

Determinants of AML/CFT Compliance Intention Among Malaysian Accounting Practitioners: An Approach Using The Theory of Planned Behaviour

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ABSTRACT

The objective of this study is to develop a model for understanding AML/CFT compliance behaviour among Malaysian accounting practitioners by examining the influence of attitude, subjective norm, perceived behavioural controls and trust in authority on their intention to comply with AML/CFT reporting requirements. A total of 240 self-administered questionnaires were collected from accounting practitioners in Malaysia. The data were analysed using variance-based structural modelling (PLS-SEM) to examine the hypothesised relationships. The results revealed positive and significant relationships between attitude, subjective norm, perceived behavioural controls, and trust in the authority and accounting practitioners' intention to comply with AML/CFT reporting requirements. However, the study found no evidence of trust in authority moderating any of these relationships. This study extends existing knowledge of AML/CFT compliance from behavioural perspectives by using the extended theory of planned behaviour. In addition, it considers the moderating role of trust in authority within the AML/CFT compliance setting. The current findings could benefit the relevant authorities in understanding AML/CFT compliance and assist them in formulating and implementing strategies to promote compliance, especially in Malaysia. Although compliance is influenced by multiple factors, this study is limited to examining the elements derived from the Theory of Planned Behaviour as well as the concept of trust in authority

Keywords: Money Laundering, AML/CFT Compliance, Accounting Practitioners, Theory of Planned Behaviour, Trust in Authority

1.0 INTRODUCTION

Money laundering is a clandestine process by which illicitly obtained money is made to appear legitimate. It involves multiple stages, typically starting with the placement of "dirty money" into the financial system, followed by layering through complex transactions to obscure the money's origins, and finally integration, where the laundered funds re-enter the economy as seemingly legitimate assets. This practice enables criminals to enjoy the profits of illegal activities, such as drug trafficking, terrorism, and corruption, while avoiding detection by authorities.

Money laundering activities not only have profound and detrimental effects on the economy of a country, but they also undermine the integrity of financial institutions and erode public trust in the financial system. In fact, the economic stability and growth potential of a country can be severely compromised by pervasive money laundering activities. As illicit funds are funnelled through legitimate businesses, they distort market competition and give an unfair advantage to criminal enterprises over lawful businesses. This distortion can lead to inefficient allocation of resources and a loss of economic productivity. Additionally, money laundering can facilitate corruption and bribery, further weakening governance and the rule of law. The infiltration of dirty money into the economy can also deter foreign investment as investors may perceive the country to be high-risk due to its association with financial crimes.

According to the United Nations Office on Drugs and Crime (UNODC), the amount of money laundered globally each year is estimated to be between USD800 billion and USD2 trillion, which is equivalent to 2 – 5% of global GDP (UNODC, 2025). In 2018 alone, over USD2.1 trillion was laundered worldwide. Furthermore, trade-based money laundering (TBML) and associated tax evasion resulted in nearly USD9 trillion in financial losses in developing countries between 2008 and 2017 (World Economic Forum, 2021). The UK's National Crime Agency reports that up to £100 billion is laundered through the country annually (National Crime Agency, 2025). These staggering figures highlight the pervasive and costly nature of money laundering in the global economy.

As a consequence, many countries have strengthened the reporting requirement mechanism not only among financial institutions but also for non-financial reporting institutions that encompass a wider range of industries and professions including accountants and lawyers, also known as Designated Non-Financial Businesses and Professions (DNFBPs). In Malaysia, Bank Negara Malaysia (BNM), being the country's central bank and competent authority for anti-money laundering issued a policy document in February 2024, entitled "The Anti-Money Laundering (AML), Countering Financing of Terrorism (CFT), Countering Proliferation Financing (CPF), and Targeted Financial Sanctions (TFS) for Designated Non-Financial Businesses and Professions (DNFBPs) and Non-Bank Financial Institutions (NBFIs)", which is a revised version of the earlier document issued in 2020. This policy document, among others, sets out the obligations of reporting institutions with respect to the requirements imposed under the Anti-Money Laundering, Anti-Terrorism Financing, and Proceeds of Unlawful Activities Act 2001 (AMLA).

However, recent studies have highlighted varying compliance levels among accountants regarding anti-money laundering (AML) regulations. The Basel AML Index provides a global snapshot, revealing a mixed compliance landscape with some regions demonstrating significant adherence while others lag behind. Although accountants are critical in preventing money laundering, the Institute of Financial Accountants (IFA) in the UK pointed out that common compliance issues persist among accountant. One example is inadequate risk assessments where some firms struggled with documenting the potential risks posed by their client base despite IFA stressing the need for strict compliance with the UK's AML regulations (Institute of Financial Accountants, 2024). Additionally, a survey conducted by Firmcheck in 2024 found

that only 36% of UK accounting firms perform regular anti-money laundering checks despite 90% being confident in their compliance measures, and 60% of them also viewed AML compliance as burdensome (Macfarlane, 2024). These findings underscore the need for continuous improvement and stringent enforcement of AML regulations within the accounting profession to mitigate the risks associated with money laundering.

In the Malaysian context, despite an abundance of research on AML compliance, most studies have focused on financial institutions, with only a limited number of studies focusing on AML compliance among accountants (Ahmad Tarmizi et al., 2023). Hence, this study aims to fill the gap by examining the compliance determinants towards the AML regime among accounting practitioners in Malaysia. This study also complements the earlier work of Ahmad Tarmizi et al. (2023) by offering a different perspective on AML compliance through the lens of the Theory of Planned Behaviour. Consequently, this study has global significance since AML compliance remains a problem not only in this country but also internationally.

