

# **Anti-Money Laundering and Counter-Terrorism Financing Program**

## **Part B – Client Identification and Verification Procedures**

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JDR Securities Pty Ltd

## **PART B – CUSTOMER IDENTIFICATION**

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### **1. INTRODUCTION**

1.1 **Part B** of this Program sets out the customer identification procedures for JDR Securities' customers.

1.2 These procedures include:

- (a) prescribed processes for the collection and verification of KYC Information; and
- (b) risk based systems and controls to determine what (if any) other information will be collected and verified in relation to a customer, having regard to the money laundering or terrorism financing risk relevant to the provision of JDR Securities' designated services.

1.3 JDR Securities will consider the following factors when identifying its risk exposure to money laundering or terrorism financing and developing its customer identification procedures set out in the table below:

- (a) its customer types; including:
  - (i) Beneficial Owners of customers; and
  - (ii) any politically exposed persons;
- (b) JDR Securities' customers' sources of funds and wealth;
- (c) the nature and purpose of the business relationship with its customers, including, as appropriate, the collection of information relevant to that consideration;
- (d) the control structure of its non-individual customers;
- (e) the types of designated services it provides;
- (f) the methods by which it delivers designated services; and
- (g) the foreign jurisdiction with which it deals.

1.4 Annexure A – Risk Assessment and Management Matrix details JDR Securities’ risk assessment procedures with respect to its customer types.

## **2. APPLICATION OF PART B**

2.1 Part B of this Program applies to JDR Securities, including any functions carried out by a responsible third party. JDR Securities does not currently engage responsible third parties to carry out any functions under Part B of this Program.

## **3. KYC – CUSTOMER IDENTIFICATION AND VERIFICATION PROCEDURES**

3.1 The customer identification and verification procedures must be carried out by JDR Securities or a responsible third being GBG PLC [www.gbgplc.com/apac/products/id-verification/](http://www.gbgplc.com/apac/products/id-verification/) party:

- (a) prior to commencing to provide a designated service to a customer (other than an existing customer), unless JDR Securities has already carried out the applicable customer identification procedure in respect of the customer; and
- (b) when JDR Securities’ employee is responsible for the customer (or another JDR Securities employee on their behalf), unless the AML/CTF CO (“**AML/CTF CO**”) authorises that these procedures can be conducted by an external party.

3.2 The same KYC procedures will be applied across all JDR Securities’ customers in order to ensure that additional procedures do not need to be carried out where a customer uses more than one of JDR Securities’ designated services.

3.3 Where JDR Securities outsources the customer identification and verification procedures to a responsible third party, being GBG PLC [www.gbgplc.com/apac/products/id-verification/](http://www.gbgplc.com/apac/products/id-verification/) and the AML/CTF CO maintains overall responsibility for the KYC obligations of JDR Securities as detailed in this Part B.

## **4. KNOW YOUR CUSTOMER – CONSIDERATIONS**

4.1 Once information relating to a customer has been collected and verified, JDR Securities will re-assess the money laundering or terrorism financing risk posed by the customer.

4.2 In re-assessing the AML/CTF risk for each customer, it may consider, where appropriate and among other factors, whether:

- (a) the customer is unwilling to produce evidence of identification or produces unsatisfactory evidence of identification;
- (b) the customer wishes to deal only in large amounts of cash and not in traceable bank transfers;

- (c) the customer or a group of customers makes frequent transactions to the same individual or group of individuals;
- (d) the customer is willing to pay very high charges to complete a transaction;
- (e) the customer's normal remitting behaviour changes and they are unwilling to explain the reason for this or the source of the increase funds;
- (f) the customer is involved in a complex business ownership structure with no legitimate commercial rationale;
- (g) the non-individual customer (for example, a trust, company or partnership) has a complex business structure with little commercial justification, which obscures the identity of the ultimate beneficiaries of the customer;
- (h) the customer is in a position which may expose JDR Securities to the possibility of corruption;
- (i) the customer is based in, or conducting business through or in, a high-risk jurisdiction;
- (j) the customer is engaged in business which involves significant amounts of cash;
- (k) there is no clear commercial rationale for the customer seeking a designated service;
- (l) the customer is a PEP;
- (m) an undue level of secrecy is requested regarding a designated service;
- (n) the source of funds is difficult to verify;
- (o) the Beneficial Owners of a non-individual customer are difficult to identify and/or verify;
- (p) the Beneficial Owners of the non-individual customer are a resident in a high-risk jurisdiction;
- (q) there is a one-off transaction in comparison with an ongoing business relationship or series of transactions;
- (r) a designated service can be used for money laundering or terrorism financing (and the extent to which it can be used);
- (s) the customer makes or accepts payments (for example, electronic transfers) to or from accounts which have not been identified by JDR Securities;

- (t) the customer makes or accepts payments (for example, electronic transfers) to or from offshore accounts;
- (u) the customer has access to offshore funds (for example, cash withdrawal or electronic funds transfer);
- (v) the customer when migrating from one designated service to another carries a different type and level of AML/CTF risk;
- (w) the customer has income which is not employment-based or from a regular known source;
- (x) the customer is new, rather than having a long-term and active business relationship with JDR Securities;
- (y) the customer's business, provision or designated services is primarily of a money remittance service nature;
- (z) the customer's business is registered in a foreign jurisdiction with no local operations or domicile;
- (aa) the customer's business is an unregistered charity, foundation or cultural association;
- (bb) the customer is represented by another person, such as under a power of attorney.

4.3 JDR Securities has made the following assessment in relation to the risk categories of its customers:

<b>Risk Exposure</b>	<b>Information to be collected</b>	<b>Certified Documents Required?</b>
Low	Minimum information (one Government issued photo ID)	No
Medium	Minimum + one Government issued photo ID plus Proof of Address document	No
High	Minimum + Government issued ID plus Proof of Address document	Yes. See List of Certifiers at Appendix 1.
<i>*This table applies to customers types as described in Sections 6 to 15, except where the AML/CTF Rules require JDR Securities to collect certified documents.</i>		

## 5. RELIABLE AND INDEPENDENT ELECTRONIC DATA

5.1 Where JDR Securities has determined that it will rely on reliable and independent electronic data in relation to the verification of its customers. JDR Securities must determine:

- (a) the accuracy of the data;
- (b) how secure the data is;
- (c) how the data is kept up-to-date;
- (d) how comprehensive the data is (for example, by reference to the range of persons included in the data and the period over which the data has been collected);
- (e) whether the data has been verified from a reliable and independent source;
- (f) whether the data is maintained by a government body or pursuant to legislation; and
- (g) whether the electronic data can be additionally authenticated.

## 6. INDIVIDUALS: CUSTOMER IDENTIFICATION AND VERIFICATION PROCEDURES

<b>STEP 1 – CATEGORISATION OF CUSTOMERS</b>
<p>Where a new customer is an individual, JDR Securities categorises the customer as one of the following:</p> <ol style="list-style-type: none"> <li>1. Individual customer;</li> <li>2. Customer with a joint account between a husband and wife with the same address;</li> <li>3. Customer with a joint account with different surnames but with the same address;</li> <li>4. Customer with a joint account with different addresses; or</li> <li>5. Sole trader.</li> </ol>

<b>STEP 2 – IDENTIFICATION AND VERIFICATION</b>		
<p>Customer Categories:</p> <ol style="list-style-type: none"> <li>1. Individual Customer;</li> <li>2. Customer with a joint account between a husband and wife with the same address;</li> <li>3. Customer with a joint account with different surnames but with the same address; and</li> <li>4. Customer with a joint account with different addresses.</li> </ol>		
<b>KYC Information to be Collected</b>	<b>KYC Information to be Verified</b>	<b>Documents to Collect to verify KYC Information</b>
<p><u>Minimum</u></p> <ol style="list-style-type: none"> <li>1. Full name;</li> <li>2. Residential address; and</li> <li>3. Date of Birth.</li> </ol>	<p><u>Minimum</u></p> <ol style="list-style-type: none"> <li>1. Name; and</li> <li>2. Residential address <u>or</u> Date of Birth.</li> </ol>	<ol style="list-style-type: none"> <li>1. <b>Reliable and Independent Documentation</b></li> </ol> <p><b>Photographic:</b></p> <ul style="list-style-type: none"> <li>• Australian driver's licence containing a photograph of the customer;</li> </ul>

