ANTI-MONEY LAUNDERING AND COUNTER-TERRORISM FINANCING PROGRAM

INTRODUCTION AND PART A

ASTERO PAY PTY LTD | ACN 653 308 831
VERSION 2 | April 2023

Contents

INTRODUCTION

1. ABOUT THE AML/CTF ACT

1.1 The Anti-Money Laundering ("**AML**") and Counter-Terrorism Financing ("**CTF**") Act 2006 ("AML/CTF Act")'s and the Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No.1) ("Rules") broad purpose is to regulate financial transactions in away that will help identify, mitigate and manage money laundering and terrorism financing risks.

1.2 The AML/CTF Act provides general principles and obligations while detailed operating rules are covered in rules made by the Australian Transaction Reports and Analysis Centre ("AUSTRAC"). AUSTRAC is the government agency responsible for administering the AML/CTF Act.

1.3 The AML/CTF Act applies to persons who provide specified services (known as "designated services"). Persons providing designated services are called"reporting entities" .

1.4 ASTERO PAY Pty Ltd ("ASTERO PAY") provides one or more designated services listed in the AML/CTF Act and is therefore a reporting entity. These services are included in the AML/CTF Act because they are vulnerable to abuse by criminals for money laundering or terrorism financing purposes.

1.5 The AML/CTF Act adopts a risk-based approach. This approach means that Astero Pay decides how best to identify, mitigate and manage the risk of money laundering and terrorism financing through its business. Reporting entities therefore need to undertake a comprehensive assessment of these risks relative to their businesses. Reporting entities need to be able to demonstrate to AUSTRAC that they have carried out such an assessment and have a documented program in place to identify, mitigate and manage the risk of their products or services being used to facilitate money laundering or terrorism financing.

2. ADOPTION

2.1 ASTERO PAY adopts Parts A and B of this Program as its AML/CTF Program ("**Program**") for the purposes of the AML/CTF Act. On and from April 2023, ASTERO PAY must comply with the Program, as varied from time to time.

Version number	**Date updated**	**Notes**
2	April 2023	Original document prepared

3. RECORDS RELATING TO ASTERO PAY'SAML/CTF PROGRAM

3.1 The AML/CTF Compliance Officer ("AML/CTF CO") ensures that the following records are retained:

- this Program and each variation to it;
- the Board of Directors' approval of Part A of this Program, and each variation to Part A of this Program;
- AUSTRAC's feedback and correspondence;
- external and internal AML/CTF reviews; and
- correspondence with external lawyers on AML/CTF issues.

3.2 The records referred to in Section 3.1 of this Program are be retained:

- in the case of records relating to the adoption of each variation to this Program and ASTERO PAY's Program, during the period it or any part of it remains in force and for seven (7) years after it ceases to be in force; and
- for the period of time determined by the AML/CTF Compliance Officer for all other records.

4. AUSTRAC ENROLMENT AND REGISTRATION

4.1 ASTERO PAY is enrolled and registered with AUSTRAC as an Independent Remittance Dealer .

4.2 Independent Remittance Dealers are required to enrol and register with AUSTRAC.

ENROLLING WITH AUSTRAC	
Responsible Person	AML/CTF CO
Time frame	ASTERO PAY must enrol within twenty-eight (28) days of providing or commencing to provide a designated service.
Changes to Enrolment	Enrolment details must be kept up to date and AUSTRAC must be notified within fourteen (14) days of any changes to ASTERO PAY's details. For further information refer to Section22of Part A.
REGISTERING WITH AUSTRAC	

Responsible Person	AML/CTF CO
Time frame	Prior to providing or commencing to provide a designated service. . Failure to register may constitute the commission of a criminal offence.
Changes to Registration	Registration details must be kept up to date and AUSTRAC must be notified within fourteen (14) days of any changes to ASTERO PAY's details. For further information refer to Section 27 of Part A.

5. PENALTIES

5.1 Failure to comply with the obligations under the AML/CTF Act may result in civil or criminal penalties.

5.2 Civil penalties for contravention of the AML/CTF Act range up to $4.4 million for an individual and up to $22.2 million for a corporation.

6. DESIGNATED BUSINESS GROUP

6.1 ASTERO PAY is a reporting entity which does not currently share obligations with another person, for the purposes of forming a Designated Business Group ("**DBG**") under the AML/CTF Act and Rules. ASTERO PAY does not intend to form and/or join an existing DBG.

7. DEFINITIONS

7.1 Words and phrases defined in the AML/CTF Actor Rules have the same meaning when used in this Program unless otherwise specified.

DEFINITIONS	

Australian Government Entity	• the Commonwealth, a State or a Territory; or
	• an agency or authority of:
	  o the Commonwealth; or
	  o a State; or
	  o a local governing body established by or under a law of the Commonwealth, a State or Territory, other than a body whose sole or principal function is to provide a particular service, such as the supply of electricity or water.

Authorised Officer	in accordance with section 5 of the AML/CTF Act, an authorized officer is 'the AUSTRAC CEO or a person for whom an appointment as an authorized officer is in force under section 145'.
Beneficial Owner	• of a person who is a reporting entity, means an individual who owns or controls (directly or indirectly)Astero Pay; • of a person who is a customer of a reporting entity, means an individual who ultimately owns or controls (directly or indirectly) the customer; • in this definition, control includes control as a result of, or by means of, trusts, agreements, arrangements, understandings and practices, whether or not having legal or equitable force and whether or not based on legal or equitable rights, and includes exercising control through the capacity to determine decisions about financial and operating policies; and • in this definition, owns means ownership (either directly or indirectly) of 25% or more of a person.
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Independent Remittance Dealer	means businesses which provide remittance services directly to customers using their own systems and processes. Typically, transfers for customers are conducted through the business's bank accounts rather than through a system provided by a registered Remittance Network Provider.

Politically Exposed Persons ("PEP")	means an individual:
	• who holds a prominent public position or function in a government body or an international organisation, including:
	  o Head of State or head of a country or government; or
	  o government minister or equivalent senior politician; or
	  o senior government official; or
	  o Judge of the High Court of Australia, the Federal Court of Australia or a Supreme Court of a State or Territory, or a Judge of a court of equivalent seniority in a foreign country or international organisation; or

  - governor of a central bank or any other position that has comparable influence to the Governor of the Reserve Bank of Australia; or
  - senior foreign representative, ambassador, or high commissioner; or
  - high-ranking member of the armed forces; or
  - board chair, chief executive, or chief financial officer of, or any other position that has comparable influence in, any State enterprise or international organisation; and
- who is an immediate family member ?
  - a spouse; or
  - a de facto partner; or
  - a child and a child's spouse or de facto partner; or
  - a parent; and
- who is a close associate? any individual who is known (having regard to information that is public or readily available) to have:
  - joint beneficial ownership of a legal entity or legal arrangement with an Individual mentioned above or
  - sole beneficial ownership of a legal entity or legal arrangement that is known to exist for the benefit of a person described in paragraph11288. .
- In this Program:
  - domestic politically exposed person means a politically exposed person of an Australian government body;
  - foreign politically exposed person means a politically exposed person of a government body of a foreign country;
  - international organisation politically exposed person means a politically exposed person of an international organisation.
- In this definition international organisation means an organisation:
  - established by formal political agreement by two or more countries and that agreement has the status of an international treaty; and
  - recognised in the law of the countries which are members of the organisation.

