



Summary of Macquarie’s Anti-Money Laundering and Counter-Terrorism Financing (“AML/CTF”) Policy

Macquarie is committed to conducting its business in accordance with all applicable laws, rules and regulations and protecting its clients, counterparties, communities, and staff from the risks associated with money laundering and terrorist financing.

Macquarie’s AML/CTF Policy outlines Macquarie’s approach to the identification, mitigation, and management of money laundering and terrorist financing risks that Macquarie faces with its customers and their use of Macquarie’s products and services.

Macquarie’s AML/CTF Policy applies to Macquarie staff employed or engaged by Macquarie Group Limited, Macquarie Bank Limited, or any of its integrated subsidiaries.

This contributes to the stability, integrity and strength of the global financial system and supports Macquarie in meeting its ethical, legal, and regulatory obligations.

1. Money Laundering and Terrorist Financing

Money Laundering (“ML”) is activity which involves hiding, disguising or legitimising the true origin and ownership of money used in or derived from committing crimes.

Terrorist Financing (“TF”) is generally the act of providing financial support to terrorism or terrorist organisations enabling them to carry out acts of terrorism. Terrorism financing does not necessarily involve illegitimate funds; in fact, it often uses legitimately obtained income and may involve relatively small amounts of money.

Failure to comply with the AML/CTF Policy may lead to criminal, civil and/or regulatory sanctions and penalties for Macquarie and/or individual staff who may be subject to internal disciplinary action, up to and including possible dismissal.

2. Core principles of Macquarie’s AML/CTF Policy

Macquarie's regulatory position:

- Macquarie will comply with the AML/CTF laws, rules and regulations of the countries where Macquarie has permanent places of business in which Macquarie provides services.
- Macquarie will engage with relevant regulators, authorities and/or law enforcement agencies in a constructive and cooperative manner (including with respect to information sharing).

Macquarie opposes criminal undertakings:

- Macquarie opposes the crimes of money laundering and terrorist financing and maintains a framework to identify, mitigate and manage the risk that its products and services could be used for such purposes.
- Macquarie will report to the applicable regulator, authority and/or law enforcement agency suspicious activity that may involve potential laundering, terrorism financing or other activity or transactions that are reportable as suspicious activity under applicable laws.

Governance and Oversight:

- Macquarie recognises the vital role of robust governance and oversight of its AML/CTF compliance structures. Senior management, including at the board level, have responsibility for managing the money laundering and terrorism financing risks identified by Macquarie by demonstrating active engagement in Macquarie's approach to mitigating these risks effectively. They also play a key role in fostering the attitude and culture embedded within Macquarie.

Macquarie safeguards:

- Macquarie includes an assessment of AML/CTF risk in its financial crime risk assessment framework to ensure that it has a thorough understanding of the AML/CTF risk across the group, including identifying those business areas where such risk is higher. Macquarie will use the risk assessments to ensure that it has proportionate systems and controls in place to identify, assess, monitor and manage AML/CTF risk.
- Macquarie will apply a risk rating and corresponding level of due diligence standard to all client relationships.
- Macquarie will maintain adequate safeguards on the confidentiality and use of customer information exchanged with regulators, including safeguards to prevent tipping off and will treat such information in accordance with its internal requirements regarding the confidentiality of data.
- Macquarie will provide its products and services only for legitimate purposes to customers whose identities Macquarie has been able to reasonably ascertain. Macquarie may decide not to provide products or services based upon decisions guided by its ML/TF risk appetite.
- Macquarie will take necessary steps to ensure that sufficient funding and resources are available for the implementation and performance of activities required by Macquarie's AML/CTF framework.
- Macquarie will monitor the activity of its customers, their transactions, and its staff using a risk-based approach that is consistent with the level of money laundering and terrorism financing risk.
- Macquarie will manage new and revised products, business processes and systems to ensure that money laundering and terrorist financing risks are identified, mitigated and managed.
- Where any AML/CTF functions are outsourced to a third party (including intra-group), Macquarie entities will ensure that they maintain oversight and control of the outsourced functions conducted on their behalf.
- Macquarie will create, maintain and implement written material, including standards, guidance and procedures to support compliance with its AML/CTF Policy.

3. Macquarie's AML/CTF training

Macquarie staff complete initial AML/CTF training when they join Macquarie and periodic AML/CTF training thereafter to understand their obligations under relevant laws, rules, and regulations and Macquarie's AML/CTF framework.

4. Independent review of the AML/CTF framework

Distinct from the self-assurance performed by the first line of defence on controls operated, Macquarie's AML/CTF framework is subject to independent testing and/or review by the Financial Crime Risk Assurance function, the Internal Audit function or another independent party for effectiveness on a regular basis, including as required in accordance with the requirements of each local jurisdiction. The results of the review are presented to senior management for review and action. In addition, regular reporting is provided to Macquarie's Board.

View the Macquarie Group's Wolfsberg Anti-Money Laundering Questionnaire:

<https://www.macquarie.com/assets/macq/impact/esg/policies/wolfsberg-financial-crime-questionnaire.pdf>

View the Macquarie Group's USA Patriot Act Certification:

<https://www.macquarie.com/assets/macq/impact/esg/policies/USA-patriot-act-certificate.pdf>