

AML/CTF Risk Assessment

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. Business Overview

Landwise Real Estate (ABN 45655356479) is a licensed real estate agency based in Melbourne. Landwise Real Estate is a reporting entity under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), with obligations applying from 1 July 2026 under the Tranche 2 reforms.

This risk assessment identifies and assesses the ML/TF risks of the services we provide, the customers and countries we deal with, and the delivery channels we use. It is reviewed whenever our services, customers, channels, technologies or country exposure materially change, when AUSTRAC communicates relevant risks, and in any case at least once every 3 years, in line with our Maintain our AML/CTF program policy.

2. Inherent ML/TF/PF Risk

Risk	Rating	Rationale
Money laundering	High	Real estate is highly vulnerable to exploitation by criminals laundering proceeds of serious crime; real estate agents pose a medium, stable vulnerability, exposed to significant criminal proceeds when holding deposits and payments.
Terrorism financing	Low	The use of real estate to facilitate terrorism financing is believed to be limited.
Proliferation financing	Low	Limited evidence exists of real estate being used in proliferation financing.

3. Designated Services

Item	Provide?
Brokering the sale, purchase or transfer of real estate on behalf of a customer	YES

Risk factor	Inherent	Accept	Control (if NO)
High value and unfinanced transactions	Medium	YES	

High value physical currency transactions	High	NO	The agency will not accept physical cash payments of \$50,000 or more. Clients will be required to pay by electronic bank transfer or through a regulated Australian financial institution. Any attempt to use large cash payments will be declined and, where appropriate, considered for reporting obligations
Virtual assets	High	NO	The agency does not accept cryptocurrency or other virtual assets for deposits, commissions or settlement payments. All payments must be made through traditional banking channels.
Unusual service requests	High	YES	

4. Customers

Item	Deal?
Individuals and sole traders	YES
Bodies corporate	YES
Trusts (including self-managed superannuation funds / SMSFs)	YES
Partnerships	YES
Associations	YES
Government bodies	YES

Risk factor	Inherent	Accept	Control (if NO)
Individuals suspected of profit-generating offences	High	NO	Do not establish or continue a business relationship where there are reasonable grounds to suspect criminal activity.
Politically exposed persons (PEPs) — domestic	Medium	YES	
PEPs — international organisations	Medium	YES	
PEPs — foreign	High	NO	Accept only after ECDD, senior management approval, verification of the source of wealth and source of funds, and ongoing monitoring.
Legal structures creating effective anonymity	High	NO	Do not proceed if beneficial ownership cannot be identified or verified.
Third party (for individuals)	Medium	YES	
Customers with significant unexplained wealth	High	NO	Do not proceed unless the source of wealth and funds can be satisfactorily explained and verified.
Charities and not-for-profit organisations (NPOs)	Medium	YES	

Low complexity customers	Low	YES	
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5. Delivery Channels

Item	Use?
In person	YES
Email	YES
Telephone	YES
Video conferencing programs	YES
Online platforms	YES

Risk factor	Inherent	Accept	Control (if NO)
Suspected false and fraudulent identities	High	NO	Do not proceed where identity cannot be reliably verified. Apply enhanced identity verification (e.g. biometric/electronic ID checks, original document sighting, independent verification sources). Escalate suspicious matters and consider lodging an SMR with AUSTRAC where required.

6. Countries

Country	Basel	FATF/DFAT	Final	In appetite	Control (if NO)
Australia	Low (4.13)	No	Low	YES	
New Zealand	Low (3.76)	No	Low	YES	
United Kingdom	Low (4.04)	No	Low	YES	
Singapore	Low (4.73)	No	Low	YES	

7. Common ML/TF Methods

Known ways criminals exploit services like ours — reference material for daily monitoring. If unsure whether something is suspicious, escalate it to the compliance officer.

Method	Description and risk	Possible red flags
Use of non-financial professionals	Professionals (e.g. lawyers, accountants) represent a person's interests, sometimes via power of attorney, obtaining services and making decisions as if they were the person. Legitimate professional services can mask a criminal's identity and the origin of proceeds, whether or not the professional is aware.	Customer uses a third party without a logical reason. Person on the contract of sale differs from the individual dealing with the practice.
Trust accounts	Client funds are held in a statutory trust account until instructed to release them. Criminals can move illicit money while hiding its origin; proceeds can be co-mingled with legitimate client funds.	Customer asks to hold funds in trust longer than required, then gives unusual disbursement instructions. Customer deposits cash, then requests a refund by cheque or transfer.

Shell companies	Companies with no real assets or legitimate operations, sometimes holding a bank account. Create a layer between suspicious transactions and the people behind them; often use dummy directors/shareholders to conceal beneficial ownership.	Company with little or no apparent business activity. Company uses dummy directors or shareholders.
Offshore companies and trusts	Entities formed in one country but used in others, especially secrecy/tax-haven jurisdictions. Obscure where beneficial owners are and where funds originate or are received.	Customer in Australia transacting through an offshore company. Domestic entity owned by an offshore company in a secrecy jurisdiction.
Overvaluation or undervaluation	Buying or selling an asset at a price above or below its market value — including property, bodies corporate and legal arrangements — misrepresented on official documents. Undervaluation: buyer pays the difference in illicit cash. Overvaluation: inflated price secures a larger loan repaid with illicit funds.	Asset sold well above or below market price. Repeated transactions involving related parties.
Quick reselling	Property bought and resold quickly, often at an inflated price without physical changes. Multiple transactions between related parties create distance between the origin of funds and their destination.	Customer reselling shortly after purchase with no logical reason. Repeated transactions involving the same buyer or seller.

8. Indicators of Unusual or Criminal Behaviour

Common indicators grouped by theme. The practice may encounter indicators not listed here — escalate anything personnel are unsure about.

Client behaviour — Unusual instructions or requests

- Pushes for urgent completion, applies undue pressure, or makes last-minute changes to financing.
- Gives instructions that are unusual or lack a clear financial purpose.
- Requests multiple changes after being asked for more information.

Client behaviour — Unusual behaviour or avoids direct contact

- Appears nervous or uncooperative during CDD.
- Avoids face-to-face meetings without a clear reason.
- Acts in ways that don't match normal client behaviour.
- Seems to follow instruction from an unnamed person.
- Gives limited ways to be contacted (messaging apps, phone or email only).

Client profile — Request inconsistent with profile

- Wealth or assets that don't match occupation or known income.
- Operates a business with little or no trading activity.
- Uses an entity in a way inconsistent with its profile (e.g. a charitable trust buying a luxury home).

Client profile — Unusual information during CDD

- Identity or verification documents that appear fraudulent or cannot be authenticated.
- Identity documents with inconsistent details (name, address, date of birth, phone number).
- Identifiers shared with multiple apparently unrelated people carrying out similar transactions.
- Gives only a post-box address, or presents one as a residential or business address.

- Refuses to identify their source of funds, or provides false or misleading information.

Client profile — Adverse information and potential criminal links

- Negative media or adverse information from a reliable source connecting them to profit-generating crime.
- Ties to industries with known ML/TF risks identified in national risk assessments.

Client profile — PEP, high-risk country or sanctions exposure

- Is a high-risk PEP or closely linked to one.
- Comes from a high-risk country linked by credible sources to corruption, organised crime, serious fraud or terrorism financing.
- Is listed on the DFAT Consolidated List.

Unusual transactions — Transactions with the practice are unusual

- Deposits physical currency, then withdraws and requests a refund by cheque or transfer.
- Pays physical currency directly to another party as a deposit or large single payment.
- Requests to pay in physical or foreign currency without a valid reason.
- Requests to pay using virtual assets (e.g. Bitcoin or Ethereum).

Foreign jurisdiction — Linked to a high-risk foreign jurisdiction

- Based in or residing in a high-risk jurisdiction.
- Company owned/controlled by another company in a high-risk jurisdiction.
- Transfers funds to/from a country with no clear connection to them, or to/from entities in high-risk countries.

Terrorism financing — Known links to activities with high TF risk

- Known or suspected involvement with terrorist or terrorism-financing-related activities.
- Based in or linked to regions identified by credible sources as funding or supporting terrorist activities, or with listed terrorist organisations operating in them.
- Appears in media or online fundraising for causes that may be directly or indirectly linked to terrorism or violent extremism.
- Linked to unregistered non-profit organisations or other unlicensed fundraising.

Proliferation financing — Linked to regions or persons subject to high PF risk

- Linked to countries of proliferation or sanctions concern (e.g. North Korea or Iran).
- Shares addresses, employment or other details with sanctioned individuals or organisations.

Proliferation financing — Deals in goods subject to high PF risk

- Deals in goods or technology listed on the Defence and Strategic Goods List.

Client behaviour — Third parties unusually involved in the sale or purchase

- Appears to know and be working with the other parties to make a transaction look legitimate while claiming no relationship.
- Tries to buy property in the name of a relative, minor or third party without a clear legal or financial reason.
- Asks for sudden or unexplained ownership changes, especially close to settlement.
- Seeks to transfer property without money changing hands, or indirectly through another person, company or trust.
- Begins purchasing a property without physically inspecting it.
- Asks the practice to hold funds in trust longer than required, then issues an unusual disbursement instruction.

Unusual transactions — Property transactions outside normal patterns

- Buys or sells property in quick succession without a clear reason.

- Requests a service outside the practice's normal area (e.g. commercial instead of residential).
- Pays far more or less than the expected market value.
- Wants an unnecessarily complex title transfer that increases costs or taxes.
- Uses promissory notes, bills of exchange or other negotiable instruments outside the financial system that can be settled in cash.
- Pays part or all of the purchase price in physical cash.
- Renovates and re-sells a recently purchased property without a clear, legitimate source of funds.

Unusual transactions — Unusual third-party involvement in transactions

- Directs sale proceeds to a third party, or asks that costs or invoices be paid by someone else.
- Brings in a third party to cover costs or receive proceeds without a clear reason.
- Person on the contract of sale differs from the individual dealing with the practice.