Primary Photographic Identification Document	• a licence or permit issued under a law of a State or Territory or equivalent authority of a foreign country for the purpose of driving a vehicle that contains a photograph of the person in whose name the document is issued;
	• a passport issued for the purpose of international travel, that:
	  o contains a photograph and either:
	    the signature of the person in whose name the document is issued; or
	    any unique identifier of the person in whose name the document is issued;
	  o is issued by a foreign government, the United Nations or an agency of the United Nations; and
	  o if it is written in a language that is not understood by the person carrying out the verification - is accompanied by an English translation prepared by an accredited translator;
	• a national identity card issued for the purpose of identification, that:
	  o contains a photograph and either:
	    the signature of the person in whose name the document is issued; or
	    any unique identifier of the person in whose name the document is issued;
	  o is issued by a foreign government, the United Nations or an agency of the United Nations; and

	○ if it is written in a language that is not understood by the person carrying out the verification - is accompanied by an English translation prepared by an accredited translator.
Reasonable Measures	means appropriate measures which are commensurate with the money laundering or terrorism financing risks.
Registrable Designated Remittance Services	means a designated service that: • is covered by item 31, 32, 32A and 50A of table 1 in section 6; and • is provided by a person at or through a permanent establishment of the person in Australia; and • is not of a kind specified in the AML/CTF Rules.
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8. PURPOSE AND APPLICATION OF PART A

8.1 Part A of this Program ("Part A") is designed to identify, mitigate and manage the money laundering or terrorism financing risk which ASTERO PAY may reasonably face in the provision of our designated services.

8.2 Part A applies to all aspects of ASTERO PAY's business, to which the Act and the Rules are applicable and to any functions which are outsourced to third parties.

8.3 All ASTERO PAY's staff are given a copy of Part A of this Program and will be provided with necessary training, so they understand the nature and purpose of our business relationship with ASTERO PAY's customers and ASTERO PAY's obligations under the Act and Rules.

9. OVERSIGHT BY THE BOARD OF DIRECTORS AND BOARD OF DIRECTORS' APPROVAL

9.1 Part A of this Program was approved and adopted by ASTERO PAY's Board of Directors ("Board") .

9.2 Part A is subject to ongoing oversight by the Board, senior management, and ASTERO PAY's AML/CTF CO, and

- The AML/CTF CO, in consultation with senior management, reviews Part A on at least an annual basis to ensure Part A is:
  - drafted in accordance with the AML/CTF Act and Rules;
  - applicable and relevant to the functions of ASTERO PAY's business operations; and
  - any changes to ASTERO PAY's designated services have been reflected in Part A.
- Any changes to Part A are required to be reviewed and approved by the Board.

9.3 Part B does not require the Board's approval but is subject to ongoing oversight by the Board, senior management and ASTERO PAY's AML/CTF CO. Any changes to Part B are required to be reviewed and approved by the AML/CTF CO of ASTERO PAY.

9.4 Monthly meetings with the Board and senior management will be held by the AML/CTF CO to report on the following:

- significant changes to the ML or TF risks affecting ASTERO PAY if any ;
- compliance with this Program, the AML/CTF Act and Rules by ASTERO PAY;
- the results of and any report produced for any internal or external review of this Program
- assessment of the ML and TF risks associated with any new product, delivery channels, business partners and any operation of ASTERO PAY, and whether the existing procedures and controls are appropriate and proportionate to the ML and TF risks;
- any AUSTRAC feedback; and
- changes to relevant legislation.

10. ASTERO PAY'SAML/CTF COMPLIANCE OFFICER

10.1 ASTERO PAY has appointed Courtney Fitzsimmons Taylor as ASTERO PAY's AML/CTF CO for the purposes of the AML/CTF Act and Rules, and also the Nominated Contact Officer for the purposes of the Rules.

10.2 ASTERO PAY's AML/CTF CO is part of the management of ASTERO PAY, she possess sufficient skills and experience to carryout the roles of the AML/CTF CO.

10.3 The AML/CTF CO is responsible for implementing and over-seeing ASTERO PAY's obligations under the AML/CTF Act and Rules in accordance with its compliance procedures, including but not limited to:

- providing regulatory and/or legal updates in relation to the AML/CTF Act and Rules – the AML/CTF CO shall regularly monitor the information circulars AUSTRAC publishes on its website and take such information into account when implementing ASTERO PAY's Program;
- ongoing monitoring of the implementation of the Program;
- considering and incorporating feedback from employees, clients and AUSTRAC;
- ensuring overall compliance with the AML/CTF Act and Rules;
- investigating suspicious matters, issues or incidents in ASTERO PAY's operation which may give rise to ML/TF risks;
- maintaining records; and
- conducting employee risk awareness training in accordance with ASTERO PAY's obligations under the AML/CTF Act and Rules.

10.4 The AML/CTF CO is authorized to act independently and to delegate any of their responsibilities under this Program to another ASTERO PAY employee,provided if it is reasonable to do so. The AML/CTF CO also liaises with ASTERO PAY's external compliance consultant.

10.5 If ASTERO PAY or any employee of ASTERO PAY receives correspondence or inquiries from AUSTRAC, those enquire should be directed to the AML/CTF CO at first instance

11. REVIEW OF THE PROGRAM

11.1 **Internal Reviews:** The AML/CTF CO must regularly assess ASTERO PAY's ML and TF risk and should take steps to have this Program modified appropriately.

INTERNAL REVIEWS	
Responsible Person:	AML/CTF CO
Frequency:	Quarterly (unless otherwise indicated based on the factors listed below)
When an internal review must be conducted:	
• Where a significant change in the ML or TF risk relating to the designated services provided by ASTERO PAY has been identified; • prior to ASTERO PAY introducing a new designated service to the market; • prior to ASTERO PAY adopting a new method of delivering a designated service; • prior to ASTERO PAY adopting a new technology or developing technology used for the provision of an existing or new designated service; and • where the AML/CTF CO identifies changes arising in the nature of the business relationship, control structure or beneficial ownership of ASTERO PAY's customers. The above issues must also be considered during each independent review.	

11.2 **Independent Reviews:** The AML/CTF CO must engage an experienced internal or external third party to conduct an independent review of this Program. The 1st Independent review will be done 1 year after commencement of operations

INDEPENDENT REVIEWS	
Responsible Person:	AML/CTF CO - report the results of the independent review to the Board of ASTERO PAY. Reports detailing the review (both internal and external) and the results provided to the Board and senior management for consideration and discussion. The reports then form the basis of a timetable to address the findings within the timeline set by the Board.
Frequency:	Annually
Who should do the external review?	The independent party conducting the review must be independent and: • have not been involved in undertaking any of the functions or measures required to be carried out under this Program; • have not been involved in the design, development, implementation, maintenance or management of this Program;

	• have not been involved in the development of ASTERO PAY's risk assessment or related internal controls; • have access to the employees of ASTERO PAY and is able to make enquire of any employee; • have access to the records, personnel and property of ASTERO PAY within the context of ASTERO PAY's obligations under the Privacy Act 1988; • be impartial and objective in performing their duties and should not be inappropriately influenced by management of ASTERO PAY; and • be appropriately qualified to conduct the review.
What should be covered in the review?	The independent party, in the course of carrying out the independent review, must: • assess the effectiveness of Part A having regard to the ML and TF risk of ASTERO PAY; • assess whether Part A complies with the Rules; • assess whether Part A has been effectively implemented; • assess whether ASTERO PAY has complied with Part A; The independent party, in the course of carrying out the independent review, may also: • assess the risk management resources available to ASTERO PAY including, but not limited to funding and staff allocation; • identify any future needs relevant to the nature, size and complexity of ASTERO PAY; • assess the ongoing risk management procedures and controls in order to identify any failures – the following factors should betaken into account: o any market information relevant to the global AML/CTF environment which may have an impact on the ML or TF risk faced by ASTERO PAY; o failure to include all mandatory legislative components in the Program; o failure to gain approval of the Program from ASTERO PAY's Board; o insufficient or inappropriate employee due diligence; o frequency and level of risk awareness training not aligned with potential exposure to ML/TF risk(s); o changes in business functions which are not reflected in this Program; o failure to consider feedback from AUSTRAC (for example, advice regarding an emerging ML/TF risk); o failure to undertake an independent review (at an appropriate level and frequency) of the content and application of this Program;

