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COMPLIANCE

AUSTRAC Enrolment Checklist

Harbourline Real Estate

Step-by-step enrolment guide and checklist

03-AUSTRAC-Enrolment-Checklist · 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	03-AUSTRAC-Enrolment-Checklist — 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.

Are you a reporting entity?

Yes. Harbourline Property Group Pty Ltd (trading as Harbourline Real Estate) provides a designated service under AUSTRAC's real estate table and has been a reporting entity since 1 July 2026.

Service Harbourline provides	AUSTRAC designated service?	Why
Residential sales (sales team of 5, Dee Why and Mona Vale)	Yes – Real estate Item 1	"Brokering the sale, purchase or transfer of real estate on behalf of a buyer, seller, transferee or transferor in the course of carrying on a business".
Buyer's agency (2 buyers agents)	Yes – Real estate Item 1	AUSTRAC states buyer's agents are covered by Item 1 (brokering the purchase of real estate on behalf of a buyer).
Residential property management	No	Property management and leasing are not designated services.
Residential leasing	No	Leases of 30 years or less are not designated.
Market appraisals	No	Not a designated service unless it forms part of brokering an actual sale or purchase.

Both offices and all 7 customer-facing staff are covered, because the obligations attach to the company, not to each office. The conveyancer Harbourline uses for contracts is a separate reporting entity with its own obligations. This does not remove Harbourline's obligations, although a written third-party reliance arrangement can be considered later under the customer due diligence (CDD) policy.

Note: Enrolment, the AML/CTF compliance officer appointment and a documented AML/CTF program were all required by 29 July 2026 at the latest. As at 3 September 2026 none is in place. Treat every item in this checklist as urgent.

Key dates for this business

Obligation	Date	Status as at 3 September 2026
Regulated by AUSTRAC as a reporting entity	1 July 2026	In effect
Enrolment application lodged on AUSTRAC Online (28 days after first designated service)	29 July 2026	Deadline passed — apply immediately; document the reason for delay in the program maintenance log. AUSTRAC may

Obligation	Date	Status as at 3 September 2026
		take compliance action.
AML/CTF compliance officer appointed (Danielle Okafor) and notified to AUSTRAC via the enrolment form	29 July 2026, or 14 days after enrolment, whichever is later	Appointment to be minuted now; notification will occur with the enrolment application
AML/CTF program (risk assessment + policies) documented and approved by the senior manager before providing designated services	Before 1 July 2026	Overdue/urgent — planned approval 15 September 2026; bring forward if possible
Initial CDD applied to every new vendor and buyer customer	From 1 July 2026	Overdue/urgent — manual ID copies exist but no PEP or sanctions screening, no risk rating. Start using the CDD forms now and record catch-up CDD for customers onboarded since 1 July 2026
Annual compliance report lodged via AUSTRAC Online	AUSTRAC-set window each year [CONFIRM: dates on AUSTRAC Online]	Not yet due
First independent evaluation	Set by the AML/CTF Transitional Rules 2026 [CONFIRM: Harbourline's deadline]	Not yet due — diarise once confirmed
Full review of risk assessment and policies (at least every 3 years, or earlier on trigger)	By 15 September 2029 at the latest	Not yet due

Information to gather before you start

Danielle Okafor should collect the following before opening the form. Items marked [CONFIRM] were not in the intake.

- Business identity: legal name Harbourline Property Group Pty Ltd; trading name Harbourline Real Estate; ABN 51 824 753 556; ACN 824 753 556; entity type company. [CONFIRM: any other registered business names]
- Directors: full name, any former names and date of birth for each of the 2 directors, including Danielle Okafor. [CONFIRM: second director's details]
- Beneficial owners: full name and date of birth of every individual who ultimately owns or controls 25% or more of the company, or otherwise controls it. [CONFIRM: shareholder register]
- AML/CTF compliance officer: Danielle Okafor, Licensee in Charge, danielle@example.com.au, 02 9000 0000. [CONFIRM: date of birth and postal address]

