement the Processes

The AML/CTF Program must be developed and implemented by 1st July 2026

04

Train Staff

Once the AML/CTF Program has been developed train staff on:

- What the ML/TF risks are
- What could be suspicious and what to do if they identify it when dealing with client
- What Policies and Processes are relevant to their role(s)
- How to use the Forms

Train staff before 1st July 2026

AUSTRAC assistance to new entrants

Released in **January 2026**, the AUSTRAC AML/CTF Starter Kits help small, low-complexity businesses on their compliance journey.

AUSTRAC is explicit that, unless the Tranche 2 entity doesn't meet the suitability criteria, the AML/CTF **Starter Kits are intended to be adapted and approved by each entity.**

Grant Thornton was engaged by AUSTRAC to support the design and development of the Starter Kits.

Regulator-endorsed

Provide a regulator-endorsed starting point for compliant AML/CTF program.

Reduced cost

Aim to reduce cost, complexity and uncertainty for newly regulated Tranche 2 entities.

Structured pathway

The AUSTRAC AML/CTF Starter Kits provide a structured pathway to achieving AML/CTF compliance

Sector-specific

Are practical, sector-specific, risk-based guidance for entities transitioning into the AML/CTF regime.

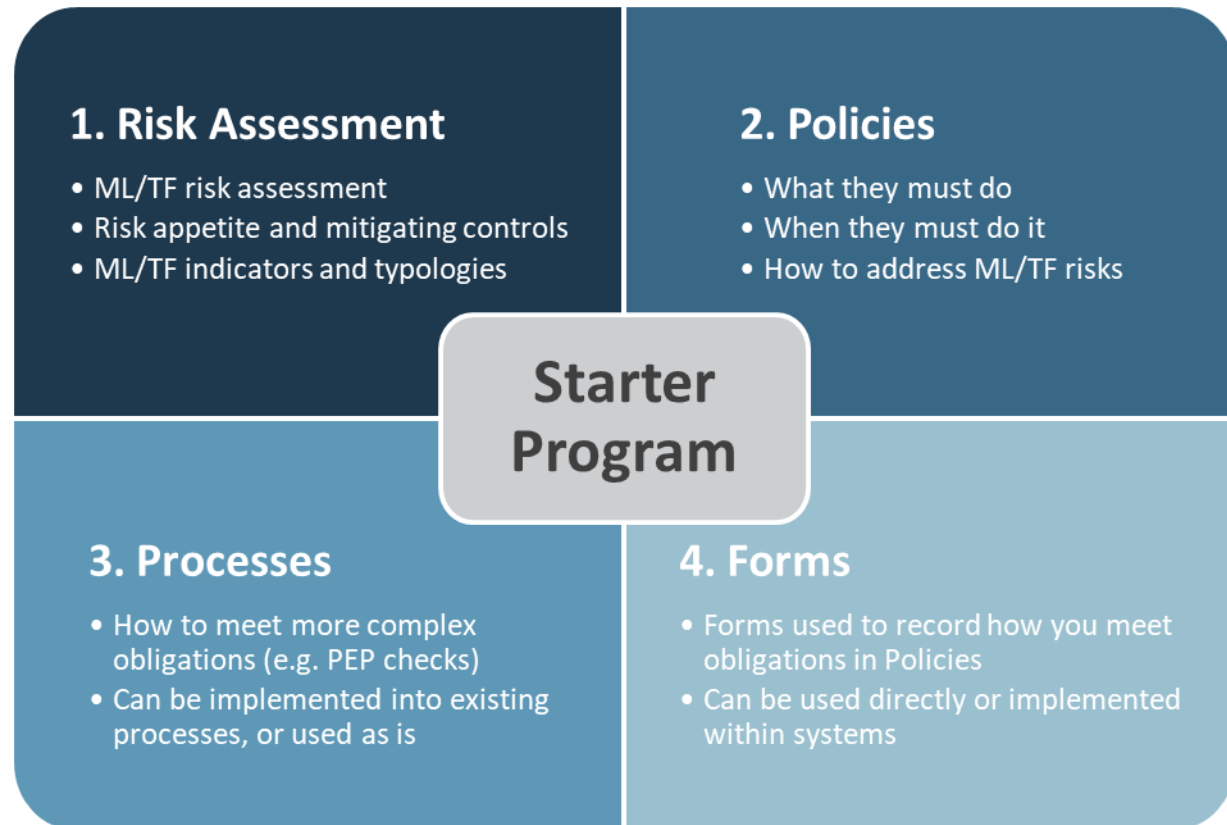
AUSTRAC Starter Kits – a guide for larger firms

The Starter Kit is aimed at small practices of <15 people, but *maybe* suitable for larger businesses.

You should review your suitability, identify how the nature, size and complexity of your firm varies from a small one and use that as the guide to adapt the Kits for your AML/CTF Program.

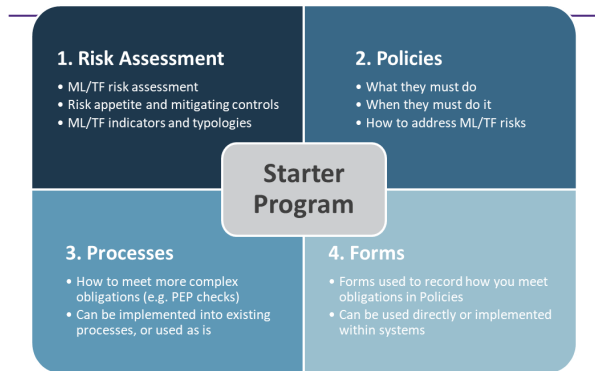
The AML/CTF Program required by the AML/CTF Act and AML/CTF Rules has these four key components – no matter the size of your firm.

InfoTrack have “digitised” the Starter Kits within the Compliance Centre.



01 Suitability

AUSTRAC Starter Kits – Suitability



The Starter Kits are designed for small businesses with the following characteristics:

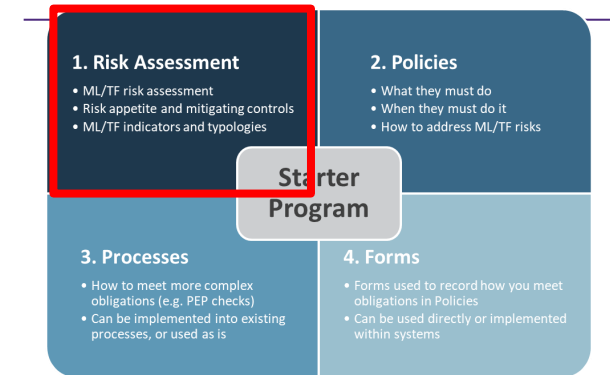
- Only provide designated services that are conveyancing, real estate and professional services.
- Have 15 or less personnel working for the practice (this includes all your personnel such as administrative staff).
- Most commonly deal with Australian clients and overseas clients are less common.
- Don't regularly deal with high-risk clients, such as foreign residents, complex legal structures, or politically exposed persons (PEPs).
- You do not often facilitate complex transactions like international property transfers or large, unusual cash movements.
- Aren't part of a large reporting group, foreign branch or subsidiary.

If your practice doesn't meet all the small business characteristics, you must assess whether the starter kit is appropriate (suitable) for your practice and identify any changes you need to make.

The Compliance Centre supports undertaking a suitability assessment to determine how and to what extent the Starter Kits can be used if you do not meet the “small business” criteria.

