

Anti-Money Laundering & Counter-Terrorism Financing (AML/CTF) Customer Information Statement

Dated: April 2026

Why we collect your information

From 1 July 2026, the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) and supporting Rules require real estate agencies to take steps to verify the identity of potential clients so that they understand who they are dealing with and to comply with their legal obligations under the Australian federal law. Accordingly, as part of our onboarding process, we collect information from customers to comply with our AML/CTF obligations and to protect the property market from misuse.

Our Onboarding Requirements

1. Customer Identification

We will collect and verify your identity using reliable and independent documents (such as a driver's licence or passport, proof of address and date of birth). For companies or trusts, we are required by law to verify company details, directors, trustees and structure.

2. Beneficial Ownership

We are required to identify the individuals who ultimately own or control an entity or transaction. You may be asked to disclose individuals who own or control 25% or more of a company or trust, and their identity will need to be verified.

3. Purpose and Nature of the Transaction

We may ask questions to understand the purpose of the property transaction, the source of your funds and source of wealth, and whether you are acting on behalf of another person.

4. Ongoing Customer Due Diligence

Throughout the transaction, we may request updated information from you and monitor the transaction for consistency with the information provided. This will be particularly so if your circumstances change.

Your Responsibilities

You must comply with our requests, including if requested to provide accurate and complete information, provide identification documents promptly, disclose beneficial ownership and control structures of any non-corporate entities, provide source of funds and wealth. You must also notify us of any changes during the transaction.

Reporting obligations

We may also be required by law to report certain matters to AUSTRAC or other government authorities. The law prohibits us from disclosing whether any such report has been made.

We may not be able to act for you

In some circumstances, we may be unable to start or continue acting for you. This may occur where we cannot complete our customer due diligence, cannot obtain information we reasonably require, or where providing services would be inconsistent with our legal obligations, AML/CTF program, policies, procedures or risk assessment. A decision not to act does not necessarily mean any report has been made about you.

Checks on a counterparty

We may also be required by law to carry out customer due diligence on the other party to the transaction (for instance, the purchaser) before providing certain services. This may include verifying their identity, obtaining further information about them and checking whether they are subject to targeted financial sanctions. If those requirements (amongst others) cannot be completed, or if proceeding would be inconsistent with our legal obligations, AML/CTF program (including policies, procedures and risk assessment), we may be required to perform enhanced customer due diligence on the other party or be unable to act or continue acting in relation to the transaction. Where necessary to avoid interrupting the ordinary course of the transaction, customer due diligence on the other party may be delayed until after the exchange of contracts.

Privacy and use of information

Your information is collected, held, used, disclosed and stored in accordance with the *Privacy Act 1988* (Cth) and our privacy policy.

What this means for you

You will be asked to complete AML/CTF onboarding forms at the start of our relationship. Providing information early helps avoid delays and protects the integrity of the property market. If you do not provide the requested information, we may be unable to provide you with services until the required information has been provided and verified.

Acknowledgement

By proceeding with our services, you acknowledge that you understand our AML/CTF obligations and agree to provide the information that we request for compliance purposes.