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AUSTRAC



**Fintel
Alliance**

An AUSTRAC initiative

2024–25 FINTEL ALLIANCE ANNUAL REPORT EXTRACT

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FINTEL
ALLIANCE



ABOUT FINTEL ALLIANCE

Fintel Alliance is an AUSTRAC-led initiative established in 2017 uniting government, law enforcement and industry partners, to increase the resilience of the financial sector to criminal exploitation.

As a world-leading public-private partnership, Fintel Alliance supports law enforcement investigations into money laundering, terrorism financing and serious crimes, while empowering both public and private sectors to better identify and mitigate financial crime and reduce community harm.

Disrupting and preventing crime using financial intelligence works best when the right people with the right skills collaborate. Fintel Alliance's operating model is built on the core principles of shared governance, strategy and capability development through sharing knowledge, insights and the experience of its members.

This model sees AUSTRAC, as Australia's financial intelligence unit (FIU), working in close partnership with key Australian government agencies and leading financial institutions. This multilateral, collaborative approach ensures Fintel Alliance generates unique insight into Australia's financial systems and criminal threat landscape. These insights support financial service providers and the broader community to identify, report and disrupt financial crime threats.

FINTEL ALLIANCE'S WORK

Growing substantially since its inception, Fintel Alliance leverages the resources and expertise of members to address criminal risks across the financial sector, and deliver on government intelligence priorities.

Information sharing is at the heart of Fintel Alliance, facilitated through staff secondments and partner co-location. Working together, Fintel Alliance members collectively generate a greater understanding of financial crime methods, identify and target suspected offenders, share learnings broadly to harden the financial environment against crime, and reduce harm to the community.

YEAR IN REVIEW

While maintaining operational pace, this financial year marked a period of expansion, transition and innovation for Fintel Alliance. As well as progressing work against strategic priorities, we focused on the expansion of Fintel Alliance, mapping our future operating model to ensure our continued success.

Key highlights included:

- developing a strategy to support the expansion of Fintel Alliance
- increasing AUSTRAC staffing within Fintel Alliance
- transitioning the Collaborative Analytics Hub from a proof-of-concept to a core function
- updating our Member Protocol to enhance information sharing
- continuing a range of working groups with key partners
- welcoming Victoria Police to Fintel Alliance, joining as a full member, further strengthening our membership among law enforcement partners
- generating threat alerts to raise industry awareness of emerging risks
- developing educational materials to raise awareness of 'scambling' to minimise harm to the community.

FINTEL ALLIANCE STRATEGIC PRIORITIES

Financial crime enterprises are highly complex, operating through globally-dispersed and multi-layered networks. Serious organised crime groups are agile and strategic, often employing professional facilitators and outsourcing money laundering to minimise risk and avoid detection. These groups exploit traditional channels and emerging opportunities created by new payment technologies and advances in financial innovation.

Responding to this complex threat environment requires a collective response. This includes ensuring alignment and complementing the work of other government initiatives, avoiding duplication of effort, and fostering relationships with key partners, while extending our reach to non-traditional partners.

To best address emerging and persistent financial crime risks, the work of Fintel Alliance has focused on the following strategic priorities.



Persistent crime threats – the illicit drug market remains a pervasive criminal threat in Australia, and money laundering by professional money laundering organisations (MLOs) is a key enabler for serious and organised crime (SOC). This work stream complements law enforcement efforts by harnessing Fintel Alliance resources to detect, disrupt and prevent illicit drug supply and MLO activity.



Technology enablers – criminal groups exploit advances in banking, payments and communications technologies. AUSTRAC is increasing our focus on digital currency exchanges (DCEs) and payments platforms due to these emerging risks. This work stream draws on industry expertise to detect and prevent criminal exploitation of emerging technologies and financial channels.



High-risk sectors and jurisdictions – AUSTRAC's Money laundering in Australia national risk assessment¹ identified vulnerable sectors of the economy and high-risk jurisdictions that SOC groups exploit. This work stream focuses on identifying criminal activity and emerging risks in these sectors and jurisdictions.



