



Australian Government

AUSTRAC

2025–29 AUSTRAC CORPORATE PLAN

COPYRIGHT

The Commonwealth owns the copyright in all material produced by this agency.

All material presented in this document is provided under a Creative Commons Attribution 4.0 International licence, with the exception of:

- the AUSTRAC logo
- content supplied by third parties.

The details of the relevant licence conditions are available on the Creative Commons website, as is the full legal code for the CC BY 4.0 license.

You may not reproduce or use this material in any way that suggests that AUSTRAC or the Commonwealth endorses you or any of your services or products



ATTRIBUTION

Material obtained from this publication is to be attributed to: © AUSTRAC for the Commonwealth of Australia 2025.

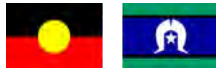
CONTENTS

CEO Foreword	6
Our Purpose	8
Key activities	11
Operating context - Environment	14
Operating context - Capability	18
Operating context - Risk management and governance	24
Key risk categories	25
Operating context - Cooperation	30
Planning and performance	34
Performance	36
Appendices	43

Acknowledgement of Country

AUSTRAC would like to acknowledge the Traditional Custodians of Country throughout Australia and their continuing spiritual, social, and cultural relationship with the land, waters, skies and community. We pay our respects to their Elders past and present, and to their community leaders, and extend that respect to all Aboriginal and Torres Strait Islander peoples.

AUSTRAC's Protecting
Country artwork represents
our vision and purpose,
fighting financial crime
together to protect
Australians from criminal
abuse, both in Australia
and beyond its borders.



Protecting Country



The background is made up of a fishing net which represents the capture of criminals. The dotted patterning represents many different Country across Australia.

The main theme is teamwork, and how AUSTRAC works together with industry and its partners to fight financial crime.

Surrounding these symbols are innovative tools that were used in everyday life. Fighting shields represent protection of the community, the boomerang represents innovation and the different ways that AUSTRAC is fighting financial crime.

Artwork by **Riki Salam**, We Are 27 Creative.

CEO FOREWORD

AUSTRAC is embarking on the most ambitious overhaul of Australia's anti-money laundering laws in a generation. Our 2025-29 Corporate Plan sets out how we are preparing to meet this change with confidence and purpose over the next 4 years.

In November 2024, the Parliament of Australia passed the Anti-Money Laundering and Counter-Terrorism Financing Amendment Bill 2024 (the Bill), amending the previous *Anti-Money Laundering and Counter-Terrorism Financing Act 2006*. The reforms represent a major milestone to strengthen Australia's ability to combat financial crime and meet the international standards set by the Financial Action Task Force. The reforms also expand our regulatory oversight to new sectors recognised as high-risk, such as real estate professionals, lawyers and accountants. AUSTRAC currently regulates over 19,000 businesses, as we bring onboard these 'Tranche 2' entities this figure will rise to over 100,000.

This expansion is a huge undertaking for our Regulatory Division. In response, we have refocused our regulatory strategy and designed new priorities that will guide our activities and ensure the effective allocation of resources. We are shifting from a narrow focus on compliance, to one centred on

outcomes, specifically, the harms caused when businesses fail to manage money laundering risks or report suspicious activity to AUSTRAC. We are collaborating closely with industry to co-design guidance and develop educational products that meet the needs of small and large businesses. Existing reporting entities, especially Fintel Alliance partners, have an important role to play as new sectors come on board – helping to set the tone and raise standards across the regime.

The Fintel Alliance, established in 2017, continues to be a world-leading public-private-partnership that connects government, law enforcement and industry partners to detect, disrupt and deter financial crime. Its success has led us to invest even further in its growth and capability. AUSTRAC's strong partnerships have also prevailed across the public and private sectors in Australia and internationally, and remain a core strength. Our work with our partners and other financial intelligence units (FIUs) helps law enforcement operations across the globe.

This period of legislative reform presents a once in a generation opportunity to transform our internal capabilities. We are embracing new tools and technologies, improving digital channels, and redesigning priority business processes ensure AUSTRAC remains a world-class, data-driven agency. We have established a dedicated Data Division to strengthen our data-driven culture, are investing in our people to foster a united and high-performing workforce, and are enhancing our risk management approach to uphold strong organisational accountability and transparency.

None of this would be possible without the commitment of our people. Their professionalism and dedication are central to our vision of a community protected from financial crime. Over the next 4 years we face important work to deliver these historic reforms and close the gaps serious and organised crime is out to exploit. With our new regulatory approach, strong partnerships and continued innovation, AUSTRAC is well positioned to strengthen the integrity of Australia's financial system and stay ahead of evolving criminal threats.

STATEMENT OF PREPARATION

I, Brendan Thomas, as the accountable authority for AUSTRAC, present the *AUSTRAC Corporate Plan 2025–29* as required under paragraph 35(1)(b) of the *Public Governance, Performance and Accountability Act 2013*.

Brendan Thomas
Chief Executive Officer

AUSTRAC



8

OUR
PURPOSE



VISION

A community protected from financially enabled crime

OUTCOME

The protection of the community and financial system from criminal abuse through a data driven and risk-based approach to financial intelligence and regulation and collaboration with domestic and international partners.