2.0 LITERATURE REVIEW AND HYPOTHESIS DEVELOPMENT

2.1 THE ROLES OF ACCOUNTANTS UNDER THE ANTI-MONEY LAUNDERING REGIME

In view of the significant threats posed by money laundering activities to financial systems and global security, rigorous international efforts have been undertaken to combat these threats through stringent regulations and advanced monitoring techniques, especially by financial institutions. As a result, the Financial Action Task Force (FATF) reported an increasing trend for criminals to launder money through non-financial sectors and industries such as real estate, casinos, and precious metals. Criminals also exploit certain professions, including the legal and accounting professions, as conduits for their money laundering activities. According to the ICAEW website, the accounting profession can be exploited as a conduit for money laundering through several methods. Accountants may be used to create complex financial structures and transactions that obscure the origins of illicit funds. Such creations can involve setting up shell companies, manipulating invoices, or falsifying financial statements to make illegal money appear legitimate. The use of professional services for money laundering often leverages the credibility and expertise of accountants to avoid detection by regulatory authorities (AIA, 2023). Additionally, corrupt accountants might knowingly facilitate money laundering by providing advice on exploiting loopholes in financial regulations or failing to report suspicious activities as is required by anti-money laundering (AML) laws (FAI Comply, 2024). This misuse of the accounting profession undermines financial integrity and poses significant challenges to global efforts to combat money laundering.

At the same time, the accounting profession can play a crucial role in preventing money laundering activities through various mechanisms. Accountants are often on the frontline of financial oversight and are required to implement stringent AML policies and procedures. By conducting thorough due diligence and Know Your Customer (KYC) checks, accountants can identify and report suspicious transactions and activities to the relevant authorities (Molyneux, 2021). Additionally, accountants can design and enforce internal controls within organisations to monitor and detect unusual financial behaviour. They also play a key role in ensuring compliance with AML regulations by regularly auditing financial statements and ensuring transparency in financial reporting. Furthermore, ongoing education and training in AML practices enable accountants to stay updated on the latest techniques used in money laundering, thereby enhancing their ability to identify and prevent such activities effectively (Nazatul Izma, 2018).

2.2 AML REPORTING REQUIREMENTS FOR ACCOUNTANTS IN MALAYSIA

The AML/CFT Reporting Obligations under Part IV of the AMLA and AML/CFT are divided into two parts: (a) the key requirements, which are the fundamental requirements that all reporting institutions (RI) must apply when they undertake gazetted activities (GA) for their clients, and (b) the AML/CFT Compliance Programme, which forms a basis for successful AML/CFT infrastructure within the firm. This study, however, focuses on compliance with the key requirements.

As one of the main reporting institutions, accountants are required by law to undertake precautionary measures to prevent their institutions from being used as a conduit for ML/FT activities. Among others, accountants are required to conduct customer due diligence (CDD), which is the process of identifying and verifying the identity of the customer. Accountants must be satisfied that their customers are in fact who they say they are, which includes knowing the identity of the customer or the beneficial owner behind the transaction and the purpose of the customer in undertaking the transaction. Accountants are also required to screen and carry out risk assessments of their clients and to further conduct enhanced due diligence (EDD) if their clients are categorised as high risk. They are also required to submit a Suspicious Transaction Report (STR) to the Financial Intelligence Unit at Bank Negara Malaysia and furthermore to maintain and retain records of transactions for at least six (6) years (Bank Negara Malaysia, 2024).

2.3 THE THEORY OF PLANNED BEHAVIOUR (TPB)

This study adopts the TPB as the underpinning theory to predict accounting practitioners' intention to comply with the AML/CFT reporting requirements. In fact, the TPB has been widely used in studies on compliance, especially for tax compliance (Alleyne & Harris, 2017; Bani-Khalid et al., 2022; Garg et al., 2024; Owusu et al., 2021) and zakat compliance (Andam & Osman, 2019; Hassan et al., 2019; Mohd Khalil et al., 2020; Sadallah et al., 2022; Yusfiarto et al., 2020). The TPB, initially proposed by Ajzen (1991), developed out of the Theory of Reasoned Action to predict whether an individual's behavioural intention subsequently led to his or her actual behaviour. The TPB posits that an individual's behaviour is a function of three factors: attitudes, subjective norms, and perceived behavioural control. These three variables influence behaviour through their impact upon behavioural intention. Attitude toward behaviour refers to the extent to which a person has a favourable or unfavourable evaluation or appraisal of planned behaviour. Subjective norms are associated with the perceived social pressure an individual faces to perform the behaviour. Perceived behavioural control refers to an individual's perceptions of their ability to perform a given behaviour.

Although attitude, subjective norms and perceived behavioural control are important in the prediction of intention, Ajzen (1991) suggested that they can be expected to vary across behaviours and situations. Thus it may be found that that in some applications only attitudes have a significant impact on intentions. In other application attitudes and perceived behavioural control may be sufficient to account for intentions, while in other instances all three predictors could make independent contributions. Furthermore, Ajzen (1991) suggested that in addition to the original TPB variables, the model may be extended by adding other determinants in analysing an intention or a behaviour. Accordingly, this study has included 'trust in authority' as an additional variable to predict behavioural intention and its moderating effect on other elements of TPB.

2.4 ATTITUDE AND COMPLIANCE INTENTION

The Theory of Planned Behaviour (TPB) introduced by Ajzen (1991) suggests that attitude toward a behaviour is a major factor that influences intention, apart from subjective norms and perceived behavioural control. According to Ajzen (1991), the behavioural intention of an individual is influenced by the

individual's attitude about the outcome of such behaviour and the subjective evaluation of the risks and benefits of that outcome. An individual's attitude towards a particular issue, event and organisation will influence them in the decision-making process. Positive attitudes have a positive impact on human behaviour and the tendency to do something is high, while negative attitudes reflect negative behaviours, and a person with such behaviours and attitudes tends to avoid doing anything. Therefore, a decision will be made based on whether the individual possesses a positive or negative attitude, resulting in a particular behaviour as the outcome (Mohd Khalil et al., 2020). Consequently, many studies have been carried out to determine how attitude influences a certain behaviour, including behaviours related to compliance.

In the context of zakat compliance, the literature reveals that attitude has a remarkable association with the intention to pay zakat, which eventually affects the compliance behaviour of zakat contributors. Using an extended TPB model, Sadallah et al. (2022) investigated the variables influencing the intention to pay zakat and found that attitude positively influenced the intention to comply with business zakat in Algeria. Similarly, another study by Mohd Khalil et al. (2020) among public servants in East Malaysia also discovered a positive relationship between attitude and the intention to comply with zakat payment deducted from their salary. Saad et al. (2020) also found a significant positive relationship between attitude toward zakat evasion and intention to pay zakat in Nigeria. The study findings revealed that an individual zakat payer who perceives non-payment of zakat as a sin is more likely to pay zakat to the authority than those who do not perceive non-payment of zakat as a sin. These empirical results are consistent with the outcomes of previous research that confirmed the positive influence of attitude toward zakat compliance intention (Andam & Osman, 2019; Hassan et al., 2019; Yusfiarto et al., 2020). Despite these findings, there are several scholars in the zakat field who consider that attitude may not be a sufficient factor to influence the decision of an individual to pay zakat. For instance, Heikal et al. (2014) argued that attitude does not influence an individual's intention to pay zakat. Similarly, in one of their studies, Bidin et al. (2013) concluded that intention to pay zakat from savings was not influenced by attitude. Thus findings on the relationship linking attitude with zakat compliance intention have been mixed.

