

## Anti-Money Laundering & Counter-Terrorism Financing Policy vs3.7 July 2024

### Purpose

The purpose of this policy is to establish clear procedures for identifying, preventing, and reporting any instances of money laundering or terrorism financing within the Peter Rowland Group.

Money laundering is the act of legitimising funds obtained through illegal activities. Terrorism financing involves providing financial support, directly or indirectly, to terrorist groups or individuals to enable acts of terrorism.

### Scope

This policy applies to all employees, contractors, agents, representatives, business partners, clients, suppliers, and any associated entities of Peter Rowland Group.

### Policy Statement

Peter Rowland Group strictly adheres to all applicable Australian laws, regulations, and obligations, particularly the Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) Act 2006 (the Act).

### AML/CTF Program

Peter Rowland Group has implemented a comprehensive AML/CTF program to identify, manage, and mitigate risks related to money laundering and terrorism financing. This program includes clearly defined procedures and regular employee training.

**Money Laundering Prevention** Money laundering involves three typical stages:

1. **Placement:** Introducing illegal funds into the financial system.
2. **Layering:** Concealing the origin of the funds through complex financial transactions.
3. **Integration:** Reintroducing the funds into the economy to appear legitimate.

Peter Rowland Group actively works alongside the Australian Transaction Reports and Analysis Centre (AUSTRAC) and other relevant authorities to detect and prevent money laundering.

### Terrorism Financing Prevention

Terrorism financing involves providing or collecting funds intended, directly or indirectly, to support terrorist activities or organisations. Funds may be from legal or illegal sources. Maintaining business relationships with entities linked to terrorism financing exposes Peter Rowland Group to significant reputational, operational, and legal risks.

Peter Rowland Group commits to stringent due diligence processes to avoid inadvertently facilitating terrorism financing.

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### Identification and Reporting of Suspicious Activities

All employees must remain vigilant for activities or transactions that may be indicative of money laundering or terrorism financing. Suspicious circumstances include, but are not limited to:

- Unusual or unexplained customer behaviour;
- Transactions that appear inconsistent with the customer's known financial profile or business activities;
- Engagements involving entities or individuals with unclear identities or questionable backgrounds.

Any suspicious activity must immediately be reported to management, who will then report it to AUSTRAC.

### Protecting the Company

Peter Rowland Group employs several strategies to safeguard against being misused for illicit purposes, including:

1. Conducting thorough customer identification and verification procedures.
2. Engaging only with verified, legitimate clients and ensuring that all services are not exploited for illicit purposes.
3. Performing ongoing due diligence and risk assessments of customers and business relationships.
4. Maintaining accurate, complete records of all transactions and identification details for a minimum of seven years, available for investigation purposes.

### Disciplinary Actions

Management holds responsibility for overseeing compliance with this policy. Supervisors and managers are required to ensure employee adherence to this policy and to implement appropriate disciplinary measures in cases of non-compliance, up to and including termination of employment.

### Training and Awareness

Peter Rowland Group will provide ongoing AML/CTF training and awareness programs for all employees to enhance their understanding of risks, obligations, and best practices related to money laundering and terrorism financing.

### Continuous Improvement and Review

This policy will undergo regular reviews, at least annually, by the Compliance Department and Senior Management to reflect legislative changes, emerging threats, and evolving best practices.

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### Reporting Obligations

Peter Rowland Group is committed to fulfilling its reporting obligations under Australian law and will ensure timely reporting of all suspicious matters to AUSTRAC.

**Policy Effective Date:** 1<sup>st</sup> July 2024 vs3.7

**Authorised by:** Malcolm Hurst COO

Peter Rowland Group