

Anti-Money Laundering Laws and Automatic Exchange of Information

1 July 2017



This document provides

- information about the investor identification requirements under Anti-Money Laundering and Counter Terrorism Financing laws
- information about the Automatic Exchange of Information
- identification requirements for different types of investment accounts
- information about how we collect and use your personal information
- a checklist for completing an application for investment in Australian Unity funds

1. Anti-Money Laundering Laws

Australia's Anti-Money Laundering and Counter Terrorism Financing ('AML/CTF') laws requires Australian Unity to adopt and maintain an AML/CTF program. To meet this legal requirement, we need to collect certain identification information and documentation (Know Your Client (KYC) Documents) from new investors. If you are applying through a financial adviser, your financial adviser will assist you in providing the necessary identification documents prior to lodging the application.

If you are submitting your application directly (without the assistance of a financial adviser), please refer to 'Applying for different types of investment accounts' on page 3 for the identification documents that should be provided with your application. Please note that your identification documents must be certified by an approved certifier. Existing investors may also be asked to provide KYC Documents as part of a re-identification process to comply with the AML/CTF laws.

Processing of applications or withdrawals will be delayed or refused if investors do not provide the required KYC Documents when requested.

Under the AML/CTF laws, Australian Unity is required to submit regulatory reports to the Australian Transaction Reports and Analysis Centre ('AUSTRAC'). This may include the disclosure of your personal information. Australian Unity may not be able to tell you when this occurs. As a result, if instructed by AUSTRAC, Australian Unity may be required to deny you (on a temporary or permanent basis) access to your investment. This could result in loss of the capital invested, or you may experience significant delays when you wish to transact on your investment.

We are not liable for any loss you may suffer because of compliance with the AML/CTF laws.

Politically Exposed Persons ('PEP')

To comply with AML/CTF laws we require you to disclose whether you (or any of your beneficial owners) are, or have an association with, a Politically Exposed Person ('PEP'). A PEP is an individual who holds a prominent public position or function in a government body or an international organisation in Australia or overseas, such as a Head of State, or Head of a Country or Government, or a Government Minister, or equivalent senior politician. A PEP can also be an immediate family member of a person referred to above, including spouse, de facto partner, child, and a child's spouse or a parent. A close associate of a PEP, i.e. any individual who is known to have joint beneficial ownership of a legal arrangement or entity is also considered to be a PEP. Where you identify as, or have an association with, a PEP, we may request additional information from you.

Source of investable assets/wealth

Under AML/CTF laws, we are required to identify your source of investable assets/wealth.

Non-individual entities – your beneficial owners

Your beneficial owner means an individual who ultimately ‘controls’ you (directly or indirectly) or owns you (directly or indirectly). ‘Control’ includes control (directly or indirectly) as a result of, or by means of trusts (including in the capacity as beneficiary, trustee or settlor), an agreement, an arrangement, an understanding or practice, and further includes the ability to exercise control over decisions about financial and operating policies. ‘Owns’ means ownership (either directly or indirectly) of 25% or more of you.

Under AML/CTF laws you are required to provide information about your Beneficial Owners for certain account types including:

- Australian incorporated or created entities such as:
 - unlicensed proprietary limited companies, not subject to regulatory oversight (note: not applicable for complying superannuation funds investors); or unregistered trusts, including family trusts.
- Entities incorporated or created outside of Australia such as:
 - companies;
 - partnerships;
 - trusts; or
 - estates.

These account types will be required to complete the ‘Beneficial Owner Information’ Form, which is available on our website australianunity.com.au or by calling our Investor Services team on 13 29 39.

Submitting your application without the assistance of a financial adviser

If you are submitting the Application Form directly, without having consulted with a financial adviser, you must submit certified copies of your identification documents with the Application Form. The required identification documents are set out under ‘Applying for different types of investment accounts’ on page 3.

Certification of documents

Where your identification documents need to be certified, we suggest that the person certifying the document(s) for you use the following statement on the copy being certified:

‘I certify this to be a true copy of [name of document] the original of which, was produced to me at the time of signing.’

The identification document must also be dated, and have the signature, printed name, occupation, employer and address of the person certifying the document.

Persons who may certify copies of original identification documents include:

- Officer with or authorised representative by an Australian Financial Services licence holder with two or more years of continuous service with one or more licensees.
- Chartered Accountant, CPA or member of the National Institute of Accountants with two or more years of continuous membership.
- Officer of a financial institution or finance company with two or more years of continuous service with one or more institutions or companies.
- Permanent employee of the Australian Postal Corporation with two or more years of continuous service, or someone who operates as an agent of the Australian Postal Corporation.
- Police Officer.
- A person who, under the law in force in a state or territory, is currently licensed or registered to practice as a: chiropractor, dentist, legal practitioner, medical practitioner, nurse, optometrist, pharmacist, physiotherapist, psychologist or veterinary surgeon.
- Lawyer, Magistrate, Registrar of a Court, Justice of the Peace.
- Notary Public (including persons authorised as a notary public in a foreign country).

