

Anti-Money Laundering Policy

This document describes the Anti-Money Laundering and Countering Terrorism Funding policy used by SQID Payments for the handling of applications for merchant services and the ongoing management of merchants.

SQID Payments Pty Ltd (SQID) is a payment aggregator for Westpac Banking Corporation who is registered with AUSTRAC - Australian Transaction Reports and Analysis Centre. AUSTRAC oversees the compliance of "reporting entities", with their requirements under the Australian Anti-Money Laundering and Counter-Terrorism Financing Act 2006 and the Financial Transaction Reports Act 1988.

Money laundering is the process by which criminally obtained money or other assets are exchanged for "clean" money, such as using card payments, with no obvious link to its criminal origin. By preventing money laundering, the movement of funds derived from criminal activities will be inhibited. This will in turn, restrict the availability of funds used for terrorist activities. SQID views Money Laundering as a serious criminal offence, and as such, complies with regulatory requirements intended to forestall and prevent money laundering. These include

- Confirming the identity of our clients as per the current Mastercard Rules.¹
- Retaining transaction and identification records for a minimum period of seven years^{2 3}.
- Training staff in terms of anti-money laundering regulations.
- Appointing a nominated officer responsible for monitoring and reporting any and all suspicious activities to the relevant authorities.

Please note that SQID reserves the right to refuse a card payment transaction at any time should suspicion arise that it may be connected to money laundering or any other criminal activity. In addition, SQID will be obliged to report this suspicious activity and in line with regulations, is prohibited from disclosing this to the client.

By providing us with false identification or contact details, we will deem this a misuse of our merchant service. We are bound to report such misdemeanours to Westpac, and as such you may be the subject of a criminal investigation.

SQID will not do business with anyone suspected of, or directly involved in Money Laundering, or where funds have been sourced by any illegal activity.

To assist the worldwide fight against the funding of terrorism and money laundering activities, worldwide laws require SQID⁴ to obtain, verify and record information that identifies each merchant that opens an account with us.

¹ Mastercard Rules 14th June 2016 1.2

² Corporations Act 2001 (Cth), s. 286(1)

³ Mastercard Security Rules & Procedures 31st March 2016 7.1.5

⁴See for example: Anti-Money Laundering and Counter-Terrorism Financing Act 2006