	- legislation incorrectly interpreted and applied in relation to a customer identification procedure; - customer identification and monitoring systems, policies and procedures that fail to: 📫 prompt, if appropriate, for further identification and/or verification to be carried out when the ML/TF risk posed by a customer increases; 📫 detect where a customer has not been sufficiently identified and prevent the customer from receiving the designated service; 📫 take appropriate action where a customer provides insufficient or suspicious information in relation to an identification check; 📫 take appropriate action where the identification document provided is neither an original nor a certified copy; 📫 recognise foreign identification issued by a high-risk jurisdiction; 📫 record details of identification documents, for example, the date of issue; 📫 consult appropriate resources in order to identify high-risk customers; 📫 identify when an expired or old identification document (for example, a driver's licence) has been used; 📫 collect any other name(s) by which the customer is known; 📫 be subject to regular review; - lack of access to information sources to assist in identifying higher risk customers (and the jurisdiction in which they may reside), such as PEPs, terrorists and narcotics traffickers; - lack of ability to consistently and correctly train staff and/or third parties, particularly in areas with high turnover in: 📫 customer identification policies, procedures and systems; and 📫 identifying potential AML/CTF risks; and - assess the acceptance of documentation that may not be readily verifiable. If the independent reviewer determines it is appropriate, the review may also: • assess whether the risk-based procedures and processes adopted in ASTERO PAY's Program have changed such that alterations need to be made;

	• assess whether Part B is sufficient to cover the ML/TF risks posed by existing and potential customers of ASTERO PAY; and

	• assess whether any additional changes need to be made to this Program as a result of changes to the AML/CTFAct and Rules and the AML/CTF environment generally.

12. AUSTRAC FEEDBACK

12.1 Where AUSTRAC provides ASTERO PAY with feedback regarding performance in the management of ML/TF risk, any receipt of such feedback is immediately referred to the AML/CTF CO for attention.

12.2 The AML/CTF CO assesses AUSTRAC's feedback to determine if any changes to this Program are required and implement any such changes as soon as reasonably practicable with the Board'sapproval.

13. WHAT IS MONEY LAUNDERING?

13.1 Money laundering ("ML") is the process used to disguise the illegal origin of the proceeds of illegal activities such as drugs trafficking, tax evasion, smuggling, theft, terrorism, arms trafficking and corrupt practices. It is the name given to the process by which illegally obtained funds are given the appearance of having been legitimately obtained.

13.2 Whilst initially there was a focus on cash transactions there has recently been a growth in awareness of the sophistication used by money launderers to structure transactions to prevent detection and investment by them in a range of assets within the financial services sector.

13.3 There are three main stages of ML:

- **Placement** – the physical disposal of the proceeds e.g. deposit into an account. This is usually when the illegal funds or assets are first brought into the financial system.
- **Layering** – creating complex layers of financial transactions to separate the proceeds from their source and hide any audit trail to maintain anonymity e.g. transferring investments from one product to another. Many different techniques can be used to layer the funds including use of corporations and trusts. The funds may be shuttled through a web of many accounts, companies and countries in order to disguise their origins.
- **Integration** – taking the proceeds of ML and placing them back into the financial system so that they appear to be normal business proceeds with apparent legitimacy e.g. settling money into a trust without links to the previous illicit funds with the trust then making investments.

14. WHAT IS TERRORISM FINANCING?

14.1 Terrorism financing ("TF") is often the reverse of ML whereby funds within a legitimate source are put into the financial system and redirected into the hands of terrorist organisations. Where those funds are the proceeds of illegal activities including fraud and criminal activities they may also be captured by AML controls.

14.2 Terrorist organisations obtain money from a number of legitimate and illegitimate sources, such as:

- **Illegal Activities** – terrorists obtain funds from illegal activities, such as drug trafficking, smuggling, kidnapping and extortion.
- **Rich Individuals** - it is increasingly apparent that rich individuals area critical source of terrorist financing.
- **Charitable and Religious Institutions** – charitable and religious institutions can be a source of terrorist funding. They are ideal conduits because they are very lightly regulated and do not need to provide a commercial justification for their activities.
- **Commercial Enterprise** – terrorist organisations may run or own otherwise legitimate commercial enterprise to generate profits and commingle illegal funds. These include jewellery businesses, trading companies, convenience stores, real estate ventures and investment management firms.
- **State Sponsors** – a number of rogue nations have been known to provide assistance, financial support and safe harbour to terrorist organisations.

15. DESIGNATED SERVICES PROVIDED BY ASTERO PAY

15.1 ASTERO PAY provides the following designed services:

- Item 31 of section 6 of the Act;
- Item 32 of section 6 of the Act;
- Item 32A of section 6 of the Act; and
- Item 50A of section 6 of the Act.

15.2 ASTERO PAY has undertaken assessment of the ML/TF risks associated with its designated services taking into account the following factors:

- nature, size and complexity of its business;
- type of ML/TF risk that ASTERO PAY might reasonably face;
- customer types, including any politically exposed persons;
- types of designated services provided;
- methods by which those services are delivered;
- jurisdictions in which those services are delivered;
- responsible third parties to whom ASTERO PAY outsource its AML/CTF obligations;
- any significant changes in ML/TF risk;

- any ML/TF risk posed by:
  - new designated services – the assessment is conducted prior to the introduction of the new designated services;
  - new delivery method - the assessment is conducted prior to the introduction of the new delivery method; and
  - new or developing technologies used in the provision of the designated services - the assessment is conducted prior to the introduction of the new technologies.

15.3 **Significant Changes to the Customer's Business**: if ASTERO PAY notices that any of the following significant changes to the customer's business have taken place, ASTERO PAY obtains further details in writing from the customer to satisfy itself that the customer does not present an unacceptable risk. Significant changes can be identified as one of the following:

- changes in the nature of the customer's business or business relationship;
- changes in the customer's control structure;
- changes in the customer's beneficial ownership; or
- changes in the way a customer conducts transactions.

15.4 **New Designated Services**: prior to a new service being introduced to the market by ASTERO PAY, the AML/CTF CO assesses it to determine whether it involves the provision of a designated service. When it is determined by the AML/CTF CO that a new service involves the provision of a designated service, the AML/CTF CO assesses the ML/TF risk involved in the provision of the new designated service.

15.5 Board approval must be received before a new designated service is introduced to the market. The Board must be given a copy of the risk assessment conducted before the approval is granted.

16. RISK ASSESSMENT AND MANAGEMENT MATRIX

16.1 ASTERO PAY has put in place a Risk Assessment and Management Matrix ("**AML/CTF Matrix**") which outlines our assessment of various ML/TF risks associated with our designated services and the measures we put in place to control such risks. The AML/CTF Risk Matrix is attached at Annexure A of the Program.

RISK ASSESSMENT AND MANAGEMENT MATRIX	
Responsible Person:	AML/CTF CO - review and update the AML/CTF Matrix to ensure that the following items are contained in the AML/CTF Matrix and updated regularly.

Risk identification of the main ML/TF risks:	• Customer types • Products & services • Business practices & delivery methods • Countries we deal with
Risk Assessment / Measurement of the risk:	• Likelihood - chance of risking happening • Impact - the amount of loss or damage if the risk is to occur • Likelihood x impact - the level of risk or risk score
Mitigating and managing the risk:	• Minimize and manage the risks • Application of strategies, policies and procedures • Existing systems and controls • Risk plan
Risk Monitoring and Review:	• Development and implementation of monitoring process • Record keeping • Review of risk plan and this Program • Independent review

17. EMPLOYEE DUE DILIGENCE PROGRAM

17.1 ASTERO PAY does not have any existing employees who may be in the position to facilitate the commission of a ML/TF offence due to the requirement for at least two (2) account signatories of ASTERO PAY to Authorised any funds transfers undertaken.

