

Meeting your anti-money laundering and counter-terrorism financing (AML/CTF) obligations

Governance quick guide for AML/CTF compliance officers

An AML/CTF compliance officer oversees and coordinates a business' day-to-day AML/CTF compliance with the AML/CTF Act, Rules and their AML/CTF program. They play an important role in helping your business:

- Maintain and update its AML/CTF policies and money laundering, terrorism financing and proliferation financing risk assessment. We refer to this as your ML/TF risks.
- Make sure its AML/CTF policies and ML/TF risk assessment are submitted to senior management for approval and records of approval are kept.





Use this quick guide to help you keep track of what actions you should take to make sure your business is complying with its AML/CTF obligations.

Note: This quick guide is a practical tool to help AML/CTF compliance officers oversee and coordinate their business's compliance with its obligations and isn't exhaustive. It should be read in conjunction with the AML/CTF governance and oversight factsheet AUSTRAC guidance and the AML/CTF Act and Rules. These explain the role and obligations of the AML/CTF compliance officer in more detail. You may wish to seek independent advice to ensure you understand your obligations.

AML/CTF programs



- Oversee day-to-day compliance with the AML/CTF Act, Rules, and the business's AML/CTF program.
- Oversee the maintenance and updates to your AML/CTF policies and money laundering and terrorism financing and proliferation financing risk assessment. We refer to these as ML/TF risks.
- Ensure your AML/CTF policies and ML/TF risk assessment are submitted to your senior manager/s for approval and records of approvals are kept.
- Oversee the independent evaluation of your AML/CTF program at least once every 3 years.
- Ensure you have the authority, independence and resources to perform your role and raise any gaps with your senior manager/s.

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| ML/TF risk management  | <ul style="list-style-type: none"> • Complete a new risk assessment before any new designated services, customer types, delivery channels or jurisdictions are introduced. • Stay informed about ML/TF risks in your business/industry. • Keep your governing body and senior management informed of ML/TF risks and compliance issues. Escalate significant non-compliance or deficiencies. |
| Reporting  | <ul style="list-style-type: none"> • Provide your governing body with a written report at least once every 12 months covering: <ul style="list-style-type: none"> - your business's compliance with its AML/CTF policies - how well your policies are managing ML/TF risks - overall compliance with the AML/CTF Act and Rules. |
| Communication and training  | <ul style="list-style-type: none"> • Communicate with AUSTRAC on all AML/CTF matters including: <ul style="list-style-type: none"> - any changes to your business or AML/CTF compliance officer details - responding to feedback received from AUSTRAC. • Oversee and coordinate your personnel receiving appropriate training on their AML/CTF responsibilities and the business's ML/TF risks. |
| Record keeping  | <ul style="list-style-type: none"> • Ensure the business keep records including: <ul style="list-style-type: none"> - your ML/TF risk assessment and AML/CTF policies (with version control) - approvals and decisions (including program updates, high-risk customer approvals, customer due diligence (CDD) agreements and personnel due diligence) - evidence of completed AML/CTF staff training - reports submitted to AUSTRAC - any communications with AUSTRAC. |