- Employee count: 11.
- Tax residency of the company. [CONFIRM: presumed Australia]
- Approximate annual turnover: within the A$2 million to A$10 million band. [CONFIRM: figure from latest accounts]
- Principal place of business: Dee Why NSW 2099 (head office). [CONFIRM: street address]
- Registered office: [CONFIRM: address per ASIC record, e.g. accountant's office]
- Second location: Mona Vale NSW 2103. [CONFIRM: street address]
- Business telephone and email: 02 9000 0000; danielle@example.com.au.
- Website domains used to provide designated services (sales listings, buyer's agency enquiries). [CONFIRM: domain names]
- Designated services to select: Real estate Item 1 – brokering the sale, purchase or transfer of real estate. Do not select property management, leasing or appraisals.

[TO COMPLETE] Attach the completed personnel due diligence form for Danielle Okafor (fit and proper: competence, skills, knowledge, diligence, expertise, soundness of judgement; good character, honesty and integrity; Australian resident — confirmed).

Step-by-step: enrolling in AUSTRAC Online

1. Create an AUSTRAC Online account at online.apps.austrac.gov.au. Danielle Okafor creates it as the AML/CTF compliance officer and initial administrator. Use the danielle@example.com.au mailbox so notices are not missed.
2. Verify identity as prompted by AUSTRAC Online. Have the company's ABN and ACN and Danielle Okafor's personal identification to hand.
3. Start the enrolment form. Note the date started; progress can be saved for up to 14 days, after which unsaved work is lost.
4. Complete Business details: legal name, trading name, ABN, ACN, entity type, principal place of business (Dee Why), registered office, telephone, email, website domains, employee count, tax residency, approximate turnover.
5. Complete Structure and key personnel: both directors (full name, former names, date of birth) and all beneficial owners (name, date of birth).
6. Complete AML/CTF compliance officer: Danielle Okafor, Licensee in Charge, with date of birth, telephone, email and postal address. This satisfies the requirement to notify AUSTRAC of the appointment.
7. Complete Designated services: select Real estate Item 1 (brokering the sale, purchase or transfer of real estate). This single item covers both the sales team and the buyer's agents. Do not select anything for property management or leasing.
8. Save, then review every screen against the information gathered in the previous section. A second director should sight the summary before submission.
9. Submit. Save a PDF or screenshot of the confirmation page and the AUSTRAC reference number to Google Drive in the AML/CTF folder, and note the submission date in the program maintenance log.

10. Because the application is late, add a short file note stating when the business became aware of the obligation and the steps taken since. Keep it with the confirmation.
11. After acceptance, keep enrolment details current: notify AUSTRAC through AUSTRAC Online within 14 days of any change to the compliance officer, directors, beneficial owners, addresses, contact details or designated services.

Note: Enrolment on its own does not make Harbourline compliant. The AML/CTF program must exist, be approved by Danielle Okafor as senior manager with a version number and approval date, and be followed by staff.

After you enrol

12. Approve the program: Danielle Okafor as senior manager approves the risk assessment and policies (version 1.0, target 15 September 2026) and provides the risk assessment to the board of directors in writing as soon as practicable. Record it in board minutes.
13. Train staff: run the initial AML/CTF training for all 11 staff, with priority on the 7 customer-facing sales and buyer's agency staff. Keep the attendance register and slides on Google Drive.
14. Start the customer forms: from the approval date, every new vendor and buyer completes the onboarding and initial CDD form for their customer type (individual, company, trust or SMSF). Record the risk rating and the DFAT sanctions and PEP check in Agentbox against the contact.
15. Set calendar reminders: 14-day update rule for enrolment changes, periodic customer reviews, annual report to the board, the 3-year review date and the first independent evaluation deadline once confirmed.
16. Diarise the annual compliance report: check AUSTRAC Online for the lodgement window and add it to Danielle Okafor's calendar with a reminder one month ahead. [CONFIRM: window dates]

