

AML/CTF obligations factsheet for virtual asset service providers

From 31 March 2026, anti-money laundering and counter-terrorism financing (AML/CTF) obligations will apply to a range of virtual asset-related services:

- Exchanging or making arrangements for the exchange of virtual assets for money
- Exchanging or making arrangements for the exchange of a virtual asset for another virtual asset of the same or a different kind
- Transfers of value involving virtual assets
- Providing a virtual asset safekeeping service
- Financial services in connection with the offer or sale of a virtual asset where the business is participating in the offer or sale

Use AUSTRAC's 'check if you'll be regulated' tool to see if you will be regulated.

Key AML/CTF obligations for businesses

The information in this fact sheet provides a summary of what you need to do to comply with your AML/CTF obligations. It does not include all obligations or cover all scenarios.

Enrol and Register with AUSTRAC

Businesses that provide newly regulated services, including virtual asset service providers, are required to enrol with AUSTRAC. Virtual asset service providers must also register with AUSTRAC.

Follow the below steps to enrol and register with AUSTRAC.

- **Enrolment:**
 - For virtual asset services (commencing 31 March 2026), enrol by 28 April 2026
 - Provide details about your business structure, services, key personnel and contact information
 - Keep enrolment information up to date. You must tell AUSTRAC within 14 days about any changes to the details you gave us when you completed your enrolment form.
- **Registration:**
 - Virtual asset service providers must apply for registration with AUSTRAC before providing a designated service.
 - AUSTRAC must review and make a decision on registration applications. It can take up to 90 days to assess an application, and AUSTRAC may seek additional information as part of this process.
 - Virtual asset service providers cannot provide designated services from 31 March 2026, until registration is approved. *(List continues on following page)*

- Virtual asset service providers must renew their registration every 3 years.
- Criminal penalties apply if services are provided without registration

Develop and maintain an AML/CTF program

An AML/CTF program tailored to your business helps protect it from the risk of being exploited for money laundering, terrorism financing and proliferation financing.

Your AML/CTF program has two components:

- Your **money laundering, terrorism financing and proliferation financing risk assessment** identifies and assesses the risks your business may face.
- Your **AML/CTF policies** are the procedures, systems and controls to manage and mitigate your money laundering, terrorism financing and proliferation financing risks, and ensure that your business complies with its AML/CTF obligations. Your AML/CTF policies must be appropriate to your business’s nature, size and complexity and be kept up to-date to reflect significant changes to your business and changing money laundering, terrorism financing and proliferation financing risks.

Refer to the [money laundering/terrorism financing risk assessment page](#) for more information.

Governance and oversight

Your senior management must approve your AML/CTF program, while your governing body must oversee the program and take reasonable steps to ensure compliance with your obligations. You must also appoint an AML/CTF compliance officer. The AML/CTF compliance officer oversees day-to-day compliance with your obligations, communicates with AUSTRAC, and carries out other functions.

The AML/CTF compliance officer, senior manager and governing body can all be the same person.

You must also carry out both internal reviews and independent evaluations of your AML/CTF program in certain circumstances, and once every three years at a minimum.

Customer due diligence

Customer due diligence is about knowing who your customers are, and understanding any money laundering, terrorism financing and proliferation financing risks associated with providing them with designated services.

You must carry out initial customer due diligence before you begin providing a designated service in most cases, and ongoing customer due diligence throughout the course of your relationship with the customer. You must also apply enhanced customer due diligence measures if the money laundering, terrorism financing and proliferation financing risk is high.



| Customer due diligence | |
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| Initial customer due diligence | Initial customer due diligence involves establishing certain information about a customer on reasonable grounds before providing them with a designated service. This ensures that you identify and mitigate relevant money laundering, terrorism financing and proliferation financing risks from the beginning of your relationship with the customer. |
| List continues on the following page | |

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| Ongoing customer due diligence | <p>Ongoing customer due diligence involves monitoring and managing money laundering, terrorism financing and proliferation financing risks throughout the customer relationship. This includes:</p> <ul style="list-style-type: none"> • monitoring transactions and behaviours for suspicious activity • updating the customer money laundering, terrorism financing and proliferation financing risk profile in response to various triggers • reviewing, updating and re-verifying information as needed. <p>Ongoing customer due diligence helps protect your business from potential money laundering, terrorism financing and proliferation financing activities.</p> |
| Pre-commencement customers | <p>You will not be required to perform initial or ongoing customer due diligence on a pre-commencement customer until:</p> <ul style="list-style-type: none"> • you are required to file a suspicious matter report in relation to the customer • there is a significant change in the nature and purpose of the business relationship with a customer which results in the money laundering, terrorism financing and proliferation financing risk of the customer being assessed as medium or high. <p>This is intended to reduce the regulatory burden of regulating your existing customers, while ensuring that they are subject to appropriate customer due diligence measures when their risk profile changes.</p> |

Reporting obligations

You must submit reports to AUSTRAC related to certain types of transactions and suspicious matters. These reports help law enforcement detect potential criminal activity, and help keep the Australian community and financial system safe.

Below is a summary of the reports you must submit to AUSTRAC.

| Report type | You must submit this report when: | This must be done: |
|---------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|
|  <p>Suspicious matter reports</p> | <p>you suspect on reasonable grounds that a person is not who they claim to be or that a matter is linked to criminal activity or proceeds of crime</p> | <p>within 24 hours for terrorism financing.</p> <p>within 3 business days for all other matters.</p> |
|  <p>Threshold transaction reports</p> | <p>an individual transaction involves physical currency of A\$10,000 or more, or the foreign currency equivalent</p> | <p>within 10 business days after the day of the transaction.</p> |

You must also submit an annual compliance report to AUSTRAC with information about how you complied with your AML/CTF obligations in the previous year. AUSTRAC will contact you when it's time to complete the compliance report.

Make and keep records

You must make and maintain accurate and complete records in regards to your AML/CTF program and the activities you carry out to comply with your AML/CTF obligations. For most obligations, you must retain records for 7 years.

Business records include the following documents:

- Your business's AML/CTF program
- Customer due diligence
- Transaction records
- Staff training sessions

Where to learn more and get full details about your AML/CTF obligations

For more information, refer to [AML/CTF Reform](#) page on our website. This includes links to our legislation, upcoming dates for detailed guidance, and information about what will be regulated under AML/CTF reforms.