17.2 **New Employees**

- The AML/CTF CO must be informed of all prospective new employees before they are issued with an employment contract with ASTERO PAY. The prospective employee will be informed that their employment is subject to the result of their background checks.
- The AML/CTF CO must undertake a risk assessment for all newly created roles or previously existing roles that are to be filled with a new employee to determine whether they will be in a position to facilitate the commission of a ML/TF offence.
- For all new employees, regardless of their position, ASTERO PAY must carry out all of the following checks, prior to an offer of employment being made:
  - collect and verify their identification documents as if they area new client;

- obtain a copy of their working visa (where the employee is not an Australian citizen);
- carryout at least two (2) reference checks;
- obtain copies of all tertiary educational qualifications or if none, the person's highest educational qualification;
- carryout a criminal history check with the Australian Federal Police (“AFP”); and
- carryout a bankruptcy/credit check.

- If ASTERO PAY determines the results to any of these procedures are not satisfactory, ASTERO PAY will not offer that person employment. Results which are not satisfactory may include:
  - a criminal history check which returns a result including fraud, dishonest conductor other ML/TF offences;
  - the prospective employee is currently bankrupt;
  - the prospective employee does not hold a valid working visa;
  - the identity of the prospective employee cannot be verified; or
  - the references obtained by ASTERO PAY uncover evidence that the prospective employee has been involved in activities which may constitute an ML/TF risk to ASTERO PAY.

17.3 **Existing Employees**

- Where ASTERO PAY proposes to transfer or promote an existing employee to a new role, a risk assessment must be undertaken of that role to determine whether they will be in a position to facilitate the commission of a ML/TF offence.
- Where an employee is transferred or promoted to a role that may put them in a position to facilitate the commission of a ML/TF offence in connection with the provision of a designated service, the AML/CTF CO will:
  - obtain an updated copy of the employee's working visa (where the employee is not an Australian citizen); and
  - carry out any other identification, reference, criminal history checks with the AFP, bankruptcy or credit checks that are deemed necessary by the AML/CTF CO.
- Employees who fail to comply with the procedures above will be reported to ASTERO PAY’s Board. Appropriate disciplinary action, including termination of employment, will occur where it is deemed necessary.

17.4 Copies of employee checks undertaken must be kept in accordance with the ASTERO PAY’s Document Retention Policy.

17.5 Managing Non-Compliance

- ASTERO PAY will,on an ongoing basis, monitor compliance with this Program.
- If an employee fails to comply with this Program, the matter will be referred to the AML/CTF CO immediately. The AML/CTF CO may then take any of the following actions:
  - undertake an internal spot check on the employee’s performance to check compliance with ASTERO PAY’s policies and procedures;
  - implement a higher level of supervision of the employee;

- provide a warning to the employee for non-compliance with procedures and breach of the Program; or
- if breaches are repeated without reasonable excuse, consider transferring or dismissing the employee in consultation with the Board.

18. RISK AWARENESS TRAINING PROGRAM

18.1 ASTERO PAY will implement a Risk Awareness Training Program ("RATP") designed to ensure each employee receives appropriate ongoing training on the ML/TF risk that ASTERO PAY may face.

18.2 The RATP is designed to enable employees to understand:

- ASTERO PAY's obligations under the AML/CTF Act and Rules;
- the consequences of non-compliance with the AML/CTF Act and Rules;
- the type of ML/TF risk that ASTERO PAY might face and the potential consequences of such risk; and
- those processes and procedures provided for by this Program which are relevant to the work carried out by the employee.

18.3 All new employees are required to undergo the RATP as part of their induction process. All employees that are in positions identified as having ML/TF risk are required to undertake training on an annual basis, or whenever the AML/CTF CO considers necessary, for example when a new product or delivery channel is introduced.

18.4 The AML/CTF CO is responsible for maintaining the training register for both the induction training and any ongoing training conducted for each employee.

18.5 **Ongoing Compliance Training** – The AML/CTF CO may decide when compliance training by an external compliance consultant is necessary. The AML/CTF CO must, upon completion of the training, make the training materials available to all employees. From time to time some employees, depending on the nature of their role and responsibilities, may be required to undertake additional training as directed by the AML/CTF CO.

18.7 **Non-attendance of Training Sessions** – Non-attendance at any training sessions, without reasonable excuse, is not acceptable and d the AML/CTF CO will take any disciplinary action they consider necessary.

19. OUTSOURCING

OUTSOURCING	
Outsourcing - due diligence requirements:	Prior to ASTERO PAY outsourcing any of its AML/CTF obligations, (if it is deemed necessary) it will: • have an agreement in place with the party to whom the activities are outsourced ("Third Party Providers"); • where relevant, require the Third-Party Providers to whom the activities are outsourced to implement the policies and procedures outlined in this Program; • assess the risk associated with the outsourcing of the particular activity; • conduct due diligence on the activities outsourced to ensure that outsourcing these activities and services will not increase the ML/TF risk ASTERO PAY faces; • conduct due diligence on the Third-Party Providers to ensure that outsourcing activities to these parties will not increase the ML/TF risk ASTERO PAY faces; • ensure that all Third-Party Providers understand: o ASTERO PAY's obligations under the AML/CTF Act and Rules; o the consequences of non-compliance with the AML/CTF Act and Rules; o the type of ML/TF risk ASTERO PAY might face and the potential consequences of such risk; and o those processes and procedures provided for by this Program that are relevant to the work carried out by the employee.
Additional due diligence requirements where outsourcing customer identification functions:	In addition to the due diligence requirements above, ASTERO PAY will: • conduct due diligence on the Third-Party Providers to ensure they hold the appropriate licenses and/or registrations with any other relevant regulator; • ensure the agreement in place between ASTERO PAY and Third-Party Providers permits access to the KYC records of ASTERO PAY's clients. When assessing the ML/TF risk associated with a Third-Party Provider undertaking customer identification procedures on its behalf having regard to the following factors: • the existence and quality of Third-Party Providers' AML/CTF Policy;

	• the resources of Third-Party Providers and access to technological resources; • the outcome of the assessment undertaken in respect of Third-Party Providers; and • quotes received and references from former and current partners of Third-Party Providers.
Reviews:	The AML/CTF CO will undertake annual reviews of all Third-Party Providers to assess whether the Third-Party Provider: • has performed their functions within the scope of the agreement with ASTERO PAY; • maintains appropriate resources, licence and registrations (where applicable; • has caused an increase in the ML/TF risk ASTERO PAY faces.

19.1 ASTERO PAY maintains a separate Third-Party Providers register, detailing:

THIRD PARTY PROVIDER REGISTER	
Service Provider	**Service Outsourced**
Sum-sub	Customer Identification and Verification and AML Screening against PEP and Sanctions List
Name Scan	Customer Identification and Verification and AML Screening against PEP and Sanctions List
Sum-Sub	Transaction Monitoring

20. PROVISION OF DESIGNATED SERVICES THROUGH PERMANENT ESTABLISHMENTS IN FOREIGN COUNTRIES

20.1 If at anytime ASTERO PAY begins to provide designated services at or through permanent establishments in other foreign countries, the AML/CTF CO will review this Program in its entirety, prepare a risk assessment and propose any necessary changes to the Board for approval. The Board will, in consultation with s any external compliance consultant, review and consider the proposed changes taking into account of any ML/TF risks imposed by provision of designated services through a permanent establishment in that particular jurisdiction.

21. RECORD KEEPING OBLIGATIONS RELATING TO CUSTOMER IDENTIFICATION AND THE PROVISION OF DESIGNATED SERVICES

21.1 A copy of customer records will be retained for at least seven (7) years after ASTERO PAY has ceased to provide designated services to the customer.

21.3 Records to be retained under this section (whether in electronic or hard copy form) must be easily identifiable, easily located and easily retrievable, in order to:

- provide the record to an AUSTRAC authorized officer within a reasonable period; and
- demonstrate to the AUSTRAC authorized officer that ASTERO PAY has complied with the obligations under subsection 112(2) of the AML/CTF Act.

21.4 A copy of any other record made by ASTERO PAY or received from a customer in relation to the provision of a designated service to the customer must be retained for seven (7) years after the record is made or received.