<p><u>Additional</u></p> <ol style="list-style-type: none"> <li>1. the customer's former name(s);</li> <li>2. the customer's occupation or business activities;</li> <li>3. the source of the customer's funds including the origin of funds;</li> <li>4. income and assets of the customer;</li> <li>5. the nature and level of the customer's intended transaction behaviour;</li> <li>6. the beneficial ownership of the funds used by the customer/the customer's account with JDR Securities; or</li> <li>7. details of the customer's employment (e.g. name of employer, length of employment, type of institution).</li> </ol>	<p><u>Additional</u></p> <p>Any other additional information collected.</p>	<ul style="list-style-type: none"> <li>• Australian passport (it is also permissible for a passport to be issued by the Commonwealth to have expired within the preceding two (2) years);</li> <li>• Card issued under a State or Territory law, for the purpose of proving a person's age, containing a photograph of the person in whose name the card is issued;</li> <li>• a current foreign government issued passport or similar travel document and contains a photograph and either the signature of the person or a unique identifier of the person in whose name the document is issued;</li> <li>• National Identity Card issued by a foreign government containing a photograph of the person in whose name the card is issued (consider the ML/TF risk posed by the provision of a designated service to a customer from that particular foreign country); or</li> <li>• Foreign driver's licence which contains a photograph of the person in whose name it was issued (consider the ML/TF risk posed by the provision of a designated service to a customer from that particular foreign country).</li> </ul> <p><b>Non-Photographic:</b></p> <ul style="list-style-type: none"> <li>• Australian Birth Certificate;</li> </ul>
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		<ul style="list-style-type: none"> <li>• Australian Citizenship Certificate;</li> <li>• Birth Certificate issued by a foreign government;</li> <li>• Citizen Certificate issued by a foreign government; or</li> <li>• A concession card as defined under the <i>Social Security Act 1991</i> (i.e.: a pensioner concession card, a health care card or a seniors health card).</li> </ul> <p>Where any document relied on as part of the procedure is in a language that is not English, it must be accompanied by an English translation prepared by an accredited translator.</p> <p><b>2. Reliable and Independent Electronic Data</b></p> <ul style="list-style-type: none"> <li>• <b>GBG PLC</b> <a href="http://WWW.GBGPLC.COM/APAC/PRODUCTS/ID-VERIFICATION/">WWW.GBGPLC.COM/APAC/PRODUCTS/ID-VERIFICATION/</a></li> </ul>
<p>Customer Categories:</p> <p>5. Sole Traders</p>		
KYC Information to be Collected	KYC Information to be Verified	Documents to Collect to verify KYC Information
<p><u>Minimum</u></p> <ol style="list-style-type: none"> <li>1. customer's full name;</li> <li>2. customer's date of birth;</li> </ol>	<p><u>Minimum</u></p> <ol style="list-style-type: none"> <li>1. Name; and</li> <li>2. Residential address <u>or</u> date of birth.</li> </ol>	<ol style="list-style-type: none"> <li>1. <b>Reliable and Independent Documentation</b></li> </ol> <p><b>Photographic:</b></p>

<ol style="list-style-type: none"> <li>3. full business name (if any) under which the customer carries on his or her business;</li> <li>4. full address of the customer's principal place of business (if any) or the customer's residential address; and</li> <li>5. ABN issued to the customer.</li> </ol>		<ul style="list-style-type: none"> <li>• Australian driver's licence containing a photograph of the customer;</li> <li>• Australian passport (it is also permissible for a passport to be issued by the Commonwealth to have expired within the preceding two (2) years);</li> <li>• Card issued under a State or Territory law, for the purpose of proving a person's age, containing a photograph of the person in whose name the card is issued;</li> </ul>
<p><u>Additional</u></p> <ol style="list-style-type: none"> <li>1. the customer's former name(s);</li> <li>2. the customer's occupation or business activities;</li> <li>3. the source of the customer's funds including the origin of funds;</li> <li>4. income and assets of the customer;</li> <li>5. the nature and level of the customer's intended transaction behaviour;</li> <li>6. the beneficial ownership of the funds used by the customer /the customer's account with JDR Securities; and</li> <li>7. details of the customer's employment (e.g. name of employer, length of employment, type of institution).</li> </ol>	<p><u>Additional</u></p> <p>Any other additional information collected.</p>	<ul style="list-style-type: none"> <li>• a current foreign government issued passport or similar travel document and contains a photograph and either the signature of the person or a unique identifier of the person in whose name the document is issued;</li> <li>• National Identity Card issued by a foreign government containing a photograph of the person in whose name the card is issued (consider the ML/TF risk posed by the provision of a designated service to a customer from that particular foreign country); or</li> <li>• Foreign driver's licence which contains a photograph of the person in whose name it was issued (consider the ML/TF risk posed by the provision of a designated service to a customer from that particular foreign country).</li> </ul>

		<p><b>Non-Photographic:</b></p> <ul style="list-style-type: none"><li>• Australian Birth Certificate;</li><li>• Australian Citizenship Certificate;</li><li>• Birth Certificate issued by a foreign government;</li><li>• Citizen Certificate issued by a foreign government; or</li><li>• A concession card as defined under the <i>Social Security Act 1991</i> (i.e.: a pensioner concession card, a health care card or a seniors health card).</li></ul> <p>Where any document relied on as part of the procedure is in a language that is not English, it must be accompanied by an English translation prepared by an accredited translator.</p> <p><b>2. Reliable and Independent Electronic Data</b></p> <ul style="list-style-type: none"><li>• <b>GBG PLC</b> <a href="http://WWW.GBGPLC.COM/APAC/PRODUCTS/ID-VERIFICATION/">WWW.GBGPLC.COM/APAC/PRODUCTS/ID-VERIFICATION/</a></li></ul>
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## 7. COMPANIES: CUSTOMER IDENTIFICATION AND VERIFICATION PROCEDURES

### STEP 1 – CATEGORISATION OF CUSTOMERS

Where a new customer is a company, either domestic or foreign, JDR Securities must be reasonably satisfied that the company exists and categorise the customer as one of the following:

1. an Australian domestic company;
2. an ASIC registered foreign company; or
3. an unregistered foreign company.

### STEP 2 – IDENTIFICATION OF THE TYPES OF COMPANIES

#### Company Types

<b>Australian Domestic Company</b>	a. listed public company	Apply <b>Step 3(i) simplified verification procedure</b> as set out below
	b. a majority owned subsidiary of an Australian listed public company	
	c. licensed and subject to the regulatory oversight of a Commonwealth, State or Territory statutory regulator in relation to its activities as a company	
	d. all other domestic companies	Apply <b>Step 3(ii) verification procedure for all other domestic companies</b> as set out below

<b>ASIC Registered Foreign Company</b>	a. majority owned subsidiary of an Australian listed public company	Apply <b>Step 3(i) simplified verification procedure</b> as set out below
	b. proprietary companies	Apply <b>Step 3(iii) verification procedure for all other ASIC registered foreign companies</b> as set out below
	c. unlisted public companies	
	d. listed public companies (from comparable jurisdictions)	
<b>Unregistered Foreign Company</b>	a. a majority owned subsidiary of an Australian listed public company	Apply <b>Step 3(i) simplified verification procedure</b> as set out below
	b. A foreign public company listed on an Australian comparable stock exchange (see below)	
	c. Proprietary and unlisted public foreign companies	Apply <b>Step 3(iv) verification procedure for all other ASIC unregistered foreign companies</b> as set out below
	d. A foreign public company not listed on an Australian comparable stock exchange (see below)	

**Comparable Stock Exchanges** – list of foreign or equivalent stock exchanges that are approved by ASIC for recognition, including but not limited to the following financial markets:

COUNTRY	STOCK EXCHANGE
Australia	Asia Pacific Exchange Limited ASX Limited Chi-X Australia Pty Ltd National Stock Exchange of Australia Limited SIM Venture Securities Exchange Ltd
Belgium	Euronext Brussels – Brussels Stock Exchange (BSE)
Canada	Toronto Stock Exchange (TSX)
Denmark	Copenhagen Stock Exchange (CSE)
Finland	Helsinki Stock Exchange (HEL)
France	Paris – SBF (PAR)
Germany	Frankfurt (FRA)
Hong Kong	Hong Kong Exchanged (HKEx)
Iceland	Iceland Stock Exchange (ICEX)
Ireland	Irish Stock Exchange (ISE)
Japan	Tokyo Stock Exchange (TSE)
Luxembourg	Luxembourg Stock Exchange (LUX)
Netherlands	Euronext Amsterdam
New Zealand	New Zealand Exchange (NZX)
Norway	Oslo Børs – Oslo Stock Exchange (OSE)
Singapore	Singapore Exchange (SGX)
Sweden	OMX Stockholm
Switzerland	Swiss Exchange (SWX)

United Kingdom	London Stock Exchange (LSE) Euronext - liffe
United States of America	New York Stock Exchange (NYSE) NASDAQ OMX NASDAQ Stock Market

<b>STEP 3 – IDENTIFICATION AND VERIFICATION PROCEDURES</b>		
<b>(i) Simplified Verification Procedures</b>		
<b>KYC Information to be Collected</b>	<b>KYC Information to be Verified</b>	<b>Documents to Collect to Verify KYC Information</b>
<p><u>For an Australian Company - Minimum Information</u></p> <ol style="list-style-type: none"> <li>1. the full name of the company as registered by the Australian Securities and Investments Commission;</li> <li>2. the full address of the company's registered office;</li> <li>3. the full address of the company's principal place of business (if any);</li> <li>4. the ACN issued to the company;</li> <li>5. whether the company is registered by ASIC as a proprietary or public company; and</li> <li>6. if the company is registered as a proprietary company, the name of each Director of the company.</li> </ol>	<ol style="list-style-type: none"> <li>1. Verify that the company is one of the following: <ul style="list-style-type: none"> <li>• an Australian listed public company;</li> <li>• a majority owned subsidiary of an Australian listed public company; or</li> <li>• licensed and subject to the regulatory oversight of a Commonwealth, State or Territory statutory regulator in relation to its activities as a company.</li> </ul> </li> </ol>	<ol style="list-style-type: none"> <li>1. <b>Verify the information collected by obtaining one or a combination of the following documents:</b> <ul style="list-style-type: none"> <li>• a search of the relevant Australian stock exchange;</li> <li>• a public document issued by the relevant company (for example, annual report);</li> <li>• a search of the relevant ASIC database;</li> <li>• a search of the license or other records of the relevant Commonwealth, State or Territory regulator.</li> </ul> </li> </ol>

