aceia
delivering assurance

LICENSED FOR 16+ GAMING MACHINES?

HERE'S WHAT YOU NEED TO KNOW.

AUSTRAC Independent Evaluations for pubs and hotels.

AML compliance doesn't need to be complicated.

aceia.com.au/aml-ctf-pubs-clubs

Australia | New Zealand

What you NEED TO KNOW

DOES THIS APPLY TO MY VENUE(S)?

If your pub or hotel has **entitlements under its licence to operate 16 or more gaming machines**, specific Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) obligations apply.

Put simply, AML/CTF requirements are designed to help prevent businesses and services being used to launder money or finance terrorism and other serious crime.

IT'S YOUR ENTITLEMENTS THAT COUNT

Your obligations are based on the number of gaming machine entitlements under your licence - **not simply how many machines are currently operating.**

So, if you're licensed for 16 or more but currently operate fewer, the 16+ requirements still apply.

THE RULES HAVE CHANGED

From 31 March 2026, changes to Australia's AML/CTF framework introduced **Independent Evaluations** of AML/CTF programs, replacing the previous Independent Review requirements.

An Independent Evaluation looks at whether your AML/CTF program and policies are appropriate for your venue(s), whether your money laundering and terrorism financing risks are being identified and managed, and whether your business is following its AML/CTF policies.

WHEN IS YOUR FIRST INDEPENDENT EVALUATION DUE?

For existing regulated businesses that completed an Independent Review under the previous Rules, the first Independent Evaluation is due by the later of:

31 MARCH 2027

OR

4 YEARS AFTER YOUR MOST RECENT INDEPENDENT REVIEW

Not sure when your venue is due? aceia can help you work through what applies to your circumstances and ascertain whether your previous review is an independent review.

IT'S AN ONGOING REQUIREMENT

Your AML/CTF policies need to set how often Independent Evaluations are conducted, with an evaluation required **at least once every three years.**

NOT SURE WHAT APPLIES TO YOUR VENUE(S)?

Contact us for a no obligation conversation about your venue and what may be required.

1300 791 794 | **info@aceia.com.au**

THE ALDGATE PUMP HOTEL

Aldgate Pump Hotel had kept up with its AUSTRAC requirements, but having an Independent Evaluation done had ended up in the family's 'too hard basket'.

The aceia specialist team helped the hotel understand what was already in place, what needed attention and what to do next to meet their AML/CTF obligations.

"Peter Francis and his team assisted us in making our AUSTRAC requirements seamless and relatively easy. They helped us implement systems so that when we do this again, the process will be pain-free. We highly recommend them."

Josie & Tony O'Donnell

What to EXPECT

MORE THAN A TICK-BOX EXERCISE

Your venue(s) may already have many of the right AML/CTF processes and controls in place.

An Independent Evaluation provides an independent check that they're working as they should and helps identify anything that may need attention.

In many cases, it's about strengthening or better documenting what you're already doing.

WHY INDEPENDENCE MATTERS

The person conducting your Independent Evaluation needs to be appropriately independent from the AML/CTF program and controls being evaluated.

This provides an objective view of how your program is working and where attention may be needed.

WHAT TO EXPECT FROM ACEIA

1. **UNDERSTAND**
   We get to know your venue(s), gaming operations and what AML/CTF arrangements you currently have in place.
2. **REVIEW**
   We review your available AML/CTF program and associated policies, risk assessments, processes, training, records and other relevant documentation.
3. **TEST**
   Where controls and processes are in place, we assess how they're working in practice.
4. **REPORT**
   You receive clear findings and practical recommendations on what needs attention. The exact scope is tailored to your venue(s), what you currently have in place and AUSTRAC expectations.

WHAT CAN AN INDEPENDENT EVALUATION LOOK AT?

Depending on your venue(s) and circumstances, this can include:

- Your AML/CTF program and policies
- Money laundering and terrorism financing risk assessments
- Customer due diligence
- Transaction monitoring
- AML/CTF staff training
- Employee due diligence
- AUSTRAC reporting
- Governance and management oversight
- Record keeping and outsourced activities

WHAT ARE THE BENEFITS?

CONFIRM WHAT'S WORKING
Get an independent view from AML qualified professionals about the processes and controls you already have in place.

IDENTIFY GAPS
Find areas in your program, documentation or processes that may need attention.

FOCUS YOUR EFFORT
Know where to prioritise your time and resources.

BE BETTER PREPARED
Strengthen your AML/CTF arrangements now and make future Independent Evaluations easier to manage.

WHY ACEIA?

aceia brings together specialist AML/CTF knowledge, extensive audit and risk experience, and local South Australian support.

MEET THE TEAM

Peter Francis **FOUNDER & MANAGING DIRECTOR, ACEIA**

Peter has more than 25 years' experience in internal audit, risk and compliance. He founded Adelaide-based aceia in 2007 and works with organisations to provide practical assurance, relevant reporting and recommendations.

Tariq Islam **AML/CTF, RISK & INTERNAL AUDIT SPECIALIST**

Tariq has 20 years' experience in risk management, compliance and internal audit, including more than a decade working in AML/CTF remediation and Independent Reviews. His experience includes senior internal audit roles with CBA and Westpac and AML/CTF remediation work and AML/CTF Independent Reviews with PwC.

Giridhar "Giri" Kannan **AML/CTF SPECIALIST & LEAD AUDITOR**

Giri has more than 20 years' experience in anti-financial crime, compliance programs and regulatory assessment. His background includes experience as a first-line regulator and financial crime internal auditor with Westpac Group during and post AUSTRAC enforcement. He also holds Advanced ACAMS-AUDIT certification.

SUPPORTING SA'S HOTEL INDUSTRY

aceia is an AHA|SA Corporate Partner, supporting South Australian hotel operators with specialist internal audit, risk, compliance and AML/CTF expertise.

AHA|SA members are welcome to contact the aceia team for an initial conversation about their Independent Evaluation requirements and what applies to their venue(s).

CORPORATE PARTNER 2026-27 | aha|sa Australian Hotels Association (SA)

NOT SURE WHERE YOUR VENUE STANDS?

You don't need to have all the answers before you talk to us.

When you're ready, start with a no obligation discovery meeting to understand your venue, current situation and what you may need to do next.

TALK TO ACEIA

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