PURPOSE

To build resilience in the financial system and use financial intelligence and regulation to detect, deter and disrupt money laundering, terrorism financing, and other serious crime

VALUES

Our values are expressed through our culture statement

Trusted



Inclusive



Collaborative



Impactful



KEY ACTIVITIES

Our purpose is demonstrated by the following activities

Key activity 1
AML/CTF
Regulator



Key activity 2
Financial
Intelligence
Unit (FIU)



PRIORITIES

Priority 1

Efforts are directed to areas of highest risk and harm as defined by the NRA, NIC missions and SOCCC priorities¹

Priority 2

Successfully implement the Government's AML/CTF reforms and embed new sectors into the regime to a global standard

Priority 3

Transform into a world leading data driven digital agency in financial regulation and intelligence

Enabling priorities

- i. Enhance and leverage our network of strategic partnerships for the mutual benefit of community protection
- ii. Cultivate a united and high performing organisation

¹ National Intelligence Community (NIC), Serious and Organised Crime Coordination Committee (SOCCC) and National Risk Assessments (NRA)

OUR PURPOSE

As Australia's anti-money laundering and counter-terrorism financing (AML/CTF) regulator and financial intelligence unit (FIU), AUSTRAC plays an important role in protecting the community and financial system from abuse. AUSTRAC builds resilience in the financial system and uses financial intelligence and regulation to detect, deter and disrupt money laundering and terrorism financing (ML/TF), and other serious crime.

AUSTRAC currently regulates more than 19,000 businesses – that provide financial, gambling, bullion, remittance and digital currency exchange services – to discover, understand and disrupt criminal threats. AUSTRAC leverages the capabilities of intelligence and regulatory experts, with the assistance of enabling services, to achieve its purpose.

AUSTRAC's functions are set out in the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (AML/CTF Act). AUSTRAC's role (as designated to the CEO) is to:

- retain, compile, analyse, disseminate and facilitate access to AUSTRAC information, to support domestic and international efforts to combat ML/TF and other serious crimes
- provide advice and assistance, in relation to AUSTRAC information, to the persons and agencies authorised to access AUSTRAC information
- promote compliance with the AML/CTF regime, as well as advise and assist reporting entities and their representatives in relation to their AML/CTF obligations
- facilitate gaining access on a timely basis to the financial, administrative and law enforcement information that the AUSTRAC CEO requires to properly undertake the AUSTRAC CEO's financial intelligence functions
- assist in the development of government policy or assist academic research.

In addition to the functions set out above, AUSTRAC's CEO has powers, functions and duties described in other legislation including:

- the *Public Governance, Performance and Accountability Act 2013* (PGPA Act) and related legislative instruments
- employment legislation including, but not limited to, the *Public Service Act 1999*
- information management legislation including, but not limited to, the *Privacy Act 1988*
- legislation establishing rights to seek review of government decisions, including the *Administrative Appeals Tribunal Act 1975*.

KEY ACTIVITIES

AUSTRAC measures our performance and demonstrates achievement of our purpose by undertaking 2 key activities as Australia's AML/CTF regulator and FIU. We refreshed and streamlined our articulation of key activities to more clearly demonstrate the link between our functions and the achievement of the outcome statement.

Key activity 1: AML/CTF Regulator

As Australia's AML/CTF regulator, AUSTRAC supports reporting entities to be aware of contemporary money laundering, terrorism financing, and proliferation financing (ML/TF/PF) risks. We also influence them to manage these risks and submit high-quality reporting under the AML/CTF Act. In doing so, AUSTRAC protects the financial sector and our regulated population from criminal infiltration and exploitation.

High-level activities and intended results

- Pursue a risk-based, outcomes-focused regulatory approach, which focuses effort on regulatory priorities that reduce harms over time and are informed by data and intelligence.
- Harness AUSTRAC data by examining trends, vulnerabilities, indicators of harm and emerging or increasing risks, to inform regulatory priorities.
- Design regulatory interventions to influence improvements in ML/TF/PF controls and quality of reporting, by using combinations of regulatory practices and statutory powers.
- Promote awareness of money laundering risks and vulnerabilities, through integrated insights.
- Assess the effectiveness of reporting entities' controls and reporting systems in managing ML/TF/PF risks.
- Promote improvements in ML/TF/PF controls and reporting by providing clear guidance, and online and in-person education, about AML/CTF obligations, ML/TF/PF risks and effective risk controls and reporting.
- Investigate suspected contraventions of the AML/CTF Act, especially where those contraventions result in harm to the Australian community.

High-level activities and intended results cont.

- Exercise statutory powers to intervene to manage ML/TF/PF risks, where reporting entities are unwilling or ineffective in doing so.
- Engage with partners to maintain an effective legislative system for managing current and emerging ML/TF/PF that minimises the adverse economic and social impacts of these risks on Australia.
- Support work to build upon the AML/CTF global standards, through engagement with such bodies as the Financial Action Task Force (FATF).

AUSTRAC introduced 6 new outcome-oriented regulatory priorities in July 2025 to guide the delivery of the activities above.² The regulatory priorities are expressed in a manner that articulates the outcomes and milestones AUSTRAC expects reporting entities to achieve by 30 June 2026:

1. 'Tranche 2' entities understand their AML/CTF obligations and start appropriately managing their ML/TF/PF risks.
2. Existing reporting entities implement changes to their AML/CTF programs and practice, to align with changes in the legislative regime.
3. An increased proportion of entities understand and comply with their suspicious matter reporting obligations.
4. Improved ML/TF/PF risk management within the digital currency exchange and virtual asset service provider sectors.
5. Improved risk management by reporting entities whose exposure to cash creates ML/TF/PF vulnerabilities.
6. Increased capability and coordination around the management of ML/TF/PF risks in the Pacific region.

² austrac.gov.au/about-us/amlctf-reform/austrac-regulatory-expectations-and-priorities-2025-26

Key activity 2: Financial intelligence unit (FIU)

As Australia's FIU, AUSTRAC uses information collected from the entities we regulate, specialised analytical tools and tradecraft, and other data sources, to understand the existing and potential future vulnerabilities that impact the financial system. AUSTRAC uses these insights to generate and provide actionable financial intelligence to partners, to disrupt national security threats and criminal exploitation of Australia's financial system.

