



Introduction

Under subsection 47(2) of the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (AML/CTF Act) a reporting entity is required to periodically provide an AML/CTF compliance report to AUSTRAC. The compliance report sets out a reporting entity's compliance with the AML/CTF Act, regulations and Anti-Money Laundering and Counter-Terrorism Financing Rules (AML/CTF Rules).

AUSTRAC performs part of its statutory function as administrator of the AML/CTF Act through the compliance report. AML/CTF compliance reports contribute to AUSTRAC's monitoring of ongoing industry compliance with the AML/CTF Act, regulations and Rules.

Reporting period

The responses you provide in your compliance report should be for your activities during the reporting period. The reporting period for the 2011 compliance report is:

1 January 2011–31 December 2011.

Lodgement period

The compliance report should be completed and submitted to AUSTRAC during the lodgement period. The lodgement period for the 2011 compliance report is:

3 January 2012–31 March 2012.

It is AUSTRAC's strong preference for the AML/CTF compliance report to be completed online. However, provisions have been made for the completion and submission of paper-based compliance reports.

Lodgement by paper

Please complete this form in black ink and print in CAPITAL LETTERS. Return completed forms to:

AUSTRAC Reporting Entity Operations
PO Box 13173, Law Courts
Melbourne VIC 8010.

Key terms

For the purposes of this compliance report:

Terms and expressions used in the compliance report will have the meanings given to them in the AML/CTF Act or Rules unless indicated otherwise.

A *reporting entity* is a person that provides a designated service.

A *designated service* is a service that is listed in section 6 of the AML/CTF Act.

The term *customer* is defined in section 5 of the AML/CTF Act and includes a prospective customer.

A *politically exposed person* is a term used by the Financial Action Task Force to refer to individuals who are or have been entrusted with prominent public functions in a foreign country, for example heads of state, senior politicians, senior government, judicial or military officers, senior executives of state owned corporations, and important political party officials.

Designated business groups

Subsections 47(6) and 47(7) of the AML/CTF Act allow a member of a *designated business group* (DBG) to lodge group compliance reports. The term *designated business group* is defined in section 5 of the AML/CTF Act.

Help

Help is provided for each question in the AML/CTF compliance report. If you are completing your compliance report in AUSTRAC Online, help may be accessed by selecting the help icon for each question. In addition, an Instruction Guide to completing the compliance report is available on the AUSTRAC website (www.austrac.gov.au). If you need assistance in completing the hard copy paper compliance report, please contact the Help Desk.

For further information, please contact the AUSTRAC Help Desk on:

Telephone (within Australia): 1300 021 037
Telephone (international): +61 2 9950 0827
Email: help_desk@austrac.gov.au.

TTY access (within Australia):

National Relay Service

- TTY/voice: 133 677 and ask for 1300 021 037
- Speak & listen (SSR): 1300 555 727 and ask for 1300 021 037.



Anti-money laundering and counter-terrorism financing (AML/CTF) programs – Part A (General)

1. Did you have a written AML/CTF program on 31 December 2011?

Yes No

2. For each component of your AML/CTF program, indicate your status on 31 December 2011.

(a) AML/CTF risk awareness training for employees:

The fourth response option (not applicable) should only be selected if you do not have any employees.

Not commenced Partially implemented Implemented Not applicable

(b) Employee due diligence program:

The fourth response option (not applicable) should only be selected if you do not have any employees.

Not commenced Partially implemented Implemented Not applicable

(c) Oversight by boards and senior management (or equivalent):

The fourth response option (not applicable) should only be selected if you operate a single person business.