Meanwhile, studies on tax compliance have also provided evidence of how taxpayers' compliance intention is influenced by their attitude. For example, a study by Garg et al. (2024) in India, focusing on GST taxpayers, found that attitude exerted a substantial positive effect on compliance behaviour, confirming its crucial role in taxation contexts. In a study of the owner-managers of SMEs in Jordan, Bani-Khalid et al. (2022) found that the attitudes of owner-managers towards tax compliance were significantly related to intentions to engage in sales tax: the results indicated that owner-managers of SMEs with positive attitudes toward tax compliance had a higher likelihood of engaging in sales tax compliance. Similarly, Owusu et al. (2021), studying self-employed individuals in Ghana, observed that attitude, alongside trust and moral obligation, significantly predicted tax compliance intentions. These are in line with the findings of Alleyne and Harris (2017) who conducted a study in the Barbados which indicated that attitudes towards tax evasion significantly impacted the intention to evade taxes, with negative attitudes diminishing an individual's willingness to comply. These findings illustrate that attitude is not only a predictor of compliance but also a protective factor against evasion behaviours. In other words, these studies argued that the degree to which an individual evaluates the behaviour (either favourably or unfavourably) is important in predicting both the intention to engage in that behaviour and the actual performance of that behaviour. As such, individuals with a more favourable attitude towards the payment of taxes can be expected to be more compliant with tax payment responsibilities as opposed to those with an unfavourable attitude towards tax compliance.

With regard to AML/CFT compliance, the influence of attitude on AML/CFT compliance intention has not been empirically tested. However, previous studies on whistleblowing, which is included as one of the roles

under the AML/CFT regime, suggest that accountants in general do not have a favourable attitude towards whistleblowing acts. Most accountants believe that whistleblowing is a no-win situation (Burt, 2015). This belief could be due to the negative connotations arising from the fact that the whistle-blower has usually been presented as a troublemaker, not as a moral individual. and many individuals would not take the risk for fear of the potential consequences (Crook, 2000). Vinten (1994) provided an analogy that equates whistleblowing to the bee-sting phenomenon: the individual has only one sting to use, and using it may well destroy his or her career. These arguments may explain Flanagan and Clarke's (2007) finding that accountants are not well known as whistle-blowers.

Based on insights from the studies discussed above, this study predicted a positive relationship between attitude toward AML/CFT reporting requirements and the intention to comply with those requirements. In other words, a more favourable attitude would lead to a greater behavioural intention toward AML/CFT compliance. Hence, the following hypothesis was proposed:

H1: Accounting practitioners' attitude is positively associated with their intention to comply with AML/CFT reporting requirements.

2.5 SUBJECTIVE NORMS AND COMPLIANCE INTENTION

Subjective norms refer to social pressure discerned by an individual to perform or not to perform a particular behaviour after taking into account the perceived expectations of other people within the individual's orbit as to whether or not the individual will perform or not perform a given behaviour (Ajzen, 1991). In other words, subjective norms can be defined as determinants of whether the individual perceives that his or her significant others would endorse or disapprove of his or her performance (or non-performance) of a behaviour (Finlay et al., 2002).

In the context of zakat compliance behaviour, Sadallah et al. (2022) found that subjective norms had a significant positive relationship with intention to comply with zakat among business owners in Algeria. Meanwhile, a study in Malaysia reported that subjective norms had a positive influence on the individual's intention to pay zakat out of his salary. This means that an individual has a higher tendency to pay zakat from their salary if all the people around him regard the zakat obligation as a priority beyond their needs, and vice versa (Mohd Khalil et al., 2020). Another study by Saad et al. (2020) also found that peer influence positively and significantly influenced intention to pay zakat in Nigeria. To summarise, these results support the findings of previous researchers who argued that subjective norms have a significant positive relationship with zakat compliance behaviour (Abashah et al., 2018; Andam & Osman, 2019; Awadh Bin-Nashwan et al., 2017). Nevertheless, some other studies, such as those conducted by Othman et al. (2017), Bidin et al. (2013), and Huda et al. (2012), produced contradicting results: their studies found that subjective norms had no significant impact on intention to comply with zakat. Thus the evidence remains inconclusive and the relationship between subjective norms and intention to comply with zakat requires further examination (Bidin et al., 2013; Huda et al., 2012; Othman et al., 2017).

Meanwhile, in the context of tax compliance, Garg et al. (2024) applied the Theory of Planned Behaviour (TPB) to better understand the determinants of Goods and Services Tax (GST) compliance behaviour in India. Their empirical findings affirmed the strong positive effect of subjective norms on GST compliance intentions. Taxpayers perceived normative pressures from peers, family, and society as compelling influences to comply with GST regulations, thereby emphasising the role of societal expectations in shaping fiscally responsible behaviour. Similarly, Bani-Khalid et al. (2022) found that subjective norms had a significant positive relationship with the intention to engage in sales tax compliance in Jordan. Their results indicated that the owners and managers of SMEs who faced high subjective norms had a greater likelihood

of engaging in sales tax compliance. This finding is in line with Owusu et al. (2021), who also found that subjective norms had a positive influence on tax compliance intention among self-employed individuals in Ghana. Arguably, it is reasonable to assert that a person's commitment to paying taxes is influenced by the opinion of their significant others. Hence, taxpayers are much less likely to comply if they observe that tax defiance (rather than compliance) is supported by their referent group (Kirchler et al., 2008). In short, prior studies have consistently emphasised that these social pressures significantly predict individuals' intentions to comply (or not), particularly in tax and related compliance settings. Based on the literature, the following hypothesis was proposed for this study:

H2: Accounting practitioners' subjective norms are positively associated with their intention to comply with AML/CFT reporting requirements.