Protecting the community – Fintel Alliance prioritises efforts to protect the community and provides operational support to urgent law enforcement investigations. Through this work stream, we can respond rapidly to the intelligence needs of partner agencies and take a collaborative approach to emerging and complex crimes that harm the community.



National security – national security threats such as terrorism, foreign interference and espionage are a high priority for government. Addressing terrorism financing threats is a key component of AUSTRAC's mandate and Australia's implementation of the Financial Action Task Force standards.

¹ austrac.gov.au/business/how-comply-guidance-and-resources/guidance-resources/money-laundering-australia-national-risk-assessment-2024

MEMBER PROTOCOL UPDATED

To accommodate varying levels of engagement among participants and better position for the future, Fintel Alliance updated our Member Protocol. A primary objective of Fintel Alliance is developing an operating environment for exchanging real-time intelligence and delivery of:

- shared information, skills, resources and capabilities
- joint review and analysis of shared information, and production of financial intelligence
- exploring new and innovative approaches to discover and disrupt financial crime
- collaboration based on operational and strategic priorities.

The updated Member Protocol provides the cooperative framework for promoting a collaborative environment within Fintel Alliance. It offers a tiered approach to membership to cater to different levels of engagement among participants and their ability to contribute to strategic priorities:

- a **strategic** level for members who commit to strong participation in our governance and oversight structures, and project involvement
- an **operational** level for members who are keen to engage in working group projects and regular meetings where their interests align
- an **intelligence** level for members who wish to receive information and opt in to certain pieces of work on ad-hoc basis, while still supporting the public-private partnership objectives.

COLLABORATIVE ANALYTICS HUB

The Collaborative Analytics Hub is a key data-driven initiative under Fintel Alliance, designed to accelerate the analysis of financial data and deepen collaboration between government and industry partners. This program looks to strengthen Australia's resilience to financial crime by improving how data is shared, analysed and operationalised, to detect and disrupt criminal activity. It aims to harden the financial system against exploitation, reducing harm to the community.

Over the past financial year, Fintel Alliance successfully transitioned the Collaborative Analytics Hub from a proof-of-concept into a core function. This evolution reflects growing recognition of the critical role that advanced analytics and integrated intelligence play in combating complex and evolving financial threats.

The inaugural project focused on enhancing visibility of suspicious cash activity in the Australian banking system. Conducted under legal notice, participating banks provided a data set of over-the-counter and ATM cash deposits, to better understand the intelligence picture of potential money laundering activity across major financial institutions. Using a secure and shared digital channel, the information was transformed to surface suspicious deposit activity through a series of visualisations and filtered views.

AUSTRAC led the design and development of interactive dashboards, in close collaboration with data science professionals from member banks. These teams worked together through design workshops to ensure they collected only the relevant data fields and points needed to identify criminality.

Using the combined data sets, Fintel Alliance was able to detect suspicious behaviour that was not previously visible. In a short space of time, Fintel Alliance identified criminal networks, which are now subject to law enforcement action. This shows the power of intelligence, partnerships and collective effort to drive proactive disruption of financial crime.

EVOLVING FINTEL ALLIANCE FOR THE FUTURE

Fintel Alliance continues to lead global efforts to combat financial crime through real-time, intelligence-led collaboration. Our joint operations have delivered significant outcomes, including enhanced understanding of money laundering typologies in Australia, arrests and asset seizures. These successes underpin the decision for AUSTRAC to expand Fintel Alliance to strengthen its capacity to detect, prevent and disrupt financial crime at scale.

Building on 8 years of proven impact, Fintel Alliance formally expanded on 1 April 2025, marking a new phase in the evolution of our public-private financial intelligence collaboration.

