AML/CTF PROGRAM · STARTER KIT

Your AML/CTF program, in seven steps.

Work in order. **Evidence each step:** a dated file note is enough.

- [ ] **1 Appoint your compliance officer**
  Assess and record their eligibility. It can be you.
- [ ] **2 Enrol via AUSTRAC Online**
  Retain the account-number email once AUSTRAC confirms enrolment.
- [ ] **3 Do your risk assessment**
  Complete, date, approve and retain it.
- [ ] **4 Put your AML/CTF policies in place**
  Use the applicable starter kit or an equivalent tailored program. Keep the approval.
- [ ] **5 Switch on customer due diligence**
  Start CDD for new customers; identify pre-commencement customers and monitor changes in risk.
- [ ] **6 Be ready to report**
  Train staff on SMR and TTR triggers and reporting readiness.
- [ ] **7 Keep records and keep a rhythm**
  Keep the evidence log for seven years and schedule annual compliance-officer reporting.

"AUSTRAC does not expect perfection on day one."

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