2.6 PERCEIVED BEHAVIOURAL CONTROL AND COMPLIANCE INTENTION

Perceived behavioural control, which is the degree of control that an individual possesses to partake in a specific behaviour, may also influence the intention of whether or not to engage in a behaviour (Ajzen, 1991). These controls imply an understanding of the individual's perceptions of his capability to behave in a particular way. Certain beliefs may be likely to encourage an individual to carry out a specific behaviour or to discourage him from behaving in a certain way (Ajzen, 1991). For the most part, the extent to which a behaviour is or is not performed depends on how easy or difficult the individual perceives engaging in the behaviour to be, and this perception influences the individual's intention to engage in that behaviour. Unsurprisingly, individuals who experience low perceived behavioural control (they anticipate a higher degree of difficulty and more obstacles) are less likely to perform that behaviour.

In zakat compliance, Bin-Nashwan et al. (2021) extended previous findings by revealing how different levels of perceived behavioural controls impacted intention to be zakat compliant. Their study's results showed that perceived behavioural control positively influenced intention to pay business zakat. This finding is in line with other studies which also attested that perceived behavioural controls significantly and positively influence intention to comply with zakat (Sadallah et al., 2022; Mohd Khalil et al., 2020). However, conversely, Andam and Osman (2019) found that perceived behavioural control exhibited an insignificant association with intention to pay zakat based on a study conducted in Marawi City, Philippines.

In the tax compliance context, Garg et al. (2024) found that perceived behavioural control shapes compliance intention and behaviour by fostering a sense of agency and control over the compliance action and this enhances the likelihood that the behaviour will be initiated and sustained. This likelihood means that perceived behavioural control translates into taxpayers' beliefs concerning their capability to understand tax regulations, to complete relevant procedures, and to make timely payments, thereby significantly influencing compliance outcomes. In addition, Bani-Khalid et al. (2022) found that perceived behavioural control was significantly related to intentions to engage in sales tax compliance, whereby SME owner-managers in Jordan with high perceived behavioural control were more inclined to engage in sales tax compliance. However, this finding contradicts the work of Owusu et al. (2021), who found a statistically insignificant link between perceived behavioural control and tax compliance intention despite exhibiting a positive association. The study indicated that even though individuals with high perceived behavioural control were more likely to comply with tax payment responsibilities, this factor was not a significant predictor of tax compliance intention.

In short, the findings are still inconclusive and call for further examination. Based on the literature above, the following hypothesis was proposed for this study:

H3: Accounting practitioners' level of perceived behavioural control is positively associated with their intention to comply with AML/CFT reporting requirements.

2.7 TRUST IN AUTHORITY AND COMPLIANCE INTENTION

In general, people will support new regulations or policies due to the trust they put in the key actors related to the respective regulations or policies. Trust is defined as a psychological state to accept vulnerability based on positive expectations of the intentions or behaviour of another (Rousseau et al., 1998). Theoretically, public trust will exist if one party has faith in the honesty and dependability of other parties. Kitt et al. (2021) examined the role of citizens' trust in explaining climate policy support in Canada and found that the perceptions of the national government's 'competence' are positively associated with the support for all the policies tested. In a different context, trust in tax authorities or institutions has been established as a pivotal factor influencing voluntary compliance across diverse contexts.

Studies in the field of tax compliance consistently show the influence of trust in tax authorities and tax compliance (Agusti & Rahman, 2023). Individuals who perceive the tax authority and system to be trustworthy are likely to be tax compliant, and vice versa. According to a study by Owusu et al. (2021), trust has a positive effect on the tax compliance intention of individual taxpayers, whereby the motivation to comply with tax payment responsibilities is usually higher when individuals have trust in the system and perceive managers of the state resources to be honest and trustworthy in handling their resources. Because of the lack of direct contact between taxpayers and the tax authorities, the relationship mainly depends on trust. A study by Faizal et al. (2017) suggested that trust in the tax authority, together with the sense of procedural fairness in the tax system, will boost tax compliance. That is, if the taxpayers are treated fairly and equally by the tax authority and if they have trust in the tax authority, their level of compliance will improve. Although Taing and Chang (2021) reported that trust in government did not show a statistically significant direct influence on tax compliance intention in their Cambodian sample, they noted that trust was instrumental in shaping perceptions of tax fairness—an important antecedent to compliance behaviour. In the context of the field of zakat compliance, research also suggests that enhancing trust in the zakat authorities would increase zakat payers' confidence and thus their willingness to pay zakat to the formal zakat institutions (Tajuddin, 2023). Similarly, Bin-Nashwan et al. (2020) emphasised that public trust in zakat authorities is essential for promoting the sustainability of zakat institutions. In fact, another study by Febriandika et al. (2023) found that trust emerged as a significant variable contributing to compliance with zakat payments within formal zakat institutions. Fostering and building trust in zakat authorities would increase zakat compliance through good governance, performance, transparency, and procedural fairness (Bin-Nashwan et al., 2021). Based on these findings in different contexts, this study hypothesised that:

H4: Accounting practitioners' trust in authority is positively associated with their intention to comply with AML/CFT reporting requirements.

2.8 MODERATING EFFECT OF TRUST

Recent studies have suggested that trust plays a crucial moderating role in the relationship between behavioural intentions and actual compliance across various compliance domains, including tax and zakat systems. Trust in tax authorities has been found to positively moderate the relationship between tax administration and personal income tax compliance in Nigeria (Ayoola et al., 2023). Similarly, trust in government positively influences tax compliance among individual taxpayers in Indonesia (Tuhumena et al., 2023), and trust in government also moderates the relationship between tax features (e.g., tax authority, tax rate) and compliance behaviour (Ahmad & Ismail, 2022). Trust also moderates the relationship between fairness perceptions and voluntary tax compliance among micro-enterprise owners in Nigeria (Ya'u et al., 2023).