Key elements of the expansion include:

- Fintel Alliance established as a distinct branch in the Intelligence division structure, with a dedicated National Manager
- increased AUSTRAC staffing including data specialists
- development of new and innovative intelligence tools and technologies
- secondment of a senior manager from ANZ Bank, to co-lead efforts to strengthen collaboration with industry and government partners
- increased member participation, including closer to full-time industry attendance in our Sydney and Melbourne offices
- development of a public-facing presence (LinkedIn) tailored to raise industry and public awareness, and showcase contributions to disrupting criminal activity.

In support of the expansion of Fintel Alliance, a strategy was developed, identifying key steps to guide growth and build enhanced capability. The strategy envisages near real-time access to enriched, consolidated financial data and intelligence holdings in a single, unified platform, enabling the detection and disruption of previously unidentified criminal activity at scale.

As AUSTRAC prepares to welcome new industries to our regulated population, the expansion will future-proof Fintel Alliance's ability to develop collaborative relationships and innovative responses to detect and disrupt serious criminal threats – now and into the future.

OPERATIONAL HIGHLIGHTS

During 2024–25 we continued initiatives aimed at raising community and industry awareness, assisting in the apprehension of wanted fugitives and protecting the community from harm.

RAISING COMMUNITY AWARENESS OF ILLEGAL ONLINE GAMBLING AND MICRO-LAUNDERING

In August 2024, Fintel Alliance began focusing on micro-laundering and illegal online gambling to better understand opportunities to disrupt the growing threat of unlawful online gambling activity in Australia.

Micro-laundering is a money laundering technique where large sums of illegally obtained money are broken down into smaller, seemingly legitimate transactions in an attempt to avoid detection. In many cases, these funds are linked to illegal online gambling activities – often targeting vulnerable communities.

Under Australia's *Interactive Gambling Act 2001*, it is illegal for gambling providers to offer certain online services, such as online casinos, to people in Australia. However, many unlicensed gambling websites continue to operate unlawfully, often promoting their services through social media and deceptive advertising.

Through collaborative analysis, Fintel Alliance members identified illegal online gambling is causing significant financial harm in Indigenous communities, particularly in regional and remote areas. In response, Fintel Alliance members launched an awareness campaign to tackle a practice known as “scambling” where individuals are lured into gambling on scam websites via misleading social media ads.

As part of this campaign, educational materials titled **‘Have You Been Scambled’** were developed to help raise awareness among at-risk communities and empower people with the knowledge to recognise the signs of illegal online gambling and avoid falling victim to these scams.

Leveraging the strength of Fintel Alliance public-private partnership, the educational package was shared through multiple channels and formats, extending its reach and impact across regional and remote areas.

Fintel Alliance worked closely with a broad network of partners including First Nations advocacy groups, banks, Indigenous engagement teams, gambling regulators, and law enforcement to raise awareness, minimise harm, and protect members of the community. These efforts also support financial institutions to better identify and report both victims and suspected offenders involved in illegal gambling-related activity.



Apprehension of fugitives

Fintel Alliance and the Australian Federal Police's (AFP) Fugitive Apprehension Strike Team collaborate to locate and arrest domestic and international fugitives, by leveraging shared financial intelligence.

This partnership helps to disrupt and dismantle criminal networks by bringing individuals wanted by Australian and foreign law enforcement agencies to justice. These fugitives are located in Australia or overseas and are subject to arrest warrants for crimes including murder, manslaughter, child exploitation, drug trafficking, money laundering and serious fraud.

This successful initiative began as a bespoke project and transitioned into an enduring body of work. The ongoing engagement of Fintel Alliance and the AFP reflects the value and relevance of the undertaking.

The collective resources of Fintel Alliance partners continue to be harnessed to operationalise financial intelligence, to support the location and arrest of fugitives. Fintel Alliance's assistance continues to play a key role in achieving successful outcomes.

WORKING GROUPS

Fintel Alliance working groups offer a platform for participants to collaborate and exchange insights on emerging trends, risks and methodologies identified through operational activity. Information shared by the financial services, gambling, remittance, and digital currency sectors plays a vital role in supporting AUSTRAC and our government partners to detect, disrupt and dismantle criminal networks moving illicit funds through Australia's financial system.