<p><u>For an ASIC Registered Foreign Company - Minimum Information</u></p> <ol style="list-style-type: none"> <li>1. the full name of the company as registered by ASIC;</li> <li>2. the full address of the company's registered office in Australia;</li> <li>3. the full address of the company's principal place of business in Australia (if any) or the full name and address of the company's local agent in Australia (if any);</li> <li>4. the ARBN issued to the company;</li> <li>5. the country in which the company was formed, incorporated or registered;</li> <li>6. whether the company is registered by the relevant foreign registration body and if so whether it is registered as a private or public company or some other type of company; and</li> <li>7. if the company is registered as a private company by the relevant foreign registration body - the name of each Director of the company.</li> </ol>		
<p><u>For an Unregistered Foreign Company - Minimum Information</u></p> <ol style="list-style-type: none"> <li>1. the full name of the company;</li> <li>2. the country in which the company</li> </ol>	<ol style="list-style-type: none"> <li>1. Verify that the company is one of the following: <ul style="list-style-type: none"> <li>• an Australian listed public company;</li> </ul> </li> </ol>	<ol style="list-style-type: none"> <li>1. <b>Verify the information collected by obtaining one or a combination of the following documents:</b></li> </ol>

<p>was formed, incorporated or registered;</p> <p>3. whether the company is registered by the relevant foreign registration body and if so:</p> <p>4. any identification number issued to the company by the relevant foreign registration body upon the company's formation, incorporation or registration;</p> <p>5. the full address of the company in its country of formation, incorporation or registration as registered by the relevant foreign registration body; and</p> <p>6. whether it is registered as a private or public company or some other type of company by the relevant foreign registration body;</p> <p>7. if the company is registered as a private company by the relevant foreign registration body – the name of each Director of the company; and</p> <p>8. if the company is not registered by the relevant foreign registration body, the full address of the principal place of business of the company in its country of formation or incorporation.</p>	<ul style="list-style-type: none"> <li>• a majority owned subsidiary of an Australian listed public company; or</li> <li>• licensed and subject to the regulatory oversight of a Commonwealth, State or Territory statutory regulator in relation to its activities as a company.</li> </ul>	<ul style="list-style-type: none"> <li>• a search of the relevant Australian stock exchange;</li> <li>• a public document issued by the relevant company (for example, annual report);</li> <li>• a search of the relevant ASIC database; or</li> <li>• a search of the license or other records of the relevant Commonwealth, State or Territory regulator.</li> </ul>
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(ii) **Verification Procedure for all other Australian Companies**

KYC Information to be Collected	KYC Information to be Verified	Documents to Collect to Verify KYC Information
<p><u>Minimum</u></p> <ol style="list-style-type: none"> <li>the full name of the company as registered by the Australian Securities and Investments Commission;</li> <li>the full address of the company's registered office;</li> <li>the full address of the company's principal place of business (if any);</li> <li>the ACN issued to the company;</li> <li>whether the company is registered by ASIC as a proprietary or public company; and</li> <li>if the company is registered as a proprietary company, the name of each Director of the company.</li> </ol>	<p><u>Minimum</u></p> <ol style="list-style-type: none"> <li>the full name of the company as registered by the Australian Securities and Investments Commission</li> <li>the ACN issued to the company; and</li> <li>whether the company is registered by ASIC as a proprietary or public company.</li> </ol>	<ul style="list-style-type: none"> <li><b>Reliable and Independent Documentation:</b></li> </ul> <p>A copy of a current:</p> <ul style="list-style-type: none"> <li>valid Australian financial services licence issued by ASIC;</li> <li>valid company registration certificate issued by ASIC;</li> <li>in relation to the beneficial ownership of a company, a disclosure certificate that verifies information about the beneficial ownership of a company; or</li> <li>a disclosure certificate (see Section 1).</li> </ul> <ul style="list-style-type: none"> <li><b>Reliable and Independent Electronic Data:</b></li> </ul>
<p><u>Additional</u></p> <ol style="list-style-type: none"> <li>all business names used by the company;</li> <li>if the company is a public company, the name of each director of the company;</li> <li>the nature of the business activities conducted by the company;</li> </ol>	<p><u>Additional</u></p> <p>Any other additional information collected.</p>	<ul style="list-style-type: none"> <li>ASIC (<a href="http://www.asic.gov.au">www.asic.gov.au</a>);</li> <li>ASX (<a href="http://www.asx.com.au">www.asx.com.au</a>); and</li> <li>APRA (<a href="http://www.apra.gov.au">www.apra.gov.au</a>).</li> <li>GBG PLC <a href="http://www.gbgplc.com/apac/products/id-verification/">www.gbgplc.com/apac/products/id-verification/</a></li> </ul>

<ol style="list-style-type: none"><li>4. the source of the customer's funds including the origin of funds;</li><li>5. the nature and level of the customer's intended transaction behaviour;</li><li>6. the name of the company secretary;</li><li>7. the name of the Director (if the company is registered as a proprietary company, the name of each director of the company;</li><li>8. for an unlisted public company other than an Australian regulated company, the full name and address of each Beneficial Owner;</li><li>9. in the case of listed companies other than domestic listed companies and companies listed on a recognised foreign stock exchange and their majority owned subsidiaries (approved listed companies) and Australian regulated companies, the full name and address of the Beneficial Owners of the top twenty (20) shareholdings; or</li><li>10. details of any current or recent prosecutions and inquiries related to ML, terrorist links, tax offences and corruption in respect of the company.</li></ol>		
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(iii) **Verification Procedure for all other ASIC Registered Foreign Companies**

KYC Information to be Collected	KYC Information to be Verified	Documents to Collect to Verify KYC Information
<p><u>Minimum</u></p> <ol style="list-style-type: none"> <li>1. the full name of the company as registered by ASIC;</li> <li>2. the full address of the company's registered office in Australia;</li> <li>3. the full address of the company's principal place of business in Australia (if any) or the full name and address of the company's local agent in Australia (if any);</li> <li>4. the ARBN issued to the company;</li> <li>5. the country in which the company was formed, incorporated or registered;</li> <li>6. whether the company is registered by the relevant foreign registration body and if so whether it is registered as a private or public company or some other type of company; and</li> <li>7. if the company is registered as a private company by the relevant foreign registration body - the name of each Director of the company.</li> </ol>	<p><u>Minimum</u></p> <ol style="list-style-type: none"> <li>1. the full name of the company as registered by ASIC;</li> <li>2. whether the company is registered by the relevant foreign registration body and if so whether it is registered as a private or public company or some other type of company;</li> <li>3. the ARBN issued to the company.</li> </ol> <p>(b)</p>	<p><b>1. Reliable and Independent Documentation:</b></p> <p>A copy of a current:</p> <ul style="list-style-type: none"> <li>• valid Australian financial services licence issued by ASIC;</li> <li>• valid company registration certificate issued by ASIC;</li> <li>• in relation to the beneficial ownership of a company, a disclosure certificate that verifies information about the beneficial ownership of a company; or</li> <li>• a disclosure certificate (only use this if other reliable verification additional information is not reasonably available) – the usage of this document requires the AML/CTF CO's approval and the AML/CTF CO will consider the following factors:</li> <li>• ML/TF risk relevant to the provision of the designated service, including the jurisdiction of incorporation of the company;</li> </ul>