Meanwhile, studies on zakat compliance among Muslim entrepreneurs have identified trust in zakat institutions as a moderating factor that has influenced zakat compliance in Muslim countries. For example, trust in zakat institutions has been identified as a significant moderator in the relationship between socio-economic determinants (e.g., religiosity, moral reasoning, peer influence) and zakat compliance (Bin-Nashwan et al., 2020). In addition, Sawmar and Mohammed (2021) suggested that good governance mechanisms, including board attributes, transparency, stakeholder management, and procedural justice enhance zakat compliance through increased trust. Public governance quality, accountability, and effectiveness have also been suggested as potential determinants of intention to pay zakat, with trust acting as a moderator (Muhammad & Saad, 2016). Additionally, knowledge about zakat has been found to moderate the relationship between political instability and compliance intention, while service quality and trust in institutions directly influence compliance (Sadallah et al., 2022).

The above findings indicate that trust acts as a crucial buffer, enhancing the positive effects of socio-economic and religious factors on compliance behaviours. Without adequate trust, even these strong factors may fail to influence compliance. Therefore, this study proposed the following hypotheses:

- H5a: Trust in authority moderates the relationships between attitude and the accounting practitioners' intention to comply with the AML/CFT reporting requirements*
- H5b: Trust in authority moderates the relationships between subjective norms and the accounting practitioners' intention to comply with the AML/CFT reporting requirements*
- H5c: Trust in authority moderates the relationships between perceived behavioural control and the accounting practitioners' intention to comply with the AML/CFT reporting requirements*

From the aforementioned literature, a conceptual framework was derived by combining elements from the Theory of Planned Behaviour (TPB) – attitude, subjective norms and perceived behavioural control, and the variable of trust in authority, as shown in Figure 1 below:

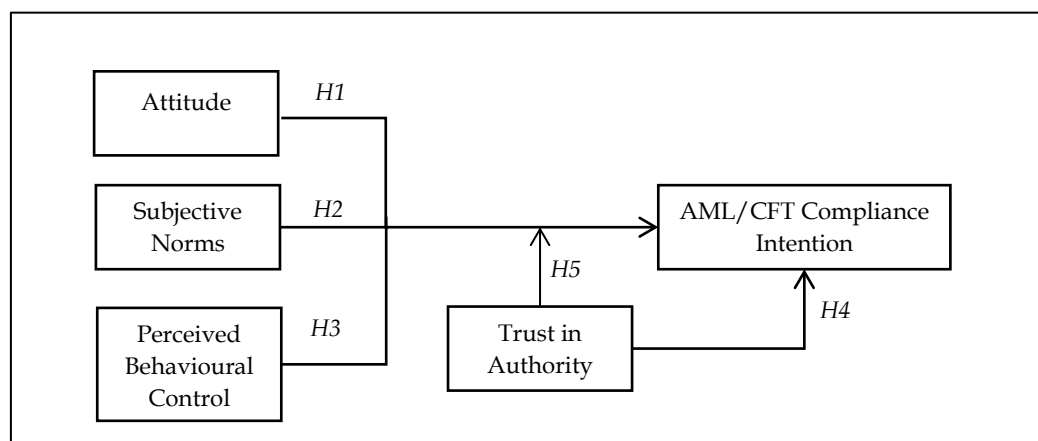


Figure 1: Research Framework

3.0 METHODOLOGY

This study adopted a quantitative method to examine the relationships between the components of the TPB and Malaysian accounting practitioners' intention to comply with AML/CFT reporting requirements, and the impact of trust in authority on these relationships. Following this method, the samples were selected through judgment sampling, which involves selecting respondents who meet specific predetermined criteria

(Sekaran & Bougie, 2016). This is because the AML/CFT reporting requirements apply only to accountants involved in certain activities specified by Bank Negara Malaysia. For example, these requirements are not applicable to accountants working at private companies. Hence, using judgmental sampling is more appropriate in achieving the objectives of this study. The criteria for selection were: those working with accounting firms around the country undertaking accounting, taxation, audit, or company secretarial work.

The study used a questionnaire to collect data from the respondents. Six variables were tested using 28 items. The measurements of the TPB elements (attitude, subjective norms, and perceived behavioural control) were adapted and modified from previous studies that used TPB models (Arkorful, 2022; Brown et al., 2016; Park & Blenkinsopp, 2009), whereas for trust in authority, the measurement was adapted from the study by Kitt et al. (2021). For the dependent variable, AML/CFT compliance intention was measured using the Bank Negara Malaysia reporting requirements for DNFBPs. For each item, the respondents were required to provide a response on a seven-point Likert-type scale with endpoints for “strongly disagree” and “strongly agree,” except for the AML/CFT compliance intention items, which ranged from “very unlikely” to “very likely.” The questionnaire was first reviewed by two academicians to validate the construct measurements, and later pre-tested with eight council members of the Malaysian Institute of Taxation (MATA) for further validation. The measurements were modified slightly in light of their feedback. Before the final data collection, a pilot test with 32 accounting employees of a large accounting firm in the Klang Valley was conducted. Once the validity and reliability criteria of the pilot study were satisfied, the questionnaire was finally sent to the university’s Research Ethics Committee for approval before commencing actual data collection.

The questionnaires were administered through Google Forms to accounting and audit firms selected from the Malaysian Institute of Accountants’ (MIA) database. In terms of sample size determination, the G-power sampling size determinant was used in this survey. The model of this study had four independent variables with three interaction terms. By using G-power with an effect size of 0.15, alpha of 0.05, and a power of 0.8, the minimum sample size required was only 103. The study was conducted over a period of two months, and 240 usable responses were received by the end of the survey period. Since the number of responses exceeded the required minimum sample size of 103, we believed that the sample was adequate; thus, findings from this study can be used with confidence. Data analysis was performed using SPSS software for descriptive analysis and Smart PLS 4.0 for testing the hypotheses.

4.0 RESULTS

4.1 COMMON METHOD BIAS ANALYSIS

Since this study employed a cross-sectional survey, the common method bias (CMB) could be of concern in terms of affecting the results. Therefore, a marker variable was used in the questionnaire to account for this common method bias. According to Lindell and Whitney (2001), a marker variable should incorporate a scale that is theoretically unrelated to the study. As such, this study adopted the three-item Cognitive Rigidity scale used by Lin et al. (2015) as a marker variable. This marker variable was later included as an exogenous variable predicting each endogenous construct in the model. The R^2 after adding the marker variable to the endogenous construct in the model was 0.386 compared to 0.372, representing a minimal difference of 1.4% or less than 10%. Thus, it can be concluded that the data did not have a CMB problem.

