

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

Governance quick guide for senior managers

Your business must nominate one or more senior managers to make important AML/CTF decisions. Senior managers cannot delegate their obligations. If your business has multiple senior managers, they may share responsibilities, but each must remain directly accountable for their assigned obligations.

Use this quick guide to help you keep track of what actions you should take to make sure you're meeting your AML/CTF obligations.

Note: This quick guide is a practical tool to help senior managers understand their business's compliance with their 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 senior managers in more detail. You may wish to seek independent advice to ensure you understand your obligations.



AML/CTF program and policies

- Approve your business's AML/CTF program, including any updates to its policies or the money laundering, terrorism financing and proliferation financing risk assessment. We refer to these as ML/TF risks.
- Approve, in circumstances listed in your AML/CTF policies:
 - starting to provide a designated service to a customer
 - whether to continue a business relationship with a customer.
- Approve your business starting to provide a designated service to a customer as part of a nested services relationship.



Third party agreements for customer due diligence (CDD)

- Approve any arrangement to use a third party to collect and verify CDD information.



Politically exposed persons (PEPs)

- Approve providing a designated service to customers where you've established on reasonable grounds that the customer, the beneficial owner of a customer, or any person on whose behalf the customer is receiving a designated service, is a:
 - foreign PEP
 - high-risk customer who is a domestic PEP
 - high-risk customer who is an international organisation PEP
 - any other person in circumstances listed in your AML/CTF policies.

Record keeping

Your business must keep records showing that your senior manager/s have met their obligations. It's good practice to use version control when approving AML/CTF policies and ML/TF risk assessments.