A complete list of persons who may certify documents can be obtained from our website australianunity.com.au or by contacting us on 13 29 39.

2. Automatic Exchange of Information (‘AEOI’)

We intend to meet any requirements imposed on our funds under Australian legislation designed to give effect to the Automatic Exchange of Information (AEOI) regimes.

Australia’s obligations under AEOI regimes include legislation designed to give effect to the Foreign Account Tax Compliance Act (FATCA) and the Organisation for Economic Co-operation and Development’s (OECD) Common Reporting Standard (CRS). As such, we may collect certain information from you, report payments made in respect of your investment and retain information to meet record keeping requirements. It is recommended you consult with your tax advisor to discuss the impact these AEOI regimes may have on you.

3. Applying for different types of investment accounts

If you are applying through a financial adviser, your financial adviser will assist you in providing the necessary identification documents. The following identification documents are required if you are submitting your application directly, without the assistance of a financial adviser.

Please Note: Certain types of entities may also be required to provide information and identification documents in relation to your beneficial owners (see page 2). You will be required to complete the 'Beneficial Owner Information' Form.

Type of investor	Your account must be in the name of:	ABN, TFN(s) or exceptions to be submitted	Signature(s) required	Identification documents required (in support of the Application Form)
Individual account	The applicant e.g. Jane Citizen	The applicant	The applicant	Original certified copy of any of the following that identify your (the applicant's) full name and either date of birth and/or residential address: <ul style="list-style-type: none"> • Driver's Licence; or • Passport containing photo identification.
Joint account	Both or all joint applicants e.g. Jane Citizen and John Citizen	Each applicant	All joint applicants	
Partnership	All partners e.g. Jane Citizen & John Citizen	The partnership	All partners	<ul style="list-style-type: none"> • Original certified copy or certified extract of a partnership agreement; or • Original certified copy or certified extract of minutes of meeting. <p>For an individual partner, please provide the same type of information requested for an Individual account (referred to as Partnership – Individual).</p> <p>For a corporate partner, please provide the same type of information requested for a Company (referred to as Partnership – Corporate).</p>
Company	The name of the company e.g. Sample Company Pty Ltd.	The company	Two directors; or a director and a company secretary or if there is only one director, by that director	<ul style="list-style-type: none"> • Copy of the Certificate of Registration/Incorporation confirming the company's name, identification number and whether the company is a public or proprietary company. <p>For each director and/or secretary, please provide the same type of information requested for an Individual account.</p>
Superannuation fund	The trustee(s) of the fund and not the name of the Super Fund e.g. ABC Trustees ATF Jane Citizen Super Fund	The superannuation fund	The trustee(s), 'as trustee(s) for...'	<ul style="list-style-type: none"> • Original certified copy of first page and schedule of the Trust Deed. <p>For each trustee, please provide the same type of information requested for an Individual account.</p> <p>For corporate trustees, please provide the same type of information requested for a Company.</p>
Trust	The trustee(s) of the Trust and not the name of the Trust e.g. ABC Trustees ATF Jane Citizen Trust	The trust		
Estate	The executors of the estate e.g. Estate of the late Jane Citizen	The deceased person	The executor(s)	<ul style="list-style-type: none"> • Original certified copy of the grant of probate or Letters of Administration; or • Original certified copy of the Death Certificate. <p>For each executor, please provide the same type of information requested for an Individual account.</p>
Minor (a person under 18 years of age)	The adult's name in trust for the minor's name e.g. Jane Citizen ITF John Citizen Jr.	All adults	All adults investing on behalf of the minor	<ul style="list-style-type: none"> • Original certified copy of birth certificate or birth extract of the minor. <p>For adults please provide the same type of information requested for an Individual account.</p>

4. Providing your information

Your personal information

We collect your personal information for the following purposes:

- to administer and provide products and services and to manage our relationship with you;
- to process transactions;
- to answer queries and for security purposes;
- to develop products and services;
- to meet regulatory requirements; and
- to allow the Australian Unity Group to market products and services to you (subject to your right to opt-out of receiving various direct marketing materials at any time).

In managing your account, we may need to disclose your personal information to:

- your financial adviser, either directly or through other service providers (such as platform software including Xplan and Visiplan) which we may have arrangements with;
- reputable service providers who may carry out functions associated with our products and services on our behalf (e.g. mailing houses who conduct mailings for us);
- our Australian financial institution to initiate the drawing from or payment to your nominated Australian financial institution account (where you have selected the direct debit or credit facility); and
- a third party, as required by law.

You are entitled to access information we have about you.

You should notify us immediately if any of the information we hold about you changes, so that we can ensure that your information is always complete, accurate and up to date. If you do not provide the information requested on the Application Form, we may be unable to process your application request.

Your personal information will be collected, used and disclosed by us in accordance with our Privacy Policy and in accordance with the law.

