AUSTRAC TRANCHE 2 · REAL ESTATE · EFFECTIVE 1 JULY 2026

Tranche 2 is here. Your deals don't have to stop.

From **1 July 2026**, every Australian real-estate agency, buyer's agent and developer becomes an AUSTRAC reporting entity under the AML/CTF Act. New duties arrive with every listing: risk-rate the customer, verify identity and ownership, screen for sanctions and PEPs, keep seven years of records — for **both sides of the transaction**. RCC turns that into a file that builds itself, flags what matters, and stays out of the way of the sale.

1 July 2026	29 July 2026	Both sides
AML/CTF obligations live for real estate	deadline to enrol with AUSTRAC	buyer AND seller are your customers now

The regulation at a glance

The AML/CTF Amendment Act 2024 and the new AML/CTF Rules 2025 bring real estate into Australia's anti-money-laundering regime — the sector AUSTRAC's national risk assessment rates **high risk** for laundering. The duties are real, but so is the regulator's posture for year one: *"effort, not perfection"* — enforcement aimed at firms that ignore the regime, not those doing the work in good faith.

Date	What happens
31 Mar 2026	AUSTRAC enrolment opened (5,300+ agencies already enrolled)
1 Jul 2026	Obligations apply to designated services provided from this day — a documented AML/CTF program must be in place before you broker
29 Jul 2026	Deadline to enrol and to notify your compliance officer to AUSTRAC
Jul–Sep 2027	First annual compliance report window (period FY 2026–27)
2029–2030	First independent evaluation of your program (staggered by AUSTRAC account number)

Are you captured?

CAPTURED — these are designated services	NOT CAPTURED
• Brokering a sale, purchase or transfer of real estate — seller's agents, buyer's agents, auctions. **The customer is both the vendor and the buyer.** • Developers selling through in-house sales teams (customer: the buyer).	• Residential and commercial property management and leasing • Private sales between individuals • Conveyancers and lawyers (regulated separately as professional services)

OBLIGATION BY OBLIGATION

What the law requires — and what RCC does about it

Obligation	The law requires	RCC provides
Customer risk assessment Act s 26C factors	Rate every customer's ML/TF risk across customer type, service, delivery channel and foreign-jurisdiction links — and document the rationale.	• Automatic four-factor weighted rating on every case, with every point explained in plain English — never a black-box score. FATF country lists kept current (Feb 2026 plenary).
Initial CDD Act s 28	Before the service: identity of the customer, beneficial owners of companies and trusts, and each party's PEP / sanctions status.	• Documents arrive by upload or a per-case intake email; each is malware-scanned, read (OCR + AI extraction) and checked against the client-type checklist — IDs, company registration, trust deeds, beneficial owners.
Sanctions + PEP screening	Don't deal with designated persons; identify politically exposed persons and treat foreign PEPs as high risk.	• Every case screened against the real DFAT Consolidated List plus a 1.9-million-entry PEP database — automatically, with re-screening freshness checks and one-click dismissal of wrong-person matches.
Enhanced CDD Act s 32	Mandatory for high-risk customers, foreign PEPs, FATF call-to-action countries, and when an SMR obligation arises — including source of funds and wealth.	• A mandatory-EDD floor that can never under-rate a sanctioned or PEP case, plus an s 32 advisory whenever the risk signals run high — so your file never shows a regulatorily impossible picture.
Simplified CDD Act s 31	Lighter checks are allowed only where risk is genuinely low and no trigger applies.	• Simplified CDD is recommended only on a pristine file — any open signal moves the recommendation to standard, conservatively.
Ongoing CDD Act s 30	Keep monitoring the relationship until settlement: unusual behaviour, stale information, new screening matches.	• Re-screening with new-match alerts, 90-day staleness flags, and document-quality checks (expiry, KYC mismatch) on every file.
Suspicious matters Act s 41 + s 123	Report suspicion to AUSTRAC within 3 business days (24 hours for terrorism financing) — and never tip the customer off.	• Guided SMR drafting: indicator checklist, grounds, and the lodgement deadline computed for you. Role-based controls keep SMR material away from front-line staff and out of customer-facing reports and exports.
Records Act Part 10	Keep CDD and transaction records for 7 years, in English, retrievable on request.	• A 7-year retention clock from case close, one-click case export, and a tamper-evident audit trail of every action — your evidence that the work was done.

Straight talk: what stays with you. Enrolling with AUSTRAC (free, online, by 29 July 2026), adopting an AML/CTF program (AUSTRAC's free starter kit covers most agencies), appointing a compliance officer, and lodging any SMR yourself via AUSTRAC Online. RCC is your working file and your evidence — it doesn't replace your accountability, it makes meeting it manageable.

DESIGNED FOR AGENTS, NOT AUDITORS

Compliance that never kills the deal

Most compliance software is built to say no. RCC is built on a different rule, taken straight from how the regulation actually works: **the tool warns, the law decides, and you stay in charge.** Six design principles make that real:

1 **Warn, don't block.**
A missing bank statement or an unfinished checklist shows up as a flag on the report — never as a locked screen. There is no “computer says no” anywhere in the product: the agent remains the decision-maker on every file.

2 **The file builds itself.**
Forward documents to the case's own intake email (or drag and drop) and the pipeline does the rest: malware scan, OCR, AI extraction, sanctions and PEP screening, risk rating, plain-English summary. Nothing to run, nothing to chase — the file fills in while you sell.

3 **EDD is recommended, never imposed.**
When risk signals run high, RCC tells you exactly what s 32 of the Act expects — perform enhanced due diligence, or record why you assess the customer lower. One line of recorded rationale and the deal moves on. The choice is documented, defensible, and yours.

4 **False positives die in one click.**
Common-name PEP matches start as candidates needing review, not findings. Confirm the real ones, dismiss the wrong-person hits — the rating and the report update instantly. No frozen files while someone works out whether your buyer is *that* John Smith.

5 **The law already gives you time — RCC just keeps you inside it.**
The Rules let the counterparty's checks finish up to 28 days after exchange of contracts (or 3 days before settlement). Exchange never has to wait for paperwork; the compliance work runs alongside the deal, not in front of it.

6 **The only hard stop is the law itself.**
One scenario gets a “do not proceed” notice: a confirmed sanctions match, where providing the service is prohibited outright (Rules 2025 s 5-3). That's not software stopping your deal — that's the one deal nobody should ever close. Even then: if the match is a false positive, dismiss it and keep moving.

Be ready before 1 July — without hiring a compliance team.

See a live case file at **aml.snaplex.ai** — upload one client's documents and watch the compliance file build itself.

Regulatory positions verified against the AML/CTF Act 2006 (as amended 2024), the AML/CTF Rules 2025, the AML/CTF (Transitional) Rules 2026 and AUSTRAC sector guidance, as at 11 June 2026. FATF country lists as at the 13 February 2026 plenary.