02 ML/TF Risk Assessment

AUSTRAC Starter Kits - Risk Assessment



The Starter Kit provides an ML/TF Risk Assessment which needs to be completed by firms

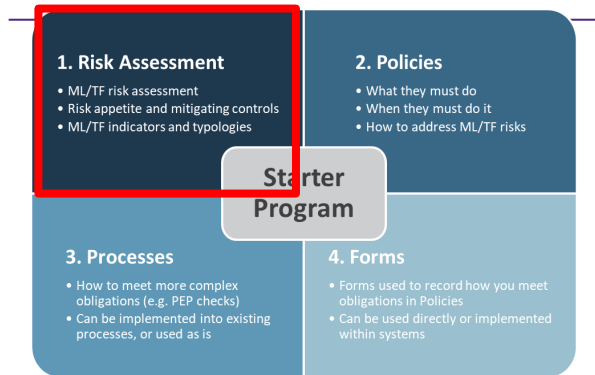
The Risk Assessment contains the following components:

- Sector Inherent ML/TF Risk Assessment
- Designated Service ML/TF Risk Assessment
- Designated Service ML/TF Risk Factors
- Client ML/TF Risk Assessment
- Client ML/TF Risk Factor
- Delivery Channel ML/TF Risk Assessment
- Delivery Channel ML/TF Risk Factors
- Country ML/TF Risk Assessment
- Methods how businesses in each sector can be exploited
- Indicators of unusual/suspicious behaviour and activity

A larger firm will need a bespoke Risk Assessment that includes consideration of the nature, size and complexity of the business.

Risk Assessment - Sector Risk Assessment

The Risk Assessment, based on the Australian ML/TF National Risk Assessment, describes and rates **the inherent ML/TF risks** faced by an industry sector.



Money Laundering

Risk rating	Rationale
High	The legal sector is highly vulnerable to exploitation by criminals seeking advice on ways to launder money and services which may make it easier to do so.

Terrorism Financing

Risk rating	Rationale
Low	The use of legal professionals to facilitate terrorism financing is uncommon but can occur when assisting exploited NPOs or providing trust and company services.

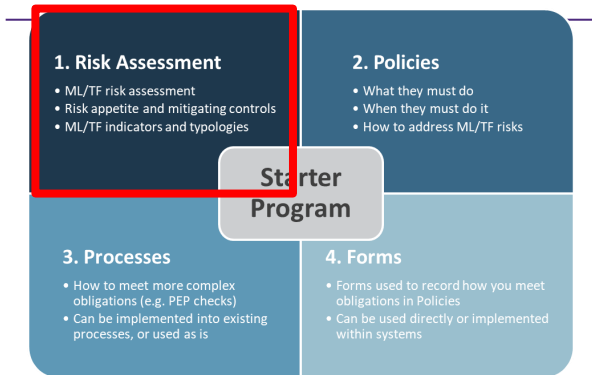
Proliferation Financing

Risk rating	Rationale
Medium	Legal professionals are vulnerable to exploitation by criminals engaging in proliferation activities when helping create corporate structures which distance them from illicit funds.

Action: Review and understand the risks faced by your Sector, which can be done within the Compliance Centre

Risk Assessment - Designated Service Risk

The Risk Assessment sets out the ML/TF risk vulnerability of each of the sector's services designated by the AML/CTF Act:



Designated service	Description	Vulnerabilities to ML/TF risk	Risk appetite - would you provide this service?
<p>Assisting a person in the planning or execution of a transaction to buy, sell or transfer a body corporate or legal arrangement.</p> <p>This includes acting on their behalf in a transaction.</p> <p>This only applies where the sale, purchase or transfer relates to a controlling interest in the body corporate or legal arrangement.</p> <p>(Item 2 of table 6 of the AML/CTF Act)</p>	<p>Legal professionals are routinely asked to help with transactions to buy, sell or transfer a body corporate or legal arrangement. This typically involves:</p> <ul style="list-style-type: none"> • preparing and reviewing contracts • conducting due diligence • obtaining relevant government approvals • preparing financial settlements or documents. <p>This doesn't include transactions following, or resulting from, an order of a court or tribunal.</p> <p>A body corporate can include a person, association or group of persons incorporated into a corporation.</p> <p>A legal arrangement can include a structured agreement or setup recognised</p>	<p>Criminals can exploit both body corporates such as companies, and legal arrangements such as trusts. This can include:</p> <ul style="list-style-type: none"> • using complex ownership structures or rapid ownership transfers to obscure ownership • as vehicles to conceal beneficiaries and source of funds • to assist in integrating illicit funds into the legitimate economy (for example, laundering of crime through a cash-intensive business) • to move proceeds of crime overseas. 	<input type="checkbox"/> Yes <input type="checkbox"/> No

Action:

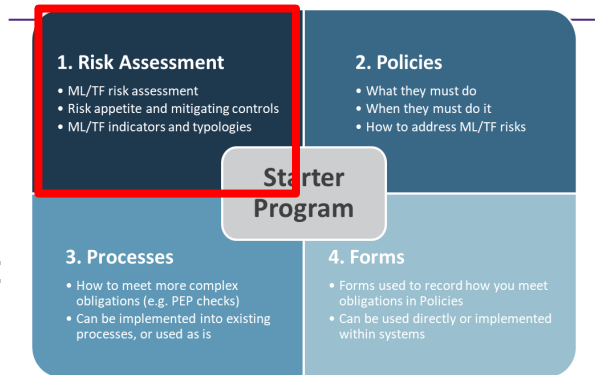
Review & determine whether you are comfortable providing each Designated Service.

This is replicated in the InfoTrack Compliance Centre.

Risk Assessment - DS Risk Factors

The Risk Assessment sets out the ML/TF risk factors when providing designated services:

Risk factor	Description of risk	Why it creates ML/TF vulnerability	Inherent risk rating	Risk appetite – would you accept this risk?	If NO, how will you avoid this risk?
High value transactions	Legal professionals can facilitate or assist with high-value transactions across a range of business areas, including mergers and acquisitions or obtaining complex financing. They're also involved in legal aspects of large asset purchases, investments, and financial markets.	Legal professionals often facilitate high value transactions on behalf of their clients, making them attractive for laundering significant amounts of illicit funds without drawing attention from law enforcement. Some transactions can occur very quickly, including those in commercial matters. This speed of transactions, along with their high value, can allow criminals to move significant amounts of illicit funds in a single transaction.	Medium	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Unusual physical transactions	Any physical currency transactions (for example in A\$ notes and coins or a foreign currency equivalent) that's unusual in the circumstances. Whether a physical currency transaction is unusual will often depend on: <ul style="list-style-type: none"> its size and complexity if it has an apparent economic or lawful purpose 	Physical currency is anonymous and hard to trace, making it difficult to verify the source of funds. In Australia, it's one of the most restrained, forfeited or frozen asset types in criminal asset confiscation matters. It's exploited for its accessibility, widespread acceptance and availability. Its use also requires minimal skills, knowledge and expertise.	High	<input type="checkbox"/> Yes <input type="checkbox"/> No	



Action:

Review & determine whether you would accept the risk (should it occur).

If not, you need to set out what you will do to ensure the risk factor doesn't occur.

These are replicated in the InfoTrack Compliance Centre.

