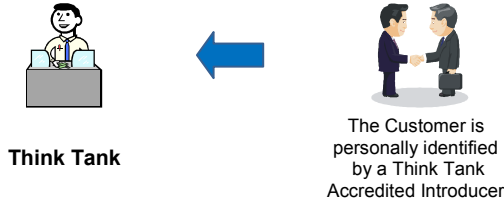


ANTI-MONEY LAUNDERING & COUNTER-TERRORISM FINANCING Act 2006 (AML/CTF Act) GUIDE TO CUSTOMER IDENTIFICATION CHECK LIST SUBMISSION

All parties to a loan application must have a Customer ID Checklist completed. Where a borrower/guarantor is not personally identified by a Think Tank Accredited Introducer, additional Customer ID Checklists must be completed and submitted. For the purposes of this guide, each party to the loan including all personal, corporate and trust borrowers and guarantors is referred to as a "Customer".

Please note the following examples regarding the Customer ID Checklist required under the AML/CTF Act.

A. Where The Customer is Personally Identified by the Introducer Presenting the Loan to Think Tank



At the time of loan application submission, provide Think Tank with:

1. AML/CTF Customer ID Checklist signed by the Think Tank Accredited Introducer who has personally witnessed and certified the identification of the customer in the presence of the customer.

B. Where The Customer is Not Personally Identified by the Introducer Presenting the Loan to Think Tank and Identification is Certified by an Approved Person



At the time of loan application submission, provide Think Tank with:

1. AML/CTF Customer ID Checklist signed by an **Approved Person** who has personally witnessed and certified the identification of the customer in the presence of the customer.
2. AML/CTF Customer ID Checklist signed by the **Think Tank Accredited Introducer** that refers to the original certified ID Checklist.

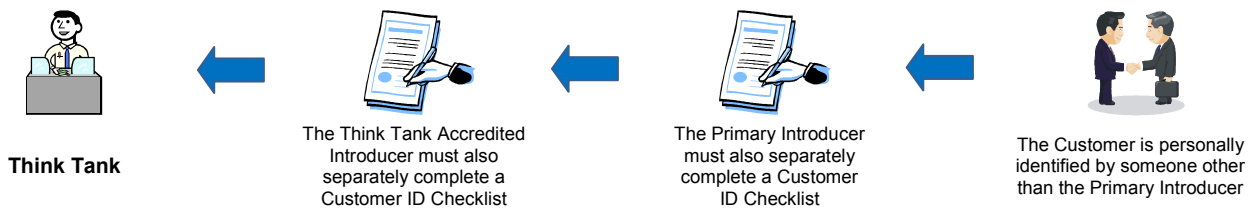
C. Where The Customer is Personally Identified by a Primary Introducer Who Gives it to a Think Tank Accredited Introducer



At the time of loan application submission, provide Think Tank with:

1. AML/CTF Customer ID Checklist signed by the **Primary Introducer** who has personally witnessed and certified the identification of the customer in the presence of the customer. *Note, the certifying person must be an approved certifier under the AML/CTF Act.*
2. AML/CTF Customer ID Checklist signed by the **Think Tank Accredited Introducer** that refers to the original certified ID Checklist.

D. Where The Customer is Not Personally Identified by the Primary Introducer and Identification is Certified by an Approved Person



At the time of loan application submission, provide Think Tank with:

1. AML/CTF Customer ID Checklist signed by an **Approved Person** who has personally witnessed and certified the identification of the customer in the presence of the customer.
2. AML/CTF Customer ID Checklist signed by the **Primary Introducer** that refers to the original certified Customer ID Checklist.
3. AML/CTF Customer ID Checklist signed by the **Think Tank Accredited Introducer** that refers to the original certified Customer ID Checklist.

AML/CTF CUSTOMER IDENTIFICATION TIPS

Who Must Be Identified?

- Each borrower and guarantor that is nominated as a party to the loan is deemed to be a customer and must be AML/CTF identified.
- This includes individuals, companies, trusts, associations, co-operatives and partnerships.

Who Can Certify Identification?

- The more accessible Approved Certifiers include: Justice of the Peace; Notary Public; police officer; a qualifying Australia Post employee (manager or two years full time experience); an employee of a financial institution or finance company with >2 yrs continuous service; an officer or Authorised Representative of an AFSL entity with >2 yrs continuous service; a CPA or Chartered Accountant; a magistrate, judge or court registrar.
- Please refer to the AUSTRAC schedule for a complete list of Approved Certifiers (Para 1.2.1 of the AML/CTF Act).

What Sort of Identification is Acceptable?

- Generally, for individuals, a primary document such as a passport (not more than 2 yrs expired) or current photo drivers licence is all that is required. There are secondary documentation options – please refer to the Customer ID Checklist.
- A company, trust, association etc. is required to provide different types of identification to that for individuals. Please refer to the Customer ID Checklist for each type.

What Customer ID Checklist Forms Can Be Used?

- You may use a Customer ID Checklist other than the Think Tank Customer ID Checklist. However, only AML/CTF compliant forms may be used and the form should state whether it is consistent with the requirements of the Act.

Why Are Certified Copies of Identification Not Acceptable Without a Completed Customer ID Checklist?

- AUSTRAC requires the completed Customer ID Checklist to be submitted so that it clearly associates the identified individual, company or trust etc. with the finance being applied for.
- We are unable to accept the certified identification without the accompanying Customer ID Checklist certified by the same person as the lender considering the finance must first be in possession of a AML/CTF compliant ID checklist.

When Should the Completed Customer ID Checklist Be Submitted?

- The Customer ID Checklist/s must be submitted along with the loan application. The assessment of credit can not commence until all Customer ID Checklists associated with the loan application are provided.
- Customer ID Checklists and legible certified identification for all parties to the loan must be submitted as well as Customer ID Checklist/s from any additional introducer involved with the loan application process.

Why Does an Introducer Who Has Not Certified the Identification Also Have to Complete a Customer ID Checklist?

- The AML/CTF Act requires all introducer parties having a role in the loan application and submission process to complete and sign a Customer ID Checklist. This then provides for an un-broken chain of identification starting with each customer and extending right through to the Think Tank Accredited Introducer.

Why has Think Tank taken this approach to AML/CTF Customer ID when others take a different approach?

- Due to the size of our organisation, AUSTRAC elected to undertake an on-site consultation and audit process with us. The forms and processes we use and apply are a direct result of AUSTRAC engaging in that process with us.
- Other finance providers may apply their own interpretation of the Act or of AUSTRAC guidelines however, we will be periodically audited by AUSTRAC in the future and must abide by the procedures already agreed directly with them.

DO's and DON'T's

Do

- Make sure every party to the loan has a certified Customer ID Checklist.
- Make sure that every Customer ID Checklist is accompanied by properly certified, legible identification. Where certified copies are not legible, Think Tank may ask for the originals to be supplied.
- Contact us if you are in any doubt as to what the requirements are in relation to your finance submission.
- Unfortunately, expect us to say we can not consider a loan application when Customer ID Checklist/s are incomplete or missing.
- Understand that each introducer has a personal liability under the AML/CTF Act – if you do not provide the correct, complete forms and identification, you can be personally prosecuted and fined by AUSTRAC.

Don't

- Submit a loan application without Customer ID Checklists for all parties to the loan and from each introducer group associated with the lodgement of the application.
- Submit a loan with just the certified ID and no Customer ID Checklist/s.
- Assume there is any discretion or flexibility within the identification requirements of the AML/CTF Act – AUSTRAC has informed us first hand the obligations of lenders and introducers are absolute and no deviation from the legislated requirements will be accepted.
- Think AUSTRAC is relaxed about your, or our, obligations under the AML/CTF Act. The supplied Customer ID Checklist/s will remain on file for years and AUSTRAC will prosecute where it finds non-compliance.