

Avenue Capital Managers



Avenue AML Service for Accounting Firms

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The Challenge: AUSTRAC tranche 2 AML/CTF compliance

Accounting firms that provide designated services are expected to become reporting entities under AUSTRAC's AML/CTF regime from 1 July 2026 (subject to passage of legislation). This represents a significant compliance change for the accounting profession in Australia.

What triggers AML/CTF obligations?

Firms providing ANY of these designated services will be reporting entities and must comply:

1. Company formation and administration
2. Trust establishment and trustee services
3. SMSF setup and administration
4. Partnership formation
5. Business acquisitions and sales
6. Director/nominee services¹
7. Registered office services
8. Property transactions²
9. Tax planning involving structures

¹As defined by AUSTRAC guidance. ²Where accountant advises on structure, settlement, or transaction execution.

Core obligations for reporting entities

Customer Due Diligence (CDD)	Verify identity of clients receiving designated services before provision of those services
Personnel Due Diligence (PDD)	Screen employees performing AML/CTF functions for skills, integrity, and expertise
Suspicious Matter Reporting (SMR)	Report suspicious transactions to AUSTRAC. Cannot tip off clients.
AML/CTF Programme	Written, Board-approved programme addressing ML/TF risks
Record-Keeping	Maintain transaction and CDD records for 7 years
AUSTRAC Enrolment	Each legal entity must enrol by 29 July 2026

The stakes: Penalties for Non-compliance

Civil penalties up to \$31.1 million per entity (for corporations) for serious breaches. Criminal penalties including imprisonment for serious contraventions. Reputational damage and regulatory scrutiny.

The solution: Avenue Capital Managers' AML service

Pathway 1 Build your own capability	Pathway 2 Outsourced AML Compliance Officer
<p>How it works:</p> <p>We train your Compliance Officer to become the internal AML expert. Your staff learn procedures and own the processes. 12-month support, then you operate independently.</p>	<p>How it works:</p> <p>We act as your external AML Compliance Officer under annual service contract. We handle compliance functions for you. You focus on clients - we handle AML/CTF.</p>
<p>What you get:</p> <ul style="list-style-type: none">• Programme design (Part A)• CDD/PDD/SMR procedures• Technology platform guidance• Staff training (all levels)• 12-month ongoing support• AUSTRAC enrolment support• Knowledge transfer: YOU become expert	<p>What we handle:</p> <ul style="list-style-type: none">• CDD processing oversight• SMR identification and lodgement (where formally appointed as compliance officer)• Transaction monitoring• Compliance testing and reporting• AUSTRAC liaison• Procedure updates• Training refreshers
<p>Best for: Mid-sized firms (4+ partners) wanting long-term cost savings and internal control</p> <p>Long-term: Independent operation after Year 1 (optional ongoing support available)</p>	<p>Best for: Smaller firms (1-3 partners) or firms preferring expert oversight without internal resourcing</p> <p>Long-term: Ongoing annual contract (renewable). We remain your compliance officer.</p>

Our three pillars

Intelligence:

40+ years regulatory compliance experience (working with AFSL and ACL regulatory frameworks, AUSTRAC requirements)

Simplified:

Integrate into existing workflows. Clear procedures. Technology that works for you.

Secured:

Implementation roadmap to support compliance readiness by 1 July 2026. Sustainable capability.

Implementation: 6 phase programme

Phase 1: Gap Analysis & Scoping

Phase 2: Programme Design

Phase 3: Technology & Process

Phase 4: Training & Capability

Phase 5: Pilot Testing

Phase 6: AUSTRAC Enrolment

Go-Live: 1 July 2026 (expected) | Post Go-Live: 12+ months support (Pathway 1) OR Annual contract (Pathway 2)

Why choose ACM

1. Specialist Focus: AML/CTF compliance exclusively for accounting firms
 2. Proven Expertise: 40+ years regulatory compliance experience
 3. Knowledge Transfer: We build YOUR capability (Pathway 1) or handle it for you (Pathway 2)
 4. Two Pathways: Build capability OR outsource - you choose what suits your firm
 5. Platform-Agnostic: You control technology selection, no vendor lock-in
 6. Cost-Effective: Transparent pricing, reduced hourly rate for accounting sector
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Get started: Free 15-minute compliance assessment

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