

**RAKUTEN SECURITIES AUSTRALIA PTY LTD -
AML POLICY**

Rakuten Securities Australia Pty Limited
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Anti-Money Laundering Policy

Rakuten Securities Australia Pty Ltd collects and verifies the personal identification data of all Rakuten Securities account holders while logging and tracking all financial and trading transactions that are carried out by our clients. Prior to opening an account with Rakuten Securities Australia Pty Ltd, a valid form of government-issued identification (Passport, Driver's Licence, or National ID), and a proof of residence is required, along with the completed account application.

- All Rakuten Securities Australia Pty Ltd client funds are held in Segregated Client Trust Accounts that are designated for clients' deposits and withdrawals only.
- Rakuten Securities Australia Pty Ltd does not accept third-party deposits of any kind.
- Rakuten Securities Australia Pty Ltd matches each deposit to the account name on file for that client.
- Rakuten Securities Australia Pty Ltd neither accepts cash deposits nor disburses cash under any circumstances.
- Rakuten Securities Australia Pty Ltd reserves the right to refuse to process a transaction at any stage where it believes the transaction to be connected in any way to money laundering or criminal activity. In accordance with International law, Rakuten Securities Australia Pty Ltd is not obligated to inform the client if suspicious activity is reported to any corresponding regulatory or legal bodies.

Account Opening Procedures - Know Your Client Policy (KYC)

Prior to opening an account, Rakuten Securities Australia Pty Ltd shall document the identity, nature of business, income, source of assets, and investment objectives of each prospective client.

Account Opening Requirements and Framework:

Photo ID -The following are acceptable forms of photo identification:

- A valid passport
- A valid government ID, such as a Driver's License or a Valid National Identity Card

**Please note that photo IDs are verified through third-party compliance software.*

Proof of Residence - The following are acceptable forms of proof of residence:

- A utility or phone bill, or a bank statement
- All proof of residences must be current and not outdated by more than 90 days

Bank Account Requirements

- All Rakuten Securities Australia Pty Ltd account holders must have a valid bank or credit card account in their name
- The bank statement should show their full name and the same registered address as their account application

Funds Withdrawal Procedures

The withdrawal process at Rakuten Securities Australia Pty Ltd detailed below is structured around strict guidelines to make sure that funds are securely sent back to their source of origination.

- Rakuten Securities Australia's clients must complete a signed paper or digital withdrawal request containing their correct account information.
- The withdrawal form is submitted to the Rakuten Securities Australia's back-office department for processing. The back-office department confirms the account balance, verifies that there are no holds or withdrawal restrictions on the account, and then approves the withdrawal request, pending approval by the compliance team.
- The Rakuten Securities Australia's compliance team reviews all withdrawal requests approved by the back-office department, verifying the original funds are withdrawn via the same method of deposit and to the account holder on file. The compliance team also examines the withdrawal request against the client's deposit history to make sure there is no suspicious activity and verifies the bank account on file.
- Withdrawal requests approved by the Rakuten Securities Australia's compliance department are sent back to the back-office department, and the funds are released to the client.
- If a withdrawal is flagged for suspicious activity, the withdrawal is placed on hold, pending further investigation by Rakuten Securities Australia's management team.
- Rakuten Securities Australia's Management team with the compliance team to see if further action needed and which, if any, relevant regulatory bodies need to be contacted.

Reporting

AML regulation requires us to monitor and track suspicious transactions and report such activities to the relevant law enforcement agencies. We also reserve the right to deny a transfer at any stage if we believe the transfer to be connected in any manner to criminal activity or money laundering. By law, we are prohibited to inform clients that a report concerning suspicious activity has been submitted to the enforcement agencies.

For additional questions concerning Rakuten Securities Australia Pty Ltd policies, please feel free to contact our [Compliance](#) department.