<p><u>Additional</u></p> <ol style="list-style-type: none"> <li>1. all business names used by the company;</li> <li>2. if the company is a public company, the name of each director of the company;</li> <li>3. the nature of the business activities conducted by the company;</li> <li>4. the source of the customer's funds including the origin of funds;</li> <li>5. the nature and level of the customer's intended transaction behaviour;</li> <li>6. the name of the company secretary;</li> <li>7. the name of the Director (if the company is registered as a proprietary company, the name of each director of the company);</li> <li>8. for an unlisted public company other than an Australian regulated company, the full name and address of each Beneficial Owner;</li> <li>9. in the case of listed companies other than domestic listed companies and companies listed on a recognised foreign stock exchange and their majority owned subsidiaries (approved listed companies) and Australian regulated companies, the full name</li> </ol>	<p><u>Additional</u></p> <p>Any other additional information collected.</p>	<ul style="list-style-type: none"> <li>• the jurisdiction of the primary operations of the company and the location of the foreign stock or equivalent exchange (if any); or</li> <li>• the activities undertaken by the company and the availability of evidence about the activities and existence of the company.</li> </ul> <p><b>2. Reliable and Independent Electronic Data:</b></p> <ul style="list-style-type: none"> <li>• GBG PLC <a href="http://www.gbGPLC.com/apac/products/id-verification/">www.gbGPLC.com/apac/products/id-verification/</a></li> <li>• a search of the relevant foreign stock or equivalent exchange (if any);</li> <li>• a search of the records of the relevant regulator;</li> <li>• ASIC (<a href="http://www.asic.gov.au">www.asic.gov.au</a>);</li> <li>• ASX (<a href="http://www.asx.com.au">www.asx.com.au</a>); and</li> <li>• APRA (<a href="http://www.apra.gov.au">www.apra.gov.au</a>).</li> </ul>
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<p>and address of the Beneficial Owners of the top twenty (20) shareholdings; or</p> <p>10. details of any current or recent prosecutions and inquiries related to ML, terrorist links, tax offences and corruption in respect of the company.</p>		
<p>(i) <b>Verification procedure for all other ASIC Unregistered Foreign Companies</b></p>		
<p><b>KYC Information to be Collected</b></p>	<p><b>KYC Information to be Verified</b></p>	<p><b>Documents to Collect to Verify KYC Information</b></p>
<p><u>Minimum</u></p> <ol style="list-style-type: none"> <li>1. the full name of the company;</li> <li>2. the country in which the company was formed, incorporated or registered;</li> <li>3. whether the company is registered by the relevant foreign registration body and if so: <ul style="list-style-type: none"> <li>○ any identification number issued to the company by the relevant foreign registration body upon the company's formation, incorporation or registration;</li> </ul> </li> </ol>	<p><u>Minimum</u></p> <ol style="list-style-type: none"> <li>1. the full name of the company;</li> <li>2. whether the company is registered by the relevant foreign registration body and if so; <ul style="list-style-type: none"> <li>○ any identification number issued to the company by the relevant foreign registration body upon the company's formation, incorporation or registration;</li> <li>○ whether it is registered as a private or public company or some other type of company by the relevant foreign registration body</li> </ul> </li> </ol>	<ul style="list-style-type: none"> <li>• <b>Reliable and Independent Documentation:</b></li> </ul> <p>A copy of a current:</p> <ul style="list-style-type: none"> <li>• valid company registration certificate issued by the relevant foreign registration body;</li> <li>• in relation to the beneficial ownership of a company, a disclosure certificate that verifies information about the beneficial ownership of a company; or</li> <li>• a disclosure certificate (only use this if other reliable verification additional information is not reasonably available) – the usage of this document requires the AML/CTF CO's</li> </ul>

<ul style="list-style-type: none"> <li>○ the full address of the company in its country of formation, incorporation or registration as registered by the relevant foreign registration body; and</li> <li>○ whether it is registered as a private or public company or some other type of company by the relevant foreign registration body;</li> </ul> <p>4. if the company is registered as a private company by the relevant foreign registration body – the name of each Director of the company; and</p> <p>5. if the company is not registered by the relevant foreign registration body, the full address of the principal place of business of the company in its country of formation or incorporation.</p>		<p>approval and the AML/CTF CO will consider the following factors:</p> <ul style="list-style-type: none"> <li>• ML/TF risk relevant to the provision of the designated service, including the jurisdiction of incorporation of the company;</li> <li>• the jurisdiction of the primary operations of the company and the location of the foreign stock or equivalent exchange (if any); and</li> <li>• the activities undertaken by the company and the availability of evidence about the activities and existence of the company.</li> <li>• <b>Reliable and Independent Electronic Data:</b></li> <li>• a search of the relevant foreign stock or equivalent exchange (if any); and</li> <li>• a search of the records of the relevant regulator.</li> <li>• GBG PLC <a href="http://www.qbgplc.com/apac/products/id-verification/">www.qbgplc.com/apac/products/id-verification/</a></li> </ul>
<p><u>Additional</u></p> <ol style="list-style-type: none"> <li>1. all business names used by the company;</li> <li>2. if the company is a public company, the name of each director of the company;</li> <li>3. the nature of the business activities</li> </ol>	<p><u>Additional</u></p> <p>Any other additional information collected.</p>	

<p>conducted by the company;</p> <ol style="list-style-type: none"><li>4. the source of the customer's funds including the origin of funds;</li><li>5. the nature and level of the customer's intended transaction behaviour;</li><li>6. the name of the company secretary;</li><li>7. the name of the Director (if the company is registered as a proprietary company, the name of each director of the company);</li><li>8. for an unlisted public company other than an Australian regulated company, the full name and address of each Beneficial Owner;</li><li>9. in the case of listed companies other than domestic listed companies and companies listed on a recognised foreign stock exchange and their majority owned subsidiaries (approved listed companies) and Australian regulated companies, the full name and address of the Beneficial Owners of the top twenty (20) shareholdings;</li><li>10. details of any current or recent prosecutions and inquiries related to ML, terrorist links, tax offences and corruption in respect of the company.</li></ol>		
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<p>11. details of any current or recent prosecutions and inquiries related to ML, terrorist links, tax offences and corruption in respect of the company.</p>		
<p>12. details of any current or recent prosecutions and inquiries related to ML, terrorist links, tax offences and corruption in respect of the company.</p>		

**8. TRUSTS: CUSTOMER IDENTIFICATION AND VERIFICATION PROCEDURES**

<b>STEP 1 – CATEGORISATION OF CUSTOMERS</b>
<p>Where a new customer acts in the capacity of a trustee of a trust, it is necessary for JDR Securities to be reasonably satisfied that:</p> <ul style="list-style-type: none"> <li>(a) the trust exists (refer to Step 2 below); and</li> <li>(b) the name of each trustee and beneficiary, or a description of each class of beneficiary, of the trust has been provided.</li> </ul> <p>Such type of customers can be categorised as one of the following:</p> <ul style="list-style-type: none"> <li>(c) regulated trusts; or</li> <li>(d) other trusts.</li> </ul>

<b>STEP 2 – IDENTIFICATION OF THE TYPES OF TRUSTS</b>		
<b>Trust Types</b>		
<b>Regulated Trusts</b>	<ul style="list-style-type: none"> <li>a. a managed investment scheme registered by ASIC</li> <li>b. a managed investment scheme that is not registered by ASIC, only has wholesale customers and does not make small scale offerings to which section 1012E of the <i>Corporations Act 2001</i> (Cth) applies</li> <li>c. registered and subject to the regulatory oversight of a Commonwealth statutory regulator in relation to its activities as a trust</li> </ul>	Apply <b>Step 3(i) Simplified verification procedure</b> as set out below

	d. a government superannuation fund established by legislation	
<b>Other Trusts</b>	All other trusts that do not fall within the Regulated Trusts category above	Apply <b>Step 3(ii) Verification procedure for all other trusts</b> as set out below.
<b>Trusts who are Custodians</b>	<p>An entity:</p> <ul style="list-style-type: none"> <li>• acting in the capacity of a trustee;</li> <li>• providing custodial or depository services as defined by item 46 of table 1 in ss 6(2) of the AML/CTF Act;</li> <li>• holds an Australian Financial Services Licence authorising it to provide custodial and depository services or is exempt from the requirement to hold such a licence;</li> <li>• either satisfies one of the geographical link tests in ss 6(6) of the AML/CTF Act or has certified in writing to JDR Securities that its name and enrolment details are entered on the Reporting Entities Roll; or</li> <li>• has certified in writing to JDR Securities that it has carried out all applicable KYC and ongoing customer due diligence requirements in accordance with Chapter 15 of the AML/CTF Rules in relation to its underlying customers, prior to, or at the</li> </ul>	Apply <b>Step 3(ii) Verification procedure for all other trusts</b> as set out below.

	time of becoming a customer of JDR Securities.	
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<b>STEP 3 – IDENTIFICATION AND VERIFICATION PROCEDURES</b>
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<b>(i) Simplified verification procedure for Regulated Trusts</b>
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KYC Information to be Collected	KYC Information to be Verified	Documents to Collect to Verify KYC Information
<p><u>Minimum</u></p> <ol style="list-style-type: none"> <li>1. the full name (if any) of the trust;</li> <li>2. the full business name (if any) of the trustee in respect of the trust;</li> <li>3. the type of the trust;</li> <li>4. the country in which the trust was established;</li> <li>5. the full name of the settlor of the trust, unless:               <ul style="list-style-type: none"> <li>○ the material asset contribution to the trust by the settlor at the time the trust is established is less than AUD \$10,000.00; or</li> <li>○ the settlor is deceased;</li> <li>○ the trust is verified using the simplified trustee verification procedure under this Program.</li> </ul> </li> <li>6. if any of the trustees is an individual,</li> </ol>	<p><u>Verify that the trust is one of the following:</u></p> <ul style="list-style-type: none"> <li>• a managed investment scheme registered by ASIC;</li> <li>• a managed investment scheme that is not registered by ASIC and that only has wholesale clients and does not make small scale offerings to which section 1012E of the <i>Corporations Act 2001</i> (Cth) applies;</li> <li>• registered and subject to the regulatory oversight of a commonwealth statutory regulator in relation to its activities as a trust; or</li> <li>• a government superannuation fund established by legislation.</li> </ul>	<ol style="list-style-type: none"> <li>1. <b>Verify the information collected by obtaining one or a combination of the following documents:</b> <ul style="list-style-type: none"> <li>• a trust deed or extract of the trust deed;</li> <li>• a search of the relevant ASIC, APRA or other regulator database.</li> </ul> </li> </ol>