Free help: the AUSTRAC program starter kit for real estate (risk assessment, policy, process and forms for businesses of 15 staff or fewer); the AUSTRAC guidance pages 'About the reforms', 'Enrol with us', 'Your AML/CTF program' and 'Customer due diligence'; the AUSTRAC contact centre for enrolment queries; and the Real Estate Institute of New South Wales for sector guidance. [CONFIRM: industry body membership]

Enrolment checklist

Step	Owner	Due	Evidence	Done
Board minute appointing Danielle Okafor as AML/CTF compliance officer and senior manager, and recording the delay	Board of directors (2 directors)	Immediately	Signed board minute on Google Drive AML/CTF folder	☐
Complete personnel	Second director	Immediately	Completed personnel	☐

Step	Owner	Due	Evidence	Done
due diligence (fit and proper) form for Danielle Okafor	[CONFIRM: name]		due diligence form	
Gather enrolment information (directors' DOBs, beneficial owners, registered office, turnover, website domains)	Danielle Okafor, Licensee in Charge	Immediately	Completed 'Information to gather' list with sources	☐
Create AUSTRAC Online account and verify identity	Danielle Okafor	Immediately	Account confirmation email	☐
Complete and submit AUSTRAC enrolment form selecting Real estate Item 1	Danielle Okafor	Immediately (deadline 29 July 2026 passed)	Submission confirmation and AUSTRAC reference number saved as PDF	☐
File note explaining reason for late enrolment	Danielle Okafor	Same day as submission	File note in program maintenance log	☐
Register of AUSTRAC communications considered (NRA 2024 ML, NRA 2024 TF, PF NRA 2022, real estate quick guide)	Danielle Okafor	10 September 2026	AUSTRAC communications register	☐
Finalise ML/TF risk assessment (services, customers, channels, countries, proliferation financing)	Danielle Okafor	12 September 2026	Risk assessment v1.0 with likelihood x impact ratings	☐
Finalise AML/CTF policies and process document, including no-cash control and tipping-off rule	Danielle Okafor	12 September 2026	Policy document v1.0	☐
Senior manager approves program (version number and approval date on each document); risk assessment given to board in writing	Danielle Okafor as senior manager; Board of directors	15 September 2026	Signed approval page and board minute	☐
Set up DFAT	Danielle Okafor	15 September 2026	Process document	☐

Step	Owner	Due	Evidence	Done
Consolidated Sanctions List and PEP check step in the onboarding process, recorded in Agentbox			step and Agentbox custom field or note template	
Initial AML/CTF training for all 11 staff, prioritising 7 customer-facing staff	Danielle Okafor	30 September 2026	Attendance register, training slides, staff acknowledgements	☐
Apply initial CDD forms to all new vendors and buyers; catch-up CDD for customers onboarded since 1 July 2026 where a trigger arises or risk warrants	Sales agents and buyers agents; checked by Danielle Okafor	From 15 September 2026, ongoing	Completed CDD forms filed in Agentbox and Google Drive	☐
Set up escalation register, unusual activity report form and SMR lodgement access on AUSTRAC Online	Danielle Okafor	30 September 2026	Blank register and forms on Google Drive; AUSTRAC Online reporting access confirmed	☐
Confirm annual compliance report window and diarise	Danielle Okafor	30 September 2026 [CONFIRM: window]	Calendar entry and note in maintenance log	☐
Confirm first independent evaluation deadline under the Transitional Rules 2026 and identify an independent evaluator	Danielle Okafor; Board of directors	31 December 2026 [CONFIRM: deadline]	Documented rationale for frequency and evaluator selection	☐
Notify AUSTRAC of any change to compliance officer, directors, addresses or services	Danielle Okafor	Within 14 days of change, ongoing	AUSTRAC Online update confirmation	☐
Annual compliance officer report to the board of directors	Danielle Okafor	By 15 September 2027, then annually	Annual report to governing body and board minute	☐
Full review of risk assessment and policies (or earlier on	Danielle Okafor; approved by senior	By 15 September 2029	Updated documents with new version number and approval	☐

Step	Owner	Due	Evidence	Done
trigger, e.g. new service or office)	manager		date	

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)	