



12-Month AML/CTF Compliance Calendar

Harbourline Real Estate

Dated obligations, effectiveness checks and recurring rhythms

04-Compliance-Calendar · version 1.0 · 3 September 2026 · Prepared for senior-manager approval

Item	Detail
Legal entity	Harbourline Property Group Pty Ltd (ABN 51 824 753 556)
Sector	Real estate agency (sales / buyer's agency)
Locations	Dee Why NSW 2099; Mona Vale NSW 2103
AML/CTF compliance officer	Danielle Okafor — Licensee in Charge
Senior manager (approver)	Danielle Okafor (Licensee in Charge / Director)
Governing body	Board of directors (2 directors)
Document	04-Compliance-Calendar — version 1.0 DRAFT — prepared 3 September 2026
Approval	Approved by: _____ Date: _____ (senior manager)

This is not legal advice. This document is a tailored draft template prepared from information supplied by the business and aligned to AUSTRAC's published guidance for businesses regulated from 1 July 2026. It must be reviewed, adapted and approved by the business's senior manager before use, and should be read together with AUSTRAC's free program starter kit for your sector. It does not create a lawyer-client or adviser relationship. Obtain independent legal advice for your specific circumstances. Verify current requirements at austrac.gov.au.

How to use this calendar

This calendar lists every AML/CTF task Harbourline Property Group Pty Ltd (trading as Harbourline Real Estate) must complete from 1 September 2026 to 31 August 2027, starting from the program effective date of 15 September 2026. It covers both offices (Dee Why head office and Mona Vale).

- Load every row into the practice calendar (Google Calendar or Agentbox tasks) with a reminder 7 days before the date.
- Owner: Danielle Okafor, Licensee in Charge and AML/CTF compliance officer. Backup: [CONFIRM: name of the delegate who acts when Danielle Okafor is on leave].
- Tick-off log: when a task is done, record the date, who did it and where the evidence sits (Agentbox or Google Drive) in the Maintain Program Log kept in Google Drive.
- Missed a date: do the task straight away, then record in the maintenance log what was missed, why, when it was completed and any change made to stop it happening again. Late enrolment or a late report should still be lodged immediately via AUSTRAC Online.
- Every dated entry is a minimum. Suspicious matter reports (24 hours for terrorism financing, 3 business days for other suspicions) and threshold transaction reports (10 business days) run off the event, not this calendar.

Note: Keep all calendar evidence for 7 years. Program records are retained from the date they stop being relevant to demonstrating compliance.

Recurring rhythms

- Monthly (last week of each month): review the escalation register; check AUSTRAC news and update the AUSTRAC communications register; spot-check 3 recent CDD files across sales and buyer's agency.
- Quarterly: run the rotating effectiveness check (onboarding Q1, enhanced CDD Q2, SMR/TTR Q3, compliance officer and senior manager Q4); confirm the DFAT Consolidated Sanctions List and FATF lists used for screening are current; review training needs for new starters and role changes.
- Annual: full training refresher for all 11 staff; annual report to the board of directors; annual compliance report to AUSTRAC in the AUSTRAC-set window; AMLCO annual compliance self-assessment; review the risk assessment for trigger events.
- 3-yearly: full review of the risk assessment and AML/CTF policies (due by 15 September 2029 at the latest); independent evaluation of the program. [CONFIRM: first independent evaluation deadline under the AML/CTF Transitional Rules 2026.]
- Customer periodic reviews: High risk annually, Medium every 2 years, Low every 3 years, plus a trigger-event review whenever the customer's profile or behaviour changes.

Calendar — 1 September 2026 to 31 August 2027

Month	When	Task	Owner	Reference	Frequency
2026-09	By 1 Sep 2026	Confirm AUSTRAC enrolment application was lodged by 29 July 2026 (28 days after first designated service). Enrolment status is 'not started': if not yet lodged, lodge immediately via AUSTRAC Online and record the date and reason for lateness in the maintenance log.	Danielle Okafor	Enrolment – 29 July 2026 due date	Once
2026-09	By 15 Sep 2026	Senior manager (Danielle Okafor) approves AML/CTF Program v1.0 and the ML/TF risk assessment; provide the risk assessment to the board of directors in writing. Record version number and approval date in the policy document.	Danielle Okafor; Board of directors	AUSTRAC Step 3 approval – Program section 1 Governance	Once
2026-09	By 15 Sep 2026	Confirm AUSTRAC has been notified of the AML/CTF compliance officer (Danielle Okafor, Licensee in Charge) within 14 days of appointment, via the enrolment form or AUSTRAC Online update.	Danielle Okafor	Compliance officer notification – Program section 1	Once
2026-09	By 15 Sep 2026	Set up the	Danielle Okafor	Record keeping –	Once