<p>then in respect of one of those individuals – the information required to be collected from an individual under this Program;</p> <p>7. if any of the trustees is a company, then in respect of one of those companies – the information required to be collected from a company under this Program;</p> <p>8. if the trustees comprise of individuals and companies then in respect of either an individual or a company – the information required to be collected from the individual or company (as the case may be) is under the applicable customer identification procedures in this Program.</p>		
<p>(ii) <b>Verification Procedure for other Trusts who are not Custodians</b></p>		
<p><b>KYC Information to be Collected</b></p>	<p><b>KYC Information to be Verified</b></p>	<p><b>Documents to Collect to Verify KYC Information</b></p>
<p><u>Minimum</u></p> <ol style="list-style-type: none"> <li>1. the full name (if any) of the trust;</li> <li>2. the full business name (if any) of the trustee in respect of the trust;</li> <li>3. the type of the trust;</li> <li>4. the country in which the trust was established;</li> <li>5. the full name of the settlor of the trust,</li> </ol>	<p><u>Minimum</u></p> <ol style="list-style-type: none"> <li>1. the full name of the trust;</li> <li>2. if any of the trustees is an individual, then in respect of one of those individuals – the information required to be collected from an individual under this Program;</li> <li>3. if any of the trustees is a company, then</li> </ol>	<ol style="list-style-type: none"> <li>1. <b>Verify the information collected with one or a combination of the following documents:</b> <ul style="list-style-type: none"> <li>• a trust deed, certified copy or certified extract of a trust deed;</li> <li>• reliable and independent documentation relating to the trust; and/or</li> </ul> </li> </ol>

<p>unless:</p> <ul style="list-style-type: none"> <li>○ the material asset contribution to the trust by the settlor at the time the trust is established is less than AUD \$10,000.00; or</li> <li>○ the settlor is deceased; or</li> <li>○ the trust is verified using the simplified trustee verification procedure under this Program.</li> </ul> <p>6. if any of the trustees is an individual, then in respect of one of those individuals – the information required to be collected from an individual under this Program;</p> <p>7. if any of the trustees is a company, then in respect of one of those companies – the information required to be collected from a company under this Program;</p> <p>8. if the trustees comprise of individuals and companies then in respect of either an individual or a company – the information required to be collected from the individual or company (as the case may be) is under the applicable customer identification procedures in this Program.</p>	<p>in respect of one of those companies – the information required to be collected from a company under this Program;</p> <p>4. if the trustees comprise of individuals and companies then in respect of either an individual or a company – the information required to be collected from the individual or company (as the case may be) is under the applicable customer identification procedures in this Program.</p> <p>5. the full name of the settlor of the trust, unless:</p> <ul style="list-style-type: none"> <li>○ the material asset contribution to the trust by the settlor at the time the trust is established is less than AUD \$10,000.00; or</li> <li>○ the settlor is deceased; or</li> <li>○ the trust is verified using the simplified trustee verification procedure under this Program.</li> </ul>	<ul style="list-style-type: none"> <li>• reliable and independent electronic data.</li> <li>• For trustees (individuals or companies) please refer to Section 0 below.</li> </ul>
<p><u>Additional</u></p> <p>1. all business names used by the trusts</p>	<p><u>Additional</u></p>	

<p>and any other name under which the trust operates;</p> <ol style="list-style-type: none"> <li>2. the nature of the business activities conducted by the trust;</li> <li>3. the source of the customer's funds including the origin of funds;</li> <li>4. the jurisdiction in which the trust was established;</li> <li>5. details of any current or recent prosecutions and inquiries related to money laundering, terrorist links, tax offences and corruption in respect of the trust;</li> <li>6. the nature and level of the customer's intended transaction behaviour;</li> <li>7. the income and assets (including location) of the trust; and</li> <li>8. details of any parties with which the trust owns property, is in partnership or undertakes a joint venture.</li> </ol>	<p>Any other additional information collected.</p>	
<p>(iii) <b>Verification Procedure for Trusts who are Custodians</b></p>		
<p><b>KYC Information to be Collected</b></p>	<p><b>KYC Information to be Verified</b></p>	<p><b>Documents to Collect to Verify KYC Information</b></p>
<p><u>Minimum</u></p> <ol style="list-style-type: none"> <li>1. the full name (if any) of the trust;</li> <li>2. the full business name (if any) of the trustee in respect of the trust;</li> </ol>	<p><u>Minimum</u></p> <ol style="list-style-type: none"> <li>1. the full name of the trust;</li> <li>2. if any of the trustees is an individual, then in respect of one of those individuals – the information required to</li> </ol>	<ol style="list-style-type: none"> <li>1. <b>Verify the information collected with one or a combination of the following documents:</b></li> </ol>

<p>3. the type of the trust;</p> <p>4. the country in which the trust was established;</p> <p>5. the full name of the settlor of the trust, unless:</p> <ul style="list-style-type: none"> <li>○ the material asset contribution to the trust by the settlor at the time the trust is established is less than AUD \$10,000.00; or</li> <li>○ the settlor is deceased; or</li> <li>○ the trust is verified using the simplified trustee verification procedure under this Program; and</li> </ul> <p>6. The Australian Financial Services Licence number of the trust.</p>	<p>be collected from an individual under this Program;</p> <p>3. if any of the trustees is a company, then in respect of one of those companies – the information required to be collected from a company under this Program;</p> <p>4. if the trustees comprise of individuals and companies then in respect of either an individual or a company – the information required to be collected from the individual or company (as the case may be) is under the applicable customer identification procedures in this Program.</p> <p>5. the full name of the settlor of the trust, unless:</p> <ul style="list-style-type: none"> <li>○ the material asset contribution to the trust by the settlor at the time the trust is established is less than AUD \$10,000.00; or</li> <li>○ the settlor is deceased; or</li> <li>○ the trust is verified using the simplified trustee verification procedure under this Program;</li> </ul> <p>6. The Australian Financial Services Licence number and authorisation of the trust;</p> <p>7. either satisfies one of the geographical link tests in ss 6(6) of the AML/CTF Act or that its name and enrolment details</p>	<ul style="list-style-type: none"> <li>• a trust deed, certified copy or certified extract of a trust deed;</li> <li>• obtain confirmation in writing that its name and enrolment details are entered on the Reporting Entities Roll;</li> <li>• obtain confirmation in writing that it has carried out all applicable KYC and ongoing customer due diligence requirements in accordance with Chapter 15 of the AML/CTF Rules in relation to its underlying customers, prior to, or at the time of becoming a customer of JDR Securities;</li> <li>• reliable and independent documentation relating to the trust; and/or</li> <li>• reliable and independent electronic data.</li> </ul>
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	<p>are entered on the Reporting Entities Roll; and</p> <p>8. that it has carried out all applicable KYC and ongoing customer due diligence requirements in accordance with Chapter 15 of the AML/CTF Rules in relation to its underlying customers, prior to, or at the time of becoming a customer of JDR Securities.</p>	
<p><u>Additional</u></p> <ol style="list-style-type: none"> <li>1. all business names used by the trusts and any other name under which the trust operates;</li> <li>2. the nature of the business activities conducted by the trust;</li> <li>3. the source of the customer's funds including the origin of funds;</li> <li>4. the jurisdiction in which the trust was established;</li> <li>5. details of any current or recent prosecutions and inquiries related to money laundering, terrorist links, tax offences and corruption in respect of the trust;</li> <li>6. the nature and level of the customer's intended transaction behaviour;</li> <li>7. the income and assets (including location) of the trust; and</li> <li>8. details of any parties with which the trust owns property, is in partnership or</li> </ol>	<p><u>Additional</u></p> <p>Any other additional information collected.</p>	

undertakes a joint venture.		
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9. TRUSTEES AND BENEFICIARIES: CUSTOMER IDENTIFICATION AND VERIFICATION PROCEDURES

IDENTIFICATION AND VERIFICATION PROCEDURES		
KYC Information to be Collected	KYC Information to be Verified	Documents to Collect to Verify KYC Information
<p><u>Minimum</u></p> <ol style="list-style-type: none"> <li>1. the full name and address of each trustee in respect of the trust; and</li> <li>2. either the:               <ul style="list-style-type: none"> <li>○ full name of each beneficiary of the trust; or</li> <li>○ if the terms of the trust identify the beneficiaries by reference to membership of a class – details of the class.</li> </ul> </li> </ol>	<p><u>Verify</u></p> <ol style="list-style-type: none"> <li>1. if any of the trustees is an individual, then in respect of one of those individuals – the information required to be collected from an individual under this Program;</li> <li>2. if any of the trustees is a company, then in respect of one of those companies – the information required to be collected from a company under this Program;</li> <li>3. if the trustees comprise of individuals and companies then in respect of either an individual or a company – the information required to be collected from the individual or company (as the case may be) is under the applicable customer identification procedures in this Program.</li> </ol>	<ol style="list-style-type: none"> <li>1. <b>Individuals</b> – refer to the verification procedures at Section 6.</li> <li>2. <b>Companies</b> – refer to the verification procedures at Section 0.</li> </ol>

## 10. PARTNERSHIPS: CUSTOMER IDENTIFICATION AND VERIFICATION PROCEDURES

### STEP 1 – EXISTENCE OF A PARTNERSHIP

Where a new customer is a partnership, it is necessary for us to be reasonably satisfied that:

1. the partnership exists; and
2. the name for each of the partners in the partnership has been provided in accordance with point 4 under “KYC information to be collected” in step 2 below.

