

As the entity responsible for AML / CTF obligations for each of these programs, Columbus must have an AML / CTF program in place, which meets the requirements of the *AML / CTF Act Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument* 2007 (No. 1) (AML / CTF Rules).

Forms Requirement

To be completed, in all situations, with every application submission and checked by the Credit area: for completeness and accuracy, satisfied that all necessary checks have been made prior to credit approval is granted and loan settlement.

Reporting Discrepancies

From time to time, discrepancies will arise in the identification documentation. Discrepancies may be easily explainable – individuals change their names when they marry and sometimes use a pseudonym.

Any unusual discrepancy must be reported to our AML / CTF Compliance Officer promptly. Our AML / CTF Compliance Officer will review the discrepancy and decide whether further investigation is required, or the discrepancy is easily explainable. Our AML / CTF Compliance Officer may determine that a suspicious matter report is required as a result of the discrepancy.

1. KYC Information for Individuals

KYC Identification Requirements		
Member 1	Member 2	
Full name	Full name	
Date of birth / /	Date of birth / /	
Residential address	Residential address	
Country of residence	Country of residence	
Country of citizenship	Country of citizenship	
Any other names known by	Any other names known by	
Occupation / business activities	Occupation / business activities	
Varification Individuals		

The documents produced must be current, except for an Australian Passport which has not been cancelled and was current within the preceding 2 years.



Verification Indiv	iduals	(continue	d)
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Documents provided must fully satisfy either one of Category 1-4

Category	Minimum Document Requirements		
	For Persons who are Australian citizens or residents		
1	Australian or foreign Passport/ <u>plus</u> Australian drivers licence or Photo Card <u>plus</u> Change of name or marriage certificate if necessary		
2	Australian or foreign Passport/ <u>plus</u> Full birth certificate or citizenship certificate or descent certificate <u>plus</u> Medicare or Centrelink or Department of Veterans' Affairs card <u>plus</u> Change of name or marriage certificate if necessary		
3	Australian drivers licence or Photo Card <u>plus</u> Full birth certificate or citizens certificate or descent certificate <u>plus</u> Medicare or Centrelink or Department of Veterans' Affairs card <u>plus</u> Change of name or marriage certificate if necessary		
4	(a) Australian or foreign Passport/ <u>plus</u> Another form of government issued photographic identity document <u>plus</u> Change of name or marriage certificate if necessary, or (b) Australian or foreign Passport <u>plus</u> Full birth certificate <u>plus</u> Another form of government issued photographic identity document plus Change of name or marriage certificate if necessary		
5	If borrower does not have documents that satisfy any of the above categories, please contact Columbus Capital Legal for further advice.		
	For Persons who are not Australian citizens or residents.		
6	(a) Foreign passport Plus another form of government issued photographic identity Document Plus change of name or marriage certificate if necessary (b) Foreign passport Plus full birth certificate Plus another form of government issued identity Document Plus change of name or marriage certificate if necessary		



2. Enhanced Due Diligence

Enhanced Due [Diligence
INDIVIDUALS:	
Clarify or update	KYC information already held.
	Collect additional KYC information, and verify this information (where appropriate).
	Verify or re-verify KYC information.
	Collect employment details, details of how declared assets were accumulated, and the source of wealth.
	Clarify the nature of the customer's ongoing business with us.
	Undertake detailed analysis of the customer's transactions.
	Seek management approval to continue a business relationship, decide whether a specific transaction should be processed, or whether the Designated Service should continue to be provided to the customer.
FOR ALL:	
	ose, reason for, or nature of the transaction?
What is the exped	cted nature and level of transaction behaviour, including future transactions?



Certified copies

Who can certify documents

The list below identifies those individuals deemed to be authorised certifiers.

- A person who, under a law in force in a State, Territory or Commonwealth is currently licensed or registered to practise the following occupations:
 - Chiropractor
 - Dentist
 - Legal practitioner
 - Medical practitioner
 - Nurse
 - Optometrist

- Patent attorney
- Pharmacist
- Physiotherapist
- Psychologist
- Trade marks attorney
- Veterinary surgeon
- 2. A person who is enrolled on the roll of the Supreme Court of a State or Territory, or the High Court of Australia, as a legal practitioner (however described).
- 3. The following if they have two or more years of continuous service or time with licensee:
 - An officer with, or an authorised representative of, the holder of an Australian Financial Services Licence
 - An officer with, or a credit representative of, the holder of an Australian Credit Licence
 - Justice of the Peace
 - ZIP ID / Max ID / IDYou etc

- Employee of Australia Post
- Chartered Accountant or Certified Practicing Accountant (CPA)
- Police officer
- Teacher (full time employed as such)
- A person authorised as a notary public in a foreign country.



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Please provide certifed ID from a certifier under section "Who Can Certify Documents", and sign below as the interviewer to confirm you have conducted a non face-to-face interview.

For identity verification documents that contain a photograph of the signatory: "I certify that I have seen the original documentation and that the photograph is a true likeness and this copy is a complete and accurate copy of that original."

For identity verification documents that do not contain a photograph of the signatory: "I certify that I have seen the original documentation and this copy is a complete and accurate copy of that original."

Face to Face Interview		
I certify that all of this information on this form is true and correct and with the Verification of Identity standard in the ARNECC Model P Laundering and Counter-Terrorism Financing Rules Instrument 2007	Participation Rules and with paragraph 4.2.11 of the Anti-Money	
I certify that I have had a face-to-face interview with the above person. I have sighted and certified the original documents listed in the 'Verification Individuals' at the interview		
I have sent the borrower to a certifier listed on page 4 for certification of identification documents		
Name of Interviewer S	signature of Interviewer	
Date:		