

AML/CTF Policy

Anti-Money Laundering & Counter-Terrorism Financing

AUSTRAC Reporting Entity • AUSTRAC AAN **209508272**

Version: 1.0

Effective: 1 July 2026

Next review: July 2027

Legislation: AML/CTF Act 2006 (Cth) & Rules 2025

1 About This Policy

Waycorp Services Pty Ltd trading as Waycorp Advisors is enrolled with AUSTRAC as a Reporting Entity (AUSTRAC AAN 209508272) under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) (the Act) and the *AML/CTF Rules 2025*.

As an accounting firm, our AML/CTF obligations apply only to a **limited set of designated services** — specifically where we assist a client in connection with certain transactions or structures. The vast majority of our day-to-day accounting and bookkeeping services do not trigger these obligations.

This policy explains what those obligations are, how we manage them, and what this means for our clients.

2 Services Covered by This Policy

Our AML/CTF obligations apply only when we actively assist or act on a client's behalf in relation to the following:

- Managing client money, securities, or other assets
- Managing bank, savings, or securities accounts
- Creating, operating, or managing companies, trusts, or similar structures
- Buying or selling business entities

Important: Routine accounting, tax preparation, bookkeeping, BAS lodgements, payroll processing, and business advisory services are **not** designated services and are not subject to these AML/CTF obligations.

3 Our AML/CTF Obligations

Where we provide a designated service, we are required to:

- **Verify your identity** — collect and verify identification documents before or when commencing the service
- **Understand your transaction** — understand the nature and purpose of the service and any related transaction
- **Keep records** — retain client and transaction records for a minimum of 7 years
- **Report to AUSTRAC** — submit reports where required, including suspicious matter reports

and threshold transaction reports

- **Screen for sanctions** — check clients against Australian and international sanctions lists
- **Monitor on an ongoing basis** — review client information periodically and when circumstances change

4 Client Identification (KYC)

Before providing a designated service, we will ask you to provide identification. What we need depends on your client type:

INDIVIDUALS

Full name, date of birth, address & photo ID (e.g. passport or driver's licence)

COMPANIES

Legal name, ACN/ABN, ASIC extract, director details & beneficial owners (25%+)

TRUSTS

Trust deed, trustee details, beneficiary information & beneficial ownership

HIGHER-RISK CLIENTS

Additional information may be requested, including source of funds and senior management approval

We apply a **risk-based approach** — lower-risk clients face lighter requirements; higher-risk situations (such as politically exposed persons or overseas entities) require additional due diligence.

5 Reporting to AUSTRAC

We are required by law to report certain matters to AUSTRAC:

- **Suspicious Matter Reports (SMRs):** If we form a suspicion that a transaction or client may be linked to money laundering, terrorism financing, tax evasion, or other serious crime, we are legally required to report this to AUSTRAC. We cannot notify you that a report has been or will be made.
- **Threshold Transaction Reports (TTRs):** Physical cash transactions of AUD \$10,000 or more connected to a designated service must be reported.
- **Annual Compliance Report:** We submit an annual report to AUSTRAC confirming how we have met our obligations.

Tip-off prohibition: Under the Act, we are prohibited from informing a client or any third party that a suspicious matter report has been, or may be, submitted to AUSTRAC. This is a legal obligation, not a choice.

6 Record Keeping

We retain all client identification, verification, and transaction records relating to designated services for a minimum of **7 years** from the date of the transaction or the end of the client relationship. All records are held securely and made available to AUSTRAC on request.

7 AML/CTF Compliance Officer

We have appointed a designated AML/CTF Compliance Officer who is responsible for overseeing our compliance with this policy, managing reporting obligations, and ensuring all staff are

trained and informed.

All staff who deliver designated services receive mandatory AML/CTF training covering client identification, red flags, and reporting obligations.

8 Contact Us

If you have questions about this policy or our AML/CTF obligations, please contact us:

Waycorp Services Pty Ltd

Trading as Waycorp Advisors

Level 45, 680 George Street, Sydney NSW 2000

Email: agent@waycorp.com.au

Phone: [1300 323 410](tel:1300323410)

For information about AUSTRAC and Australia's AML/CTF framework, visit www.austrac.gov.au

Disclaimer: This policy is a summary document intended for public disclosure. It does not constitute legal advice. Waycorp Services Pty Ltd's full AML/CTF Program is maintained internally and available to AUSTRAC on request. This policy will be reviewed annually and updated in response to changes in legislation or our business activities.