BRANSGROVES REPORTING GROUP

AML/CTF Program

Document	Group AML/CTF Program
Version	2 August 2026
AML/CTF Compliance Officer	Matthew James Bransgrove — Director
Adopted by	Resolutions of the sole director of Bransgroves Lawyers Pty Ltd and Private Mortgage Holdings Pty Ltd made under s 248B(1) of the Corporations Act 2001 (Cth), 31 July 2026
Review	Annually, on any change to the Group ML/TF Risk Assessment, and on material regulatory change

Introduction and scope

1. This is the AML/CTF program of the Bransgroves reporting group, maintained by the lead entity under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) (the Act) and the Anti-Money Laundering and Counter-Terrorism Financing Rules 2025 (the Rules). It applies to each reporting entity in the group and to all personnel who perform work connected with designated services.

Entity	Role	AUSTRAC identifiers
Bransgroves Lawyers Pty Ltd	Lead entity — legal practice	AAN 100851567; ABN 42 650 216 050; RE 79099
Private Mortgage Holdings Pty Ltd (PMH)	Member — lender of record / bare trustee	AAN 100851575; ABN 52 662 260 433; RE 79100

2. The program comprises this document, the Group ML/TF Risk Assessment, and the documents incorporated by reference. The risk assessment is the foundation of the program: all controls are calibrated to the risks identified in it, and any change to the risk assessment prompts review of this program.

Governance and oversight

3. The directors of each reporting entity (the governing bodies) retain ultimate oversight of ML/TF risk and of compliance with the Act. The governing bodies approve this program and any material amendment, and take reasonable steps to ensure the entity complies with its obligations.

4. The AML/CTF Compliance Officer (AMLCO) for both entities is Matthew James Bransgrove, Director. The AMLCO is appointed at management level, satisfies the fit-and-proper requirements of the Rules, has been notified to AUSTRAC, and is responsible for implementing and maintaining this program day to day.

5. The AMLCO reports to the governing bodies at least annually, and immediately on any SMR lodged, any AUSTRAC enquiry or feedback, any material control failure, or any change in the group's risk profile.

6. Any change of AMLCO will be notified to AUSTRAC within 14 days of the appointment.

Risk assessment

7. The Group ML/TF Risk Assessment identifies and rates the group's ML/TF risks by customer type, designated service, channel and geography, concluding an overall residual rating of Low–Medium. It is reviewed annually and on the trigger events it lists. Where a matter presents features outside the assessed profile, the matter is escalated to the AMLCO before the designated service is provided.

Customer due diligence

8. CDD is performed before a designated service is provided to a customer, in accordance with the annexed policies:

a. **Lender clients:** Lender Client Due Diligence & Verification of Identity Policy

b. **Borrowers, mortgagors and guarantors:** Borrower / Guarantor Due Diligence & Verification of Identity Policy

Screening

9. Every new customer and each beneficial owner is screened against the DFAT Consolidated List, together with adverse media searches. The screening performed and its result are recorded on the matter file. AI tools may be used to assist searching and summarisation but never substitute for the DFAT Consolidated List check.

Enhanced due diligence

10. EDD applies on the triggers listed in the annexed policies, including: any foreign resident, foreign passport, offshore account or foreign source of funds; a PEP or sanctions match; unexplained or third-party funding; complex or layered structures; rapid successive borrowings; attempted cash; unexplained urgency; or any suspicion of structuring. EDD requires AMLCO (or partner with AMLCO notification) approval, source-of-funds/wealth verification, and heightened monitoring, all documented on the file.

Reliance and agency

11. Where the firm relies on a borrower's solicitor for identification and verification, the reliance conditions in the Act and Rules are observed: the third party is itself a reporting entity (or an authorised identity verifier operating to ARNECC standards), identification records are obtained and retained, the reliance decision is recorded, and responsibility for CDD remains with the relying entity notwithstanding the reliance. Where the firm performs CDD as agent for a lender that is itself a reporting entity, the arrangement is recorded in the Certification as to Title accepted by the lender; standing reliance agreements may be entered with repeat institutional lenders.