High-level activities and intended results

- Generate and disseminate timely, actionable financial intelligence and data, and strengthen relationships and capabilities with AUSTRAC's partner agencies.
- Collaborate with and support AUSTRAC's domestic and international law enforcement partners, to enable them to disrupt exploitation and criminal misuse of Australia's financial system.
- Continue to make relevant and timely transactions and suspicious matters reported to AUSTRAC directly available – via Analyst Workbench – to authorised users.
- Identify, acquire and analyse new data sets and sources to reveal and respond to financial crime.
- Enhance analytical capabilities to better present insights and targeted intelligence to partners, to effectively manage vulnerabilities in the financial system.
- Leverage domestic and international partnerships to share experience and better understand emerging threats and risks.
- Share insights and knowledge with AUSTRAC's domestic and international partners through our deployed officers located in overseas posts, and work in regional forums to provide a high standard of actionable intelligence and optimise uptake of referrals.
- Deliver capability development programs to international partner agencies, to support efforts to strengthen the global financial system.
- Harness the collective resources of industry, government, international partners and Fintel Alliance, to detect crime, share actionable intelligence and improve the capability of regional partner agencies to discover, combat and disrupt serious financial crime and national security threats.
- Shape AUSTRAC's intelligence-led regulation of reporting entities and decision making through financial expertise and intelligence capability.

14

OPERATING
CONTEXT -
ENVIRONMENT



OPERATING CONTEXT— ENVIRONMENT

Australia, by virtue of its economic prosperity, stability of government and effective rule of law, is an attractive destination for criminals to launder the proceeds of crime. Australia remains a highly lucrative market for illicit goods and is targeted by transnational criminal networks. Individual wealth remains a target for fraud and cybercrime. The combination of these threats means that proceeds of crime will be laundered through Australia's financial system to reach offshore criminal networks or invested into further criminal offending. AUSTRAC, with law enforcement and national security agencies, targets the criminal business model to disrupt and deter this activity, reduce harm to the community, and minimise loss of government revenue.

In 2025–26, with the expansion of AUSTRAC's regulatory remit following passage of the *Anti-Money Laundering and Counter-Terrorism Financing Amendment Act 2024* (AML/CTF Amendment Act), AUSTRAC's operating environment is set to become more dynamic, diverse, and sizable. Specific environmental factors impacting AUSTRAC over the period of this plan are described below.

Global shifts

AUSTRAC must continually adapt to the changing national security and broader financial crime environment. Threats to Australia are becoming more serious, with heightening international conflict and the fragmentation of social cohesion across the world. Domestically, a broad range of grievances, fuelled by ongoing international conflicts and cost-of-living pressures, drive politically motivated violence and religiously and ideologically motivated violent extremism. More broadly, AUSTRAC must also maintain an awareness of global events and decisions made by key international partners, ensuring that the potential implications of strategically significant matters are considered or prioritised, particularly as they relate to Australia's financial services sectors and regional priorities. AUSTRAC will continue to cooperate with the National Intelligence Community, government and law enforcement partners in response to these shifts.

Technological change

The rapid evolution of technology is an accelerant to criminal activity. It allows malevolent action to be taken more quickly, with greater anonymity and on a broader scale than previously possible, which presents significant challenges for AUSTRAC and our partners.

The emergence of artificial intelligence (AI) has reduced the level of sophistication cybercriminals need for their operations. AI has enabled personalised, targeted attacks and has inherent user risks that must be continually managed to gain benefit and ensure security. Cyberattacks continue to increase in frequency, and the popularity of untraceable cryptocurrency and blockchains has risen sharply. Identity verification, a key pillar of AML/CTF controls, is likely to become an increasingly contested space with the emergence of AI and deepfakes. The dark web and easy-access encryption tools continue to allow criminal activities to be obscured. It is crucial that AUSTRAC, in partnership with industry, maintains our ability to adapt and respond to these advances in technology, to achieve the purpose to detect, deter and disrupt ML/TF and other serious crime.

Technological advancements continue to drive innovation. This speeds up the value transfer chain and enables value to be transferred almost instantaneously across national and international borders, in some cases anonymously. While the evolving technological environment can surface new threats, it also presents opportunities to enhance the value and efficiency of Australia's financial system. AUSTRAC is committed to leveraging these technological advancements for a more impactful, efficient and scalable use of data, to further evolve towards a data-driven, digital-first agency.

Legislative reform

On 10 December 2024 the AML/CTF Amendment Act received Royal Assent and broadened Australia's AML/CTF remit to more effectively deter, detect and disrupt ML/TF.

These reforms represent a significant step forward in protecting the Australian community from financially enabled crime. The amendments to the AML/CTF Act modernise existing frameworks and expand the obligations under the Act to a wide range of industries and businesses that facilitate the transfer of value in Australia's financial system.

From 1 July 2026 the amended AML/CTF Act will cover certain services provided by sectors exposed to higher ML/TF risks: real estate professionals; dealers in precious metals and stones; and professional service providers such as lawyers, conveyancers, accountants, and trust and company service providers. The number of reporting entities covered by the reform is estimated to rise from more than 19,000 to over 100,000.

A key priority for AUSTRAC is to successfully implement the legislative reforms and embed the new sectors into the regime to a global standard. A key element of this goal is to ensure that regulated businesses (particularly small businesses) can manage ML/TF/PF risks without incurring unreasonable costs. AUSTRAC is working closely with industry to implement the reforms, including: developing guidance to support businesses to understand their obligations and financial crime risks; and developing 'starter kits' comprising risk assessments and AML/CTF programs for smaller, less complex businesses.

International best practice

AUSTRAC remains committed to supporting the Australian Government and private sector stakeholders in preparing for Australia's upcoming comprehensive mutual evaluation by the FATF from 2025 to 2027. As part of these efforts, AUSTRAC will deliver on its agency-wide strategic plan to demonstrate effectiveness as a regulator and FIU.