Month	When	Task	Owner	Reference	Frequency
		registers in Google Drive: maintain program log, escalation register, training register, AUSTRAC communications register, version table. Set Agentbox onboarding checklist fields for CDD, PEP/sanctions and risk rating.		Program section 9	
2026-09	By 29 Sep 2026	Program approval and any updates documented within 14 days; version table completed and filed with the approved program.	Danielle Okafor	AUSTRAC Step 3/4 – 14-day documentation rule	Once
2026-09	Last week Sep 2026	First monthly rhythm: review escalation register; check AUSTRAC news and update the communications register; spot-check 3 recent CDD files opened since 15 Sep 2026.	Danielle Okafor	Ongoing CDD – Program section 4	Monthly
2026-10	By 15 Oct 2026	All 7 customer-facing staff (5 sales agents, 2 buyer's agents) complete induction AML/CTF training; training register updated with date, content and attendance. Remaining 4 staff complete awareness module.	Danielle Okafor	Personnel training – Program section 7	Once
2026-10	By 31 Oct 2026	Confirm PEP and	Danielle Okafor	Targeted financial	Once

Month	When	Task	Owner	Reference	Frequency
		DFAT Consolidated Sanctions List screening is live for every new vendor, buyer and beneficial owner (no screening existed before 1 July 2026). Record the screening tool or method used. [CONFIRM: screening tool selected]		sanctions – Program section 5	
2026-10	Last week Oct 2026	Monthly rhythm: escalation register review; AUSTAC news check and communications register; spot-check 3 recent CDD files (one from Mona Vale).	Danielle Okafor	Ongoing CDD – Program section 4	Monthly
2026-11	By 30 Nov 2026	Q1 effectiveness check: onboarding and initial CDD. Sample 10 files opened since 15 Sep 2026 and test identity verification, beneficial owner checks, PEP/sanctions screening and risk rating before the service was provided. Record on the onboarding effectiveness check form.	Danielle Okafor	Effectiveness testing – Program section 8	Quarterly
2026-11	By 30 Nov 2026	Quarterly: confirm DFAT Consolidated Sanctions List and FATF high-risk jurisdiction lists in use are current; review training needs for any new	Danielle Okafor	Targeted financial sanctions; Personnel training	Quarterly

Month	When	Task	Owner	Reference	Frequency
		starters.			
2026-11	Last week Nov 2026	Monthly rhythm: escalation register review; AUSTRAC news check; spot-check 3 recent CDD files.	Danielle Okafor	Ongoing CDD – Program section 4	Monthly
2026-12	First week Dec 2026	Confirm the deadline for the first independent evaluation under the AML/CTF Transitional Rules 2026 and diarise it; record the rationale for evaluation frequency. [CONFIRM: deadline and chosen evaluator]	Danielle Okafor; Board of directors	AUSTRAC Step 5 – Independent evaluation	3-yearly
2026-12	By 18 Dec 2026	Holiday cover: name the delegate who will receive escalations and lodge any SMR over the Christmas closure; confirm AUSTRAC Online login access. [CONFIRM: delegate name]	Danielle Okafor	Reporting – Program section 6	Annual
2026-12	Last week Dec 2026	Monthly rhythm: escalation register review; AUSTRAC news check; spot-check 3 recent CDD files.	Danielle Okafor or delegate	Ongoing CDD – Program section 4	Monthly
2027-01	First week Jan 2027	Check AUSTRAC Online for the annual compliance report window dates and diarise them; confirm enrolment details (directors, offices, contact) are still correct.	Danielle Okafor	Annual compliance report – Reporting	Annual
2027-01	Last week Jan 2027	Monthly rhythm: escalation register	Danielle Okafor	Ongoing CDD –	Monthly

Month	When	Task	Owner	Reference	Frequency
		review; AUSTRAC news check; spot-check 3 recent CDD files.		Program section 4	
2027-02	By 28 Feb 2027	Q2 effectiveness check: enhanced CDD. Review every file rated high risk or flagged for enhanced CDD (expat vendors selling from overseas, family trusts, SMSFs, high-net-worth buyers) and test source of funds/wealth records and senior manager sign-off.	Danielle Okafor	Enhanced CDD – Program section 4; Effectiveness testing – section 8	Quarterly
2027-02	By 28 Feb 2027	Quarterly: sanctions and FATF list refresh check; training needs review.	Danielle Okafor	Targeted financial sanctions; Personnel training	Quarterly
2027-02	Last week Feb 2027	Monthly rhythm: escalation register review; AUSTRAC news check; spot-check 3 recent CDD files.	Danielle Okafor	Ongoing CDD – Program section 4	Monthly
2027-03	By 15 Mar 2027	Schedule customer periodic reviews: list all high-risk customers with ongoing relationships for annual review; confirm medium (2-yearly) and low (3-yearly) review dates are recorded in Agentbox.	Danielle Okafor	Ongoing CDD – periodic review – Program section 4	Annual
2027-03	By 31 Mar 2027	Toolbox session for sales and buyer's agents on AUSTRAC real estate indicators	Danielle Okafor	Personnel training – Program section 7	Annual

