

**Anti-money laundering and counter-terrorism financing framework (AML/CTF framework)**

**Effective from 1 July 2026**

Our firm is subject to obligations under Australia's Anti-Money Laundering and Counter-Terrorism Financing framework (AML/CTF Framework). The primary legislation under the AML/CTF Framework is the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth). To comply with these obligations, we are required to collect and verify information about you, any beneficial owners, and the nature and purpose of the services we are engaged to provide. This may include identification information, beneficial ownership details, information regarding the source of funds or source of wealth, and other information reasonably required for us to conduct customer due diligence.

Any information provided to us for this purpose will be kept by us in accordance with the AML/CTF Framework, the Privacy Act 1988 (Cth) and other applicable laws.

**Client cooperation and ongoing disclosure**

You must provide us with all information and documentation we reasonably request to meet our obligations under the AML/CTF Framework. This includes identity verification documents, details of beneficial ownership or control, information regarding the source of funds or source of wealth relevant to the engagement, and any updates to that information as circumstances change.

You acknowledge that:

- a) we may be required to request additional information from you during the course of the engagement
- b) we may be required to report certain transactions or activities to AUSTRAC without notifying you
- c) if you fail to provide the requested information, or if we suspect that information provided is false, misleading, incomplete or cannot be verified, this may restrict or prevent our ability to act for you and may require us to suspend work or terminate the engagement.

**Right to decline or terminate our engagement**

We reserve the right to refuse to accept instructions, suspend our services or terminate this engagement if:

- a) we are unable to complete customer due diligence to our satisfaction or in accordance with the AML/CTF Framework;
- b) information necessary for us to comply with the AML/CTF Framework is not provided or cannot be verified; or
- c) continuing to act is, or would be, inconsistent with our ethical duties or professional responsibilities or the terms of our retainer.

Depending on the circumstances, legislation may prohibit us from providing reasons for terminating the retainer. However, where permitted, we will notify you if such actions are taken. We will not be liable for any loss you may suffer arising from our decision to refuse, suspend or cease acting in these circumstances.

**Record keeping and reporting**

We must keep any records we obtain for AML/CTF law purposes for seven years and also complete an annual report to the Australian Transaction Reports and Analysis Centre (AUSTRAC). The annual report includes details about how we have met our AML/CTF obligations.

You should be aware that the AML/CTF Framework require us to report certain matters, such as any suspected money laundering, to AUSTRAC; and the AML/CTF Framework also prohibit us from informing you that we have done so.

**Consent and ongoing obligations**

By instructing us to act, you agree to provide accurate and up-to-date information on request and to notify us of any changes to personal or beneficial ownership details. You acknowledge that failure to provide such information may affect our ability to act for you.