22. TRANSACTION MONITORING

22.1 ASTERO PAY's transaction monitoring program consists of

- Monitoring all customer transactions
- Identifying all suspicious transactions; and
- Taking the appropriate action.

22.5 As required by the AML/CTF Act, ASTERO PAY will provide reports to AUSTRAC in an approved form that contains the required information. The table below provides a summary of ASTERO PAY's reporting obligations:

SUMMARY OF REPORTING OBLIGATIONS				
Compliance Obligations	**Compliance Requirements**	**Compliance Actions**	**Responsible Person**	**Frequency**
Annual AUSTRAC Compliance Report	Submit the annual compliance report to AUSTRAC by the deadline.	Ensure that AUSTRAC Compliance Report is completed in line with AUSTRAC regulations and are submitted accordingly – usually by 31 March each year.	AML/CTF CO	Annually
Changes to ASTERO PAY's AUSTRAC enrolment	Notify AUSTRAC of any change in business details.	Ensure that changes to ASTERO PAY's business details are reported to AUSTRAC within fourteen (14) days.	AML/CTF CO	As required – within fourteen (14) days.

Suspicious Matter Reporting (SMR)	Implement and monitor SMR procedures.	Ensure all SMRs are reported to AUSTRAC within the required time frame. An SMR must be submitted within three (3) business days of forming the suspicion. If the suspicion relates to the financing of terrorism, the SMR must be submitted within twenty- four (24) hours of forming the suspicion.	AML/CTF CO	As required - within three (3) business days or twenty-four (24) hours.
Threshold Transaction Reporting (TTR)	Implement and monitor TTR procedures.	Ensure all TTRs are reported to AUSTRAC within ten (10) business days of the threshold transaction taking place.	AML/CTF CO	As required - within ten (10) business days.
International Fund Transfer Instructions (IFTI)	Implement and monitor IFTI procedures.	Ensure all IFTIs are reported to AUSTRAC within ten (10) business days of sending or receiving the instruction.	AML/CTF CO	As required - within ten (10) business days.

22.6 ASTERO PAY will use the following methods for electronic reporting via AUSTRAC Online at*https://online.AUSTRAC.gov.au/ao/login.seam*:

- **Spreadsheets (for AML/CTF reports)**: Reports can also be entered into a specially designed spreadsheet or Microsoft Excel template (available through AUSTRAC Online account or upon request to AUSTRAC respectively).

23. SUSPICIOUS MATTER REPORTING

23.1 ASTERO PAY adopts a 'Red Flag' policy which requires employees to complete a Red Flag Indicator Sheet (please refer to Annexure B of this Program) for each new client and as a procedure to conduct ongoing transaction monitoring. ASTERO PAY's policies and procedures for suspicious matter reporting are set out in the table below

<table>
<tr><th colspan="2">SUSPICIOUS MATTER REPORTING</th></tr>
<tr><td>Responsible Person</td><td>AML/CTF CO</td></tr>
<tr><td>Supervision</td><td>The Board of ASTERO PAY has overall responsibility and oversight of ASTERO PAY's transaction reporting and monitoring program.</td></tr>
<tr><td colspan="2">1. What are the Suspicious Matter Reporting obligations?</td></tr>
<tr><td>General Rules</td><td>ASTERO PAY must submit a SMR to AUSTRAC if:
• ASTERO PAY commences to provide, or proposes to provide, a designated service to a customer ; or
• a customer requests ASTERO PAY provides a designated service (of a kind ordinarily provided by us), or
• a person makes an enquiry to ASTERO PAY as to whether it would be willing provide a designated service (of a kind ordinarily provided by ASTERO PAY);

and ASTERO PAY forms a suspicious on reasonable grounds that:
• the customer is not who they claim to be, or
• information we have maybe:
o relevant to the investigation or prosecution of a person or institution for:
📫 an offence against a law of the Commonwealth,a State or Territory;
📫 an evasion, or an attempted evasion, of a taxation law (as defined in the Taxation Administration Act 1953 (Cth)) or a law of a State or Territory that deals with taxation; or
📫 a ML/TF offence;
o of assistance in the enforcement of laws relating to proceeds of crime; or</td></tr>
</table>

	• providing a designated service maybe: o preparatory to committing an offence related to ML or TF, or o relevant to the investigation or prosecution of a person for an offence related to ML or TF.
Who is covered by the general rules?	Existing, new, or potential customers.
When to report to AUSTRAC?	ASTERO PAY must report a matter to AUSTRAC if a reasonable person would conclude from all the circumstances and information available that an SMR must be submitted. ASTERO PAY's employees and AML/CTF CO are NOT necessarily expected to know or to establish: • the exact nature of any criminal offence the customer maybe involved in, or • particular funds or property have been acquired through illicit or criminal means.
2. Identification of Suspicious Activities and Suspicious Customer Behaviour	
Red Flag Policy	ASTERO PAY adopts a 'Red Flag' policy which requires employees to complete the Red Flag Indicators Sheet and put a red flag when a red flag indicator exists.
Red Flag Indicators	ASTERO PAY develops a list of Red Flag Indicators Sheet (Annexure B). This sheet is updated on an ongoing basis. ASTERO PAY requires a copy of Annexure B to be completed: • for each new client – before the provision of a designated service; and • for existing clients – on an annual basis or whenever the AML/CTF CO considers necessary.
What happens when a Red Flag is identified?	**Reporting Line:** 

	Existence of 1 Red Flag:

	The employee responsible should: • refer the matter to the immediate attention of their supervisor and then conduct the enhanced due diligence procedures after consultation with the employee's supervisor – the employee must not discuss the matter with anyone else except his/her immediate supervisor or the AML/CTF CO; • the supervisor will report to the AML/CTF CO once the results of enhanced due diligence are received; and • the AML/CTF CO will then make an assessment on whether an SMR is required.
Suspicion in relation to the identity of a customer	If the AML/CTF CO is notified of a suspicion relating to the identity of the customer, the AML/CTF CO must, within fourteen (14) days commencing after the day on which the AML/CTF CO was notified of the suspicion, do one of the following for the purpose of enabling the ASTERO PAY to be reasonably satisfied that the customer is the person that he or she claims to be: • review all KYC information in respect of the customer; • re-verify, from a reliable and independent source, any KYC Information that has been obtained in respect of the customer; or • verify, from a reliable and independent source, any previously unverified KYC Information that has been obtained in respect of the customer. If: • after reviewing the enhanced due diligence information from a customer in accordance with this Program, the AML/CTF CO is still not satisfied that the customer is who they claim to be; or • the AML/CTF CO is unable to collect any additional information from the customer, then the AML/CTF CO must make a SMR to AUSTRAC.
Suspicion in relation to an existing customer	If the AML/CTF CO forms a reasonable suspicion in respect of an existing customer of ASTERO PAY, the AML/CTF CO must, within fourteen (14) days commencing after the day on which the AML/CTF CO formed the suspicion, carry out the applicable customer identification procedures in Part B.
3. Discussion or Communication about the SMR	
Immediate Supervisor or	ASTERO PAY's employees or representatives must ONLY discuss the matter with their immediate supervisor, or the AML/CTF CO when their immediate supervisor is not available, unless as otherwise authorized by the AML/CTF CO.

