

Governance & Personnel

Landwise Real Estate

ABN 45655356479 · Melbourne

Draft for review. This document was generated from the AUSTRAC AML/CTF program starter kit (January 2026) and the information you provided. It is a starting point, not a complete or approved AML/CTF program.

Before you rely on it, you must review it, customise it to how your business actually operates, and have it approved by your senior manager. Responsibility for meeting your obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and the AML/CTF Rules remains with your business as the reporting entity.

This tool and its output do not constitute legal or compliance advice. If you are unsure about your obligations, obtain independent professional advice.

Version	Date generated	Approved by (senior manager)	Approval date	Next review due
1.0	1 July 2026			

When you update this document, keep a copy of the previous version for 7 years.

1. AML/CTF Roles

Role	Name	Position
Governing body	Vorinder Turen	Director
Senior manager	Vorinder Turen	Director
AML/CTF compliance officer	Vorinder Turen	Director OIEC
Customer-facing personnel	Vorinder Turen	Director / Licensed Agent

2. Responsibilities Matrix

Responsibility	GB	CO	SM	CP
Oversee the risk assessment	X			
Oversee compliance with AML/CTF obligations and the program	X			
Take reasonable steps to manage and mitigate ML/TF risks	X			
Ensure the business appoints a senior manager and AML/CTF compliance officer	X			
Allocate adequate resources to comply with AML/CTF obligations	X			
Oversee and coordinate effective day-to-day AML/CTF compliance		X		
Act as the primary contact with AUSTRAC		X		
Conduct compliance monitoring, effectiveness checks and annual written reports to the governing body		X		
Oversee creation and retention of AML/CTF records and personnel training		X		
Assess and lodge suspicious matter reports; submit TTR, CBM and annual compliance reports		X		
Escalate significant issues to the senior manager and governing body		X		
Approve the AML/CTF program and any updates to the risk assessment			X	
Approve the decision to continue providing services to high-risk customers			X	

Conduct customer onboarding and collect required information				X
Initiate identity verification				X
Assign the initial customer risk rating and complete CDD documentation				X
Monitor customer activity and identify unusual behaviour				X
Report unusual activity to the compliance officer on the same business day				X

3. Personnel Due Diligence — Fit and Proper Acknowledgment

For the compliance officer and personnel in key AML/CTF roles. A holistic consideration, not a pass/fail checklist; how you evidence each consideration is at your discretion (no specific check is mandated). Reassess at least annually; retain for 7 years.

Consideration	Considered	Notes / basis
Employed or engaged by the business at management level	☒	Holds Director position and appointed AML/CTF Compliance Officer with documented internal role assignment.
Australian resident (where services are provided at or through a permanent establishment in Australia)	☒	Residency confirmed via Australian residential address records held by the business (KYC/HR records).
Sufficient authority, independence, and access to resources and expertise to perform the role	☒	Has authority to implement AML/CTF Program, access to business records, and direct reporting line to governing body.
Competence, skills, knowledge, diligence, expertise and soundness of judgement (or the ability to develop these)	☒	Holds real estate licence and has experience in property transactions and compliance obligations; ongoing AML/CTF training completed.
Good character, honesty and integrity	☒	Statutory declaration and internal reference checks completed; no known integrity concerns identified.
Has not been convicted of a serious offence	☒	Self-declaration provided; no adverse findings identified through reasonable checks conducted.
No adverse findings, and no findings of serious misconduct, by a regulatory body	☒	No disciplinary action found on licensing register or regulatory sources (e.g. state property regulator / AUSTRAC guidance checks).

Not bankrupt and has not signed a personal insolvency agreement	☒	AFSA personal insolvency register search completed — no records found.
No conflict of interest that creates a material risk the person will not act properly in the role	☒	No conflicts identified (no ownership in AML/CTF vendors or competing compliance roles disclosed).

Assessed by: [name] [position] · Date: 1 July 2026. Reassess at least annually; retain for 7 years.

Roles: Governing body; Senior manager; AML/CTF compliance officer; Customer-facing personnel.