4.2 DESCRIPTIVE ANALYSIS

The descriptive analysis in Table 1 shows that 39.6% of the respondents are males and 60.4% are females. Most respondents (71.3%) are below 40 years old; of the remaining respondents 20.0% are aged between

41 and 50 years, and a further 8.7% are older than 50 years of age. In terms of respondents' organisational position, 17.9% are partners in their respective firms, 16.7% hold top management positions, 22.9% are senior executives, and the remaining 42.5% are at the executive level. Regarding working experience, 31.7% of the respondents have been working for more than ten years, while 40.4% have less than five (5) years' experience, consistent with the number of respondents holding executive-level post.. As for the size of the firms in which the respondents are employed, a similar percentage of respondents is employed in both small and medium-sized firms, with 40% each, while the remaining 20% of respondents are employed in big firms. In summary, the respondents' demographic profile matches the common profile of an accounting firm or organisation in general and also shows a good mixture of age, gender, experience, and position.

Table 1: Demographic Profile of Respondents

Category		Frequency	Percentage
Gender	Female	145	60.4%
	Male	95	39.6%
	Total:	240	100.0%
Age	<30 years	99	41.3%
	30-40 years	72	30.0%
	41-50 years	48	20.0%
	51 years and above	21	8.7%
	Total:	240	100.0%
Position	Partner	43	17.9%
	Top management	40	16.7%
	Senior executive	55	22.9%
	Executive	102	42.5%
	Total:	240	100.0%
Experience	<5 years	97	40.4%
	5-10 years	67	27.9%
	11-20 years	45	18.8%
	21 years and above	31	12.9%
	Total:	240	100.0%
Firm Size	Big	49	20.4%
	Medium	96	40.0%
	Small	95	39.6%
	Total:	240	100.0%

Table 2 provides the mean scores for each variable in the study. Since the questionnaire used a 7-point Likert-type scale, the mean (M) scores for each scale point are as follows: “completely disagree” $M \leq 1.86$, “largely disagree” ($1.87 \geq M \leq 2.74$), “slightly disagree” ($2.75 \geq M \leq 3.61$), “neutral” ($3.62 \geq M \leq 4.48$), “slightly agree” ($4.49 \geq M \leq 5.35$), “largely agree” ($5.36 \geq M \leq 6.22$), and “completely agree” ($M \geq 6.23$). The results indicate that respondents only slightly agree that they will comply with the AML/CFT reporting requirements. Overall, the respondents demonstrated a favourable (largely agree) attitude towards AML/CFT reporting requirements, and they also largely agree that important parties close to them want them to comply with the requirements. However, most of the respondents indicated that AML/CFT reporting compliance is not a simple task ($M=4.41$) and that they do not have an absolute trust in the authority ($M=5.03$) in handling the AML/CFT cases.

Table 2: Descriptive Statistics of the Variables

Variable	Mean	Std. Dev.	Mean Rank
AML/CFT Compliance Intention	5.35	1.073	3
Attitude	5.64	1.022	2
Subjective Norms	5.90	1.014	1
Perceived Behavioural Control	4.41	1.117	5
Trust in Authority	5.03	1.210	4

4.3 MEASUREMENT MODEL ASSESSMENT

This study followed the suggestions of Anderson and Gerbing (1988) to test the model developed using a 2-step approach. First, it tested the measurement model to assess the validity and reliability of the instruments used according to the guidelines of Hair et al. (2019) and Ramayah et al. (2018). Thereafter, it ran the structural model to test the hypothesis developed. For the measurement model, this study assessed loadings, average variance extracted (AVE), and composite reliability (CR). The values of loadings should be ≥ 0.5 , the AVE should be ≥ 0.5 , and the CR should be ≥ 0.7 . As shown in Table 3, the AVEs are all higher than 0.5, and both the CRs and CAs are also all higher than 0.7. The loadings were also acceptable with no loadings less than 0.708 (Hair et al., 2019).

Table 3: Measurement Model

Construct	Items	Loadings	AVE	CR	CA
AML/CFT Compliance Intention	AML1	0.743	0.698	0.933	0.913
	AML2	0.835			
	AML3	0.854			
	AML4	0.880			
	AML5	0.891			
	AML6	0.800			
Attitude	AT1	0.930	0.848	0.957	0.940
	AT2	0.948			
	AT3	0.934			
	AT4	0.869			
Perceived Behavioural Control	PBC1	0.898	0.782	0.947	0.930
	PBC2	0.893			
	PBC3	0.921			
	PBC4	0.873			
	PBC5	0.833			
Subjective Norms	SN1	0.926	0.775	0.932	0.903
	SN2	0.863			
	SN3	0.886			
	SN4	0.843			
Trust in Authority	TR1	0.902	0.829	0.967	0.959
	TR2	0.876			
	TR3	0.923			
	TR4	0.929			
	TR5	0.904			
	TR6	0.928			

Note: AVE = Average Variance Extracted, CR=Composite Reliability, CA=Cronbach's Alpha

Then, discriminant validity was assessed using the HTMT criterion suggested by Henseler et al. (2015) and as updated by Franke and Sarstedt (2019). The HTMT values should be ≤ 0.85 for the stricter criterion, while

the more lenient criterion requires the HTMT value to be ≤ 0.90 . As shown in Table 4, the values of HTMT are all lower than the stricter criterion of ≤ 0.85 . As such, it can be concluded that the respondents understood that each of the five (5) constructs are distinct. Taken together, these validity tests show that the measurement items are both valid and reliable.

Table 4: Discriminant Validity (HTMT)

		1	2	3	4	5
1	AML/CFT Compliance Intention					
2	Attitude	0.580				
3	Perceived Behavioural Control	0.440	0.482			
4	Subjective Norms	0.526	0.786	0.402		
5	Trust in Authority	0.482	0.525	0.421	0.424	

4.4 STRUCTURAL MODEL ASSESSMENT

For hypothesis testing, a bias-corrected bootstrapping with 5000 resamples was run to generate the path coefficient, t-values, p-values, and standard errors as suggested by Hair et al. (2019). To test the in-sample predictive accuracy, the R^2 value was observed. The R^2 value is 0.372 ($Q^2=0.301$), indicating that the four independent variables together could explain 37.2% of the variance in AML/CFT compliance intention with a moderate predictive relevance of 0.301 (>0) (Hair et al., 2019).