Not commenced Partially implemented Implemented Not applicable

(d) AML/CTF compliance officer appointed:

Yes No

(e) Procedures for independent review of your AML/CTF program:

Not commenced Partially implemented Implemented

(f) Procedures to respond to AUSTRAC feedback:

Not commenced Partially implemented Implemented

(g) Enhanced customer due diligence program:

Not commenced Partially implemented Implemented

(h) Transaction monitoring system to identify suspicious customer activity:

Not commenced Partially implemented Implemented

3. (a) From the following list, please select the customer types to which you provided a designated service:		3. (b) Did you assess the money laundering/terrorism financing risks posed by these customer types: Responses for question 3(b) are only required for each customer type selected in 3(a).	
Individuals	<input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Companies	<input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Trustees	<input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Partnerships	<input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Incorporated and unincorporated associations	<input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Registered co-operatives	<input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Government bodies	<input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>



Anti-money laundering and counter-terrorism financing (AML/CTF) programs – Part A (General)

4. Did you assess the money laundering/terrorism financing risk of each of your designated services?

Yes No

5. Did you have a procedure to assess the money laundering/terrorism financing risk of any new designated services before making them available to customers?

Yes No

6. (a) Did you provide designated services from a permanent establishment in a foreign country?

Yes No

(b) Did you assess the money laundering/terrorism financing risk posed by the provision of designated services in that country?

A response for question 6(b) is only required if you responded 'Yes' to question 6(a).

Yes No

7. Did you assess the money laundering/terrorism financing risk posed by the methods used to deliver your designated services? Some examples of delivery methods are:

- face-to-face
- internet, telephone, mail, facsimile, or email
- via a third party such as an agent, broker or intermediary.

Yes No

8. Did you have a procedure to assess the money laundering/terrorism financing risk of any new delivery methods before making them available to your customers?

Yes No

9. Have all members of your designated business group adopted a joint AML/CTF program?

A response for question 9 is only required if you belong to a designated business group.

Yes No

10. (a) Did you screen employees who were in a position to facilitate money laundering or terrorism financing?

Yes No

(b) Did you have a procedure in place to manage employee non-compliance with your AML/CTF program?

Yes No

11. Was an independent review of your AML/CTF program conducted by:

(a) an internal party?

Yes No

(b) an external party?

Yes No



Anti-money laundering and counter-terrorism financing (AML/CTF) programs – Part B (Customer identification)

12. For each of your customer types, indicate if you had procedures to:

Responses to question 12 are only required for each customer type that was selected in question 3(a).

Customer type	Collect the minimum know your customer (KYC) information?		Verify the minimum KYC information?		Identify if additional KYC information needed to be collected?		Identify if additional KYC information needed to be verified?	
	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Individual	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Company	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Trustees	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Partnerships	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Incorporated and unincorporated associations	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Registered co-operatives	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Government bodies	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>

13. Did you have procedures in place to respond to discrepancies that arose in the course of verifying KYC information?

Yes No

14. Did you have procedures in place to identify agents of customers?

Yes No Not applicable

15. Did you have any high-risk customers or groups of customers (including politically exposed persons)?

Yes No

16. Did you outsource any of your customer identification or verification procedures?

Yes No

17. Did members of your designated business group rely on the customer identification and verification procedures carried out by another member?

A response for question 17 is only required if you belong to a designated business group.

Yes No

18. Did you make and retain records of all customer identification information?

The third response option for question 18 ('Done by another DBG member') is only applicable if you belong to a designated business group.

Yes No Done by another DBG member



Reporting of international funds transfer instructions, threshold transactions, suspicious matters.

19. Indicate whether you have procedures in place to report the following to AUSTRAC, as at 31 December 2011.

(a) International funds transfer instructions:

The fourth response option (not applicable) is only required if you are not an authorised deposit-taking institution, a bank, a building society, or a credit union; or you are one of these institutions but do not accept and process electronic funds transfer instructions.

Not commenced Partially implemented Implemented Not applicable

(b) Threshold transactions:

The fourth response option (not applicable) is only required if you do not allow transactions involving the transfer of physical currency or e-currency of AUD\$10,000 or more.

Not commenced Partially implemented Implemented Not applicable

(c) Suspicious matters:

Not commenced Partially implemented Implemented