### STEP 2 – IDENTIFICATION AND VERIFICATION PROCEDURES

KYC Information to be Collected	KYC Information to be Verified	Documents to Collect to Verify KYC Information
<p><u>Minimum</u></p> <ol style="list-style-type: none"> <li>1. full name of the partnership;</li> <li>2. the full business name (if any) of the partnership as registered under any State or Territory business names legislation</li> <li>3. the country in which the partnership was established;</li> <li>4. in respect of one of the partners – the information required to be collected under Section 6 of this Part B; and</li> <li>5. the full name and residential address of each partner in the partnership except where the regulated status of the partnership is confirmed through reference to the current membership directory of the relevant professional</li> </ol>	<p><u>Minimum</u></p> <ol style="list-style-type: none"> <li>1. full name of the partnership;</li> <li>2. in respect of one of the partners – the information required to be collected under Section 6.</li> </ol>	<ol style="list-style-type: none"> <li>1. <b>Verify the information collected with one or a combination of the following documents:</b> <ul style="list-style-type: none"> <li>• a partnership agreement, certified copy or certified extract of a partnership agreement;</li> <li>• a certified copy or certified extract of minutes of a partnership meeting;</li> <li>• reliable and independent documentation relating to the partnership; and/or</li> <li>• reliable and independent electronic data.</li> </ul> </li> </ol>

association.		
<p><u>Additional</u></p> <ol style="list-style-type: none"> <li>1. any alias names used by the partner;</li> <li>2. the partnership's business activities;</li> <li>3. the source of the partnership's funds including the origin of funds;</li> <li>4. income and assets of the partnership;</li> <li>5. the nature and level of the partnership's intended transaction behaviour; and</li> <li>6. the beneficial ownership of the funds used by the partnership/the partnership's account with JDR Securities.</li> </ol> <p><i>*Note:</i></p> <p><i>The information collection requirements are not intended to conflict with any other obligation JDR Securities has under other legislation including the Privacy Act 1988. Any conflicts, which arise, should be immediately notified to the AML/CTF CO.</i></p>	<p><u>Additional</u></p> <p>Any other additional information collected.</p>	

## 11. ASSOCIATIONS: CUSTOMER IDENTIFICATION AND VERIFICATION PROCEDURES

### STEP 1 – EXISTENCE OF AN ASSOCIATION

Where a new customer is an association, it is necessary for JDR Securities to be reasonably satisfied that:

1. the association exists; and
2. the name for any members of the governing committee (howsoever described) of the association have been provided.

### STEP 2 – CATEGORISATION OF ASSOCIATIONS

#### Types of Associations

#### Incorporated Associations

Apply **Step 3(i) Verification procedure for incorporated associations** as set out below.

#### Unincorporated Associations

Apply **Step 3(ii) Verification procedure for incorporated associations** as set out below.

### STEP 3 – IDENTIFICATION AND VERIFICATION PROCEDURES

#### (i) Verification procedure for Incorporated Associations

KYC Information to be Collected	KYC Information to be Verified	Documents to Collect to Verify KYC Information
<u>Minimum</u> <ol style="list-style-type: none"> <li>1. the full name of the association;</li> <li>2. the full address of the association's principal place of administration or registered office (if any) or the</li> </ol>	<u>Minimum</u> <ol style="list-style-type: none"> <li>1. the full name of the association; and</li> <li>2. any unique identifying number issued to the association upon its incorporation by the State, Territory or overseas body</li> </ol>	<ol style="list-style-type: none"> <li>1. <b>Verify the information collected with one or a combination of the following documents:</b> <ul style="list-style-type: none"> <li>• the constitution or rules of the association or a certified copy or certified extract of</li> </ul> </li> </ol>

<p>residential address of the association's public officer or (if there is no such person) the association's president, secretary or treasurer;</p> <p>3. any unique identifying number issued to the association upon its incorporation by the State, Territory or overseas body responsible for the incorporation of the association; and</p> <p>4. the full name of the chairman, secretary and treasurer or equivalent officer in each case of the association.</p>	<p>responsible for the incorporation of the association.</p>	<p>the constitution or rules of the association;</p> <ul style="list-style-type: none"> <li>• the minutes of meeting of the association or a certified copy or certified extract of minutes of meeting of the association;</li> <li>• in the case of an incorporated association, information provided by ASIC or by the State, Territory or overseas body responsible for the incorporation of the association;</li> <li>• reliable and independent documentation relating to the association; and/or</li> <li>• reliable and independent electronic data.</li> </ul>
<p><u>Additional</u></p> <p>1. any alias names used by the member of the association;</p> <p>2. the association's business activities;</p> <p>3. the source of the association's funds including the origin of funds;</p> <p>4. income and assets of the association;</p> <p>5. the nature and level of the association's intended transaction behaviour; and</p> <p>6. the beneficial ownership of the funds used by the member/the association's account with JDR</p>	<p><u>Additional</u></p> <p>Any other additional information collected.</p>	

<p>Securities.</p> <p><i>*Note:</i></p> <p><i>The information collection requirements are not intended to conflict with any other obligation JDR Securities has under other legislation including the Privacy Act 1988. Any conflicts, which arise, should be immediately notified to the AML/CTF CO.</i></p>		
<p><b>(ii) Verification Procedure for Unincorporated Association</b></p>		
<p><b>KYC Information to be Collected</b></p>	<p><b>KYC Information to be Verified</b></p>	<p><b>Documents to Collect to Verify KYC Information</b></p>
<p><u>Minimum</u></p> <ol style="list-style-type: none"> <li>1. the full name of the association;</li> <li>2. the full address of the association’s principal place of administration (if any);</li> <li>3. the full name of the chairman, secretary and treasurer or equivalent officer in each case of the association; and</li> <li>4. in respect of the member – the information required to be collected from an individual under the applicable customer identification procedure in accordance with Section 6 of this Part B.</li> </ol>	<p><u>Minimum</u></p> <ol style="list-style-type: none"> <li>1. the full name of the association;</li> <li>2. in respect of the member – the information required to be collected from an individual under the applicable customer identification procedure in accordance with Section 6 of this Part B.</li> </ol>	<ol style="list-style-type: none"> <li>1. <b>Verify the full name of the association with one of the following documents:</b> <ul style="list-style-type: none"> <li>• the constitution or rules of the association or a certified copy or certified extract of the constitution or rules of the association; or</li> <li>• the minutes of meeting of the association or a certified copy or certified extract of any minutes of meeting of the association.</li> <li>• For beneficial owners and signatories – verify beneficial owners and signatories in accordance with the KYC procedure for individuals as per Section 6.</li> </ul> </li> </ol>

<p><u>Additional</u></p> <ol style="list-style-type: none"><li>1. any alias names used by the member of the association;</li><li>2. the association's business activities;</li><li>3. the source of the association's funds including the origin of funds;</li><li>4. income and assets of the association;</li><li>5. the nature and level of the association's intended transaction behaviour; and</li><li>6. the beneficial ownership of the funds used by the member/the association's account with JDR Securities.</li></ol>	<p><u>Additional</u></p> <p>Any other additional information collected.</p>	
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## 12. REGISTERED CO-OPERATIVES: CUSTOMER IDENTIFICATION AND VERIFICATION PROCEDURES

### STEP 1 – EXISTENCE OF A REGISTERED CO-OPERATIVE

Where a new customer is a registered co-operative, it is necessary for JDR Securities to be reasonably satisfied that:

1. the co-operative exists; and
2. the name for the chairman, secretary or equivalent in each case of the co-operative have been provided.

### STEP 2 – IDENTIFICATION AND VERIFICATION PROCEDURES

KYC Information to be Collected	KYC Information to be Verified	Documents to Collect to Verify KYC Information
<p><u>Minimum</u></p> <ol style="list-style-type: none"> <li>1. the full name of the co-operative;</li> <li>2. the full address of the co-operative's registered office or principal place of operations (if any) or the residential address of the co-operative's secretary or (if there is no such person) the co-operative's president or treasurer;</li> <li>3. any unique identifying number issued to the co-operative upon its registration by the State, Territory or overseas body responsible for the registration of the co-operative; and</li> <li>4. the full name of the chairman, secretary and treasurer or equivalent officer in each case of the co-</li> </ol>	<p><u>Minimum</u></p> <ol style="list-style-type: none"> <li>1. the full name of the co-operative; and</li> <li>2. any unique identifying number issued to the co-operative upon its registration by the state, territory or overseas body responsible for the registration of the co-operative.</li> </ol>	<ol style="list-style-type: none"> <li>1. <b>Verify the information collected with one or a combination of the following documents:</b> <ul style="list-style-type: none"> <li>• any register maintained by the co-operative or a certified copy or certified extract of any register maintained by the co-operative;</li> <li>• the minutes of meeting of the co-operative or a certified copy or certified extract of minutes of meeting of the co-operative;</li> <li>• information provided by the State, Territory or overseas body responsible for the registration of the co-operative;</li> </ul> </li> </ol>

operative.		
<p><u>Additional</u></p> <ol style="list-style-type: none"> <li>1. any alias names used by the member of the co-operative;</li> <li>2. the co-operative's business activities;</li> <li>3. the source of the co-operative's funds including the origin of funds;</li> <li>4. income and assets of the co-operative;</li> <li>5. the nature and level of the co-operative's intended transaction behaviour; and</li> <li>6. the beneficial ownership of the funds used by the member/the co-operative's account with JDR Securities.</li> </ol> <p><i>*Note:</i></p> <p><i>The information collection requirements are not intended to conflict with any other obligation JDR Securities has under other legislation including the Privacy Act 1988. Any conflicts, which arise, should be immediately notified to the AML/CTF CO.</i></p>	<p><u>Additional</u></p> <p>Any other additional information collected.</p>	<ul style="list-style-type: none"> <li>• reliable and independent documentation relating to the co-operative; or</li> <li>• reliable and independent electronic data.</li> </ul>

**13. GOVERNMENT BODIES: CUSTOMER IDENTIFICATION AND VERIFICATION PROCEDURES**

**STEP 1 – EXISTENCE OF A GOVERNMENT BODY**

Where a new customer is a government body, it is necessary for JDR Securities to be reasonably satisfied that:

1. the government body exists; and
2. in the case of certain kinds of government bodies – information about the beneficial owners of the government body.