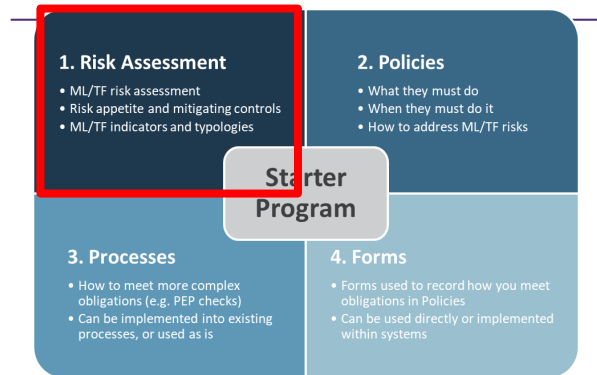
**You will also need to describe how you will manage each risk factor that you decide to accept
This is beyond the AUSTRAC Starter Kits.**

Risk Assessment – Client Risk

The Risk Assessment sets out the vulnerability and ML/TF risk factors of clients designated services can be provided to:

Kinds of client	Description	Vulnerabilities to ML/TF risk	Risk appetite - would you deal with these clients?
Individuals and sole traders	<p>An individual client, other than a sole trader, is a human being with legal capacity to enter into contracts and conduct transactions.</p> <p>A sole trader is an individual client who owns and operates a business alone, with no legal separation between the owner and the business. Like individuals, sole traders have the legal capacity to enter into contracts and conduct transactions.</p>	<p>The risk level varies based on personal, transactional and contextual factors.</p> <p>Individual clients can have risk factors that increase their ML/TF risk. This includes:</p> <ul style="list-style-type: none"> • their personal background and occupation • their business activities • their source of funds • their financial behaviour • any potential connections to high-risk activities or jurisdictions. 	<input type="checkbox"/> Yes <input type="checkbox"/> No

Risk factor	Description of risk	Why it creates ML/TF vulnerability	Inherent risk rating	Risk appetite – would you accept this risk?	If NO, how will you avoid this risk?
Individuals that you suspect have committed profit-generating offences	<p>An individual may be involved in crime and use criminal proceeds to buy property.</p> <p>Not all criminal offences generate ML/TF risks. Offences that can be used to generate illicit profits include, but aren't limited to:</p> <ul style="list-style-type: none"> • money laundering • terrorism financing 	<p>Criminals who have profited from serious crimes are highly likely to try and obtain professional assistance when laundering their illicit funds. They're likely to continue doing so until their behaviour is detected.</p>	High	<input type="checkbox"/> Yes <input type="checkbox"/> No	



Action:

Similar to Designated Services, you need to review to determine whether you are comfortable dealing with this kind of client.

And whether you accept each of the risk factors and how you will manage them whether you accept them or not.

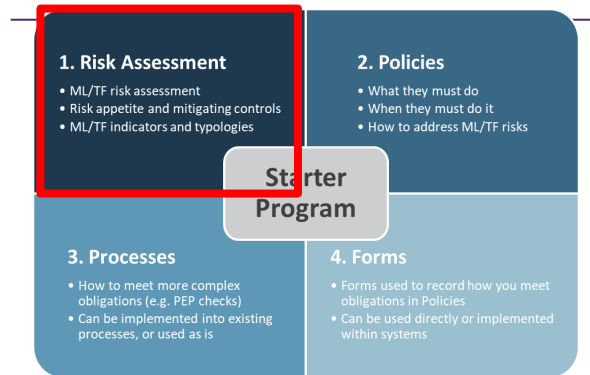
These are replicated in the InfoTrack Compliance Centre.

Risk Assessment – Channel Risk

The Risk Assessment sets out the vulnerability and ML/TF risk factors of the way services can be provided:

Channel type	Description	Vulnerabilities to ML/TF risk	Risk appetite - would you provide services using these delivery channels?
In person	The client is engaged or provided access to a service through direct, face-to-face interactions.	Risk factors include: <ul style="list-style-type: none"> Exploitation through personal relationships and manipulation. Ability to detect fake or stolen IDs in person. 	<input type="checkbox"/> Yes <input type="checkbox"/> No

Risk factor	Description of risk	Why it creates ML/TF vulnerability	Inherent risk rating	Risk appetite - would you accept this risk?	If NO, how will you avoid this risk?
Suspected false and fraudulent identities	Criminals can use false identities to obtain services from practices without disclosing their real identity to them. False identities can involve using fake identification documents, lying on documentation about personal details, or using technology to impersonate another person.	Using a false identity allow criminals to get services which may have otherwise been out of reach, avoiding detection by those practices and affecting their ability to correctly assess ML/TF risk. Leveraging emerging technologies, criminals can more easily hide their identities than ever before. Using techniques such as spoofing (impersonating phone numbers and email addresses) or using deepfake images and videos, criminals can take advantage of remote and digital channels more easily than ever before. You should consider how their delivery channels may allow for false identities and how you will detect if your client and other related parties are who they claim to be.	High	<input type="checkbox"/> Yes <input type="checkbox"/> No	



Action:

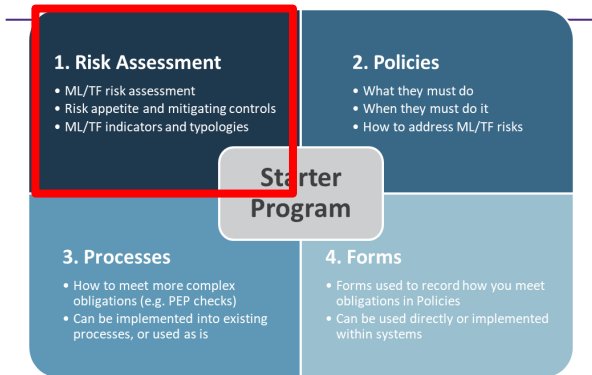
Similar to Designated Services and Clients you need to review & determine whether you are comfortable using this type of channel.

And whether you accept each of the risk factors and how you will manage them whether you accept them or not.

These are replicated in the InfoTrack Compliance Centre.

Risk Assessment – Country Risk

The Risk Assessment requires you to identify and then risk rate each country you deal with as part of your business, with a focus on where Clients are located:



Country	Basel AML risk rating	Listed in high-risk country list?	Final country risk rating	Risk appetite – would you onboard these clients?	If NO, how will you avoid this risk?
Australia	Low	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Low	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	Choose an item.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Choose an item.	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Step 1:

Identify each country and look up the Basel Index Risk Rating for that country

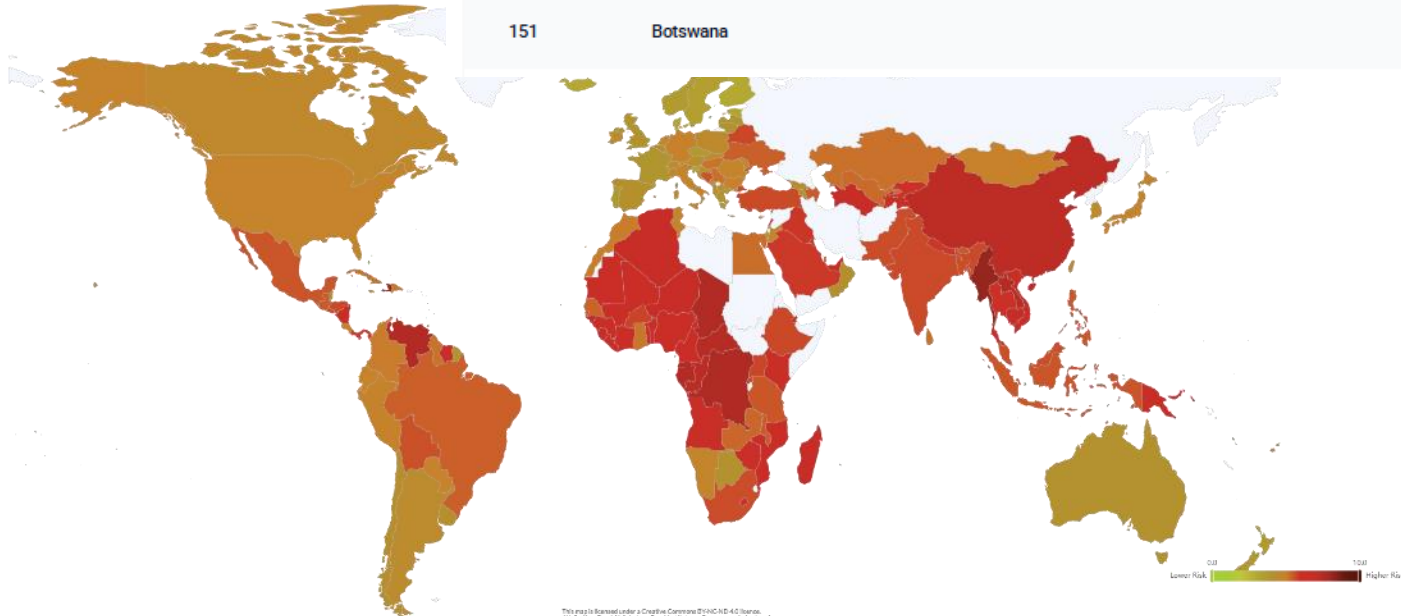
This step is replicated and automated in the InfoTrack Compliance Centre.

