

LANDWISE REAL ESTATE

ANTI-MONEY LAUNDERING & COUNTER-TERRORISM FINANCING (AML/CTF) POLICY

Customer Due Diligence, Risk Management & Compliance Framework

Document Owner	Landwise Real Estate
Policy Status	Approved Policy
Effective Date	1 July 2026
Review Cycle	At least every 3 years, and earlier where required
Classification	Internal Compliance Document

This policy is intended to operate as part of Landwise Real Estate’s broader AML/CTF Program and risk management framework.

1. Policy Statement

Landwise Real Estate (Landwise, we, us or our) is committed to conducting its business with integrity, transparency and in accordance with applicable Australian laws and regulatory requirements. Landwise will take reasonable and proportionate measures to prevent its services from being misused for money laundering, terrorism financing or proliferation financing, and to identify, assess, manage and mitigate the associated risks.

Where Landwise provides a designated service regulated under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) (AML/CTF Act), Landwise will comply with applicable AML/CTF obligations, including customer due diligence, ongoing monitoring, record keeping, reporting and governance requirements.

Landwise will not commence or continue a regulated designated service where it cannot satisfy the applicable customer due diligence requirements or where doing so would place the business in breach of an applicable legal or regulatory obligation.

2. Purpose

The purpose of this Policy is to establish the principles and minimum controls Landwise applies to:

- identify and assess money laundering, terrorism financing and proliferation financing (ML/TF) risks;
- identify and verify customers and relevant persons before providing a regulated designated service;
- understand the nature and purpose of the proposed business relationship or transaction;
- apply enhanced due diligence and additional controls where risk warrants;
- monitor customer relationships and transactions for unusual activity and changes in risk;
- identify and escalate matters that may require reporting to AUSTRAC or other competent authorities;
- protect personal information and minimise unnecessary collection and retention of identification information; and
- maintain appropriate governance, training, records and oversight.

3. Scope

This Policy applies to Landwise Real Estate, its directors, officers, employees, contractors, representatives and any other person performing functions on behalf of Landwise that may involve a regulated designated service or an AML/CTF control.

The Policy applies to relevant customers and transactions involving individuals, companies and other bodies corporate, trusts, partnerships, sole traders and other legal or organisational structures, to the extent relevant to the services Landwise provides.

4. Regulatory Framework

This Policy is designed to operate consistently with the AML/CTF Act, applicable AML/CTF Rules and AUSTRAC guidance, together with applicable privacy obligations under the Privacy Act 1988 (Cth) and Australian Privacy Principles.

Landwise will maintain its AML/CTF Program in a manner appropriate to the nature, size and complexity of its business and the ML/TF risks it reasonably faces. The AML/CTF Program will be approved by an appropriate senior manager and reviewed when relevant risk, business, legislative or regulatory changes occur and at least as frequently as required by law.

5. Governance and Responsibilities

5.1 Governing Body / Directors

- provide appropriate oversight of the AML/CTF framework;
- support a culture of compliance and ethical conduct;
- ensure adequate resources are available for AML/CTF compliance; and
- ensure significant AML/CTF risks and compliance issues are escalated appropriately.

5.2 AML/CTF Compliance Officer

Landwise will appoint an AML/CTF Compliance Officer with appropriate authority, seniority, knowledge and access to information to oversee the implementation and operation of the AML/CTF Program. The Compliance Officer is responsible for coordinating risk management, CDD processes, escalation, reporting, training, record keeping and periodic review.

5.3 Employees and Representatives

- follow this Policy and applicable AML/CTF procedures;
- complete required training and cooperate with CDD and verification processes;
- promptly escalate unusual or suspicious matters to the Compliance Officer;
- not circumvent or override AML/CTF controls without proper authority; and
- maintain confidentiality regarding compliance reviews and regulatory reporting.

6. ML/TF Risk-Based Approach

Landwise adopts a risk-based approach. Controls will be proportionate to the ML/TF risks associated with the customer, ownership and control structure, transaction, service, delivery channel, jurisdiction and other relevant circumstances.

