

## Regulatory & Compliance Overview

Direct FX Limited (“DFX”) is a New Zealand incorporated foreign exchange and international payments provider. We operate across New Zealand and Australia and are committed to maintaining the highest standards of regulatory compliance, financial integrity, and risk management.

DFX maintains a comprehensive Anti-Money Laundering and Counter-Terrorism Financing (AML/CFT) compliance framework aligned with the legal requirements in both jurisdictions in which we operate.

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### Regulation in New Zealand

In New Zealand, Direct FX Limited is subject to the:

- **Anti-Money Laundering and Countering Financing of Terrorism Act 2009 (AML/CFT Act)**
- Supervision by the **Department of Internal Affairs (DIA)**

As a money remittance and foreign exchange service provider, DFX is required to:

- Maintain a documented AML/CFT Risk Assessment
- Implement and maintain an AML/CFT Compliance Programme
- Conduct customer due diligence (KYC) procedures
- Monitor transactions and report suspicious activities
- Maintain appropriate record-keeping systems
- Undergo periodic independent AML/CFT audit

DFX is listed on the New Zealand Financial Service Providers Register (FSPR).

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### Regulation in Australia

In Australia, Direct FX Limited is subject to the:

- **Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (AML/CTF Act)**
- Regulation and supervision by **AUSTRAC**

As a reporting entity under Australian law, DFX is required to:

- Maintain a compliant AML/CTF Programme
- Conduct customer identification and verification procedures
- Monitor transactions and report suspicious matters
- Submit threshold transaction and compliance reports where required
- Undertake periodic independent review of its AML/CTF Programme

DFX is registered with AUSTRAC as a reporting entity.

DFX is also registered with the **Australian Securities and Investments Commission (ASIC)** as a foreign company (ARBN 114 868 978).

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### **Our Compliance Framework**

DFX operates under a structured and risk-based compliance framework designed to meet both New Zealand and Australian regulatory standards. Where requirements differ between jurisdictions, DFX applies the higher regulatory standard to ensure consistent compliance.

Our compliance programme includes:

- Governance oversight and appointment of a designated AML/CFT Compliance Officer
- Risk-based customer due diligence and enhanced due diligence where required
- Ongoing transaction monitoring and sanctions screening
- Staff training and awareness programme
- Independent AML/CFT audits
- Continuous review and enhancement of compliance controls

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### **Commitment to Transparency and Integrity**

DFX is committed to:

- Preventing money laundering and terrorism financing
- Protecting the integrity of the financial system
- Cooperating fully with regulators in both jurisdictions
- Maintaining transparent and robust compliance processes

We take our regulatory obligations seriously and continuously review our policies, procedures, and systems to ensure alignment with evolving regulatory expectations.



DIRECT FX