

# Real Estate

## AML/CTF Compliance Checklist

Use this checklist to track your progress towards meeting your AML/CTF obligations under AUSTRAC. Tick off each step as you complete it.

◆ With ARCamI, you get secure portal access to manage all your customers, verifications, and compliance documentation in one place.

- **1. Enrol & nominate an AMLCO**  
Enrol with AUSTRAC and appoint an AML/CTF Compliance Officer who has the authority to implement AML/CTF processes & controls.
- **2. ML/TF risk assessment**  
Identify the money laundering, terrorism financing & proliferation financing risks within your business by assessing your customer types, products, delivery channels, and the countries you deal with.
- **3. AML/CTF Program**  
Develop and document your AML/CTF Program which will capture the policies, procedures, systems and controls you'll use to manage and mitigate your ML/TF risks.
- **4. Subscribe to ARCamI for portal access**  
Get secure access to the ARCamI portal — your centralised dashboard to manage customers, run verifications, track compliance status, and generate audit-ready CDD Certificates. Visit [www.ideedworks.com.au/arcaml](http://www.ideedworks.com.au/arcaml) to get started.
- **5. INITIAL ONBOARDING: ARCamI 5-Step Process**
  - Step 1:** Subscribe to ARCamI and set up your account for real estate compliance.
  - Step 2:** Send buyers & sellers link from ARCamI for identity & ownership verification.
  - Step 3:** ARCamI verifies identities, screens against PEP & sanctions lists — all AUSTRAC compliant.
  - Step 4:** Receive settlement-ready compliance pack confirming due diligence is complete.
  - Step 5:** Proceed to settlement with audit-ready records retained for 7 years.
- **6. Continuous Compliance for New Customers**
  - Initial Phase (First Transaction):** Complete full CDD using the ARCamI 5-step process above to verify all customers before settlement.
  - Ongoing Monitoring:** Monitor changes in customer information and property details. Re-verify KYC/KYB annually or when risk indicators emerge (adverse media, address changes, sanctions hits).
  - Enhanced Due Diligence:** Apply EDD procedures where red flags appear (complex ownership structures, unusual geographic patterns, high-value transactions).

## ■ 7. Continuous Compliance for Existing Customers

**Transition to Continuous Process:** Establish risk-based profiles for existing customers. Update ARCamI with current customer information and re-verify beneficial ownership.

**Re-verification Schedule:** Rescreen existing customers on a risk-based cycle (typically annually for low-risk, semi-annually or quarterly for medium/high-risk).

**Trigger-Based Re-screening:** Immediately rescreen when: address or beneficial ownership changes, new customer relationship developments, adverse media emerges, or PEP status changes.

## ■ 8. Enhanced Customer Due Diligence (ECDD)

Apply ECDD procedures and verify additional KYC/KYB information where red flags/risk indicators arise (e.g., complex structures, high-risk geographies, adverse media).

## ■ 9. Reporting obligations

Submit Suspicious Matter Reports (SMRs) to AUSTRAC whenever a new suspicion forms.

## ■ 10. Records, training & review

Keep customer & other records for at least 7 years, provide ML/TF risk awareness training to your management & staff, and arrange regular independent reviews of your AML program.