Pre-commencement customers

12. Customers whose identity was verified before the reformed obligations commenced are not re-verified solely by reason of the reforms (Rules 6-42 and 6-43), subject to ongoing CDD and the EDD triggers.

Transaction monitoring

13. Monitoring is file-based, reflecting the group's matter-driven model. Fee earners monitor each matter for red flags throughout its life, including: changes of parties or funding source after instruction; requests to route funds to or from unrelated third parties; attempted cash; early repayment patterns inconsistent with commercial purpose; pressure to bypass checks; and instructions inconsistent with the customer's profile. Concerns are escalated to the AMLCO immediately. The Certification as to Title records, for each advance, that the matter was assessed against the risk assessment and whether any EDD trigger arose.

Reporting to AUSTRAC

Suspicious matter reports

14. Where a suspicion on reasonable grounds is formed, the AMLCO lodges an SMR within 3 business days — or within 24 hours where the suspicion relates to terrorism financing.

15. Tipping off: no person may disclose information where the disclosure would or could reasonably be expected to prejudice an investigation. Client communications about a matter under SMR consideration are approved by the AMLCO first. Legal professional privilege is preserved in accordance with the Act.

16. Suspicion formation, deliberation and lodgement are documented in a restricted-access SMR register maintained by the AMLCO.

Threshold transaction reports

17. The group does not accept physical currency in any amount. Accordingly no threshold transactions are expected. If physical currency of A$10,000 or more were ever accepted, a TTR would be lodged within 10 business days; any attempt to pay in cash is refused, escalated to the AMLCO, and considered for an SMR.

Other reports

18. Cross-border movement and IFTI reporting obligations are not expected to arise on the group's profile; any novel scenario is referred to the AMLCO before proceeding. The annual compliance report is lodged on the financial-year cycle; the first report under the reformed regime is due 30 September 2027 for FY2026–27.

Personnel due diligence and training

19. Before a person is engaged in a role that touches designated services, references are verified and practising certificate / entitlement checks are made where applicable; screening is proportionate to the role's ML/TF exposure and is recorded.

20. All fee earners and support staff complete AML/CTF training on induction and annually thereafter (CPD-aligned), covering this program, red-flag recognition, escalation, SMR handling and tipping off. Attendance is recorded in a training register.

21. All personnel acknowledge this program and the annexed policies in writing; acknowledgments are kept in a register maintained by the AMLCO.

Record keeping

22. CDD records, screening results, reliance records, DVS verification results and authorities, certifications, EDD documentation, SMR/TTR records, training and acknowledgment registers, and this program and its versions are retained for at least 7 years from the end of the matter or relationship (electronic files are in practice retained in perpetuity). Records are stored securely and are retrievable without delay, including for a lender exercising its records-access rights under the Certification as to Title.

Independent evaluation

23. The program must be independently evaluated at least once every 3 years, mandated under s 26F(4)(f) of the Act and s 5-10 of the Rules 2025. First evaluation is due:

    a. PMH (AAN 100851575, ends 75 — both odd): 30 June 2029

    b. Law firm (AAN 100851567, ends 67 — even then odd): 31 December 2030

Enrolment and registration maintenance

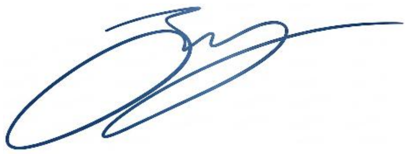
24. Enrolment details for each entity are reviewed on any material change and updated with AUSTRAC within 14 days, including changes to designated services, AMLCO, contact details, addresses and reporting group composition. The AMLCO maintains the AUSTRAC Online accounts, user access (removing departing personnel immediately), and the receipt register of lodgements.

Program review

25. This program is reviewed annually, on any review of the Group ML/TF Risk Assessment, on material regulatory change or AUSTRAC feedback, and after any SMR or control failure. Amendments are approved by the governing bodies, version-controlled, and communicated to all personnel.

Incorporated by reference

The documents electronically signed by Matthew James Bransgrove dated today and listed in the Spreadsheet named 26.08.02 Document Register *as amended* are adopted.



Matthew Bransgrove — Director, AML/CTF Compliance Officer   Date 2 August 2026