Alderman
COMPLIANCE

Cover Letter and Customisation Notes

Harbourline Real Estate

How to review, customise and approve this pack

05-Cover-Letter-and-Customisation-Notes · 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	05-Cover-Letter-and-Customisation-Notes — 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.

Cover letter

3 September 2026

Danielle Okafor
Licensee in Charge / Director
Harbourline Property Group Pty Ltd (trading as Harbourline Real Estate)
Dee Why NSW 2099

Dear Danielle,

Thank you for choosing the {{BRAND}} Compliance Pack + written Q&A. Enclosed are five documents drafted for Harbourline Real Estate from the intake you completed: an ML/TF risk assessment, an AML/CTF program, an AUSTRAC enrolment checklist, a 12-month compliance calendar, and this letter. Each document follows AUSTRAC's 2026 program structure (governance framework, risk assessment, policies, review, independent evaluation, record keeping) and mirrors the document set in AUSTRAC's real estate program starter kit, so the free AUSTRAC forms slot in alongside them.

Risk headline: overall inherent ML/TF risk is assessed as Medium. The drivers are real estate brokering (named by AUSTRAC as a higher-risk service), some family trust and SMSF purchasers, occasional expat vendors selling from the United Kingdom, Singapore and Hong Kong, and no existing PEP or sanctions screening. The absence of cash and your EFT-only trust account materially lower the risk.

Note: Three most urgent actions: (1) Lodge your AUSTRAC enrolment on AUSTRAC Online now. It was due by 29 July 2026 and is overdue; we suggest lodging by 10 September 2026 and nominating you as AML/CTF compliance officer in the same form. (2) Approve the risk assessment and program as version 1.0 by 15 September 2026, your intended program effective date, and give the risk assessment to the board in writing. (3) Deliver induction training to all 7 customer-facing staff and choose a PEP and sanctions screening method before 15 September 2026, so initial customer due diligence starts on every new sale and buyer's agency engagement from that date.

What this pack is: a tailored draft for you, as senior manager, to review, adapt and approve. What it is not: legal advice, or a substitute for AUSTRAC's starter-kit forms, which remain free and should be used with the pack. Wherever your intake was silent we wrote generically and inserted a [CONFIRM: ...] marker for you to complete.

Your tier includes written Q&A. Send questions to {{BRAND_EMAIL}} within 14 days of delivery, that is by 17 September 2026, quoting Harbourline Real Estate in the subject line. We answer in writing, usually within 3 business days. If you would like to talk it through, book a time at {{BOOKING_URL}}.

Kind regards,
The {{BRAND}} team

What is in your pack

Document	Purpose	Who reviews	Who approves
01 ML/TF Risk Assessment	Inherent risk across services, customers, channels, countries and proliferation financing; risk register and 3x3 matrix	Danielle Okafor (compliance officer)	Danielle Okafor (senior manager); provided to the board in writing
02 AML/CTF Program	Governance, CDD, enhanced CDD, sanctions, reporting, training, records, review and independent evaluation policies	Danielle Okafor; sales and buyer's agent team leads	Danielle Okafor (senior manager)
03 AUSTRAC Enrolment Checklist	Data to gather and step-by-step lodgement on AUSTRAC Online	Danielle Okafor	Not approved; completed and filed
04 12-month Compliance Calendar	Dated obligations from September 2026 to August 2027	Danielle Okafor	Danielle Okafor
05 Cover letter and customisation notes	This document	Danielle Okafor	Filed with the program

How to customise and approve (60-90 minutes)

1. Read document 01. Where you disagree with a likelihood or impact rating, change it and record why in the risk register comments column. Your reasons are part of the record.
2. Resolve every [CONFIRM: ...] marker in documents 01, 02 and 04. Open each file and search for "[CONFIRM" (Ctrl+F or Cmd+F). Replace the marker with the confirmed fact or delete the sentence.
3. Complete the version table at the front of documents 01 and 02: version 1.0, approval date, approver name and role. AUSTRAC expects the version number and approval date in your policies.
4. Download the AUSTRAC real estate program starter kit and adopt its forms: AML/CTF roles and assign responsibilities forms; personnel due diligence forms; customer onboarding and initial CDD forms (individual/sole trader, body corporate, trust); request to verify information (third-party reliance); unusual activity report form; escalation form and register; enhanced CDD form;

periodic and trigger-event review forms; maintain program log; effectiveness check forms; annual report to the governing body. File them in the AML/CTF folder on Google Drive next to the program.