This study also followed the suggestion made by Hahn and Ang (2017) to use a combination of criteria, such as p-values, confidence intervals, and effect sizes, for testing the significance of the hypotheses. Tables 5 and 6 display the summary of the criteria used to test the hypotheses developed for this study.

Table 5: Hypotheses Testing (Direct Effect)

Hypotheses	Relationship	Std. Beta	Std. Error	t-Value	p-Value	BCI LL	BCI UL	f2
H1	AT -> AML	0.291	0.077	3.775	0.000	0.173	0.426	0.047
H2	SN -> AML	0.136	0.070	1.943	0.026	0.012	0.244	0.012
H3	PBC -> AML	0.154	0.065	2.375	0.009	0.045	0.259	0.028
H4	TR -> AML	0.182	0.078	2.339	0.010	0.037	0.291	0.033

First, the study tested the direct effect of the four predictors on AML/CFT compliance intention. The four hypotheses developed posited that each factor has a positive effect on AML/CFT compliance intention. Based on Table 5, Attitude ($\beta=0.291$, $p<0.01$), Subjective Norms ($\beta=0.136$, $p<0.05$), Perceived Behavioural Control ($\beta=0.154$, $p<0.01$), and Trust in Authority ($\beta=0.182$, $p<0.01$) are all positively related to AML/CFT compliance intention. Thus, H1, H2, H3, and H4 are all supported.

Next, Table 6 presents the results of the moderating effect of Trust in Authority on the relationships between attitude, subjective norms, and perceived behavioural control and AML/CFT compliance intention. The results suggest that Trust in Authority does not significantly influence the relationships, as the interaction term failed to exert a significant coefficient for attitude ($\beta=0.106$), subjective norms ($\beta=-0.062$), or perceived behavioural control ($\beta=-0.014$). Hence, H5a, H5b, and H5c are not supported.

Table 6: Hypotheses Testing (Moderating Effect)

Hypotheses	Relationship	Std Beta	Std Error	t- Value	p- Value	BCI LL	BCI UL	f2
H5a	TR * AT -> AML	0.106	0.108	0.976	0.165	-0.056	0.302	0.006
H5b	TR * SN -> AML	-0.062	0.106	0.586	0.279	-0.241	0.108	0.002
H5c	TR * PBC -> AML	-0.014	0.063	0.227	0.410	-0.106	0.101	0.000

5.0 DISCUSSION

The findings of this study indicate that accounting practitioners' attitudes, subjective norms, perceived behavioural control, and trust in authority have a significant positive effect on their intention to comply with the AML/CFT reporting requirements. Of the four predictors, attitude has the biggest influence on their compliance intentions, followed by their trust in authority, perceived behavioural control, and lastly, subjective norms.

Accounting practitioners are more likely to comply with the AML/CFT reporting requirements if they have a favourable attitude towards the AML regulations. This output is in line with findings from other studies of tax compliance (Alleyne & Harris, 2017; Bani-Khalid et al., 2022; Garg et al., 2024; Owusu et al., 2021) and zakat compliance (Andam & Osman, 2019; Mohd Khalil et al., 2020; Saad et al., 2020; Sadallah et al., 2022). In general, accounting practitioners agree that non-compliance with AML/CFT reporting requirements is a serious offence, and they also acknowledge the importance of complying with AML/CFT reporting requirements to protect themselves from unwittingly becoming involved with unknown money laundering or criminal activities carried out by their clients'. However, the mean score of only 5.64 for the attitude construct also indicates that some accounting practitioners still do not view money laundering as a serious crime nor consider the severe repercussions of non-compliance with AML regulations. Since attitude has the most significant influence on compliance intention, it can be implied that the intention to comply with AML/CFT reporting requirements could be improved by encouraging a more favourable attitude toward the requirements. It is therefore important for the respective parties, such as the authorities and professional accounting bodies, to continuously develop awareness programmes and provide training on AML subjects for these accounting practitioners to improve their compliance level.

Further, the data reveals that subjective norms are positively related to accounting practitioners' intention to comply with AML/CFT reporting requirements, which is consistent with findings from previous studies (Bani-Khalid et al., 2022; Garg et al., 2024; Mohd Khalil et al., 2020; Owusu et al., 2021; Saad et al., 2020; Sadallah et al., 2022). In general, the respondents largely agree that all important parties or persons related to and close to them in their work environment want them to comply with AML/CFT reporting requirements ($M = 5.90$, $SD = 1.014$). However, while acknowledging the role of top management in encouraging them to comply with the requirements, the respondents indicated that their colleagues are among the least likely to be concerned whether they are fulfilling the requirements. This response indicates that there are elements among accounting practitioners who have yet to embrace AML/CFT responsibilities. Hence, although having good and clear policies may not be sufficient to improve compliance, they should be communicated to employees at all levels.

The findings also indicate that accounting practitioners' AML/CFT compliance intention depends on their perceived behavioural control of the reporting requirements. Other studies on tax compliance (Bani-Khalid et al., 2022; Garg et al., 2024) and zakat compliance (Bin-Nashwan et al., 2020; Mohd Khalil et al., 2020; Sadallah et al., 2022) have reported similar findings. Nonetheless, perceived behavioural control received the lowest score among the predictors ($M=4.41$, $SD=1.117$), which is not surprising in view of the fact that

the requirements were introduced quite recently. The results indicate that accounting practitioners do not view AML/CFT reporting compliance as an easy task, with most citing that it requires a great deal of documentation and is time-consuming to complete. Thus, simplifying the reporting process should be one of the main priorities for the authorities if they want to increase compliance. In fact, given the current advances in information technology, it is anticipated that this problem will not persist in the future.

The findings also indicate that trust in authority plays a crucial role in influencing the AML compliance intention of the accounting practitioners. This finding supports the arguments propounded in previous studies that trust has an influence on tax compliance (Agusti & Rahman, 2023; Mohd Faizal & Palil, 2015; Owusu et al., 2021) and zakat compliance (Bin-Nashwan et al., 2020; Febriandika et al., 2023; Tajuddin, 2023). Despite it being the second largest factor after attitude, the respondents, did not rate highly their trust in authority in handling AML/CFT matters ($M=5.03$, $SD=1.210$). While the respondents indicated that they trust the authority to have the expertise and competency to handle AML/CFT related issues, they registered relatively lower scores for items measuring integrity elements, such as the authority's openness with the public in their ML/TF investigation and in conducting the investigation without any biases. Therefore, to increase compliance, the authorities need to demonstrate more objectivity and transparency in their investigations to overcome any negative perceptions among accounting practitioners. Perhaps this effort should start by changing the public's perception so that people will understand that the AML/CFT regulations are not draconian laws for selected targets and that they are free from any political influence.