**STEP 2 – CATEGORISATION OF GOVERNMENT BODIES**

**Types of Government Bodies**

**Australian Government Body**

Apply **Step 3(i) Verification procedure for Australian Government Body** as set out below.

**Foreign Government Body**

Apply **Step 3(ii) Verification procedure for Foreign Government Body** as set out below.

**STEP 3 – IDENTIFICATION AND VERIFICATION PROCEDURES**

**(i) Verification Procedure for Australian Government Body**

KYC Information to be Collected	KYC Information to be Verified	Documents to Collect to Verify KYC Information
<p><u>Minimum</u></p> <ol style="list-style-type: none"> <li>1. Full name of the government body;</li> <li>2. Full address of the government body's principal place of operations;</li> </ol>	<p><u>Minimum</u></p> <ol style="list-style-type: none"> <li>1. Full name of the government body</li> <li>2. Full address of the government body's principal place of operations</li> </ol>	<ol style="list-style-type: none"> <li>1. <b>Verify the information collected with one or a combination of the following documents:</b></li> </ol>

<p>3. Whether the government body is an entity or emanation, or is established under legislation of the Commonwealth; and</p> <p>4. Whether the government body is an entity or emanation or is established under legislation of a state or territory; and if so the name of the state or territory.</p>	<p>3. Whether the government body is an entity or emanation, or is established under legislation of the Commonwealth; and</p> <p>4. Whether the government body is an entity or emanation, or is established under legislation of a state or territory; and if so the name of the state or territory</p>	<ul style="list-style-type: none"> <li>• government directories search; government/regulatory authorities search summary;</li> <li>• register of government bodies extract; and/or</li> <li>• a legislative extract establishing the body.</li> </ul>
<p><u>Additional</u></p> <p>1. any alias names used by the member of the government body;</p> <p>2. the government body's business activities;</p> <p>3. the source of the government body's funds including the origin of funds;</p> <p>4. income and assets of the government body;</p> <p>5. the nature and level of the government body's intended transaction behaviour; and</p> <p>6. the beneficial ownership of the funds used by the member/the government body's account with JDR Securities.</p>	<p><u>Additional</u></p> <p>Any other additional information collected</p>	
<p>(ii) <b>Verification Procedure for Foreign Government Body</b></p>		
<p><b>KYC Information to be Collected</b></p>	<p><b>KYC Information to be Verified</b></p>	<p><b>Documents to Collect to Verify KYC Information</b></p>
<p><u>Minimum</u></p>	<p><u>Minimum</u></p>	<p>1. <b>Verify the information collected with</b></p>

<ol style="list-style-type: none"> <li>1. Full name of the government body;</li> <li>2. Full address of the government body's principal place of operations;</li> <li>3. Whether the government body is an entity or emanation, or is established under legislation of the foreign country; and if so the name of the foreign country; and</li> <li>4. Beneficial Owners: should be identified and verified in accordance with the KYC procedure for individuals (with the exception of occupation/industry information).</li> </ol>	<ol style="list-style-type: none"> <li>1. Full name of the government body;</li> <li>2. Full address of the government body's principal place of operations;</li> <li>3. Whether the government body is an entity or emanation, or is established under legislation of the foreign country; and if so the name of the foreign country; and</li> <li>4. Beneficial Owners: should be identified and verified in accordance with the KYC procedure for individuals (with the exception of occupation/industry information).</li> </ol>	<p><b>one or a combination of the following documents:</b></p> <ul style="list-style-type: none"> <li>• government directories search;</li> <li>• government / regulatory authorities search summary;</li> <li>• register of government bodies extract; or</li> <li>• a legislative extract establishing the body.</li> <li>• Verify Beneficial Owners in accordance with Section 6.</li> </ul>
<p><u>Additional</u></p> <ol style="list-style-type: none"> <li>1. any alias names used by the member of the government body;</li> <li>2. the government body's business activities;</li> <li>3. the source of the government body's funds including the origin of funds;</li> <li>4. income and assets of the government body;</li> <li>5. the nature and level of the government body's intended transaction behaviour; and</li> <li>6. the beneficial ownership of the funds used by the member/the government body's account with JDR Securities.</li> </ol>	<p><u>Additional</u></p> <p>Any other additional information collected.</p>	

#### 14. AGENTS: CUSTOMER IDENTIFICATION AND VERIFICATION PROCEDURES

STEP 1 – EXISTENCE OF AN AGENT	
Where a customer authorises an agent to act for or on behalf of them in relation to a designated service, it is necessary for JDR Securities to be reasonably satisfied that:	
<ol style="list-style-type: none"><li>1. the agent exists; and</li><li>2. the authorisation is able to be evidenced.</li></ol>	

STEP 2 – IDENTIFICATION AND VERIFICATION PROCEDURES		
KYC Information to be Collected	KYC Information to be Verified	Documents to Collect to Verify KYC Information
<ol style="list-style-type: none"><li>1. Full name of each agent acting on the customer's behalf; and</li><li>2. Evidence of the authorisation of the agent to act on behalf of the customer.</li></ol>	Only verify the agent if there are doubts as to the veracity of the information supplied by the customer, in accordance with the KYC procedures for individuals	Verify in accordance with the KYC procedure for individuals (refer to Section 6).

## 15. BENEFICIAL OWNER

### STEP 1 – DETERMINING THE BENEFICIAL OWNER OF EACH CUSTOMER

1. In identifying the Beneficial Owners of a customer, JDR Securities may:
  - (a) collect from the customer information relating to the ownership structure of the customer including but not limited to:
    - information relating to the shareholders of the company;
    - information relating to the people exercising responsibility for senior management decisions, or similar, of the customer;
    - information relating to the people with the ability to control the customer and/or dismiss or appoint those in senior management positions;
    - information relating to those people holding more than 25% of the customer's rights;
    - information relating to those individuals (for example, the CEO) who hold senior management positions; and
    - trustees (where applicable);
  - (b) if the customer is controlled by other entities (and/or those entities are in turn controlled by further entities) the ownership structure of each entity must also be clarified until JDR Securities has a clear understanding of who the ultimate Beneficial Owners of the customer are.
2. JDR Securities' employees are required to identify and verify each customer's beneficial owners subject to the exceptions below.
3. If JDR Securities is unable to ascertain a Beneficial Owner, the reporting entity must identify and take reasonable measures to verify:
  - (a) for a **company** (other than a company which is verified under the simplified company verification procedure or a partnership, any individual who:
    - is entitled (either directly or indirectly) to exercise 25% or more of the voting rights, including power to veto, or
    - holds the position of senior managing official (or equivalent);
  - (b) for a trust (other than a trust which is verified under the simplified verification procedure, any individual who holds the power to appoint or remove the trustees of the trust;
  - (c) for an association or a registered co-operative, any individual who:

- is entitled (either directly or indirectly) to exercise 25% or more of the voting rights including a power of veto, or
- would be entitled on dissolution to 25% or more of the property of the association or registered co-operative, or
- holds the position of senior managing official (or equivalent).

**EXCEPTIONS**

1. JDR Securities does not need to identify and verify its customer’s beneficial owners if the customer is:
  - an **individual** - JDR Securities may assume that the customer and the Beneficial Owner are one and the same, unless JDR Securities has reasonable grounds to consider otherwise;
  - a **company** which is verified under ‘Simplified Verification Procedures’;
  - a **trust** which is verified under ‘Simplified Verification Procedures’; or
  - a **foreign listed public company** subject to disclosure requirements (whether by stock exchange rules or by law or enforceable means) to ensure transparency of beneficial ownership which are, or are comparable to, the requirements in Australia.