Virtual Assets Working Group

The Fintel Alliance Virtual Assets Working Group brings together experts from DCE providers, law enforcement and government agencies, in the fight against money laundering and terrorism financing, and other serious crime.

The working group involves collaborative information sharing between industry and government, including new and emerging trends, methodologies and risks relating to financial crime. Throughout the year, the working group continued to focus on:

- awareness and prevention of cryptocurrency-related scams
- combating child exploitation where virtual assets are used.

The Virtual Assets Working Group has:

- enabled capability and tradecraft uplift among members, focusing on understanding and responding to financial crime through virtual assets
- used the enhanced knowledge to increase the quantity and quality of reporting related to suspicious activity involving virtual assets
- identified new and emerging financial crime risks impacting DCE providers and the wider Australian community.

Insights and learnings developed and captured by the working group continue to be shared domestically and internationally. This has supported public and private partners to improve their capability relating to virtual assets.

Casino Working Group

The Fintel Alliance Casino Working Group unites financial crime experts from across law enforcement, government, AUSTRAC and representatives from every Australian casino. This collaboration fosters a strong, trusted network committed to sharing intelligence, promoting best practice, and enhancing the collective ability to detect and respond to financial crime in the casino and gaming sector.

The working group provides a dedicated forum for members to exchange timely information and operational insights on new and emerging money laundering typologies specific to the casino environment. Through these discussions, the group builds a shared understanding of risks and vulnerabilities that may be exploited by criminal networks.

Beyond information sharing, the group actively explores opportunities to strengthen financial crime controls across the sector. This includes identifying regulatory gaps, improving detection capabilities, and aligning industry efforts with ongoing regulatory and law enforcement priorities.

Through sustained collaboration, the Casino Working Group contributes to more effective disruption of criminal activity, delivering outcomes for both the Australian public and the broader gaming industry.

National Security Working Group

The Fintel Alliance National Security Working Group is a trusted partnership between government, law enforcement and private industry. It leverages financial intelligence, forensic accounting, criminal investigative skills and national security knowledge.

The working group focuses on identification, response and prevention of terrorism financing and national security risks, through support of the Joint Threat Financing Group, an AFP and AUSTRAC partnership.

Areas of focus for 2024–25 included:

- maturing national security crisis coordination processes related to financial intelligence, to ensure a unified, coordinated approach to terrorism situations and investigations
- private and government collaboration including the efficient, lawful sharing of information in times of crises
- developing a set of financial indicators and data analysis tools to identify national security risks across the threat spectrum
- supporting national security activities where applicable.

Five Eyes public-private partnership round table

The Fintel Alliance-led public-private round table between Five Eyes FIUs continued this financial year, with a focus on:

- sharing insights on disrupting money laundering and terrorism financing
- understanding how financial systems are misused to cause harm to vulnerable individuals
- enhancing public-private data sharing between industry and government
- exploring opportunities for collaboration on operational priorities between Five Eyes public-private partnerships.

The quarterly round table provides a forum for sharing insights gained into current financial crime trends, increased understanding of new and emerging financial crime risks, identifying best practices and strengthening relationships. The round table will continue to expand on opportunities to collaborate operationally across borders, to fight criminal abuse of financial systems globally.

THREAT ALERTS

Threat alerts are co-developed by members, in response to contemporary or emerging financial crime threats, identified by government agencies and industry partners working collaboratively in Fintel Alliance. Threat alerts support government agencies to understand how criminals are targeting businesses and the community, while assisting the financial sector to identify and report suspicious activity and enhance their internal controls.

Money laundering impacts of citizenship and residency by investment programs

The Fintel Alliance Casino Working Group undertook a collaborative project to understand money laundering and financial crime risks associated with citizenship or residency by investment programs. This project was driven by growing concerns within the casino industry about the elevated risks posed by customers from jurisdictions that offer such programs.