18

OPERATING
CONTEXT -
CAPABILITY



OPERATING CONTEXT— CAPABILITY

People

AUSTRAC prides itself on a highly capable workforce that is recognised for its integrity and expertise, and is well equipped to respond to change. Over the period of this plan, as embodied by the 'One AUSTRAC' culture statement, we will continue to develop our people to ensure a **trusted, inclusive, collaborative** and **impactful** workforce now and into the future.

Workforce planning

AUSTRAC's future workforce activities, initiatives, and strategies are informed by the 'People Strategy 2022–26' and 'Strategic Workforce Plan 2022–26'. These support our high-performing workforce and position AUSTRAC for sustainable success at a time of growth and rapid change. AUSTRAC operates in line with the Strategic Commissioning Framework. Core work is done in-house in most cases, and any outsourcing of core work is minimal and aligns with the limited circumstances permitted under the framework.

ONE AUSTRAC
FIGHTING FINANCIAL CRIME, TOGETHER

Trusted



Inclusive



Collaborative



Impactful



To ensure AUSTRAC attracts and retains staff who are adaptable and responsive to our evolving environment, we revised and enhanced our recruitment and attraction strategies. The talent acquisition plan incorporates updated processes, policies, advertising, and guides to prepare for the future. The plan features practical, actionable, sustainable, and scalable initiatives that will continue to set AUSTRAC apart as an employer of choice.

Learning and development

With the new legislative reforms and upcoming FATF mutual evaluation, AUSTRAC continues to invest in the learning and development of our people, to create an adaptable operating environment. We are committed to fostering and developing expertise in staff. This includes world-class analysts for tactical, operational and strategic financial intelligence, and specialist staff to drive education, supervision and enforcement outcomes.

We are developing a new 'Enterprise Capability Architecture' and a 'Skills and Competency Framework', building on our commitment to a united and high-achieving workforce. The identification of critical capabilities, access to professional development programs, and expanded core skills offerings will support the growth of our workforce with appropriate skills and capabilities to deliver AUSTRAC's purpose and key activities. With the continued increase in workforce size, focus is shifting from the recently implemented enhancements in

staff onboarding and induction program, to manager induction and ongoing support. This shift aims to optimise the knowledge, skills and attributes needed to lead high-performing teams in a hybrid workplace within a fast-paced environment of change.

Diversity and inclusion

AUSTRAC embraces diversity, flexibility, equality and an inclusive workforce culture that strengthens capability to deliver on our purpose and key activities. We are committed to ensuring our workforce reflects the diversity of the Australian community, and fostering a sense of belonging for all employees. The action plans in the 'Innovate Reconciliation Action Plan 2024–26' and 'Gender Equality Action Plan 2025–26' outline key actions that drive AUSTRAC's commitment to diversity and inclusion. AUSTRAC is also pleased to be an ongoing member of Pride in Diversity, the Australian Disability Network, and the Diversity Council of Australia.

Security and integrity

AUSTRAC embeds a strong security and integrity culture against a backdrop of an increasingly dynamic, diverse and degraded security environment. We are committed to ensuring every one of our employees understands and adheres to their obligations across integrity and personnel security, physical security and information security. This is in accordance with the requirements of the Protective Security Policy Framework and Information Security Manual.

AUSTRAC supports capability improvements through:

- driving understanding of the threat environment
- developing and delivering fit-for-purpose training initiatives
- delivering multi-modal awareness campaigns on integrity and security obligations
- implementing a credible 'Insider Threat Program'
- increasing security resilience of AUSTRAC workplaces, including for deployed employees.

AUSTRAC's delivery of a robust program of pre-engagement and ongoing suitability assessment remains a priority, particularly during agency growth, to maintain high security standards and strong workplace culture aligned with Australian Public Service and AUSTRAC values.

AUSTRAC addresses non-compliance at the earliest opportunity to identify, mitigate and manage security risks. We will continue to facilitate investigations into suspected breaches of integrity and security policies, and any suspected actions that require mandatory referral to the National Anti-Corruption Commission (NACC).

AUSTRAC's security and integrity posture equips our people to deliver on our purpose. This is essential for AUSTRAC to remain a trusted and integral law enforcement and National Intelligence Community partner.

Data capability

AUSTRAC's core mission of protecting Australia from financially-enabled crime was strengthened and broadened by the expansion of our legislative remit to cover new industries and sectors vulnerable to ML/TF risks. To achieve impact in this wider population, AUSTRAC needs to transform the way we work with ever-increasing volumes and complexity of data, and invest in data capabilities to deliver a sustainable and scalable way of delivering more comprehensive and impactful analysis and insights.

In 2024–25 we established a Data division and appointed a Chief Data and Analytics Officer to lead strategic uplift and transformation across our use and management of data, analytics, AI and insights capabilities. Through these capabilities, we aim to incrementally strengthen the use of high-quality and high-value data to drive actionable financial intelligence, risk-based regulation, data-driven business planning, and data-focused collaboration with domestic and international partners.

AUSTRAC continues to foster a data-driven culture through access to data literacy training programs. We are growing our internal data profession community through: professional development; participation in whole-of-government policy, research and training initiatives; and recruiting additional specialist data expertise to complement existing capability. We are focused on building insights to empower everyday decision making using data, and create more effective and efficient ways of working.

We are committed to driving data collaboration with reporting entities and government partner agencies, to maximise regulatory and intelligence operations. Integrating advanced analytics and AI techniques, and investing in interoperable data environments across our operations, will broaden our ability to collaborate with partners. This is to protect the community from financial crime harms, by anticipating and detecting emerging threats in the financial ecosystem.

