



Anti-Money Laundering and Counter-Terrorism Financing Act (Bennelong Designated Business Group Modification) Declaration 2025 (No. 1)

I, Daniel Mossop, National Manager, Policy Rules and Guidance Branch of the Australian Transaction Reports and Analysis Centre (AUSTRAC), make the following declaration as a delegate of the AUSTRAC CEO.

Dated: 10 June 2025

Daniel Mossop
National Manager, Policy Rules and Guidance Branch
Australian Transaction Reports and Analysis Centre

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1 Name

This instrument is the *Anti-Money Laundering and Counter-Terrorism Financing Act (Bennelong Designated Business Group Modification) Declaration 2025 (No. 1)*.

2 Commencement

This instrument commences on the day after it is signed.

3 Cessation

This instrument ceases to have effect on 31 March 2026.

4 Authority

This instrument is made under subsection 248(1)(b) of the Act.

5 Definitions

Note: A number of expressions used in this instrument are defined in section 5 of the Act, including the following:

- a. AML/CTF Rules;
- b. person;

In this instrument:

Act means the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth).

Nominated Contact Officer has the meaning given to the term by subparagraph 2.1.3(5) of the AML/CTF Rules.

6 Application

This declaration varies the definition of ‘designated business group’ in section 5 of the Act, in relation to:

- Bennelong Funds Management Limited ACN 111 214 085;
- Bennelong Australian Equity Partners Pty Ltd ACN 131 665 122;
- Bennelong Long Short Equity Management Pty Ltd ACN 118 724 173;
- 4D Infrastructure Pty Ltd ACN 604 979 259;
- Touchstone Asset Management Pty Ltd ACN 605 911 519;
- Quay Global Investors Pty Ltd ACN 163 911 859;
- Skerryvore Asset Management LLP (Company Number: OC429371); and
- Canopy Investors Pty Ltd ACN 677 231 079.

7 Schedules

This instrument modifies the definition of ‘designated business group’ in section 5 of the Act in the manner set out in Schedule 1.

Schedule 1—Amendments

Anti-Money Laundering and Counter-Terrorism Financing Act 2006

1 Section 5 – definition of designated business group

The definition of ‘designated business group’ in section 5 of the Act applies in relation to persons specified in section 6 of this declaration as if the definition is omitted and substituted with:

designated business group means a group of 2 or more persons, where:

- (a) each member of the group has elected, in writing, to be a member of the group, and the election is in force; and
- (b) each election was made in accordance with the AML/CTF Rules, with the exception that an election may be made in accordance with an alternative form to the election form specified in 2.1.2(1) of the AML/CTF Rules that is approved by AUSTRAC and provided to AUSTRAC by the Nominated Contact Officer; and
- (c) no member of the group is a member of more than one designated business group; and
- (d) each member of the group satisfies such conditions (if any) as are specified in the AML/CTF Rules, with the exception of the requirements specified in 2.1.2(4) of the AML/CTF Rules; and
- (e) the members of the designated business group are limited to:
 - i. Bennelong Funds Management Limited ACN 111 214 085;
 - ii. Bennelong Australian Equity Partners Pty Ltd ACN 131 665 122;
 - iii. Bennelong Long Short Equity Management Pty Ltd ACN 118 724 173;
 - iv. 4D Infrastructure Pty Ltd ACN 604 979 259;
 - v. Touchstone Asset Management Pty Ltd ACN 605 911 519;
 - vi. Quay Global Investors Pty Ltd ACN 163 911 859;
 - vii. Skerryvore Asset Management LLP (Company Number: OC429371); and
 - viii. Canopy Investors Pty Ltd ACN 677 231 079.

Important Notice to the person named in this instrument

1. Under sections 136 and 137 of the Act, it is an offence to provide false or misleading information or documents. If any of the information submitted by the applicant or its representatives is found to be false or misleading, the modification may be revoked and action initiated against the applicant.
2. The person granted the modification may request the AUSTRAC CEO to revoke or vary it at any time.
3. Any request to vary this modification must be submitted to the AUSTRAC CEO or an approved delegate no later than 90 days before the date the change is requested to commence.
4. This declaration does not preclude the person from making communications or disclosures that are otherwise permitted by law.