These programs, often referred to as 'golden passports' or 'golden visas', allow individuals to gain residency or citizenship in certain jurisdictions through financial investment, and have been identified internationally as potential vehicles for criminal exploitation. Recognising the evolving nature of these risks, the Casino Working Group brought together experts from across government, law enforcement, AUSTRAC, and the casino industry, to examine how these programs may be misused to facilitate illicit financial flows, conceal beneficial ownership, or bypass customer due diligence processes.

As a result of this work, the group developed a threat alert to highlight key risk indicators and typologies associated with the misuse of investment-based migration schemes. The alert provides practical intelligence to help financial service providers and casino operators identify suspicious behaviour linked to these programs.

The threat alert was shared with Fintel Alliance working groups and international partners to increase awareness and encourage the strengthening of controls and customer due diligence practices. These collective efforts aim to protect the Australian financial system from being exploited through complex, cross-border schemes, and reduce the risk of serious and organised crime infiltrating legitimate financial and investment channels.

Exploitation of digital currency exchange providers by high-risk remittance service providers

The Fintel Alliance Virtual Assets Working Group collaborated to develop a comprehensive understanding of how criminals exploit the nexus between high-risk remittance service providers and DCE providers to launder funds and conduct illicit activities.

With the rise of digital currencies in Australia, illicit actors have increasingly leveraged cryptocurrency channels to obscure the origin of funds and evade detection by government and law enforcement agencies. To address this, the working group produced a threat alert outlining key risks and indicators associated with high-risk remitter and DCE activity.

The alert highlighted findings on the exploitation of DCE providers by high-risk remittance services. Remittance corridors remain vulnerable to money laundering and terrorism financing due to factors such as cash exposure, cross-border transactions, and the rapid movement of funds facilitated by diverse product delivery methods.

While legitimate remittance providers may open accounts with DCE providers for liquidity or efficient international transfers, this alert details observed criminal methodologies used to facilitate money laundering and illegal remittance services.

Aligning with Fintel Alliance's strategic objective to proactively detect and prevent exploitation of emerging technologies and financial channels by criminal groups, the threat alert was distributed to Fintel Alliance and Virtual Assets Working Group members, to raise awareness and support financial service providers in strengthening controls to mitigate these emerging risks.

PROJECT CLOSURES

Fintel Alliance projects allow greater understanding of a crime type, identification and targeting of suspected offenders, and sharing learnings with a wider audience, to assist in hardening the environment. At the closure of a project, the project is evaluated, recognising outcomes and successes and sharing learnings before the effort is transitioned into standard operational activity or ceased, as appropriate.

This year, three projects were transitioned out of Fintel Alliance operations, in recognition of the considerable progress made on understanding these risks due to the dedicated focus of Fintel Alliance members. They are summarised below.

Combating the exploitation of international students as money mules

Operating between February 2022 and July 2024, the project aimed to better understand and mitigate the money laundering risks associated with international student visa holders in Australia.

Money mules are a key enabler of SOC groups. International students are particularly vulnerable to recruitment as money mules due to their immigration status, limited working opportunities and lack of access to government support.

Through identifying networks of money mules among international students, the project sought to enhance industry capability in detecting and disrupting such activities, through collaborative intelligence sharing.

Key achievements of the project include:

- an increased awareness of the financial crime risk and methodology associated with the use of money mules
- enhanced understanding of the financial crime risks associated with international students
- education of the wider financial sector and partner agencies on the indicators and behavioural methodologies of international student money mules in Australia
- identification of the role of financial intelligence in detecting and disrupting criminal activity linked to accounts held by international students
- identification of entities who engaged in ongoing financial activity indicative of other criminality such as money laundering, scam activity, and tax fraud.

Insights identified through the project were shared publicly in the financial crime guide *Combating the exploitation of international students as money mules*,² to assist government agencies and the financial sector to understand and identify signs of criminal networks exploiting vulnerable members of the community as money mules.

