



REMEDIAL DIRECTION

SUBSECTION 191(2) *ANTI-MONEY LAUNDERING AND COUNTER-TERRORISM FINANCING ACT 2006*

TO: Allsafe International Pty Ltd ACN 061 544 652 (**Allsafe**) of
c/-Achievet Conveyancing Services Pty Ltd
Unit 1/28 Pickett Street
Footscray VIC 3011

I, JOHN LANCE SCHMIDT, Chief Executive Officer of the Australian Transaction Reports and Analysis Centre (**AUSTRAC**) BEING SATISFIED THAT Allsafe is a reporting entity that has contravened a civil penalty provision, namely subsections 45(2) and 81(1) of the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (**AML/CTF Act**) HEREBY DIRECT THAT:

Within 28 days of the date of this direction, Allsafe must:

- (1) Appoint an anti-money laundering and counter-terrorism financing expert/consultant to assist Allsafe to:
 - (a) develop and implement an anti-money laundering and counter-terrorism financing program (**AML/CTF program**) that complies with the requirements in the AML/CTF Act and the *Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No. 1)* (**AML/CTF Rules**); and
 - (b) develop and implement policies and procedures that will ensure that Allsafe complies with its obligation to report international funds transfer instructions in compliance with subsection 45(2) of the AML/CTF Act.

The person to be appointed must not be an officer, employee or agent of Allsafe. The person's appointment must be approved in writing by AUSTRAC.

Within 56 days of the date of this direction, Allsafe must:

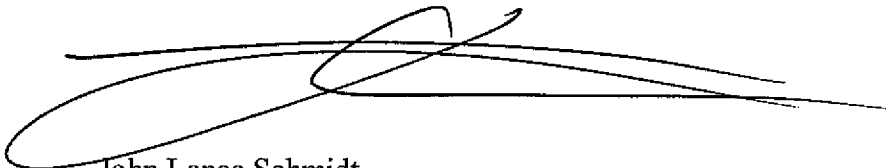
- (2) Submit to AUSTRAC an AML/CTF program which complies with section 85 of the AML/CTF Act and with AML/CTF Rules, specifically, Chapter 4, Chapter 8 and Chapter 15 of the AML/CTF Rules.
- (3) Submit to AUSTRAC Allsafe's policies and procedures in relation to its obligation in subsection 45(2) of the AML/CTF Act to report international funds transfer instructions.
- (4) Submit to AUSTRAC evidence that the AML/CTF program referred to in paragraph (2) has been approved and adopted by Allsafe's board and senior management.

The address for providing AUSTRAC with any document which this remedial direction requires to be provided to AUSTRAC is:

AUSTRAC – Enforcement
PO Box 5516
West Chatswood NSW 1515

Pursuant to subsection 191A(1) of the AML/CTF Act, Allsafe is entitled to apply to the Administrative Appeals Tribunal for review of the decision by the AUSTRAC CEO to give this direction.

Dated this *9TH* day of February 2011



John Lance Schmidt
CHIEF EXECUTIVE OFFICER