the AML/CTF CO	After the employee forms an initial suspicion about a customer, he/she should use discretion when making further inquiries about the customer, to minimize the risk of the customer realizing an SMR has been submitted about them.
AUSTRAC CEO	Once ASTERO PAY has fulfilled the obligation to provide the relevant information about a suspicious matter to the AUSTRAC CEO , ASTERO PAY's employees and representatives must not disclose to anyone other than the AUSTRAC CEO or a member of the staff of AUSTRAC that the information has been communicated to the AUSTRAC CEO.
4. Submitting an SMR	
Assessment of the situation and SMR	If ASTERO PAY's AML/CTF CO receives a notification in relation to a suspicious matter, the AML/CTF CO must: • assess the information which led the employee to form a suspicion; and • determine whether a SMR should be lodged. If the AML/CTF CO determines that a SMR must be lodged in relation to a customer, ASTERO PAY will: • keep all records of the results of any enhanced customer due diligence conducted; and • report the suspicion to the AUSTRAC CEO through submitting an SMR in an approved form in accordance with the requirements of the AML/CTF Act and Rules: o within twenty-four (24) hours after the time when the AML/CTF CO forms the relevant suspicion, if the matter relates to Terrorist Financing; or o in all other cases, within three (3) business days after the time when the AML/CTF CO forms the relevant suspicion; • consult with AUSTRAC and other relevant enforcement agencies to determine how best to deal with the customer, if required; and • continue to transact with the customer on the usual basis until further advised by AUSTRAC and other relevant enforcement agencies.
5. Can ASTERO PAY continue providing services if it has formed a suspicion about the customer?	
The AML/CTF Act does not direct reporting entities to stop providing designated services to, or terminate a business relationship with, a customer, even if ASTERO PAY has formed a suspicion about that particular customer. ASTERO PAY must determine whether to terminate the relationship with the customer based on its own risk-assessment, procedures, and controls. The AML/CTF CO will, after submitting an SMR, make an assessment as to whether to continue transact with the customer. Astero PAY decides to continue the business relationship:	

• ASTERO PAY must not disclose to the customer that it has formed a suspicion and/or communicated the suspicion to AUSTRAC – this is referred to as "tipping off" the customer; and • ASTERO PAY must continue to comply with the AML/CTF Act in all future dealings with that customer, which may include submitting additional SMRs.	
Tipping Off Provisions	ASTERO PAY must NOT disclose to any person (other than AUSTRAC) that it formed a suspicion about a customer or that it submitted an SMR to AUSTRAC. Doing so would constitute 'tipping off', which is an offence prohibited by section 123 of AML/CTF Act. Reporting Entities that submit SMRs also have additional obligations under the AML/CTF Act not to disclose any: • information that might reasonably lead a person to conclude that they formed a suspicion about a customer or that we communicated that suspicion to AUSTRAC; and • requests from AUSTRAC for further information about an SMR report. AUSTRAC considers that simply asking a customer for additional information (for example, about their identity or the source or destination of their funds) would not constitute an unlawful disclosure of information or an offence under the tipping off provisions of the AML/CTF Act. There are exemptions under the AML/CTF Act for the tipping off provisions which includes when ASTERO PAY communicates a suspicion to a legal practitioner to obtain legal advice.
6. Other Resources	
• AUSTRAC Website:http://www.AUSTRAC.gov.au/suspicious-matter-reports-smrs The Australian Typologies and Case Studies Reports, available athttp://www.AUSTRAC.gov.au/typologies.html • Financial Action Task Force and its guidance, available at: HTTP://www.fatf-gafi.org •	

24. TRANSACTION REPORTING - THRESHOLD TRANSACTION REPORTS

24.1 Definitions:

- **Fiat Currency** – A government issued currency that is not backed by physical commodities

○

24.2 Under the AML/CTF Act, if ASTERO PAY provides a designated service to a customer which involves the transfer of a of AUD10,000 or more (or the foreign currency equivalent), ASTERO PAY must submit a threshold transaction report ("TTR") to AUSTRAC.

24.3 All employees of ASTERO PAY must notify their immediate supervisor of any transactions relating to transaction with a value of AUD10,000 or more (or the foreign currency equivalent) immediately.

24.4 The supervisor will then report to ASTERO PAY's AML/CTF CO on a daily basis and the AML/CTF CO will submit a TTR to the AUSTRAC CEO within ten (10) business days of the threshold transaction taking place.

24.5 The TTR must be in the approved form and sent in accordance with the requirements of the Rules. Please see details of the requirement in the table below.

What should be included in a TTR?	
General Requirements:	a. The date of the threshold transaction; b. A description of the designated service provided or commenced to be provided by ASTERO PAY to the customer which involves the threshold transaction; c. The total amount of funds provided to or received from the customer; and d. Details of the threshold transaction,

Additional Requirement -s	a. The name of the customer and any business name(s) under which the customer operates; b. A description of the legal form of the customer and any business structure it is apart of, if known; c. The full address of the customer's principal place of business; d. The postal address of the customer if different from the full address; e. The ACN, ARBN and/or ABN of the customer, if known; f. The customer's telephone number, if known; and g. The details of the person conducting the threshold transaction.

25. TRANSACTION REPORTING - INTERNATIONAL FUNDS TRANSFER INSTRUCTION REPORTS - INTERNATIONAL FUNDS TRANSFER INSTRUCTION UNDER A DESIGNATED REMITTANCE ARRANGEMENT

25.1 Under the Act, if a Reporting Entity sends or receives an instruction:

- accepted at or through a permanent establishment of a 'non-financier' in Australia, where the person who receives the instruction is to make, or arranges to make, money or property available to the ultimate transferee at or through a permanent establishment of a person in a foreign country; or
- accepted at or through a permanent establishment of a person in a foreign country where a 'non-financier' is to make, or arranges to make, money or property available to the ultimate transferee through a permanent establishment of the non-financier in Australia;

they must submit an international funds transfer instruction under a designated remittance arrangement ("**IFTI-DRA**") report to AUSTRAC.

25.2 The term 'non-financier' is defined in section 5 of the Act as a person who is not an ADI, a bank,a building society,a credit union or a person specified in the AML/CTF Rules.

25.3 The IFTI report must be in the approved form and sent in accordance with the requirements of the AML Rules. Section22.6sets out three (3) different ways of preparing IFTI reports. Depending on the size of ASTERO PAY's business, ASTERO PAY may use different report formats as determined by the AML/CTF CO.

25.4 The table below outlines the details of the requirement:

<table>
<tr><th colspan="2">IFTI - DRA</th></tr>
<tr><td>Rules</td><td>Under the Act, if a Reporting Entity sends or receives an instruction to or from a foreign country for a transfer of money or property under a remittance arrangement, they must submit an IFTI report to AUSTRAC. The reporting obligations for IFTIs are set out in section 45 and 46 of the Act.</td></tr>
<tr><td>IFTI-DRA</td><td>IFTI-DRAs are set out in item 3 and item 4 of section 46 of the Act. ASTERO PAY is a designated remittance services provider and will be required to lodge IFTI-DRA under the Act.

There are two types of IFTI-DRAs:

a. IFTI-DRA (outgoing)

These are instructions transmitted out of Australia.

b. IFTI-DRA (incoming)

These are instructions transmitted into Australia.</td></tr>
<tr><td>ASTERO PAY's Process</td><td>a. When an employee of ASTERO PAY receives an international funds transfer instruction from a customer, they must refer this instruction immediately to their supervisor;
b. The supervisor will report to the AML/CTF CO on a daily basis on all international funds transfer instructions; and
c. The AML/CTF CO must submit an IFTI-DRA in an approved form to the AUSTRAC CEO within 10 business days of the transaction taking place.</td></tr>
</table>

Information required for an IFTI-DRA (Outgoing)	a. ASTERO PAY must complete all required elements of the relevant form (for single transaction report) or the spreadsheet (for bulk transaction reports) via AUSTRAC Online. b. **Where the transferor is an institution**: the information required in an IFTI-DRA is included in section 17.2(2) of the AML/CTF Rules. c. **Other information required**: is included in section 17.2(3)-(13) of the AML/CTF Rules.
Information required for an IFTI-DRA (Incoming)	a. ASTERO PAY must complete all required elements of the relevant form (for single transaction report) or the spreadsheet (for bulk transaction reports) via AUSTRAC Online. c. **Where the transferor is an institution**: the information required in an IFTI-DRA is included in section 17.3(2) of the AML/CTF Rules. d. **Foreign entity that accepts instructions from the transferor - if the foreign entity is an institution** is included in section 17.3(3)(b) of the AML/CTF Rules. e. **Other information required** : is included in section 17.3(4)-(14) of the AML/CTF Rules.
IFTI Reports - information on the person completing the form	A report under subsection 45(2) of the Act must contain the following details about the person completing the report: a. Full name; b. Job title or position; c. Telephone number; and d. Email address.

