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AML/CTF Senior Manager Appointment Checklist

Proposed Senior Manager Name:

Date:

Person completing checklist:

Recap of role before you start

The Senior Manager(s) is responsible for:

- approving our AML/CTF Policies;
- approving our ML/TF Risk Assessment;
- notifying the Governing Body in writing of any updates to our ML/TF Risk Assessment as soon as practicable after the update is made; and
- working closely with the AML/CTF Compliance Officer and ensuring our Governing Body is sufficiently informed of the risks of money laundering, financing of terrorism and proliferation financing that we may reasonably face in providing our Designated Services.

The Senior Manager's approval is required before we:

- commence to provide Designated Services to certain Customers in accordance with our AML/CTF Customer Due Diligence Policy; and
- enter into any written agreement or arrangement with a third party that will collect and verify CDD information for us.

Our Governing Body may designate a Senior Manager for approvals of our AML/CTF Program that is different to the Senior Manager designated for approving relationships with certain Customers or entering into arrangements with a third party to collect and verify CDD information. Where no explicit instruction is given by the Governing Body on these matters, any one Senior Manager may discharge all of the above functions.

Item	Requirement	Yes/No/Comment
Eligibility Requirements		
1.	Is the proposed Senior Manager an individual who makes, or participates in making, decisions that affect the whole or a substantial part of our business? Describe reasons for being satisfied about this:	
Appointment process		
2.	Does the Senior Manager understand what is involved in their role?	
3.	Has our Governing Body resolved to designate this individual as Senior Manager including whether they are designated to approve our ML/TF Risk Assessment and AML/CTF Policies and/or approve certain high risk relationships and CDD reliance arrangements? <i>Ensure a copy of the resolution is saved.</i>	
4.	Have you updated DCP personnel records including completing ALL fields in the personnel entry?	

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November 2025

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