Risk Area	Examples of Risk Indicators	Landwise Response
Customer	Unclear identity, complex ownership, PEP/TFS concerns, inconsistent information	Verify identity; establish authority, ownership/control and risk profile; escalate where appropriate.
Transaction	Unusual structure, unexplained complexity, inconsistent payment arrangements or other red flags	Clarify purpose and circumstances; obtain supporting information; consider enhanced due diligence.
Geography	Higher-risk jurisdictions or unusual cross-border links	Assess jurisdictional risk and obtain further information where required.
Delivery Channel	Remote/online interaction, third-party involvement or other higher-risk arrangements	Apply controls appropriate to the channel and verify relevant persons.

7. Customer Due Diligence (CDD)

Landwise will complete initial CDD before commencing a regulated designated service. The purpose of CDD is to establish, on reasonable grounds, the identity and relevant circumstances of the customer and associated persons and to understand the ML/TF risk presented by the relationship or transaction.

CDD may include, as applicable:

- identifying the customer and verifying the customer's identity;
- identifying and verifying persons acting on behalf of the customer and confirming their authority;
- identifying persons on whose behalf the customer is receiving the service, where applicable;

- determining whether relevant persons are politically exposed persons (PEPs) or subject to targeted financial sanctions (TFS);
- understanding beneficial ownership and control of companies, trusts, partnerships and other structures;
- establishing the nature and purpose of the business relationship or transaction;
- assessing the customer's ML/TF risk; and
- obtaining source of funds and/or source of wealth information where required by the applicable risk and legal requirements.

8. Enhanced Customer Due Diligence

Where a customer or transaction presents heightened ML/TF risk, Landwise may apply enhanced due diligence. This may include obtaining additional information about the customer, beneficial owners, source of funds or wealth, purpose of the transaction, business activities, expected transaction behaviour or relevant jurisdictions.

Examples of circumstances that may warrant escalation include complex or opaque ownership structures, unexplained third-party involvement, inconsistent information, unusual transaction patterns, significant unexplained changes in circumstances, PEP or sanctions considerations, or other indicators identified through Landwise's risk assessment.

9. Ongoing Customer Due Diligence and Monitoring

Landwise will conduct ongoing monitoring appropriate to the customer's and relationship's ML/TF risk. Landwise will consider whether customer information remains current and whether transactions or behaviour are consistent with the known nature and purpose of the relationship.

Triggers for review may include changes in ownership or control, changes in business activities, unusual transaction volumes, new or higher-risk services, changes in delivery channels, relevant jurisdictional changes, or other information that materially changes the customer's risk profile.

10. Suspicious Matters and Regulatory Reporting

Where Landwise identifies conduct, transactions or circumstances that may give rise to a reporting obligation, the matter must be escalated promptly to the AML/CTF Compliance Officer for assessment and, where required, reporting to AUSTRAC within the applicable statutory timeframe.

Employees and representatives must not undertake their own external disclosure or notify a customer that a suspicious matter has been or may be reported where doing so could breach applicable tipping-off or related confidentiality restrictions.

11. Targeted Financial Sanctions and PEPs

Landwise will apply appropriate screening and escalation controls to identify relevant politically exposed person (PEP) and targeted financial sanctions (TFS) considerations. Where a potential match or concern is identified, the matter must be referred to the AML/CTF Compliance Officer before the relevant service proceeds further, unless otherwise authorised under applicable procedures.

12. Record Keeping

Landwise will maintain records sufficient to demonstrate compliance with its AML/CTF obligations, including records relating to customer identification, verification, risk assessment, CDD decisions, ongoing monitoring, escalation, reporting and relevant transactions.

AML/CTF records will be retained for the period required by law. Records must be accurate, secure, accessible to authorised personnel and protected from unauthorised access, alteration or disclosure.

13. Privacy and Handling of Identification Information

Landwise will collect, use, disclose and retain personal information only to the extent reasonably necessary for AML/CTF compliance, the provision of its services and other lawful purposes.

Consistent with current OAIC guidance, Landwise will not retain copies of full identification documents solely for AML/CTF record-keeping purposes where the law does not require such copies to be retained. Instead, Landwise will maintain the relevant identification information, document type, verification method and outcome, and applicable risk assessment information.