Risk Assessment – Basel Index

Basel score risk rating:

- 0.00-5.00 - Low risk
- 5.01-6.00 - Medium risk
- 6.01-10.00 - High risk

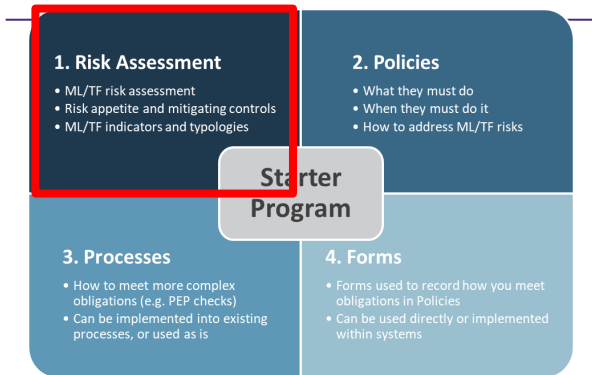
Income		Region		Search for jurisdiction	
RANK	JURISDICTION			OVERALL SCORE	
148	Croatia			4.18	
149	Dominica			4.17	
150	Australia			4.13	
151	Botswana			4.12	



<https://index.baselgovernance.org/>

Risk Assessment – Country Risk

The Risk Assessment requires you to identify and then risk rate each country you deal with as part of your business, with a focus on where Clients are located:



Country	Basel AML risk rating	Listed in high-risk country list?	Final country risk rating	Risk appetite – would you onboard these clients?	If NO, how will you avoid this risk?
Australia	Low	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Low	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	Choose an item.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Choose an item.	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Step 2:

Check to see if it is a high-risk country identified by AUSTRAC

Step 3:

Reach a final risk rating (Note if it is a high-risk country, that acts as an override)

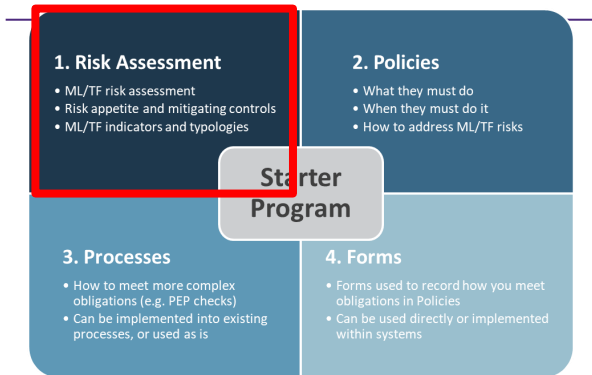
Step 4:

Similar to Designated Services, Clients and Channels, you need to review & determine whether you are comfortable to on-board clients from this country. And, if not what you will do to avoid them.

These steps are replicated and automated in the InfoTrack Compliance Centre.

Risk Assessment – Common ML/TF Methods

The Common ML/TF Methods describes how designated services can be used as part of criminal behaviour:



Method	Description	How it creates ML/TF risk	Possible red flags/indicators
Use of non-financial professionals	Professionals, such as lawyers and accountants, are often used by people to represent their interests in particular situations. This may be through mechanisms such as a power of attorney, empowering someone to obtain services and make decisions as if they were the person themselves.	Legitimate services offered by professionals such as lawyers and accountants can also be used by criminals to help mask their identity and the origin of their criminal profits, whether the professional is aware of the criminal's intentions. For example, a buyer may hire a solicitor to manage all interactions with a seller's conveyancer, making it difficult for the conveyancer to understand who their client is.	<ul style="list-style-type: none"> • Client uses a third-party without a logical reason. • Person on the contract of sale is different from the individual dealing with the conveyancer.
Trust accounts	Conveyancers are required to hold funds received from buyers in a statutory trust account, as opposed to an ordinary practice bank account. When a buyer or real estate agent transfers a deposit to the conveyancer, they'll hold it in their trust account until they're instructed to send those funds to the seller.	Criminals can misuse trust accounts to move illicit money while hiding its origin from the beneficiary. For example, when a conveyancer transfers funds from the sale to a seller, the seller's bank won't have visibility of the original source of that deposit.	<ul style="list-style-type: none"> • Client asks conveyancer to hold a deposit in trust longer than required, then issues an unusual instruction for disbursement.

Action: These are replicated in the Compliance Centre and need to be reviewed, to understand the common ML/TF methods that can be used, and referred to during your monitoring and when reviewing client activity.

Risk Assessment – Indicators of unusual or criminal behaviour

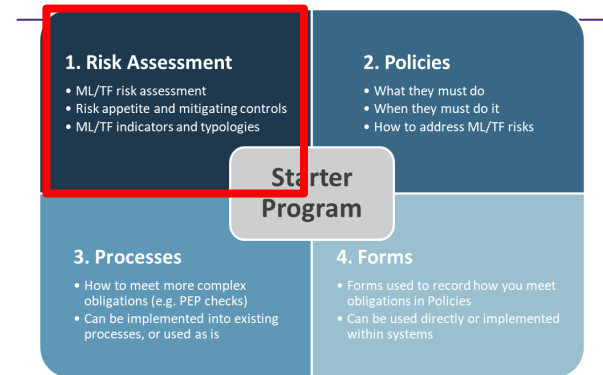
The Risk Assessment describes common indicators of unusual or criminal behaviour for each sector. **Your business may experience other indicators not listed.**

Use this information as a reference during your ongoing monitoring and when reviewing client activity. If you aren't sure if something is suspicious, escalate it so the AML/CTF compliance officer can make the assessment and determine next steps.

Indicators are tabled in the Starter Kits (and so also in the Compliance Centre) to cover:

- Client behaviour
- Client profile
- Unusual transactions and behaviours
- Foreign jurisdiction indicators
- Terrorism financing indicators
- Proliferation financing indicators

Action: These are replicated in the Compliance Centre and need to be reviewed to understand the common indicators so you can use that knowledge during your monitoring and when reviewing client activity.



03 AML/CTF Policy/Process

AUSTRAC Starter Kits – Policy

The Starter Kit provides an AML/CTF Policy which sets out:

- what your practice must do, and when, to meet its AML/CTF obligations
- who is responsible for key AML/CTF activities.