Month	When	Task	Owner	Reference	Frequency
		of suspicious activity and the unusual activity report form; record in training register.			
2027-03	Last week Mar 2027	Monthly rhythm: escalation register review; AUSTRAC news check; spot-check 3 recent CDD files.	Danielle Okafor	Ongoing CDD – Program section 4	Monthly
2027-04	By 30 Apr 2027	Review intermediary and third-party arrangements: any written reliance arrangement with the conveyancer or referral partners is current, assessment records are filed, and Harbourline remains responsible for CDD. [CONFIRM: whether any reliance arrangement exists]	Danielle Okafor	Third-party reliance – Program section 4	Annual
2027-04	Last week Apr 2027	Monthly rhythm: escalation register review; AUSTRAC news check; spot-check 3 recent CDD files.	Danielle Okafor	Ongoing CDD – Program section 4	Monthly
2027-05	By 31 May 2027	Q3 effectiveness check: SMR and TTR. Walk through an SMR scenario end to end (identify, escalate, decide, lodge within 3 business days, no tipping off); confirm the no-cash control on the sales trust account (EFT only)	Danielle Okafor	Reporting – Program section 6; Effectiveness testing – section 8	Quarterly

Month	When	Task	Owner	Reference	Frequency
		is working and no cash of A\$10,000 or more was received.			
2027-05	By 31 May 2027	Quarterly: sanctions and FATF list refresh check; training needs review.	Danielle Okafor	Targeted financial sanctions; Personnel training	Quarterly
2027-05	Last week May 2027	Monthly rhythm: escalation register review; AUSTRAC news check; spot-check 3 recent CDD files.	Danielle Okafor	Ongoing CDD – Program section 4	Monthly
2027-06	By 15 Jun 2027 (before 30 June)	Check AUSTRAC real estate sector guidance and starter-kit updates, the national risk assessments and any new indicators; update the AUSTRAC communications register (date, relevance, changes made, by whom) and note any program change needed.	Danielle Okafor	AUSTRAC communications – Program section 2	Annual
2027-06	By 30 Jun 2027	Personnel due diligence refresh for the compliance officer and both directors (fit and proper: competence and good character); confirm due diligence was completed for every staff member hired since 15 Sep 2026.	Danielle Okafor; Board of directors	Personnel due diligence – Program section 7	Annual
2027-06	Last week Jun 2027	Monthly rhythm: escalation register review; AUSTRAC news check; spot-	Danielle Okafor	Ongoing CDD – Program section 4	Monthly

Month	When	Task	Owner	Reference	Frequency
		check 3 recent CDD files.			
2027-07	First week Jul 2027	Plan the annual training refresher and start drafting the annual report to the board (SMR/TTR activity, effectiveness check results, training, evaluation status, changes made).	Danielle Okafor	Annual report to governing body – Program section 1	Annual
2027-07	By 31 Jul 2027	Annual AML/CTF training refresher for all 11 staff at both offices; training register updated.	Danielle Okafor	Personnel training – Program section 7	Annual
2027-07	Last week Jul 2027	Monthly rhythm: escalation register review; AUSTRAC news check; spot-check 3 recent CDD files.	Danielle Okafor	Ongoing CDD – Program section 4	Monthly
2027-08	By 15 Aug 2027	Q4 effectiveness check: compliance officer and senior manager roles. Test that escalations were decided and recorded, approvals were versioned and dated, and the board received the risk assessment and updates in writing.	Board of directors (second director), with Danielle Okafor	Effectiveness testing – Program section 8	Quarterly
2027-08	By 31 Aug 2027	Complete the periodic effectiveness testing summary for the year; quarterly sanctions and FATF list refresh check; training needs review.	Danielle Okafor	Effectiveness testing – Program section 8	Quarterly

Month	When	Task	Owner	Reference	Frequency
2027-08	By 31 Aug 2027	Draft the trigger-event review of the risk assessment (new services, channels, customer types, countries, sanctions changes, AUSTRAC communications) and the AMLCO self-assessment ready for the 15 Sep 2027 anniversary.	Danielle Okafor	AUSTRAC Step 4 – Review and update	Annual
2027-08	Last week Aug 2027	Monthly rhythm: escalation register review; AUSTRAC news check; spot-check 3 recent CDD files.	Danielle Okafor	Ongoing CDD – Program section 4	Monthly
2027-09	By 15 Sep 2027	Annual review of the risk assessment for trigger events; annual report to the board of directors; AMLCO annual compliance self-assessment. Senior manager approves any updates, board notified in writing, changes documented within 14 days and version table updated.	Danielle Okafor; Board of directors	Review / governing body report – AUSTRAC Steps 1 and 4	Annual
2027-09	AUSTRAC-set window – confirm on AUSTRAC Online	Lodge the annual compliance report with AUSTRAC via AUSTRAC Online; file a copy and the lodgement receipt in Google Drive and note it in the maintenance log.	Danielle Okafor	Annual compliance report – Reporting	Annual

Version history and approval

This document takes effect once the senior manager named below has reviewed, adapted where needed, and signed the approval line for the current version.

Version	Date	Approved by	Signature
1.0	3 September 2026	Danielle Okafor (Licensee in Charge / Director)	