Program and change management

As AUSTRAC undertakes rapid reform and growth it has recognised the need to expand its approach to change management, service design, insights, business analytics and its enterprise portfolio management office (EPMO). The benefits of this expansion are:

- improved service delivery: enhancing regulatory processes makes compliance more straightforward for reporting entities
- insights driven outcomes: business analysis provides data-driven insights to inform and focus on priority activities, achieving regulatory and intelligence outcomes
- agility in regulatory changes: change management ensures smooth adaptation to new systems, processes, policies and legislative requirements

- stronger alignment with strategic goals: EPMO functionality ensures that projects align with organisational priorities
- enhanced collaboration and stakeholder engagement: service design fosters user-centred solutions, improving our effectiveness
- scaled program decisions: supports data, technology and digital program prioritisation across AUSTRAC, creates visibility, alignment, and accountability on investments and allows early identification of interdependencies, delivery feasibility, and change impacts

Digital and technology

The modernisation and expansion of the AML/CTF legislation, and the need for AUSTRAC to keep pace with a rapidly-evolving technological environment, requires a substantial work program to enhance AUSTRAC's systems and technology. Critical to the delivery of our corporate plan and new digital and technology strategies, is an investment underway to uplift core information and communications technology and digital capabilities, including architecture, information management, service management and cloud operations. Investment in information and cybersecurity also remains an ongoing priority.

Specific initiatives in progress include:

- improving the online registration, enrolment and transaction reporting portal for use by reporting entities, to support the modernisation and expansion of AUSTRAC's regulatory environment
- investing in the customer relationship management system, and modernising our Contact Centre, to support the significant increase in reporting entities and facilitate a single view of related information across AUSTRAC
- enhancing the case management system to standardise and automate processes
- investing in corporate platforms, including service management, human resource, and financial management systems, to improve usability and functionality
- developing service management capabilities to support internal processes, including the management of the employee lifecycle
- maximising the functionality and usage of the communication and collaboration platform for internal, domestic, public-private and international secure information sharing.



24

OPERATING
CONTEXT -
RISK MANAGEMENT
AND GOVERNANCE



OPERATING CONTEXT— RISK MANAGEMENT AND GOVERNANCE

Enterprise risk oversight and management arrangements

AUSTRAC manages risks in accordance with the Commonwealth Risk Management Policy and our 'Risk Management Policy and Framework', which provides guidance to all employees integrating risk-based decision making into their business-as-usual activities. Managing risk is the responsibility of all AUSTRAC employees, contractors, consultants and seconded personnel, including government, private sector and representatives seconded to Fintel Alliance.

AUSTRAC's governance structure and practices support the CEO in the effective oversight of the agency. The Executive Board has oversight of AUSTRAC's risk management, including internal control and enterprise risk profile, and ensures organisational accountability and transparency through oversight of our governance committees. Our committees actively manage risks within their specific areas of strategic operation, while our Audit and Risk Committee provides the CEO with independent advice on the appropriateness of our system of risk oversight and management.

Our SES officers champion positive risk practices and behaviours, and guide their implementation through embedding risk management into the day-to-day decision-making processes within their divisions and branches.

AUSTRAC's Internal Audit function independently confirms governance and compliance effectiveness, and recommends improvements.

We continue to focus on maturing our internal control environment; in particular, testing and reporting of controls to provide our leadership team with assurance of the design and operating effectiveness of controls. This allows decision makers to act quickly and with confidence in a dynamic environment. We will also embed a range of training and awareness activities to support employees in their role of managing risks.

KEY RISK CATEGORIES

The following table outlines AUSTRAC's **key risk categories** for 2025–26 to achieve our strategic priorities and meet government, stakeholder and public expectations. Risk focus areas are reviewed and prioritised annually. A full list of AUSTRAC's risk categories is in Figure 1 (page 29).

Key risks

Risk category	Description	Key mitigation strategies
Technology	AUSTRAC's technology does not adequately meet the future requirements of the agency leading to disruption and harm to reporting entities, partners and staff, and harm to reputation.	<p>Our 'Agency Roadmap', 'Technology Strategy' and 'Technology Blueprint' set out the critical path for transformation activities and guide future technology decisions, supporting AUSTRAC to evolve and enhance capability to protect the Australian community from financially-enabled crime and become a world-leading agency in data-driven financial intelligence and regulation. These are supported by a holistic 'Digital Strategy' that seeks to ensure our digital maturity and delivery capabilities continue to advance in line with global advancements in technology, while continuing to respond to technology-related threats.</p> <p>Through enhanced governance, coordination and business processes via the Executive Board, Technical Advisory Group, EPMO and Change Management Office, AUSTRAC considers the future architecture, systems and technology, and ensures technology decisions and activities across different groups are aligned to our purpose and priorities.</p>

Risk category	Description	Key mitigation strategies
People	AUSTRAC does not have appropriate resources and adequately skilled staff leading to opportunity costs and deterioration of culture and morale.	Our Agency Roadmap , 'People Strategy', 'Leadership Strategy', 'Learning and Development Framework', essential learning program , 'Talent Acquisition Plan' and 'Strategic Workforce Plan' guide and support AUSTRAC to build organisational capability through attracting, retaining and developing a skilled workforce. AUSTRAC is committed to a respectful, inclusive and diverse workplace for all, framed by policies and processes and underpinned by the 'Agency Values'.
Regulation	AUSTRAC does not effectively engage with industry and manage regulatory interventions leading to an increase in regulatory non-compliance and opportunity costs.	Our ' Agency Strategy ', ' Regulation Strategy ', ' Regulatory Operating Model ' and ' Regulatory Priorities ' guide and support AUSTRAC to: <ul style="list-style-type: none"> • provide accurate and timely advice and education to internal and external stakeholders • use effective regulatory approaches • and proactively engage, consult and collaborate with industry to best meet the needs of our regulated population.