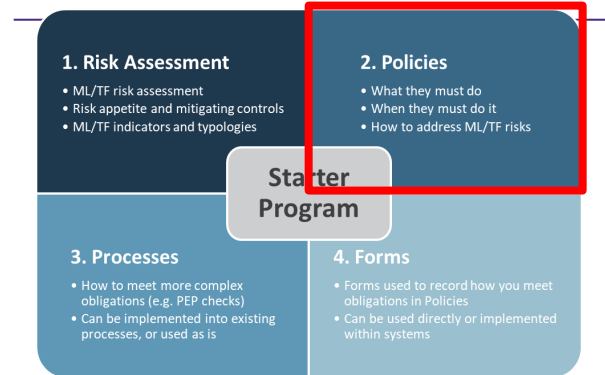
The Policy document details what a practice does, and when, to meet our AML/CTF obligations.

Note – a larger firm will need to tailor Policies to the specific Risk Assessment you create so that it outlines the practical framework used to meet the risks.

There are 3 parts to the Policy:

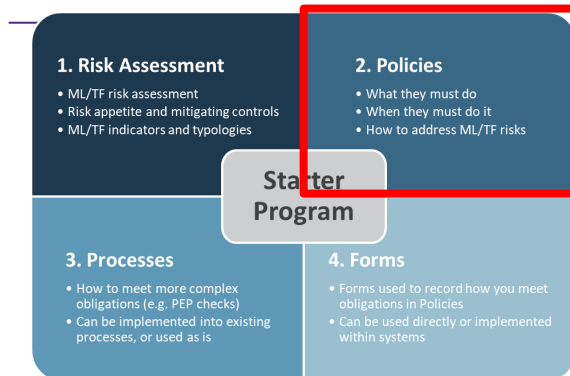
- Part 1: Personnel
- Part 2: Clients
- Part 3: Maintain the AML/CTF program.

InfoTrack has digitised the AML/CTF Policy for each Tranche 2 sector within the Compliance Centre. You can also edit these to better suit your business if you need to.



Policy - Personnel

The Policy within the Starter Kit provides an AML/CTF Policy to comply with personnel related obligations in the AML/CTF Act and AML/CTF Rules:



Sets out who does what in relation to AML/CTF

Sets out what level of due diligence on employees is required

Specifies what training is required

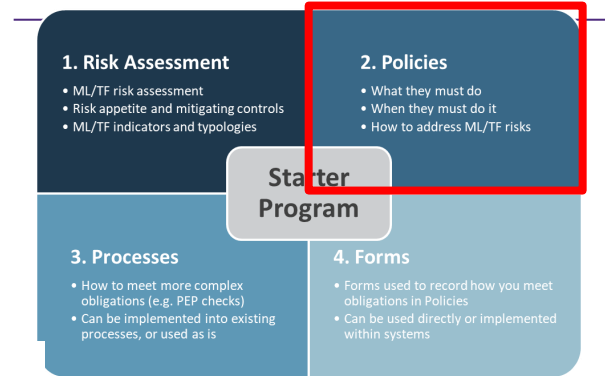
Section	Actions
1. Align personnel to roles	<p>Identify who will hold each key role:</p> <ul style="list-style-type: none"> • governing body • senior manager • AML/CTF compliance officer • client-facing personnel. <p>Assign responsibility for meeting the AML/CTF obligations to each role we've identified.</p>
2. Conduct personnel due diligence	<p>Before confirming appointment, make sure individuals are suitable and meet the requirements for their roles.</p> <p>Make sure they remain suitable by conducting ongoing personnel due diligence.</p> <p>If a person in an AML/CTF role is no longer suitable, take appropriate action.</p>
3. Deliver personnel training	<p>Plan and deliver training to make sure our personnel understand their AML/CTF obligations and can apply the program in their day-to-day work.</p>

These Policy requirements are set out in the AML/CTF Policy and Process section of the Compliance Centre.

Action: Reviewing, understanding, tailoring and approving these policy statements.

Policy - Clients

The Policy within the Starter Kit provides an AML/CTF Policy to comply with customer due diligence related obligations in the AML/CTF Act and AML/CTF Rules:



Complete initial customer due diligence (initial CDD) to:

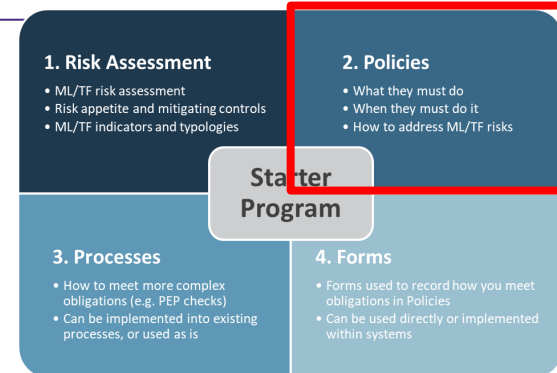
- identify clients and their representatives, beneficiaries and beneficial owners
- identify clients' ML/TF risk
- manage and mitigate this ML/TF risk.

Section	Actions
1. Initial customer due diligence	<p>Conduct initial CDD before starting to provide a client with a designated service.</p> <p>Follow the policy and:</p> <ul style="list-style-type: none"> • Identify the kind of client - if they're an individual, trust, body corporate or government body. This determines the client forms we use. • Use the Onboarding form for the service requested to collect information from a client. • Use the Initial CDD form to complete initial CDD. We'll complete more checks for complex and high risk clients. • For conveyancing services, if we want to work with another conveyancer or real estate agent to verify client information, use the Request to verify information form.

This activity has been digitised and can be managed through the Compliance Centre.

Policy - Clients

The Policy within the Starter Kit provides an AML/CTF Policy to comply with customer due diligence related obligations in the AML/CTF Act and AML/CTF Rules:



In a business relationship with a client:

- monitor them for reportable activity and changes in ML/TF risk
- review their information periodically / triggers occur

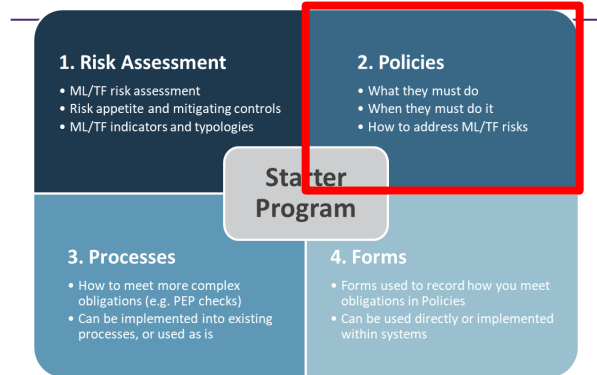
Section	Actions
2. Ongoing customer due diligence	<p>Follow the policy to:</p> <ul style="list-style-type: none"> • monitor our client's activity and changes in their information or ML/TF risk throughout our relationship • take appropriate action to mitigate and manage their ML/TF risks. • Use the client forms to record the results of: • reviews triggered by changes in client information or ML/TF risk factors • periodic reviews of client information and ML/TF risk. <p>We must conduct periodic reviews if we still have a practice relationship with the client every:</p> <ul style="list-style-type: none"> • year for high risk clients • 2 years for medium risk clients • 3 years for low risk clients.
3. Pre-commencement customer due diligence	<p>Complete appropriate due diligence on all clients we were providing a designated services to on 1 July 2026.</p>

Conduct lighter due diligence on clients who were receiving designated services on 1 July 2026

This activity has been digitised and can be managed through the Compliance Centre.