You can obtain a copy of our Privacy Policy via our website australianunity.com.au/privacy-policy or by telephone 13 29 39.

Providing your Tax File Number ('TFN')

You may decide whether you wish to provide your TFN on the application. If we do not receive your TFN, ABN or appropriate exemption information, we must withhold tax at the highest marginal tax rate (plus levies) from distributions paid to you.

Changing your personal details

It is important that we maintain accurate records about you. Please inform us of any changes to your personal details as soon as possible.

You can change your personal details, such as mailing address, phone, mobile or email address, by logging into your account on our website portal, by sending us a request by mail, emailing us at investments@australianunity.com.au or contacting us on 13 29 39.

Please ensure that you provide us with the following information when requesting a change of personal details:

- your account number;
- the full name on your account;
- the change(s) you are requesting;
- a contact name and daytime phone or mobile number in case we need to contact you; and
- where the request is made by mail, ensure each signatory to the account signs the request.

Providing instructions via email or fax

We offer an email and fax service that allows you to send us instructions on your account. Any instructions which are submitted to us by email or fax must have your signature or that of an authorised signatory on your account.

By using our service, you are taken to have agreed and understood that neither we nor any part of the Australian Unity Group accept any responsibility or liability for any payment or action we make based on any instruction (even if not genuine) that we receive by email or fax bearing your account number, a signature which is apparently yours, or that of an authorised signatory on your account. This means that you cannot make a claim for such a thing as a fraudulent email or fax redemption request made by someone who has access to your investor code and a copy of your signature. You use the service entirely at your own risk.

5. Application Form checklist

Ensure you complete the relevant section according to your investor type outlined in the table below:

Investor type	Application Form Part A	Application Form Part B
Individual	Complete Section 1–10	Not applicable
Joint	Complete Section 1–10	Not applicable
Partnership - Individual	Complete Section 1–10	Not applicable
Partnership - Corporate	Complete Section 1–10	Complete relevant sections
Company	Complete Section 1–10	Complete relevant sections
Superannuation fund	Complete Section 1–10	Complete relevant sections
Trust	Complete Section 1–10	Complete relevant sections
Estates – Individual Executor	Complete Section 1–10	Complete relevant sections
Estates – Corporate Executor	Complete Section 1–10	Complete relevant sections
Other applicant types	Please contact us on 13 29 39 for assistance	

To ensure that we are able to process your Application Form quickly and efficiently, please 'X' that you have completed all of the following:

Account details

- Indicate whether you are a new investor or if you have an existing investor number (mandatory). Please note that if you have an existing investor number with us, you are not required to supply the required identification documents.

Investor details

- Indicate your investment type and provide your personal details (mandatory).

Mailing address

- Provide only if different from your residential address.

Contact details

- Provide your contact details.

Investment details (for new or additional investments)

- Indicate the type of interest(s) you wish to acquire and the amount you wish to invest (mandatory); and provide details for your Regular Savings Plan and Direct Debit Request instructions (if applicable).

Payments from your investment

- Indicate your preferred method of payment for distribution.

Adviser arrangements

- This section is to be completed by your financial adviser. If you are not using the services of a financial adviser, please leave blank.

Statements

- Indicate at this section if you would like to receive a printed copy of your statements when they are available.

Annual Report

- Indicate if you would like to receive a printed copy of the Fund's Annual Report. The Annual Report is also available from our website at australianunity.com.au.

Declarations and investor signature(s) (mandatory)

- Individual investors** – Provide your signature and date the form.
- Joint investors** – Provide your signatures and date the form.
- Partnership** – Provide the signatures and date the form.
- Corporate partnership** – Provide the signatures of two directors; or a director and a company secretary or if there is only one director, by that director and date the form. Ensure you also complete the relevant sections in **Part B**.
- Company** – Provide the signatures of two directors (or a director and a company secretary); or if there is only one director, by that director and date the form. Ensure you also complete the relevant sections in **Part B**.
- Superannuation fund** – Provide the signatures of the trustees and date the form. Ensure you also complete the relevant sections in **Part B**.
- Trust** – Provide the signatures of the trustees and date the form. Ensure you also complete the relevant sections in **Part B**.
- Estate** – Provide the signature of the executor and date the form. Ensure you also complete the relevant sections in **Part B**.
- Power of Attorney** – Provide your signature and date the form. Attach a certified copy of the Power of Attorney. A Justice of the Peace, Solicitor or Notary Public must certify each page of the Power of Attorney. You also need to provide the same type of information requested for an **Individual account** as it relates to the Attorney named in the application. Should the Power of Attorney document not contain a sample of the Attorney's signature, please provide a certified copy of identification documents for the Attorney, containing a sample of their signature, e.g. Driver's Licence or Passport containing photo identification.
- Your Beneficial Owners** – Certain types of entities may also be required to provide information and identification documents in relation to your Beneficial Owners (see page 2). You will be required to complete the 'Beneficial Owner Information' Form.

Contact us

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