26. AML/CTF COMPLIANCE REPORTS

26.1 ASTERO PAY is required to submit an AML/CTF Compliance Report to AUSTRAC between 3 January and 31 March for the preceding calendar year in the form specified by AUSTRAC.

26.2 The AML/CTF CO is responsible for the submission of this report.

27. CHANGES TO ASTERO PAY'S AUSTRAC ENROLMENT/REGISTRATION DETAILS

27.1 Part 8.9.1 of the Rules outlines the requirement of ASTERO PAY to report to AUSTRAC any material changes in circumstances under section 75M of the AML/CTF Act; and

27.2 ASTERO PAY is required to report the following changes in its enrolment details to AUSTRAC within fourteen (14) days of the change:

- changes to enrolment details on AUSTRAC Business Profile Form which can be obtained from ASTERO PAY's AUSTRAC Online Account;
- changes in the number of key personnel at ASTERO PAY and a declaration that a police and bankruptcy checks have been obtained;
- whether any key personnel of ASTERO PAY have been criminally charged; and
- whether ASTERO PAY is the subject of civil or criminal proceedings or enforcement action.

27.3 Notification of a change of ASTERO PAY's enrolment details may be made by an agent Astero PAY where:

- there is a current written agreement in place between the agent of ASTERO PAY and ASTERO PAY, or ASTERO PAY has provided to the agent of ASTERO PAY a written authority;
- that agreement or written authority authorizes the agent to notify, on behalf of ASTERO PAY, a change in the enrolment details of ASTERO PAY on the Reporting Entities Roll; and
- the notification of a change in ASTERO PAY's enrolment details includes a declaration by the agent that the information is true, accurate and complete.

28. REQUEST TO OBTAIN INFORMATION FROM A CUSTOMER

28.1 Where ASTERO PAY has provided or is providing a designated service to a customer and the AML/CTF CO believes, on reasonable grounds, that a customer has information that may assist ASTERO PAY in the identification, management and mitigation of ML or TF risk, the AML/CTF CO may request the customer to provide them with any such information. The request must be provided in writing and notify the customer that if the request is not complied with, then ASTERO PAY may do any or all of the following until the information covered by the request is provided:

a refuse to continue to provide a designated service;

b refuse to commence to provide a designated service; or

c restrict or limit the provision of the designated service to the customer.

28.2 If the customer does not comply with the request within a reasonable time then the AML/CTF CO may determine that, until the information covered by the request is provided, ASTERO PAY will take any of the actions included in section28.1(a) – (c).

28.3 In these circumstances, the AML/CTF CO will determine whether the matter should be reported to AUSTRAC as a suspicious matter (please refer to section 23of this Program).

29. ONGOING CUSTOMER DUE DILIGENCE

29.1 ASTERO PAY, as a Remittance Exchange Provider, will monitor its own customers in accordance with this Section for the purpose of identifying, mitigating and managing the ML/TF risk that the provision of a designated service at or through a permanent establishment in Australia may involve.

29.2 ASTERO PAY will comply with the ongoing customer due diligence procedures outlined in the table below.

<table>
<tr><th colspan="4">ONGOING CUSTOMER DUE DILIGENCE MANAGEMENT SYSTEM</th></tr>
<tr><td>Types of customers that the Reporting Entity will provide services to:</td><td>a. Companies.</td><td>Types of customers that the Reporting Entity will not provide services to:</td><td>a. Trusts;
b. Trustees and beneficiaries;
c. Partnerships;
d. Associations;
e. Registered cooperatives;
f. Government bodies; and
g. Agents.
h. Institutions with PEPs</td></tr>
<tr><td>Review of Customer types:</td><td colspan="3">The AML/CTF CO is responsible for reviewing and updating the customer types that we provide services to on an ongoing basis.</td></tr>
<tr><td colspan="4">Astero Pay will monitor customers by implementing systems to:
a. collect further KYC Information for ongoing customer due diligence processes;
b. update and verify KYC Information for ongoing customer due diligence purposes;
c. monitor the transactions of customers; and
d. conduct enhanced customer due diligence on customers about whom a suspicion has been formed.</td></tr>
</table>

Grouping of customers:	As part of implementing systems for ongoing customer due diligence purposes, Astero Pay will group customers according to their level of risk, which has been assessed as part of the risk assessment procedures outlined in this Program. The risk grouping will determine: a. what further KYC Information needs to be collected for ongoing customer due diligence purposes in respect of a particular customer; b. what level of transaction monitoring needs to be conducted in relation to a customer; and
ADDITIONAL KYC INFORMATION	
Risk Assessment for New Activities and Technologies:	In undertaking the risk assessment for new activities and technologies, the AML/CTF CO will determine whether any additional KYC Information or Beneficial Owner information should be collected from relevant customers either before any designated services are provided to the customer or during the course of ASTERO PAY's relationship with the customer. These requirements will be incorporated into the relevant customer identification procedures.
Assessment on the level of ML/TF risk involved for different type of customers:	Based on the assessed level of the ML/TF risk involved in the provision of designated services provided by Astero Pay as at the date of this Program, ASTERO PAY has determined that: • **Low Risk Customers -** no additional KYC Information needs to be collected; • **Medium Risk Customers -** the AML/**CTF** CO will determine what additional KYC Information or Beneficial Owner information will be collected as ongoing customer due diligence. • **High Risk and Sever Risk Customers -**to be put on hold and not transact

New Customers:	In respect of a new customer, the additional KYC Information will be collected at the same time as and in the same manner as the KYC Information is required to be collected under Part B. Failure to provide additional KYC Information will be treated in the same way as the failure to provide any other KYC Information collected under Part B.
Existing Customers:	In respect of an existing customer or Beneficial Owner,Astero Pay will update and re-verify KYC Information by requesting additional KYC Information where the AML/CTF CO considers the KYC Information is no longer up-to-date, incomplete or unreliable.Astero Pay may also request additional KYC information where the scope of the services provided to an existing customer changes.
WHEN TO UPDATE AND RE-VERIFY KYC INFORMATION:	Astero Pay will update and re-verify KYC Information in respect of a customer where: a. a significant transaction occurs if a transaction, or series of transactions conducted within any calendar month exceeds Ten Thousand Dollars (AUD10,000.00) in value; or b. a significant change occurs: • in the way the customer conducts transactions; • in the nature of the customer's business or business relationship; • in the customer's control structure; • in the customer's beneficial ownership; or\ • in the number of transactions carried out by a customer increases by 100% within a five (5) calendar day period.

TRANSACTION MONITORING PROGRAM	
Responsible Persons:	The Director and the AML/CTF CO have overall responsibility and oversight of Astero Pay's transaction- monitoring program. Astero Pay will conduct transaction monitoring on a daily basis.
Identification of Risk Factors:	The AML/CTF CO must identify ML/TFrisk factors relevant to customers of particular services and products provided by us. Such risk factors include the: a. value of the transaction exceeds Ten Thousand Dollars (AUD10,000.00) or equivalent b. volume of transactions conducted by a customer within a five (5) calendar day period has increased by more than one hundred percent (100%); c. transaction involves foreign countries, customers or third parties against whom sanctions have been imposed or have been included on the lists maintained by the Department of Foreign Affairs and Trade under the Charter of United Nations (Terrorism and Dealings with Assets) Regulations 2002 (Cth); or d. transaction involves a customer or third party who is a PEP.
Steps to Take After One or More Risk Factors Have Been Identified:	a. An employee must immediately inform the AML/CTF CO when any ML or TF risk factor(s) are identified in relation to a customer or a customer's representative; b. The AML/CTF CO will then liaise with the Board in relation to any further action by Astero Pay including, but not limited to the items listed in the "**Further Actions to take**" section below. c. Where an employee identifies a customer or third party of a kind specified in item (c) and (d) in "**Identification of Risk factors**" section above, the AML/CTF CO will take such appropriate action as is necessary, including seeking further information from the customer or their representative or from another source, to determine, with a reasonable degree of certainty, whether the customer is that person.