Personal information will be stored securely and destroyed or de-identified when it is no longer required for a lawful purpose, subject to applicable legal or regulatory retention requirements.

14. Refusal, Deferral or Termination of Services

Landwise may refuse, defer or cease providing a regulated service where required information cannot be obtained or verified, where the required CDD cannot be completed, where the proposed service would create unacceptable legal or compliance risk, or where otherwise required or permitted by law.

Any such decision must be appropriately documented and escalated to the AML/CTF Compliance Officer where required. Customer communications must be handled carefully so as not to disclose protected information or compromise a regulatory investigation or reporting obligation.

15. Staff Training and Awareness

Landwise will provide AML/CTF training appropriate to the functions performed by its personnel. Training will cover relevant obligations, CDD procedures, risk indicators, escalation processes, privacy, record keeping, suspicious matters and confidentiality requirements.

Personnel will be expected to maintain sufficient knowledge and competence to perform their AML/CTF responsibilities effectively.

16. Independent Evaluation, Testing and Review

Landwise will maintain processes for reviewing the effectiveness of its AML/CTF Program. Where required by law, an independent evaluation of the AML/CTF Program will be conducted. Findings will be documented and material deficiencies will be addressed through appropriate remediation and management oversight.

This Policy will be reviewed following material legislative or regulatory change, material changes to Landwise's business or risk profile, significant compliance incidents, or at least within the applicable regulatory review cycle.

17. Breach and Escalation

Any suspected breach of this Policy, failure to complete required CDD, attempted circumvention of AML/CTF controls, or other material compliance concern must be reported promptly to the AML/CTF Compliance Officer or an appropriate senior manager.

Landwise will assess reported breaches and take proportionate corrective action, including remediation, additional training, process changes, disciplinary action where appropriate, and regulatory notification where required.

18. Customer Communication

Landwise may request information or supporting documentation from customers where reasonably necessary to meet its AML/CTF obligations. Customers are expected to provide accurate and complete information within a reasonable timeframe.

The information requested may include identity information, authority to act, beneficial ownership and control information, transaction purpose, source of funds or wealth, and other information required to assess and manage ML/TF risk.

Failure to provide required information may result in Landwise being unable to commence or continue a regulated service.

19. Related Documents

- Landwise Real Estate AML/CTF Program
- ML/TF Risk Assessment
- Customer Due Diligence / KYC Procedure
- Enhanced Due Diligence Procedure
- Suspicious Matter Escalation and Reporting Procedure
- Privacy Policy and Collection Notice
- Staff AML/CTF Training and Compliance Records

20. Approval and Review

Document Owner	Landwise Real Estate
Approved By	Director / Senior Manager
Approval Date	01-July-2026
Next Review Date	

Important: This document is a company policy template and should be read together with Landwise Real Estate's complete AML/CTF Program, ML/TF risk assessment, procedures and applicable legislation. It should be reviewed by Landwise's AML/CTF Compliance Officer and, where appropriate, Australian legal counsel before formal adoption.

Appendix A — Customer AML/CTF Information Notice

Landwise Real Estate is required to comply with applicable Australian AML/CTF laws when providing regulated services. These requirements are designed to reduce the risk that legitimate businesses and transactions are misused for money laundering, terrorism financing or proliferation financing.

As part of our customer due diligence process, we may need to verify your identity, confirm who owns or controls an entity, understand the purpose and nature of the transaction, and obtain additional information where the circumstances present a higher level of risk.

Depending on the circumstances, we may request your full name, date of birth, residential address, identification information, authority to act, beneficial ownership information, transaction information and, where required, source of funds or wealth information.

We collect and use this information to meet legal and regulatory obligations, verify identity, assess and manage risk, maintain required records and comply with applicable reporting obligations. Landwise will handle personal information in accordance with applicable privacy laws and its Privacy Policy.

If required information is not provided, Landwise may be unable to provide or continue a regulated service.

Privacy Policy: <https://www.landwisere.com.au/privacy-policy>