



Anti-Money Laundering and Counter-Terrorism Financing (“AML/CTF”) Policy Statement

September 2024

Macquarie's AML/CTF Policy Statement

Macquarie Group Ltd and its subsidiaries (collectively, "Macquarie") is committed to operating within a financial crime risk framework that minimises the possibility that Macquarie's products and services might be used to facilitate money laundering or terrorism financing ("ML/TF"), and in ensuring that it complies with all AML/CTF laws, rules and regulations in the jurisdictions in which it operates.

Key Aspects of Macquarie's AML/CTF Policy

Macquarie's approach to identifying, mitigating and managing ML/TF risks is outlined in Macquarie's AML/CTF Policy and is applicable to all Macquarie staff. Macquarie's AML/CTF Policy and other related material, establish the key requirements for managing ML/TF risk including, but not limited to:

- Appointment of senior managers as AML/CTF Compliance Officers or Money Laundering Reporting Officers in specific jurisdictions;
- Assessing the ML/TF risk of all customers and application of appropriate levels of due diligence;
- Providing products and services for legitimate purposes to customers whose identities Macquarie has been able to ascertain;
- Monitoring the activities of its customers, their transactions, and its staff using a risk-based approach that is consistent with the level of ML/TF risk;
- Managing new and revised products, business processes and systems to ensure that ML/TF risks are appropriately identified, mitigated and managed;
- Providing AML/CTF training to staff within a reasonable time after commencement of employment with Macquarie, and periodic AML/CTF training thereafter to understand their obligations under relevant laws, rules, and regulations and Macquarie's AML/CTF framework;
- Maintaining adequate safeguards on the confidentiality and use of customer information exchanged with regulators, including safeguards to prevent tipping off and treatment of such information in accordance with its internal data confidentiality requirements;
- Where AML/CTF functions are outsourced to a third party (including intra-group), Macquarie entities will ensure that they maintain appropriate governance and oversight of the outsourced functions conducted on their behalf;
- Maintain suitable funding and resources to ensure the effective implementation and performance of Macquarie's AML/CTF framework.

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

Engagement with authorities

Macquarie will report to the applicable regulator, authority and/or law enforcement agency suspicious activity that may involve potential laundering, terrorism financing or other activity or transactions that are reportable as suspicious activity under applicable laws.

Macquarie will engage with relevant regulators, authorities and/or law enforcement agencies in a constructive and cooperative manner (including with respect to information sharing).

Additional Information

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

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

View the Macquarie Group's USA Patriot Act Certification:

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