Policy - Clients

The Policy within the Starter Kit provides an AML/CTF Policy to comply with customer due diligence related obligations in the AML/CTF Act and AML/CTF Rules:



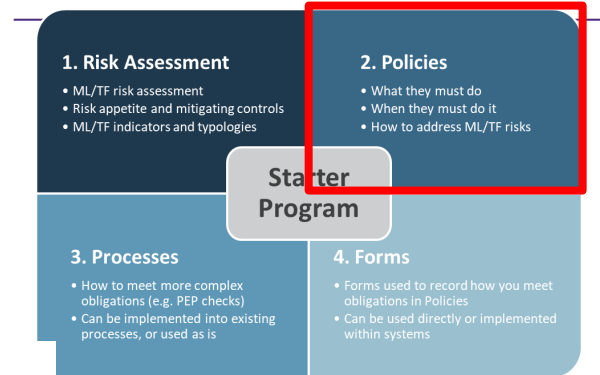
Escalate any of the matters in this policy to the AML/CTF compliance officer to action, including completing ECDD

Section	Actions
4. Dealing with high risk or complex clients	<p>We escalate the following to our AML/CTF compliance officer to action:</p> <ul style="list-style-type: none"> • high risk clients • reportable matters (see step 5) • positive sanctions checks • difficult beneficial ownership checks • kinds of services, clients, delivery channels, countries or ML/TF risks not in our risk assessment.

This activity has been digitised and can be managed through the Compliance Centre.

Policy - Clients

The Policy within the Starter Kit provides an AML/CTF Policy to comply with customer due diligence related obligations in the AML/CTF Act and AML/CTF Rules:



Escalate reportable matters to the AML/CTF compliance officer, who reports them to AUSTRAC within the required timeframes

Do not disclose information on suspicious matter reports (SMRs) where this would or could reasonably be expected to prejudice an investigation

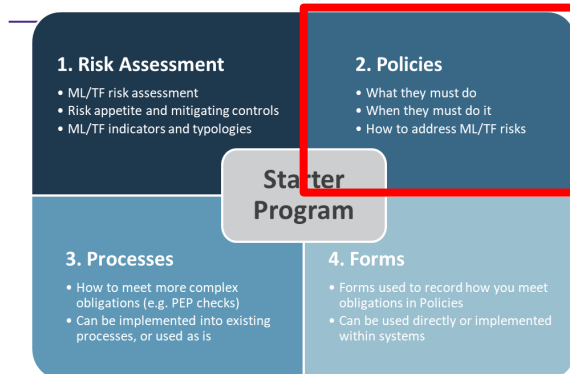
When to decline or stop providing designated services to clients

Section	Actions
5. Report to AUSTRAC	<p>We use this policy to report the following to AUSTRAC.</p> <ul style="list-style-type: none"> • suspicious matters • -any physical currency transaction, or cross-border movement of physical currency and/or bearer negotiable instruments, valued at \$10,000 or more • annual compliance reports.
6. Tipping off	<p>Don't let clients know we think their behaviour is suspicious.</p>
7. Terminate a retainer	<p>Decline or stop providing services where clients fall outside our risk appetite or would cause us to fail to meet our AML/CTF obligations where this is consistent with our client retainer and professional ethical obligations.</p> <p>Follow the policy and our risk appetite statement in the risk assessment.</p>

The Reporting to AUSTRAC activity has been digitised and can be managed through the Compliance Centre.

Policy - Maintain the AML/CTF Program.

The Policy within the Starter Kit provides an AML/CTF Policy to comply with maintaining the AML/CTF Program related obligations in the AML/CTF Act and AML/CTF Rules:



Maintain the AML/CTF program to make sure it remains:

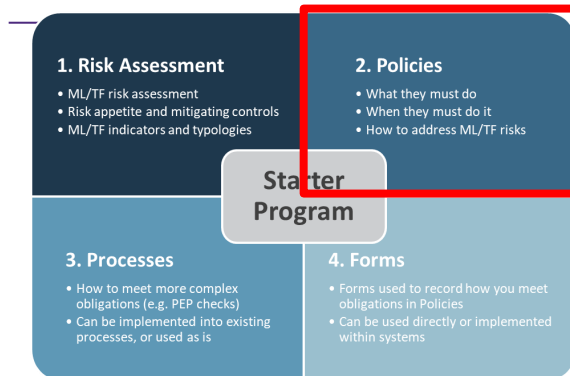
- current
- accurate
- compliant with regulatory obligations as they change

Section	Actions
1. Maintain the program	<p>Make sure our AML/CTF program stays up to date as ML/TF risks change.</p> <p>Follow the policy to review and update our program in response to triggers. This includes significant changes to our services, delivery channels, clients or countries we deal with.</p> <p>Respond to new risks:</p> <ul style="list-style-type: none"> • if personnel detect a new ML/TF risk, method or indicator of criminal activity they'll use the Escalation checklist process – factors not addressed in risk assessment. • When a review and update is triggered, the AML/CTF compliance officer will use the: • Maintain the AML/CTF program form to record this and get senior manager approval for updates • Inherent risk rating and country risk rating processes to assess the new ML/TF risks that arise.

This activity will need to be done outside of the Compliance Centre if a firm isn't suitable for the AUSTRAC Starter Kit.

Policy - Maintain the AML/CTF Program.

The Policy within the Starter Kit provides an AML/CTF Policy to comply with maintaining the AML/CTF Program related obligations in the AML/CTF Act and AML/CTF Rules:



Periodically check whether The AML/CTF Program is operating effectively

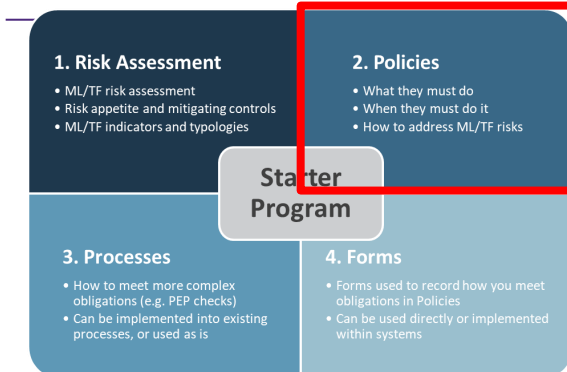
Make reports annually to the governing body

Section	Actions
2. Conduct periodic effectiveness checks and reports	<p>Make sure our AML/CTF compliance officer:</p> <ul style="list-style-type: none"> • periodically checks if our program is working as intended and being followed • reports annually to our governing body on key compliance activities, the results of effectiveness checks and recommendations for improvement.

This activity will need to be done outside of the Compliance Centre if a firm isn't suitable for the AUSTRAC Starter Kit.

Policy - Maintain the AML/CTF Program.

The Policy within the Starter Kit provides an AML/CTF Policy to comply with maintaining the AML/CTF Program related obligations in the AML/CTF Act and AML/CTF Rules:



Have an independent evaluation of the AML/CTF Program every 3 years

Make and keep records relating to AML/CTF compliance and the AML/CTF Program

Enrol with AUSTRAC and keep enrolment information accurate and up to date.

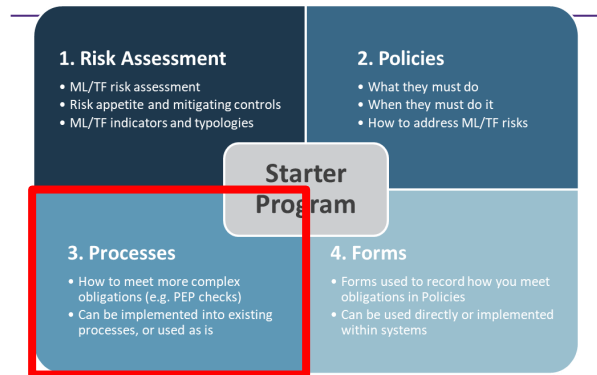
Section	Actions
3. Independent evaluations	<p>Conduct and respond to independent evaluations of our AML/CTF program.</p> <p>Conduct an independent evaluation of our AML/CTF program at least once every 3 years.</p> <p>Record how we responded to any findings from the independent evaluation, particularly adverse findings.</p>
4. Keep records	<p>Keep sufficient records to help us comply with our AML/CTF obligations and demonstrate compliance to AUSTRAC.</p> <p>Use the forms referred to throughout this policy document to help meet this obligation.</p>
5. Maintain AUSTRAC enrolment	<p>Keep enrolment details accurate and up to date.</p>

Record Keeping for AML is supported by and can be managed through the Compliance Centre, however, for larger firms not all record keeping may be supported.