Further Actions to Take:	If it is determined, as a result of transaction monitoring, that: a. KYC Information needs to be updated or verified in respect of a customer, ASTERO PAY will update or verify the required information with Section29of this Program; b. a suspicious matter report needs to be lodged in respect of a customer, ASTERO PAY will follow the procedure outlined in Section23of this Program.
Training on Identification of Risk Factors:	In addition to the Risk Awareness Training referred to in this Program, the AML/CTF CO will ensure that all employees of ASTERO PAY who have direct contact with customers or their representatives, receive regular training in the identification of ML/TF risk factors.
Review and Update of ASTERO PAY's Transaction Monitoring Program:	The AML/CTF CO, in consultation with the Board, must regularly assess ASTERO PAY's transaction monitoring program and should take steps to have this modified appropriately: a. where there has been a significant change in the ML or TF risk relating to designated services provided by ASTERO PAY; b. prior to ASTERO PAY introducing a new designated service to the market; c. prior to ASTERO PAY adopting a new method of delivering a designated service; d. prior to ASTERO PAY adopting a new technology or developing technology used for the provision of an existing or new designated service; and e. where the AML/CTF CO identifies changes arising in the nature of the business relationship, control structure or beneficial ownership of ASTERO PAY's customers.
ENHANCED CUSTOMER DUE DILIGENCE PROGRAM	
Responsible Persons:	The AML/CTF CO has overall responsibility and oversight of ASTERO PAY's enhanced customer due diligence program.
Factors for Conducting Enhanced Customer Due Diligence Program:	All customers must go through Enhanced Due Diligence by filling and signing the Enhanced Due Diligence form and providing all required documents for on-boarding. Where information and documents provided are not satisfactory, the Compliance Manager will request for more information until satisfactory information and documents are provided.

Steps to Take where an existing customer is perceived to be high risk or severe risk	Where one or more of the factors above arises, the AML/CTF CO will arrange for one or more of the following due diligence procedures to occur:
	
	• seek further information from the customer or from third party sources in order to:
	    o clarify or update the customer's KYC Information or Beneficial Owner information already collected from the customer, in accordance with 'Additional KYC Information' above under this Section.
	    o obtain any further KYC Information or Beneficial Owner information in accordance with 'Additional KYC Information' above under this Section, including where appropriate, taking reasonable measures to identify:
	        📬 the source of the customer's and each Beneficial Owner's wealth; and
	        📬 the source of the customer's and each Beneficial Owner's funds; and
	    o clarify the nature of the customer's ongoing business with ASTERO PAY Pty Ltd.
	• conduct more detailed analysis in respect of the customer's KYC Information and Beneficial Owner information taking reasonable measures to identify:
	    o the source of the customer's and each Beneficial Owner's wealth; and
	    o the source of the customer's and each Beneficial Owner's funds;
	• verify or re-verify KYC Information or Beneficial Owner information in accordance with the customer identification program outlined in Part B of this Program;
	• conduct more detailed analysis and monitoring in respect of the customer's activities and transactions – both past and future, including but not limited to:
	    o the purpose, reasons for, or nature of specific transactions;
	    o the expected nature and level of transaction behaviour, including future transactions;
	• consider whether a Suspicious Matter Report ought to be lodged in accordance with section 41 of the AML/CTF Act (refer to Section23of this Program);
	
	when the customer has been confirmed to be high risk or severe risk the account will be suspended and Astero Pay will not provide service to this customer.

30. RESTRICTED JURISDICTION

1 Abkhazia	13 Guinea-Bissau	25 Russia
2 Afghanistan	14 Iran	26 Sahrawi Arab Democratic
3 Angola	15 Iraq	27 Somalia Republic
4 Armenia	16 Ivory Coast	28 South Ossetia
5 Belarus	17 Japan	29 South Sudan
6 Burma (Myanmar)	18 Lebanon	30 Sudan
7 Burundi	19 Liberia	31 Syria
8 Canada	20 Libya	32 Ukraine
9 Central African Republic	21 Mali	33 United States of America
10 Congo	22 Nicaragua	34 Venezuela
11 Cuba	23 North Korea	35 Yemen
12 Ethiopia	24 Northern Cyprus	

31. LIST OF PROHIBITED ACTIVITIES

The following business activities are prohibited and Astero Paywill not on-board businesses who engage in such acclivities

A. Illegal products and services

i. Illegal drugs, substances designed to mimic illegal drugs, and equipment designed for making or

using drugs

ii. Fake references or ID-providing services

iii. Telecommunications manipulation equipment including jamming devices

iv. Any business or organization that a. engages in, encourages, promotes or celebrates unlawful violence or physical harm to persons or property, or b. engages in, encourages, promotes or celebrates unlawful violence toward any group based on race, religion, disability, gender, sexual orientation, national origin, or any other immutable characteristic

v.Any other products or services that are in violation of law in the jurisdictions where our business is located or targeted to

B. Products and services that infringe intellectual property rights

i. Sales or distribution of music, movies, software, or any other licensed materials without appropriate

authorization.

ii. Counterfeit goods; illegally imported or exported products

iii. Unauthorized sale of brand name or designer products or services

iv. Any other products or services that directly infringe or facilitate infringement upon the trademark, patent, copyright, trade secrets, proprietary or privacy rights of any third party

C. Products and services that are unfair, predatory, or deceptive

i. Pyramid schemes

ii. ‘Get rich quick’ schemes including: investment opportunities or other services that promise high rewards to mislead consumers; schemes that claim to offer high rewards for very little effort or up front work; sites that promise fast and easy money; businesses that make outrageous claims, use deceptive testimonials, use high-pressure up-selling, and/or use fake testimonials; (with or without a written contract) offering unrealistic incentives/rewards as an inducement to purchase products or services but do not respond to any queries after the purchase.

iii. No value added services including sale or resale of a service without added benefit to the buyer and resale of government offerings without authorization or added value.

V.Sales of online traffic or engagement

vi. Negative response marketing and telemarketing

vii. Predatory mortgage consulting, lending, credit repair and counseling services

viii. Predatory investment opportunities with no or low money down

ix. Remote technical support; mugshot publication or pay-to-remove sites; essay mills; chain letters; door-to-door sales

x. Any other businesses that Astero Pay considers unfair, deceptive, or predatory towards consumers

D. Adult content and services

i. Pornography and other mature audience content (including literature, imagery and other media) depicting nudity or explicit sexual acts.

ii. Adult services including prostitution, escorts, pay-per view, sexual massages, and adult live chat features.

iii. Adult video stores

iv. Gentleman's clubs, topless bars, and strip clubs

E. Firearms, explosives and dangerous materials

i. Guns, gun-powders, ammunition, weapons, fireworks and other explosives

ii. Peptides, research chemicals, and other toxic, flammable and radioactive materials

F. Gambling

i. Games of chance including gambling, internet gambling, sweepstakes and contests, fantasy sports leagues with for a monetary or material prize.

ii. Sports forecasting or odds making with a monetary or material prize

iii. Lotteries

iv. Bidding fee auctions

G. Marijuana

i. Cannabis products

ii. Cannabis dispensaries and related businesses

iii. Products containing any amount of CBD/THC

Other prohibited business activities include, Cash intensive Businesses and Precious Metals

In addition it is prohibited to use Astero Pay's services in a false, manipulative, pretentious, misleading manner. It is also prohibited to use Astero Pay for services that deliberately evades another's privacy, deliberately infringes on another's intellectual property or deliberately puts another person in danger or at risk.

This list may be updated from time to time.

Issued by the Board of ASTERO PAY PTY LTD

Name: Shantnu Saxena

Title: CEO

Signature: