



# Property360 Agency®

Sales | Rentals | Compliance | Finance — All Under One Roof

Operating with embedded compliance governance and in-house finance capability.

## PROGRAM INCLUSIONS – SINGLE OFFICE MODEL

### AUSTRAC Compliance Framework (G1–G5)

#### Context

AUSTRAC expects every reporting entity to **prove** compliance, not merely claim it. The Property360 Agency G1–G5 framework represents the minimum evidentiary standard regulators look for when assessing whether AML/CTF obligations are being met in practice. For a single office agency with a few agents, this is administratively heavy and high-risk if done incorrectly.

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#### G1 – Governance & Responsibility

AUSTRAC requires clear appointment of a **Responsible Officer**, defined reporting lines, and documented oversight. Evidence must show who is accountable, how decisions are made, and how compliance is monitored.

**Property360:** embeds a trained finance manager who operates under a defined governance structure, ensuring accountability is documented and defensible.

#### G2 – Risk Assessment

Agents must identify, document, and regularly update ML/TF risk assessments across clients, products, and delivery channels. This is not a one-off exercise.

**Property360:** applies a structured, repeatable risk framework maintained by the finance manager.

#### G3 – AML/CTF Program

AUSTRAC expects a living AML/CTF Program (Part A & B), tailored to the business and actively applied. Generic templates fail audits.

**Property360:** delivers a customized program with templates that is operationally enforced, not just stored.

## G4 – Customer Due Diligence (CDD)

Verification, ongoing monitoring, and enhanced due diligence must be evidenced per client. Errors here trigger penalties.

**Property360:** centralizes CDD execution through the program and embedded finance manager.

## G5 – Reporting, Training & Record Keeping

Timely SMR/TTR reporting, staff training records, and audit-ready documentation are mandatory.

**Property360 Agency:** manages reporting, maintains records, and ensures continuous compliance.

## AUSTRAC AML Reporting

The Compliance Officer has a reporting tool to easily prepare and lodge regular reports to AUSTRAC and for audits where required.

## Can One Compliance Officer Cover Multiple Offices?

Yes. A single Compliance Officer **may be allocated across multiple offices**, provided that:

- The officer has **sufficient capacity, authority, and access** to perform their role effectively
- Each office is clearly linked to that officer in governance documents
- Risks are assessed **per office**, not assumed to be uniform
- Oversight activities are evidenced (training, reviews, reporting, escalation)

AUSTRAC assesses **effectiveness**, not headcount.

Property360 Agency can provide an accredited Finance Broker/Finance Manager, or you can nominate your own mortgage broker to join you, under the Property360 program. Talk to us about your preference. Certain criteria need to be met to qualify as a Property360 finance manager.

**Property360 Agency - Systems & Templates** – Click [HERE](#) to see what you get in your compliance pack.

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## Why Embedding Matters

Without Property360, G1–G5 is complex, time-consuming, and high-risk. With Property360 Agency, the process remains structured and rigorous—but execution becomes seamless, controlled, and audit-ready. Link to Legislation below:

[https://www.austrac.gov.au/amlctf-reform/reforms-guidance/before-you-start/new-industries-and-services-be-regulated-reform/real-estate-services-reform?utm\\_source=chatgpt.com](https://www.austrac.gov.au/amlctf-reform/reforms-guidance/before-you-start/new-industries-and-services-be-regulated-reform/real-estate-services-reform?utm_source=chatgpt.com)