



The AML/CTF Readiness Guide for Real Estate Agencies

A practical four-week plan for Australian agencies ahead of 1 July 2026.

Prepared by VeriEzi. Share this with your principal, licensee-in-charge and sales team.



The short version

From 1 July 2026, agencies that broker the sale, purchase or transfer of property become reporting entities under the *Anti-Money Laundering and Counter-Terrorism Financing Amendment Act 2024* (Cth). Developers selling directly through in-house teams are captured too.

1

Enrol

Be enrolled with AUSTRAC, the window closes 29 July 2026.

2

Program & Officer

Have an AML/CTF program in place and a designated compliance officer.

3


Train Staff

Ensure all staff have been trained before the commencement date.

4

Report

Be ready to report suspicious matters from day one.

 AUSTRAC expects effort, not perfection, in the first year. Early enforcement is aimed at businesses that fail to enrol or turn a blind eye to money laundering.

What is captured, and what is not

Captured

- Brokering the sale, purchase or transfer of real estate, for selling agents and buyer's agents alike. No price threshold; residential and commercial alike.
- Developers selling or transferring property without an independent agent: off-the-plan apartments, house and land packages, subdivision lots.

Not Captured

- Property management and leasing (leases of 30 years or less are excluded).
- Private sales by owners.
- Selling your own business premises.

- ❑ A combined sales and property management agency is still a reporting entity because of its sales arm.

✓ INCLUDED ACTIVITIES

REAL ESTATE TRANSACTIONS



WHAT'S INCLUDED:

-  REPRESENT BUYERS AND SELLERS
-  NEGOTIATE TERMS AND PRICES
-  FACILITATE PROPERTY SALES AND PURCHASES

EXAMPLES



VS.

✗ EXCLUDED ACTIVITIES

NOT REAL ESTATE TRANSACTIONS

PROPERTY MANAGEMENT

Overseeing, inspecting, and managing rental properties is not a real estate transaction.



PRIVATE HOMEOWNER TRANSACTIONS

Homeowners selling or renting their own property without a real estate license are not conducting a real estate transaction.



FOCUS: BROKERAGE AND SALE OF REAL ESTATE

NOT A BROKERAGE ACTIVITY – EXCLUDED FROM LICENSING

The point most agencies get wrong

Under the brokering service, your customer is **both the seller and the buyer**, regardless of who appointed you.

	Your client	The other side
Selling agent	When the agency agreement is signed	When the offer is accepted and the contract is signed
Buyer's agent	When the engagement agreement is signed	When the transaction is reasonably expected to proceed
Developer	The buyer only	Not applicable


Vendor due diligence happens at listing. Buyer due diligence happens between acceptance and exchange. For auctions, where the buyer is only known at the fall of the hammer, AUSTRAC permits delayed initial customer due diligence. The check still happens; only the timing flexes.

Both sides are your customer



Your deadlines

Obligation	Deadline
Enrol the legal entity with AUSTRAC	By 29 July 2026 (sooner is safer)
AML/CTF program in place	Before 1 July 2026
Designate a compliance officer (typically the licensee-in-charge)	Notify AUSTRAC by the later of 29 July 2026 or 14 days after enrolling
Customer due diligence operating	From the first designated service
Record retention	7 years, ongoing

-  Enrolment is per legal entity. One ABN with three offices enrolls once. Each franchisee enrolls separately as its own reporting entity.

What due diligence looks like on a sales file

Before the designated service starts, establish on reasonable grounds:

1

Identity

The identity of the customer, and anyone acting on their behalf.

2

Beneficial Owners

Beneficial owners, where the vendor or buyer is a company or trust.

3

PEPs & Sanctions

Whether any of those people are politically exposed persons or subject to targeted financial sanctions.

4

Relationship Purpose

The nature and purpose of the relationship.

5

Source of Funds

Source of funds and wealth where the risk requires it.

For everyday domestic transactions this is a tight workflow: verify, screen, risk-rate, record. The files needing more are the ones you would expect: company and trust buyers, overseas-based parties, unusual settlement structures.

Cash has its own rules

Threshold Transaction Reports

Receiving \$10,000 or more in physical cash triggers a threshold transaction report within 10 business days. AUSTRAC's own worked example is an agency receiving a \$21,250 cash deposit.

Electronic Transfers

Electronic transfers do not trigger TTRs. The TTR obligation applies to physical cash only.

Structuring

A buyer offering to split a large cash deposit into smaller payments to stay under the threshold is structuring. That is what a suspicious matter report is for.

- ❑ Because leasing is not a designated service, cash rent and bonds sit outside TTR territory on the current framing. Agencies handling significant cash rent should confirm their position with AUSTRAC or a compliance adviser.



The four-week plan

Week 1: Enrol and Appoint

Enrol the licensee entity on AUSTRAC Online. Designate the compliance officer, document the fit-and-proper assessment, notify AUSTRAC.

1

2

Week 2: Build the Program

Work through AUSTRAC's real estate starter kit risk assessment honestly: suburb mix, buyer profile, cash exposure, trust and company transactions, overseas parties. Customise the policies to how your office actually runs files.

3

Week 3: Wire CDD into Workflow

Decide who runs verification at listing and at contract, what tool they use, where records live, and how a high-risk result escalates. An agent should not be able to take a file to exchange without the CDD step existing.

4

Week 4: Train and Dry-Run

Brief every agent and admin staff member on the program, the red flags and the reporting workflow. Run two recent sales files through the new process end to end.

The readiness checklist

Use this checklist to confirm your agency is prepared before 1 July 2026.

- Confirm which parts of the business provide designated services
 - Enrol the legal entity on AUSTRAC Online
 - Designate and document a fit-and-proper compliance officer
 - Complete the risk assessment and customise the program
 - Build vendor CDD into listing and buyer CDD into acceptance-to-exchange
- Set the auction process: delayed CDD applied correctly, never skipped
 - Stand up TTR and SMR workflows, including structuring red flags
 - Train every agent and staff member before 1 July, and keep a training register
 - Confirm 7-year record retention
 - Franchise groups: every franchisee entity needs its own enrolment and compliance officer



Where VeriEzi fits

VeriEzi verifies vendors and buyers in one flow. The client receives a link, completes a short questionnaire, and verifies their identity in 5 languages, with no app to download. Overseas-based buyers and sellers are handled natively, including clients on WeChat and Alipay.



300+ Global Databases

Screening runs across 300+ global databases covering sanctions, politically exposed persons and adverse media.



Automated Escalation

High-risk results escalate to your compliance officer. Cash thresholds are flagged for TTR lodgement automatically.



Audit Trail Export

The full audit trail exports to CSV, keeping your records compliant and ready for inspection.



Pay Per Verification

No subscription. No platform fee. You pay per verification, so a quiet month costs almost nothing.



Get 5 free verifications at veriezi.com.au, or book your free demo and see the compliance officer workspace before 1 July.

Important information

VeriEzi provides identity-verification software to support firms preparing for AUSTRAC Tranche 2 reporting obligations. The information in this guide is general in nature and does not constitute legal or compliance advice. Firms remain responsible for their own AML/CTF Program and reporting-entity obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth). For advice specific to your firm's obligations, consult AUSTRAC guidance materials or a qualified compliance adviser.

Sources: AUSTRAC published guidance (verified June 2026), AML/CTF Amendment Act 2024 (Cth), AUSTRAC updated regulator statement of expectations (21 May 2026).

GENERAL INFORMATION ONLY

NOT LEGAL ADVICE

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