**STEP 2 – IDENTIFICATION AND VERIFICATION PROCEDURES**

KYC Information to be Collected	KYC Information to be Verified	Documents to Collect to Verify KYC Information
<u>Minimum</u> 1. each Beneficial Owner’s full name, and 2. the Beneficial Owner’s date of birth; or 3. the Beneficial Owner’s full residential address.	<u>Minimum</u> 1. each Beneficial Owner’s full name, and 2. the Beneficial Owner’s date of birth; or 3. the Beneficial Owner’s full residential address.	Verify in accordance with the KYC procedure for individuals (refer to Section 6).
<u>Additional</u>	<u>Additional</u>	

<ol style="list-style-type: none"> <li>1. the Beneficial Owner's former name(s);</li> <li>2. the Beneficial Owner's occupation or business activities;</li> <li>3. the source of the Beneficial Owner's funds including the origin of funds;</li> <li>4. income and assets of the Beneficial Owner;</li> <li>5. the nature and level of the Beneficial Owner's intended transaction behaviour;</li> <li>6. the beneficial ownership of the funds used by the Beneficial Owner's /the Beneficial Owner's account with JDR Securities; and</li> <li>7. details of the Beneficial Owner's employment (e.g. name of employer, length of employment, type of institution).</li> </ol>	<p>Any other additional information collected.</p>	
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## 16. POLITICALLY EXPOSED PERSONS

### STEP 1 – EXISTENCE OF A POLITICALLY EXPOSED PERSON

If when conducting the risk analysis of a customer, JDR Securities has a reasonable suspicion that a customer is a Politically Exposed Person (“**PEP**”), the AML/CTF CO, must conduct in relation to that customer additional checks to determine whether the customer is a PEP. These checks might include but are not limited to:

1. a customer self-declaration regarding their PEP status;
2. an internet and media search;
3. a search of relevant commercial databases (if available to JDR Securities);
4. Government issued PEP lists relevant to the jurisdiction/s of the customer;
5. Information sharing databases relating to PEP within the Australian financial system; and
6. asset disclosure systems.

### STEP 2 – CATEGORISATION OF PEPS

#### Types of PEPS

#### Australian PEP

#### International Organisation PEP

#### Foreign PEP

Apply **Step 3(i) Verification Procedure for Australian/International Organisation PEPS** as outlined below.

Apply **Step 3(ii) Verification Procedure for Foreign PEPS** as outlined below.

(i) **Verification Procedure for Australian/International Organisation PEPs**

**STEP 3 – IDENTIFICATION AND VERIFICATION PROCEDURES**

<b>KYC Information to be Collected</b>	<b>KYC Information to be Verified</b>	<b>Documents to Collect to Verify KYC Information</b>
<u>Minimum</u> 1. Full name; 2. Residential address; and 3. Date of Birth.	<u>Minimum</u> 1. Name; and 2. Residential address <u>or</u> date of birth.	Verify in accordance with the KYC procedure for individuals (refer to Section 6).
<u>Additional</u> 1. the PEP's former name(s); 2. the PEP's occupation or business activities; 3. the source of the PEP's funds including the origin of funds; 4. income and assets of the PEP; 5. details of the PEP's employment (e.g. name of employer, length of employment, type of institution).	<u>Additional</u> Any other additional information collected.	

**STEP 4 – RISK ASSESSMENT OF THE PEP**

Determine whether the PEP is of high money laundering or terrorism financing risk.	If the customer is determined to be of high money laundering or terrorism financing risk, then, in addition to Step 3 above:  1. obtain the Director's approval before establishing or continuing a business relationship with the individual and before the provision, or continued provision, of a designated service to the customer; and
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	2. take reasonable measures to establish the PEP's source of wealth and source of funds; and comply with the ongoing due diligence obligations.	
<b>(ii) Verification Procedure for Foreign PEPs</b>		
<b>STEP 3 – IDENTIFICATION AND VERIFICATION PROCEDURES</b>		
<u>Minimum</u> 1. Full name; 2. Residential address; and 3. Date of Birth.	<u>Minimum</u> 1. Name; and 2. Residential address <u>or</u> date of birth.	Verify in accordance with the KYC procedure for individuals (refer to Section 6).
<u>Additional</u> 1. the PEP's former name(s); 2. the PEP's occupation or business activities; 3. the source of the PEP's funds including the origin of funds; 4. income and assets of the PEP; 5. details of the PEP's employment (e.g. name of employer, length of employment, type of institution).	<u>Additional</u> Any other additional information collected.	
<b>STEP 4 – FURTHER ACTION</b>		
1. obtain the Director's approval before establishing or continuing a business relationship with the individual and before the provision, or continued provision, of a designated service to the customer; 2. take reasonable measures to establish the PEP's source of wealth and source of funds; and 3. comply with the ongoing due diligence obligations.		

**17. NOTIFICATION OF ALL NEW CUSTOMERS TO THE AML/CTF CO**

17.1 The AML/CTF CO must be notified of all new customers prior to the provision of any services.

17.2 Sign-off for each new customer should be obtained from the AML/CTF CO certifying that no additional KYC Information relating to the customer's existence needs to be verified.

## **18. TOLERANCE OF DISCREPANCIES AND ERRORS**

18.1 **Tolerance of discrepancies:** Where, during the KYC Information collection and verification process, a director, officer or employee of JDR Securities discovers any discrepancies in the KYC Information provided by the new customer, the matter should be immediately notified to the AML/CTF CO. The discrepancy must not be raised with the new customer without first consulting the AML/CTF CO.

18.2 The AML/CTF CO must then collect from the customer whatever additional information they consider necessary to verify that the PEP is the person that the customer claim they are.

18.3 **Pre-defined tolerance levels for matches and errors:** JDR Securities will allow for obvious typographical errors in customer information other than name, company registration or identification number, or date of birth. Where the error relates to name, company registration or identification number, or date of birth, the AML/CTF CO should be notified and independent contact should be initiated with the customer to clarify the information.

## **19. DISCLOSURE CERTIFICATES**

19.1 Disclosure certificates may only be requested from customers in the following circumstances:

- (a) JDR Securities has determined that the information cannot otherwise be reasonably obtained or verified;
- (b) the information to be provided or verified is reasonably required under this Program;
- (c) JDR Securities has applied the relevant procedures and requirements of this Program, but has been unable to obtain or verify the information; and
- (d) the information is one or more of the items of information specified below:

**CONTENT TO BE INCLUDED IN DISCLOSURE CERTIFICATES**

Customer Type	Disclosure Certificates must include:
Domestic Companies	<ol style="list-style-type: none"> <li>1. the full name and full residential address of each beneficial owner of the company;</li> <li>2. the full name of the appropriate officer;</li> <li>3. a certification by the appropriate officer that the information contained in the disclosure certificate is true, accurate and complete; to the best of their knowledge and belief; and</li> <li>4. the date of certification by the appropriate officer.</li> </ol>
Foreign Companies - Registered	<ol style="list-style-type: none"> <li>1. the full name of the company;</li> <li>2. information about whether the company is registered by the relevant foreign registration body and if so, whether it is registered as a private or public company or some other type of company;</li> <li>3. the full name and full residential address of each beneficial owner;</li> <li>4. the full name of the appropriate officer;</li> <li>5. certification by the appropriate officer that the information contained in the disclosure certificate is true, accurate, and complete, to the best of their knowledge and belief; and</li> <li>6. the date of certification by the appropriate officer.</li> </ol>
Foreign Companies - Unregistered	<ol style="list-style-type: none"> <li>1. the full name of the company;</li> <li>2. information about whether the company is registered by the relevant foreign registration body and if so: <ul style="list-style-type: none"> <li>○ any identification number issued to the company by the relevant foreign registration body upon the company's formation, incorporation or registration;</li> <li>○ whether it is registered as a private or public company or some other type of company by the relevant foreign registration body;</li> <li>○ the jurisdiction of incorporation of the foreign company as well as the jurisdiction of the primary operations of the foreign company and the location of the foreign stock or equivalent exchange (if any); and</li> <li>○ contain the full name and full residential address of each beneficial owner;</li> </ul> </li> <li>3. the full name of the appropriate officer;</li> <li>4. certification by the appropriate officer that the information contained in the disclosure certificate is true,</li> </ol>

	<p>accurate, and complete, to the best of their knowledge and belief; and</p> <p>5. the date of certification by the appropriate officer.</p>
<p>Trusts, Partnerships, Associations and Registered Cooperatives</p>	<p>1. verify KYC information about a trust, partnership, association or registered cooperative;</p> <p>2. contain the full name and full residential address of each beneficial owner;</p> <p>3. contain the full name of the appropriate officer;</p> <p>4. contain certification by the appropriate officer that the information contained in the disclosure certificate is true, accurate and complete; to the best of their knowledge and belief; and</p> <p>5. contain the date of certification by the appropriate officer.</p>

Issued by the Director of JDR Securities Pty Ltd

August 2021

## APPENDIX 1 – LIST OF CERTIFIERS

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A **certified copy** means a document that has been certified as a true copy of an original document by one of the following persons:

- (a) a person who, under a law in force in a State or Territory, is currently licensed or registered to practise in an occupation listed in Part 1 of Schedule 2 of the Statutory Declarations Regulations 2018;
- (b) a person who is enrolled on the roll of the Supreme Court of a State or Territory, or the High Court of Australia, as a legal practitioner (however described);
- (c) a person listed in Part 2 of Schedule 2 of the Statutory Declarations Regulations 2018. For the purposes of these Rules, where Part 2 uses the term '5 or more years of continuous service', this should be read as '2 or more years of continuous service';
- (d) an officer with, or authorised representative of, a holder of an Australian financial services licence, having 2 or more years of continuous service with one or more licensees;
- (e) an officer with, or a credit representative of, a holder of an Australian credit licence, having 2 or more years of continuous service with one or more licensees;
- (f) a person in a foreign country who is authorised by law in that jurisdiction to administer oaths or affirmations or to authenticate documents.