² austrac.gov.au/sites/default/files/2024-06/2024_AUSTRAC_FCG_StudentMoneyMules.pdf

The guide, developed in partnership with the AFP and Australian Border Force, provides indicators and behavioural methodologies of money mule activity, including methods of recruitment. It supports industry efforts to target and disrupt financial transactions associated with money mule activity.

The financial crime guide formed part of a broader awareness campaign via Australian universities to protect students from becoming victim to this activity, and links into the AFP's 'Don't be a mule!' campaign.³

Environmental crime project

The environmental crime project operated from 2022 to 2024, focusing on understanding and identifying the links between environmental crime and financial crime.

In 2021 the Financial Action Task Force (FATF) called on countries to prioritise understanding of financial links to environmental crimes, to help identify and disrupt organised crime networks involved.⁴ FATF reported that transnational crime gangs involved in environmental crimes often commit other serious crimes such as drug trafficking, illicit arms smuggling and human trafficking.

The project resulted in shared learnings, associated insights and information sharing, made possible by the collaborative approach of Fintel Alliance partners. Insights gained through the project allowed Fintel Alliance members to better identify financial indicators of environmental crime.

These insights were harnessed by partners to identify financial activity indicative of environmental crime, and progress it to the point of intervention either via suspicious matter reporting or enforcement action.

Key achievements of the project include:

- sharing trends, indicators and detection techniques, resulting in an increased ability to understand and identify financial indicators of environmental crime
- an increase in the quality and quantity of suspicious matter reports submitted to AUSTRAC detailing suspected environmental crime
- suspicious matter reporting enabled a referral pathway from industry to AUSTRAC, and on to state and federal environment agencies
- an increased awareness of environmental crime as a form of financial crime
- education of the wider financial sector on the indicators of environmental crime in Australia.

³ afp.gov.au/news-centre/media-release/australian-police-warn-university-students-about-money-muling-dontbeamule

⁴ fatf-gafi.org/en/publications/Fatfgeneral/Environmental-crime-conference-dec-2021.html

The collective efforts of the Fintel Alliance public and private partners directly contributed to increased protection for the Australian community and the environment in which they live.

Technology enablers of crime

Running from September 2022 to March 2025, in collaboration with government and industry partners, this project aimed to enhance understanding of technology-enabled crimes. Criminals exploit various technological tools to coordinate their illicit activity, evade detection and obscure their operations.

The project successfully:

- enhanced industry, government and law enforcement understanding of the financial and behavioural indicators of technology-enabled crime
- increased quality of suspicious matter reports detailing suspected criminal activity, generating referrals to state and federal environment agencies.

Upon closure of the project, this work transitioned to AUSTRAC's business-as-usual functions, with law enforcement partners directly accessing and retrieving AUSTRAC holdings relating to this risk.

PARTNERS

Fintel Alliance consists of 30 member organisations who leverage their resources and expertise to address risks across the Australian financial ecosystem requiring a multi-lateral approach.

Our current membership consists of:

- Attorney-General's Department
- AUSTRAC
- Australia and New Zealand Banking Group Limited
- Australian Border Force
- Australian Competition and Consumer Commission
- Australian Criminal Intelligence Commission
- Australian Federal Police
- Australian Financial Crimes Exchange Ltd
- Australian Government Treasury
- Australian Securities and Investments Commission
- Australian Taxation Office
- Bendigo and Adelaide Bank Ltd
- Commonwealth Bank of Australia
- Deakin University
- HSBC Bank Australia Limited
- Macquarie Bank Limited
- MoneyGram Payment Systems Inc.
- National Australia Bank Limited
- National Crime Agency (UK)
- New South Wales Crime Commission
- New South Wales Police Force
- New Zealand Police Financial Intelligence Unit
- PayPal Australia Pty Limited
- Queensland Police Service
- Services Australia
- South Australia Police
- Tabcorp Ltd
- Western Australia Police Force
- Western Union Financial Services (Australia) Pty Ltd
- Westpac Banking Corporation

PARTNER LOGOS