5. Senior manager (Danielle Okafor) signs the approval table in documents 01 and 02.
6. Provide the approved risk assessment to the board of directors in writing as soon as practicable and minute it.
7. Brief all staff, then deliver induction training to the 7 customer-facing staff before they perform designated-service tasks under the program. Record attendance.
8. Store the approved versions, this letter and the board minute securely on Google Drive with access limited to authorised staff. Retain for 7 years after they stop being relevant to demonstrating compliance.

Open items we could not confirm from your intake

- No PEP or sanctions screening method. Decide between manual checks of the DFAT Consolidated Sanctions List plus an internet search for PEP status, or a screening vendor. Record the choice in the program at section [CONFIRM: section reference].
- Identity verification is by manual document copies. Confirm the document standards staff must follow, or adopt an electronic verification provider and integrate it with Agentbox.
- No prior written AML/CTF policy. This pack becomes version 1.0 once approved. Note in the maintain program log that designated services were provided from 1 July 2026 before the program was documented.
- No AML/CTF training delivered. Schedule induction training before 15 September 2026 and annual refreshers thereafter.
- AUSTRAC enrolment not lodged. Application was due by 29 July 2026. Lodge now and keep the confirmation email.
- Jurisdiction note: you reported no known dealings with FATF-listed jurisdictions. Check the current FATF high-risk and other monitored jurisdictions list and confirm in the risk assessment.
- Enrolment data: both directors' full names, former names and dates of birth; beneficial owners' names and dates of birth; approximate annual turnover figure. Gather these before starting the AUSTRAC Online form; progress can be saved for up to 14 days.

Assumptions we made

- No cash is accepted at either office; all deposits go to the sales trust account by EFT. The program therefore states that threshold transaction reports are not expected, with a control to detect any cash offered.
- Harbourline operates only in Australia, from Dee Why and Mona Vale, and has no overseas office or staff.

- Property management, residential leasing and market appraisals are not designated services and are outside the program, though staff in those roles still receive awareness training.
- Danielle Okafor performs both the compliance officer and senior manager roles, and the board of two directors is the governing body. The compliance officer reports to the board at least annually.
- The external conveyancer handles contracts; Harbourline does not rely on the conveyancer's CDD and performs its own. If you intend third-party reliance, a written arrangement is needed.
- Agentbox is the system of record for customer files and Google Drive holds the program documents. Both are backed up and access-controlled.
- Harbourline does not send or receive international funds transfer instructions itself; overseas vendor proceeds move through your bank and no IFTI reports apply.
- Approximately 140 transactions a year, with individual buyers and sellers the majority and companies and trusts a minority.

Next steps and timeline

Day	Action	Owner
Day 1 (3 September 2026)	Read pack; gather director, beneficial owner and turnover data for enrolment	Danielle Okafor
By day 7 (10 September 2026)	Lodge enrolment on AUSTRAC Online; nominate compliance officer; save confirmation	Danielle Okafor
By day 12 (15 September 2026)	Resolve [CONFIRM] markers; approve documents 01 and 02 as version 1.0; provide risk assessment to board; choose screening method; deliver induction training	Danielle Okafor; board
Day 12 onward	Apply initial CDD to every new sales and buyer's agency engagement using starter-kit forms	Sales team and buyer's agents
By day 14 (17 September 2026)	Submit written Q&A questions to {{BRAND_EMAIL}}	Danielle Okafor
By day 30 (3 October 2026)	First effectiveness check of onboarding files; record in maintain program log; confirm first independent evaluation deadline under the AML/CTF Transitional Rules 2026 [CONFIRM: deadline]	Danielle Okafor

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)	