Risk category	Description	Key mitigation strategies
Information management, information security (including cyber events) and data protection	AUSTRAC does not effectively protect and manage its information and data leading to harm to stakeholders, relationships and trust, harm to reputation and compliance breaches.	The protection of AUSTRAC's sensitive information is a priority. Our 'Cybersecurity Strategy' describes AUSTRAC's cyber posture and 3 guiding principles that outline best practice approach to cybersecurity, while the maturing of our data governance policies and practices will ensure our data is appropriately protected. Our security and privacy frameworks, policies and practices ensure AUSTRAC's compliance with the <i>Privacy Act 1988</i> , <i>Archives Act 1983</i> , and <i>Freedom of Information Act 1982</i> , and are underpinned by the Protective Security Policy Framework, Australian Privacy Principles and best practice cybersecurity standards (for example, Australian Cyber Security Centre Essential Eight). These are supported by an embedded security and privacy culture , and robust controls, monitoring and oversight .
Program and project management	AUSTRAC does not have adequate project and program governance leading to unrealised benefits, harm to stakeholder relationships and trust, misused public monies, harm to reputation and opportunity costs.	Our EPMO provides critical oversight, guidance and assurance for key projects to ensure project decisions align with the agency's strategic objectives. This is supported by our project frameworks ('Benefits Realisation', 'Project Delivery' and 'Project Governance'), training, project guides and templates . This supports existing risk management frameworks, guides and templates .

AUSTRAC risk categories

Key risk categories

- Technology
- Regulation
- People
- Information Management, Information Security (including cyber events) and Data Protection
- Program and Project Management

Other risk categories

- Governance
- Finance
- Third Party
- Legal and Compliance
- Strategic Priorities
- Business Continuity
- Financial Intelligence
- Physical Security and Safety
- Conduct and Integrity
- Data Management and Use



Figure 1: AUSTRAC's risk categories

30

OPERATING
CONTEXT -
COOPERATION



OPERATING CONTEXT— COOPERATION

Criminal abuse of the financial system is pervasive and can infiltrate and impact all aspects of the Australian community. AUSTRAC's work to prevent criminal abuse of the financial system and protect Australian communities is founded in partnerships with government, industry and other bodies, both domestically and internationally.

AUSTRAC's key partnerships include:

Sector oversight

MINISTER AND PARLIAMENT

AUSTRAC reports to the Minister for Home Affairs, the Hon Tony Burke MP. As a statutory agency and non-corporate Commonwealth entity, AUSTRAC is subject to parliamentary oversight, including through parliamentary committees.

INDEPENDENT OVERSIGHT

AUSTRAC is subject to external, independent oversight from various bodies, including the Australian National Audit Office and the NACC. In 2026, Australia is expecting a mutual evaluation by FATF, to ensure our AML/CTF controls meet international standards. AUSTRAC, as Australia's AML/CTF regulator and FIU, will be front-and-centre in this mutual evaluation.

Government partners

AUSTRAC works with federal, state and territory law enforcement and intelligence partners, in the Home Affairs portfolio and across the wider National Intelligence Community and broader Australian Government, to detect and disrupt serious crime, undertake reforms, and implement improvements to our legislative frameworks. AUSTRAC also works closely with regulatory and revenue agencies to identify risks across the financial sector, to manage risk and non-compliance. As a member of diverse taskforces, AUSTRAC plays an important role in detecting, deterring and disrupting ML/TF and other serious crime.

Industry partners

REGULATED REPORTING ENTITIES

AUSTRAC works with more than 19,000 reporting entities to harden the financial system against criminal exploitation, by providing guidance and education, and taking regulatory action where necessary. In 2026 the number of reporting entities is predicted to increase to over 100,000. To increase the effectiveness of the reforms, we are: developing guidance and educational materials; engaging through forums and working groups to support reporting entities to meet new or changed obligations; and developing starter kits for small, low-complexity businesses.

FINTEL ALLIANCE

AUSTRAC leads and collaborates through our public-private partnership, Fintel Alliance, to analyse and generate financial intelligence with government and private sector partners. This collaborative effort detects financial crime, improves industry resilience and compliance, and proactively supports investigations into serious crimes and national security threats. In April 2025 Fintel Alliance was expanded and became a distinct branch within AUSTRAC, with greater involvement from industry and government partners. This move demonstrates how essential and successful the public-private partnership is in addressing complex financial crime that requires a multilateral response.

International partners

AUSTRAC operates within a broad web of international collaboration. AUSTRAC Liaison Officers and our international engagement teams drive international exchanges and partnerships in forums such as FATF and the Egmont Group of FIUs, to collaboratively combat financial crime. AUSTRAC plays a leading role in strengthening ties and building capability among regional partners. We do this through initiatives like the Financial Intelligence Consultative Group and the Pacific Financial Intelligence Community. AUSTRAC shares intelligence to combat financial and other serious crime in Australia and overseas.

Sector engagement

REGTECH/FINTECH PROVIDERS AND AML/CTF ADVISERS

AUSTRAC engages with firms who provide support to reporting entities, enabling industry compliance programs and technological solutions to meet AUSTRAC requirements.

ACADEMIA

AUSTRAC works with various academics, specialist technology providers and research bodies, who provide ongoing support and expertise that ensures AUSTRAC's approach to technology, data and analytics is innovative and leverages contemporary research expertise.

