

GDI and client identification

Making life simpler for advisers and their clients

Australia's anti-money laundering and counter terrorism financing laws (AML laws) place a considerable burden on investors to identify themselves when they first applying for units in our trusts.

This includes collecting verification documents (Know Your Clients or KYC documentation) and sending verified copies them to us when they wish to invest.

We at GDI Funds Management Limited (GDI) appreciate that your advisers bear much of this paperwork burden.

To make life simpler, we offer an alternative: if a dealer group agrees to the following terms of business, then its advisers can simplify the KYC process by simply sending us a completed KYC Adviser Confirmation form when they send in the completed application for applying for units.

The terms of business follow and the KYC Adviser Confirmation form is attached and available on our website.

GDI's terms of business for streamlined applications processing the dealer group signs this once

These are terms of business for GDI's streamlined applications processing. To accept them, the dealer group signs at the end and returns this document to us.

What forms to send

An adviser need not send to us any KYC forms (for example, for individuals), nor any client identifying document, if we receive a completed:

- 1. application form**
found at the end of each information memorandum, available on our website
- 2. if needed, accountant certificate or dealer certificate**
certifying the client is wholesale, and found at the end of each information memorandum and also separately on our website and
- 3. KYC Adviser Confirmation**
available on our website.

Conditions

- 1. the adviser must actually obtain the KYC documents**
the adviser must have all the relevant KYC documents in their possession before the Application Form is sent to us
- 2. the KYC documents must be in the correct form**
the adviser must ensure the KYC documents are in the correct form, for example, that they are properly certified
- 3. the KYC documents must be kept safe**
*for at least 7 years
and if your adviser leaves, you must obtain them or copies from the adviser before they go*
- 4. we must have access to the KYC documents**
you must give us (and anyone we name) access to the KYC documents within 2 business days of us asking if your adviser has them, you must make sure the adviser gives this access
- 5. you must give the actual KYC documents to us within 3 business days of us asking**
*or if we agree, copies at your expense
and you may keep copies for your files, but we may keep any originals if we choose.*

Other matters

- you must adequately **supervise** your advisers
You are responsible to us for your advisers as if their actions were yours
- you **indemnify** us for loss we suffer because you breach these terms
this includes loss caused by your advisers and
- we can tell you at any time that these terms of business **cease to apply** (generally, or for particular advisers or a group of them), and we need not give reasons.

The fine print

These terms are a deed between us and you (the company signing below), governed by the NSW laws. They are confidential.

AML laws means the Anti-Money Laundering and Counter Terrorism Act and associated laws as well as AUSTRAC rules and policies from time to time. **KYC documents** means the minimum verification documents which AML laws require in relation to that type of client. **Your advisers** means your representatives, relevant group staff & your authorised representatives (as well as any authorised representatives they may appoint under authority you give them).

Terms defined in the AML laws are used in this agreement with their defined meaning. We can amend this agreement by telling you in writing. This is the entire agreement about its subject matter. Either party can terminate this agreement by notice to the other. Examples are not exhaustive, and time is Sydney time. Each party warrants that this agreement is its legal, valid and binding obligation and enforceable. Notices can be sent to any office of a party. Assignment by you needs our consent. We have no special relationship with you or any of your advisers (for example, fiduciary or agency).

Signed sealed and delivered by

Print name of dealer group

by a director and secretary/director:

Signature of secretary/director

Name of secretary/director
please print

Signature of director

Name of director
please print

Dated

KYC Adviser Confirmation form

When to use this form:

Send this form to GDI (with the completed GDI Application Form and if needed an Accountant Certificate or Dealer Certificate) instead of sending the client's actual verification documents. That is, although the client's identity must still be verified, documents can be kept on your file.

I have verified the identity of this client or these clients as AML laws require:

Client(s) name(s) <i>attach a separate list if you have not enough space</i>	name	<input type="text"/>
	name	<input type="text"/>
	name	<input type="text"/>
	name	<input type="text"/>
	name	<input type="text"/>
	name	<input type="text"/>
	name	<input type="text"/>

Adviser name	<input type="text"/>
Authorised representative number	<input type="text"/>
Licensee name	<input type="text"/>
AFSL number	<input type="text"/>

I agree to:

- tell my licensee if I am suspicious of this client
- keep the verification documents safe for at least 7 years
- give the licensee and/or GDI access to them if asked
- give them to the licensee if asked and
- not take the verification documents with me if I leave this licensee.

Signature	<input type="text"/>
Date	<input type="text"/>