

## **Anti money laundering policy**

The Anti-Money Laundering / Counter-Terrorism Financing Act (AML/CTF) was introduced in December 2006 and is aimed at addressing money laundering in Australia and the threat to national security caused by the financing of terrorism.

The purpose of the reforms within the AML/CTF Act is the regulation of financial transactions in a way that will help detect and prevent money laundering and the financing of terrorism. The new regulations have been designed to bring the Australian Financial Services Industry into line with international best practice in detecting and deterring money laundering and the financing of terrorism.

RHG is committed to complying with the AML/CTF laws. We have developed an AML/CTF policy which clearly sets out our approach to the identification, mitigation and management of the risks that we can reasonably anticipate. In approving, implementing and formally adopting this Policy, our objectives are to:

- Establish the core principles that guide the way we identify, manage and mitigate the risk of money laundering or terrorist financing occurring at RHG;
- Ensure that we meet our legal and regulatory obligations, and that all who work at RHG are trained to comply with these requirements; and
- Oppose the crimes of money laundering and terrorism financing to protect RHG, our people and our shareholders from the reputation damage, regulatory intervention and potential financial penalties attached to non-compliance with AML/CTF obligations.

### **Core AML/CTF Principles**

RHG's approach to AML/CTF issues is centered on the following core principles:

- We oppose the crimes of money laundering and terrorist financing and do not tolerate the use of our products and services for either of these purposes;
- We report any activity that we detect which falls within the scope of the AML/CTF Act to the AUSTRAC CEO;
- We are committed to complying with the AML/CTF laws;
- We will seek to provide our products and services only for legitimate purposes to customers whose identities we have been able to reasonably ascertain;
- We will seek to avoid relationships with those that we reasonably assess as posing an unacceptable risk of money laundering or terrorist financing, and we will assess the viability of maintaining ongoing relationships with customers that fit this criteria;
- We will not tolerate behaviors that compromise RHG's compliance with AML/CTF legislation;
- Our people will be assigned clear AML/CTF responsibilities, relevant to their respective roles and areas, as appropriate;
- Our people will receive the AML/CTF training they need to understand and fulfill their obligations under the AML/CTF legislation and our Group AML/CTF Program;
- We will monitor, measure and report compliance with our RHG AML/CTF Programs, and take corrective actions as necessary; and

- We will manage changes to our products, business processes and systems to ensure that money laundering and terrorist financing risks are identified and managed.