Finally, contrary to some earlier works discussed in the literature section (Ahmad & Ismail, 2022; Ayoola et al., 2023; Bin-Nashwan et al., 2020; Muhammad & Saad, 2016; Tuhumena et al., 2023; Ya'u et al., 2023), this study found no evidence of a significant moderating effect of trust in authority on the relationships between the TPB elements and AML/CFT compliance intention. One possible reason is that the previous studies were focusing on tax and zakat compliance, in which both require respondents to make payments to the authorities. Therefore, the element of trust in those authorities that manage their money could be important to boost their compliance level. In contrast, AML/CFT reporting compliance has no direct financial impact; thus, their level of trust in authority would not influence their attitude, subjective norms and perceived behavioural control. In short, this study suggested that 'trust in authority' stands on its own in predicting AML/CFT compliance intention and does not interact with other predictors.

6.0 CONCLUSION

This study made a number of important contributions to our understanding of AML compliance in Malaysia. First, it is one of the few studies to determine the factors that influence AML compliance using a combination of elements from the Theory of Planned Behaviour (TPB) with the additional element of Trust in Authority. Second, the participants in this study were accounting practitioners, regarded as important gatekeepers who provide the first line of defence against money laundering activities before financial institutions. Thus, the findings from this study are expected to benefit the authorities and policymakers in increasing the compliance level among the relevant reporting institutions.

Since most studies of AML compliance in Malaysia have focused on financial institutions, this study contributes to the existing body of knowledge by providing empirical evidence from the perspective of DNFBPs. While attitude, subjective norms, and perceived behavioural control were found to be significant, the authorities and policymakers should not ignore the importance of gaining the trust of the reporting institutions; having the confidence of these institutions in the authority's competency and transparency in handling AML matters, will eventually translate into a higher level of AML compliance in this country.

However, there are several limitations to this study. Firstly, the study used elements only from the Theory of Planned Behaviour with an additional variable of trust to predict accounting practitioners' AML/CFT compliance intention. As the model used in this study explained only about 37% of the variance in intention, future studies may extend the model by incorporating different variables or perhaps using different theories related to compliance. Future studies may also segregate accounting practitioners according to various criteria such as their roles, MIA membership, and firm size for comparison to provide further insights into the issue of AML/CFT compliance. Furthermore, future research could also investigate compliance with the AML/CFT Compliance Program at the firm's level, which is another aspect of AML/CFT compliance for the accounting profession.

Declaration of Generative AI and AI-assisted technologies

This work was prepared with Grammarly software to check for grammatical errors. This tool/service enabled the author(s) to review and edit the content and assumes full responsibility for the publication.

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Appendix

Construct	Measures		Sources
Attitude	AT1	I believe that my compliance with AML/CFT reporting requirements will help the authorities in preventing ML/TF activities in this country.	Adapted from: (Arkorful, 2022; Brown et al., 2016; Park & Blenkinsopp, 2009)
	AT2	I believe that my compliance with AML/CFT reporting requirements will protect me (my firm) from being used by criminals for ML/TF activities.	
	AT3	I believe that my compliance with AML/CFT reporting requirements will protect me (my firm) from being charged for collusion with client's unknown ML/TF activities.	
	AT4	I believe that non-compliance with AML/CFT reporting requirements is a serious offense.	
Subjective Norms	SN1	I believe that the top management in my firm will always want me to comply with AML/CFT reporting requirements.	Adapted from: (Arkorful, 2022; Brown et al., 2016; Park & Blenkinsopp, 2009)
	SN2	I believe that my colleagues will always want me to comply with AML/CFT reporting requirements.	
	SN3	I believe that the authorities will always want me to comply with AML/CFT reporting requirements.	
	SN4	I believe that the professional accounting body(ies) of which I am a member (e.g., MIA, MATA, CTIM, ACCA, MICPA, CPA (Aust.), ICAEW etc.) will always want me to comply with AML/CFT reporting requirements.	
Perceived Behavioural Control	PBC1	The AML/CFT reporting is easy to comply with.	Adapted from: (Arkorful, 2022; Brown et al., 2016; Park & Blenkinsopp, 2009)
	PBC2	The AML/CFT reporting requires only minimal documentation.	
	PBC3	The AML/CFT reporting can be completed swiftly.	
	PBC4	The AML/CFT reporting is not costly.	
	PBC5	The AML/CFT reporting requires only minimal IT skills and equipment to complete.	
Trust in Authority	TR1	The authorities are competent enough to deal with money laundering / terrorism financing (ML/TF) issues.	Adapted from: (Kitt et al., 2021)
	TR2	The authorities have the expertise to investigate ML/TF activities.	
	TR3	I believe that the authorities intend to act fairly in every ML/TF case.	
	TR4	I believe the authorities are open and honest with the public in their investigation of ML/TF cases.	
	TR5	I believe the authorities will strictly protect the identity of their informants.	
	TR6	I believe the authorities are not biased in their investigation of ML/TF cases.	
AML/CFT Compliance Intention	In your opinion, what is the likelihood of members of your profession complying with each of the following requirements?		(Bank Negara Malaysia, 2024; Taing & Chang, 2021)
	AML1	Conduct a Know Your Client (KYC) exercise to verify clients' identity and their business information.	
	AML2	Screen clients' names against Ministry of Home Affairs (MOHA) Sanctions Lists.	
	AML3	Screen clients' names against United Nations Security Council Resolutions (UNSCR) Sanctions Lists.	
	AML4	Perform additional due diligence for high-risk clients identified in (b), and (c) above.	
	AML5	Perform client AML/CFT risk profiling.	
	AML6	Submit Suspicious Transaction Report (STR) to BNM.	
Cognitive Rigidity	CR1	Once I've made a conclusion, I'm not likely to change my mind.	(Lin et al., 2015)
	CR2	I don't change my mind easily.	
	CR3	My views are very consistent over time.	