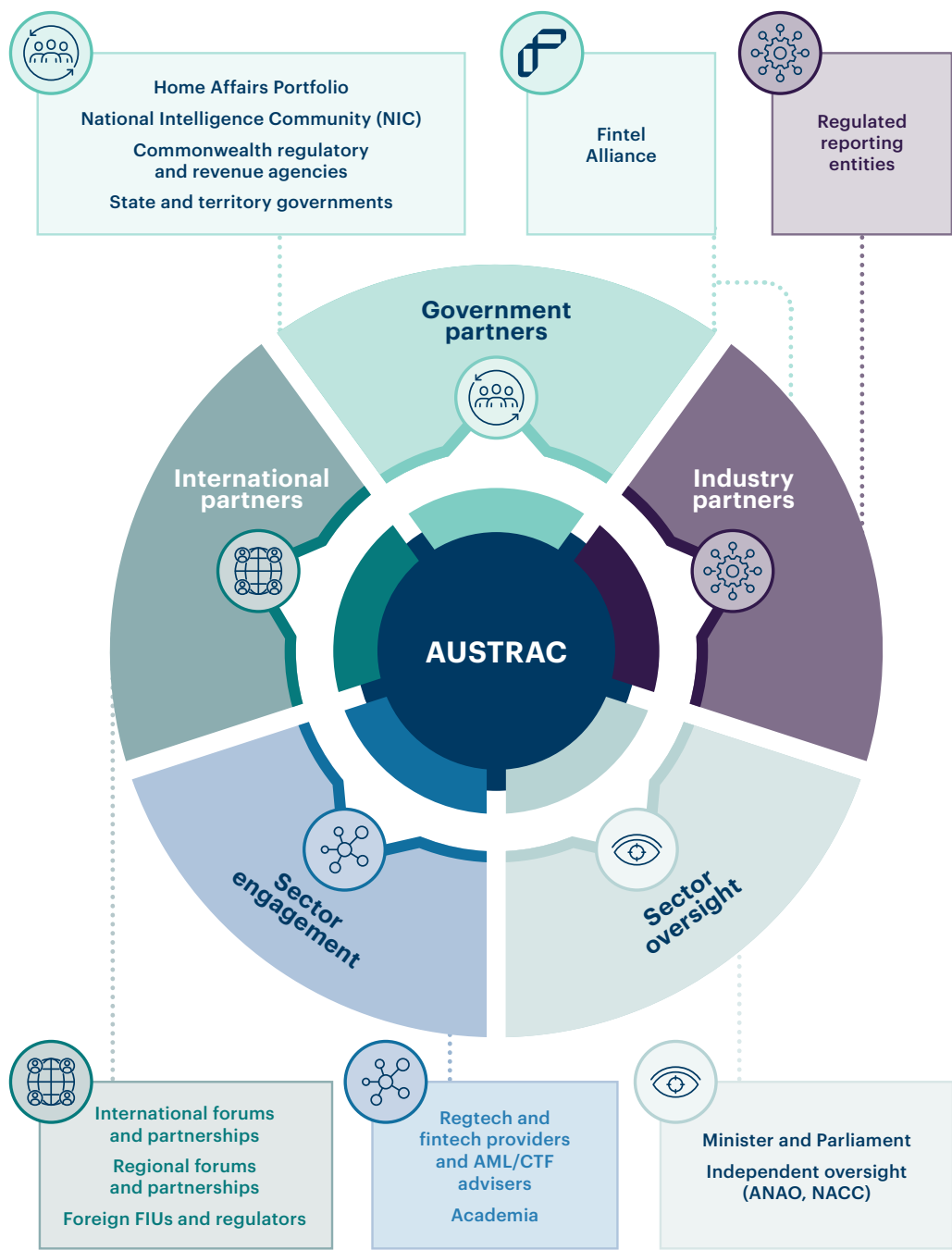


Figure 2: AUSTRAC's key partnerships

34

PLANNING AND PERFORMANCE



PLANNING AND PERFORMANCE

AUSTRAC's planning and performance framework

AUSTRAC's planning and performance reporting framework is aligned to the Commonwealth Performance Framework. The corporate plan is AUSTRAC's primary planning document and sets out our vision, outcome, purpose and key activities, and how performance against those activities is measured in alignment with the Commonwealth Performance Framework.

Performance planning begins with the publication of AUSTRAC's performance measures and targets in the Portfolio Budget Statements, followed by further details on the performance measures, targets, and measurement methodology in the corporate plan. Each division reports quarterly against their plan.




We close off the performance cycle each year by reporting on the results in the annual performance statements in our annual report. The annual performance statements detail the actual performance for the year, against the measures and targets in the corporate plan. This includes analysis of the extent to which AUSTRAC has achieved our purpose and the factors that contributed to the outcome. This provides a clear line of sight between AUSTRAC's strategic direction and operational activities.

Regulator performance reporting requirements

The Minister for Home Affairs as portfolio minister issues a Ministerial Statement of Expectations as a notice of strategic direction to AUSTRAC. This, with AUSTRAC's Statement of Intent, is reported on our website.³

Through AUSTRAC's performance reporting, our agency demonstrates how we are meeting the government's expectations of regulator best practice as defined by the 3 principles outlined below. Our regulatory performance is reported through our annual performance statements, to ensure we take a holistic and integrated approach to agency performance.

³ austrac.gov.au/about-us/corporate-information-and-governance/reports-and-accountability

Principles of regulator best practice		Measures
	1. Continuous improvement and building trust: regulators adopt a whole-of-system perspective, continuously improving their performance, capability and culture to build trust and confidence in Australia's regulatory settings.	Performance measure 1
	2. Risk based and data driven: regulators manage risks proportionately and maintain essential safeguards while minimising regulatory burden, and leverage data and digital technology to support those they regulate to comply and grow.	Performance measures 1 and 4
	3. Collaboration and engagement: regulators are transparent and responsive communicators, implementing regulations in a modern and collaborative way.	Performance measures 1 and 2

PERFORMANCE

Throughout 2025 AUSTRAC has undertaken a comprehensive overhaul of our performance measures to better align with our strategic priorities, and to develop performance measures that are more meaningful reflections of our performance. The revised suite of measures has been streamlined and simplified, and is expected to be instrumental in informing strategic decision making and demonstrating effectiveness. For 2025–26 AUSTRAC has committed to establishing a performance baseline as a target for most of these new measures, and will continue to evolve and mature our measurement methodologies and targets in the forward years. We also revised our key activities of regulation and intelligence to reflect our functional remit.

We will use the following performance measures to evaluate performance against our key activities. Results against these performance measures will be reported in the annual performance statements in our annual report 2025–26.