AUSTRAC Starter Kits – Processes

The Starter Kit provides AML/CTF Processes that describe:

- how to carry out AML/CTF activities in practice
- the minimum steps that the practice must follow
- where automated systems or tools are used instead of manual processes.



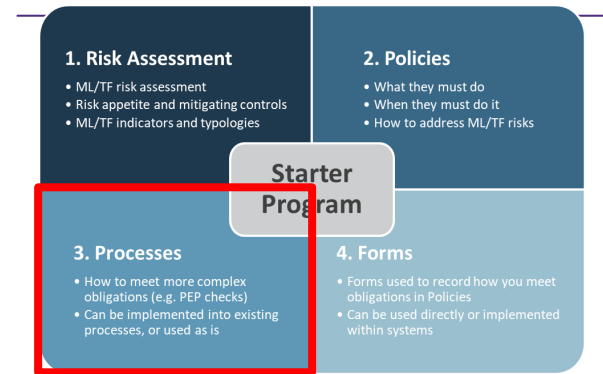
The Compliance Centre sets out Processes that align to the Policies in the AML/CTF Program.

The Compliance Centre has adjusted some of the Processes to align to the use of the Compliance Centre and InfoTrack services to achieve AML/CTF compliance

Action: Review, understand, adapt, approve and importantly implement the Process.

Processes – Scope and Coverage

Each of the processes support the AML/CTF Policy and are what you actually do and how you do it



The AML/CTF Processes cover the following AML/CTF requirements:

- Client risk rating and ongoing customer due diligence
- Verify the nature and purpose of the practice relationship
- Source of funds and source of wealth check
- Sanctions check
- Politically exposed persons check
- Adverse media check
- Identify personnel
- Beneficial ownership
- Annual (or more frequent) report to the governing body
- Update country risk and risk ratings
- Updating inherent risk and risk ratings
- AUSTRAC communications
- Independent evaluation
- Annual compliance report
- AUSTRAC enrolment
- Escalating matters to the AML/CTF compliance officer

InfoTrack has digitised the AML/CTF Policy for each Tranche 2 sector within the Compliance Centre and where appropriate aligned them to InfoTrack's solutions

04 AML/CTF Forms

AUSTRAC Starter Kits – Forms

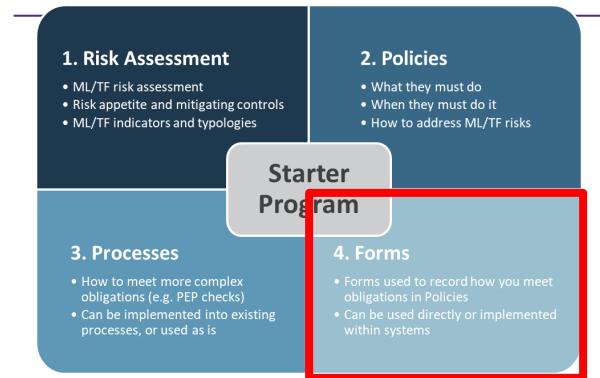
The Starter Kit provides a document library that stores all the Forms in the Starter Kit In one place:

- **Personnel forms** - Use these forms when appointing, reviewing or assessing people who perform roles relating to AML/CTF.
- **Client forms** – Use these forms to complete onboarding by collecting information when you engage a new client and undertake initial customer due diligence to rate client ML/TF risk and verify their information.

Note: The forms you use depends on the kinds of client you have and whether you provide conveyancing and/or other professional services to this client

- **Escalating significant issues forms** - Use these forms when you identify unusual activity, high-risk clients or reportable matters.
- **Acting on escalations forms** - Use these forms to assess and respond to escalated matters.
- **Ongoing monitoring forms** - Use these forms to monitor client activity and keep information up to date.
- **Maintain and review the AML/CTF Program forms** - Use these forms to keep your AML/CTF program current, and to support governance and oversight.

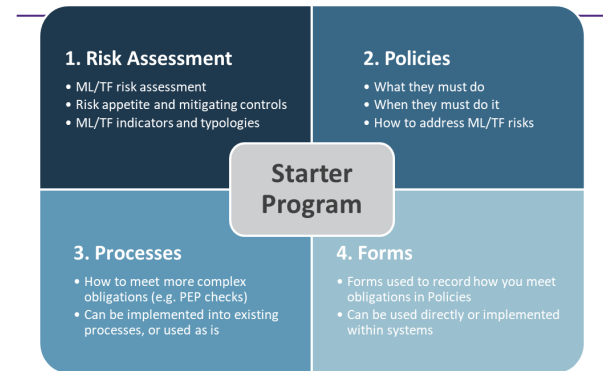
Where appropriate these forms have been digitised in the Personal Due Diligence Client Due Diligence and AUSTRAC Reporting sections of the Compliance Centre.



05 Key Actions

AUSTRAC Starter Kits – Key Actions

- **Assess Suitability** – Review the Starter Kit and determine and document whether and why it is suitable
- **ML/TF Risk Assessment** – Review, understand, and complete a Risk Assessment
- **AML/CTF Policy** – Review, understand, adapt and approve a Policy
- **AML/CTF Processes** – Review, adjust (ensuring alignment to the Policy) and approve your processes
- **AML/CTF Forms** – Review, implement/deploy within the business, including training on how to use them.



Getting Ready for AML

With less than 4 months left, now is the time to start to get ready for AML/CTF

01

Assign AML/CTF Roles

Identify who will be your:

- Governing Body
- Senior Manager(s)
- Anti-Money Laundering Compliance Officer

Make sure they are aware of what they need to do in that role

Supported by the Compliance Centre

02

Enrol with AUSTRAC

If you will be providing one or more of the Designated Services after 1st July 2026 you must enrol with AUSTRAC.

Supported by the Compliance Centre check list

03

AML/CTF Program

Using the Starter Kits, develop and implement :

- An ML/TF Risk Assessment
- An AML/CTF Policy
- AML/CTF Processes
- Implement the Processes

Achieved through the Compliance Centre for a small firm – externally for large ones.

04

Train Staff

Once the AML/CTF Program has been developed train staff on:

- What the ML/TF risks are
- What could be suspicious and what to do if they identify it when dealing with client
- What Policies and Processes are relevant to their role(s)
- How to use the Forms

Supported by the Compliance Centre

AUSTRAC Enrolment – Overview

Enrol with AUSTRAC after 31st March and before 1st July.

Have the following details ready to help you fill out the form quickly:

- the **legal name** of the business you want to enrol
- your registration numbers such as **ABN, ACN**
- **the structure** of your business
- **contact details** for your business
- **the designated services** your business provides
- **financial statements** for the most recent financial year.
- Go to AUSTRAC Online.
- Select Sign up to enrol a new business. Go to the new user sign up guide for help creating an account.
- Create your AUSTRAC Online user account and then return to the log in page.
- Enter your account credentials.
- Select Log in. This will take you to the AUSTRAC Online home page.
- Select AUSTRAC business profile form (ABPF) to get started on your enrolment.