JOINT KEY ACTIVITIES - AML/CTF REGULATOR AND FIU

Performance measures	Targets			
	2025–26	2026–27	2027–28	2028–29
1. Improvement in key indicators of money laundering and terrorism financing risk	2 out of 3 initiatives in response to key risks met their targets	2 out of 3 initiatives in response to key risks met their targets	2 out of 3 initiatives in response to key risks met their targets	2 out of 3 initiatives in response to key risks met their targets
<p>Rationale: Both AUSTRAC's regulatory and intelligence functions target their resources at addressing the most significant and pressing ML/TF risks. This measure is intended to demonstrate the efficacy of the initiatives AUSTRAC undertakes in reducing or mitigating those key risks. Each reporting period, AUSTRAC identifies and prioritises the most significant ML/TF risks, and designs and implements initiatives to mitigate them. The purpose of each initiative is to tangibly impact the key risk.</p> <p>During the planning phase, a target impact is determined for each initiative using a risk indicator which is baselined at the beginning of the reporting period, prior to intervention. At the end of the reporting period, AUSTRAC assesses whether each expected impact was achieved by comparing the change in risk indicator from the baseline to the target.</p>				
<p>Methodology: The sum of initiatives that delivered their targeted impact out of the total number of initiatives.</p>				
<p>Data source: SAFE</p>				
<p>Changes since corporate plan 2024–28: New measure.</p>				

AML/CTF REGULATOR

Performance measures	Targets			
	2025–26	2026–27	2027–28	2028–29
2. Percentage of regulatory activities targeted at reporting entities which are exposed to the highest inherent risk	Establish a baseline	TBD	TBD	TBD
Rationale: As a risk-based and data-driven regulator, AUSTRAC strives to ensure our regulatory efforts are targeted where they will have the greatest impact. This measure is intended to demonstrate the extent to which AUSTRAC’s regulatory activities (comprised of guidance, supervisory and enforcement activities) are targeted at influencing those reporting entities that are considered to be exposed to the highest inherent risk.				
Methodology: The number of regulatory campaigns and activities targeted at reporting entities exposed to the highest inherent risk (as identified by AUSTRAC’s Targeting and Prioritisation Model) within the financial year, divided by the total number of regulatory campaigns and activities.				
Data source: SAFE				
Changes since corporate plan 2024–28: New measure.				

FINANCIAL INTELLIGENCE UNIT

Performance measures	Targets			
	2025–26	2026–27	2027–28	2028–29
3. Improvement or maintenance of Partnership Engagement Score	Establish a baseline	TBD	TBD	TBD
Rationale: In order for AUSTRAC to achieve its outcome, it is critical that we are responsive to the needs of our partners, and that they view our intelligence products as timely, insightful and actionable. This measure is intended to demonstrate the extent to which AUSTRAC’s intelligence supports stakeholders’ decision-making needs, and provide a single overall score indicating partner sentiment.				

Methodology: Partner feedback is collected through 3 channels: an annual partner engagement survey, regular partner feedback sessions, and intelligence product feedback forms.

Responses from all 3 channels are assigned a numerical value, weighted, and added together to provide a single 'Partnership Engagement Score'.

Data source: SAFE

Changes since corporate plan 2024–28: New measure. This measure incorporates the annual survey measure noted in AUSTRAC's Portfolio Budget Statements 2025–26, Program 1.1, page 212, as part of the overall Partnership Engagement Score.

4. Improvement or maintenance of ratio of intelligence products to partner substantive action	Establish a baseline	TBD	TBD	TBD
---	----------------------	-----	-----	-----

Rationale: AUSTRAC's intelligence products are intended to drive decision-making and substantive actions by our partners in order to reduce harm and protect Australia from ML/TF and other serious and organised crime. This measure is intended to demonstrate the number of substantive actions undertaken by partners for every AUSTRAC intelligence product.

AUSTRAC will utilise intelligence product feedback forms, targeted product feedback requests and direct engagement through our regional intelligence manager network, to record instances of AUSTRAC intelligence leading to substantive actions by partners. Substantive actions are defined in consultation with partner agencies, but may include directing a line of enquiry, closing a line of enquiry, initiating or furthering an investigation, or supporting the instigation of a taskforce. Instances of substantive action will be tallied and represented as a ratio of the total number of intelligence products disseminated during the reporting period.

Methodology: A ratio of the sum of partner substantive actions in response to AUSTRAC intelligence products, to the total number of AUSTRAC intelligence products disseminated to those partners during the reporting period.

As this is the first year of reporting against this performance measure, AUSTRAC will assess a subset of relevant partners, rather than all partners, while the collection methodology is refined and matured.

Data source: JIRA

Changes since corporate plan 2024–28: New measure.

40

APPENDICES



APPENDIX A – LIST OF REQUIREMENTS

This corporate plan has been prepared in accordance with the requirements of:

- subsection 35(1) of the PGPA Act
- subsection 16E(2) of the PGPA Rule 2014.

The table below details the requirements met by AUSTRAC's corporate plan and the page references(s) for each requirement.

Requirements	Page(s)
Introduction	
<ul style="list-style-type: none"> • Statement of preparation • The reporting period for which the plan is prepared • The reporting periods covered by the plan 	6-7
Purpose	10
Key activities	11
Operating context	
<ul style="list-style-type: none"> • Environment 	15
<ul style="list-style-type: none"> • Capability 	19
<ul style="list-style-type: none"> • Risk oversight and management, including key risks and their management 	25
<ul style="list-style-type: none"> • Cooperation 	31
<ul style="list-style-type: none"> • Subsidiaries 	N/A
Performance	
<ul style="list-style-type: none"> • Performance measures 	37
<ul style="list-style-type: none"> • Targets for each performance measure (if reasonably practicable to set a target) 	37