**Learn more about what
AML/CTF means.**





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Ashish Patil
Product Lead



Taylah Morrison
Account Manager



1. Enrol with AUSTRAC after 31st March

From 31 March 2026, professionals can access the Compliance Centre to begin their enrolment journey. Inside the Compliance Centre, firms will find:

- ✓ Clear instructions on how to complete AUSTRAC's Business Profile Form
- ✓ A direct link to AUSTRAC's enrolment portal
- ✓ Storage for confirmation messages, forms and correspondence
- ✓ A single location for future enrolment update

This ensures firms are correctly registered and that all evidence is centrally retained for audits or regulatory reviews.

The screenshot displays the 'AML/CTF Compliance Centre' dashboard. At the top, there is a search bar and a dropdown menu labeled 'AUSTRAC links'. Below this, the dashboard is divided into several sections. The main section is 'Transaction summary', which shows a total of 134 transactions. A progress bar indicates that 86 transactions are completed and 48 are in progress. To the right of the progress bar, there are four key metrics: 12 new clients, 7 clients with pending actions, 1 high risk client, and 4 reports. A tooltip explains that a transaction is complete when all checks are done and in progress when checks are still outstanding. The dashboard also includes tabs for 'Transactions', 'AUSTRAC Reports', 'Your AML/CTF program', and 'Staff training'.

Metric	Value
Total transactions	134
Completed	86
In progress	48
New clients	12
Clients with pending actions	7
High risk clients	1
Reports	4

2.

Onboard your firm and people

between 31st March and 1st July

Firm Level Risk Assessment

Develop your AML/CTF policies & processes

Conduct Personnel Due Diligence

Train Staff

The screenshot shows the 'AML/CTF Compliance Centre' interface. At the top, there is a search bar and navigation links for 'All services' and 'Compliance centre'. Below this, the user's 'AUSTRAC No: 1234-5386-2436621' and 'AUSTRAC links' are displayed. A horizontal menu contains several options: 'Transactions', 'Firm risk assessment', 'Policy and process', 'Personnel onboarding', 'Training', and 'AUSTRAC reports'. The 'Policy and process' option is highlighted with an orange border. Below the menu, there is a large blue icon of a document with a green plus sign. The main heading reads 'Create your AML/CTF policy and process', followed by the instruction 'Answer a few simple questions to generate a policy and process for your business.' At the bottom, there are two buttons: 'Create policy and process' (highlighted in dark blue) and 'Upload your own' (in light grey). The footer contains the copyright notice '© 2025 InfoTrack. All rights reserved.' and links for 'General Terms' and 'Privacy Policy'.

3. Onboard your customers

July 1st onwards

Onboarding Questionnaire

Customer Due Diligence
And Enhanced Due Diligence

Customer Risk Assessment
and Escalation

Final AML/CTF Report

Onboarding Companies
& Trusts

The screenshot displays the InfoTrack software interface. On the left is a sidebar menu under the heading 'PROPERTY PURCHASE' with items: Contract review, Client onboarding and VOI (highlighted), Sign contract, Order certificates, Strata/Body corporate, Title insurance, Settlement, Searches and certificates, Fee summary, and Quick launch. The main content area is titled 'My clients' and shows a client profile for 'John Smith' (john.smith@email.com - 0457 248 532 - DOB: 09/09/1991). Below the profile is a section for 'AML/CTF: Client Due Diligence' with a list of tasks: 'Verification of identity' (checked, ARNECC dropdown, Liveness check dropdown, Individual dropdown), 'PEPs, Sanctions and Adverse media' (checked, DOW JONES logo, Precise dropdown), 'Client questionnaires' (checked, AML onboarding dropdown, Preview link), 'Verification of funds' (unchecked), 'Client Authorisation form' (unchecked), and 'NSW Purchasers Declaration' (unchecked). A '+ Add new client' button is visible in the top right of the client list area.

4.

Report to AUSTRAC



Transactional reports

Annual Compliance reports

Create a new report [X]

- Suspicious matter report**
Report suspicious transactions related to criminal activity
- International funds transfer instruction**
Report fund transfers in and out of Australia
- Threshold transaction report**
Report cash transactions worth more than \$10,000

[Cancel](#) [Continue](#)

The screenshot shows the 'AML/CTF Compliance Centre' dashboard. At the top, there's a search bar and navigation links for 'All services', 'Compliance centre', and user profile. The main header includes 'AUSTRAC No: 1234-5366-2436021' and 'AUSTRAC links'. Below the header, there are navigation tabs: 'Client onboarding', 'Risk assessment', 'AML/CTF policy', 'Staff onboarding', 'Training', and 'AUSTRAC Reports'. A 'Your reports' section contains a 'Create new report' button and a search bar for reports. A table lists various reports with columns for 'Matter', 'Type', 'Description', 'Status', and 'Date lodged'. Each row has a corresponding action button like 'Complete' or 'View'. A tooltip 'Suspicious matter report' is visible over the 'SMR' type in the last row.

Matter	Type	Description	Status	Date lodged	Action
MT-2025-001	SMR	Marcus Flynn	DRAFT	-	Complete
MT-2025-435	TTR	\$14,958 cash transaction for Dominic Greene	DRAFT	-	Complete
MT-2025-642	IFTI	Fund transfer for Sarah Marshel	DRAFT	-	Complete
MT-2025-084	TTR	\$18,098 cash transaction for Jean Crosby	RECEIVED	-	View
MT-2025-084	SMR	Sarah Johntson	SUBMITTED	-	View
MT-2025-084	IFTI	Fund transfer for Frank Brown	RECEIVED	-	View
MT-2025-001	SMR	Craig Gibbons	DRAFT	-	Complete

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5. Record keeping

InfoTrack delivers automated, end-to-end record keeping inside the Compliance Centre, ensuring Tranche 2 entities always meet AUSTRAC's retention requirements.

ACTIVITY AUDIT TRAIL

Report generated: Tuesday 07 October 2025, 11:56am

Matter reference: TestMatter4356

John Smith

john.smith@example.com • 0456 492 504

Date and time	Activity
23/03/2024 3:45pm AEST	Ashish Patil requested verification of identity for John Smith
23/03/2024 3:45pm ACST	John Smith submitted their identity documents for review
23/03/2024 3:45pm AWST	Ashish Patil reviewed and completed the verification of identity

Roadmap

Item	Date
The Compliance Centre	Available Now
AML Reliance feature	May
Transactional AML checks	June
New AML report	June
KYC onboarding forms or non-individuals	June
PEP review feature	June
PEP monitoring for up to 12 months	June
Re-filling existing VOI if already done	Post-June
In person workflow	Post-June
Additional features for Trust due diligence	Post-June

Cost Breakdown

InfoTrack does not charge for software. Only for the transactions you disburse

InfoTrack AML/CTF Compliance Centre	No fee
✓ Firm-level risk assessment	No fee
✓ Creation of policies and processes	No fee
✓ Staff training	No fee

Personnel onboarding & due diligence	Complimentary until 31 May 2026
	✓ VOI
	✓ PEP, Sanction and Adverse Media Check
	✓ Bankruptcy and National Criminal History
	✓ Check for Compliance Officer

Client onboarding & due diligence (CDD)	Pay per use (bundled price)
	✓ VOI
	✓ PEP, Sanctions and Adverse Media Check
	✓ KYC Onboarding Questionnaire

Summary

1. **All inclusive:** single, comprehensive solution to keep you compliant
2. **Built in AUS:** Australian made for Australian regulations
3. **Integration:** data flows seamlessly to/from your Practice Management System
4. **Complimentary:** no subscriptions, lock-in contracts or additional fees.
Simply pay for digital client onboarding and disburse as required.
5. **Audit ready:** automated record keeping, enterprise-grade security and compliance
6. **Trusted platform:** InfoTrack is a market leader with 5m+ AML equivalent searches annually

Q&A

Book a
Demonstration

