

INFRINGEMENT NOTICE

SECTION 184(1) OF THE ANTI-MONEY LAUNDERING AND COUNTER-TERRORISM FINANCING ACT 2006

To: Cryptolink Pty Ltd ACN 646 989 595

ATT: The Proper Officer

I, Brendan Thomas, Chief Executive Officer (CEO) of the Australian
Transaction Reports and Analysis Centre (AUSTRAC), having reasonable
grounds to believe that Cryptolink Pty Ltd (Cryptolink) has contravened a
designated infringement notice provision, give this infringement notice (Notice)
under section 184(1) of the Anti-Money Laundering and Counter-Terrorism
Financing Act 2006 (Cth).

Background

- Cryptolink provides digital currency exchange services. It is registered with AUSTRAC as a digital currency exchange provider. In the course of carrying on a digital currency exchange business, Cryptolink exchanged physical currency (money) for digital currency and vice versa.
- Under section 43(2) of the AML/CTF Act, if a reporting entity provides a
 designated service to a customer and the provision of the service involves a
 threshold transaction, the reporting entity must, within 10 business days after
 the day on which the transaction takes place, give the AUSTRAC Chief
 Executive Officer a report of the transaction.
- Section 43(2) is a designated infringement notice provision: section 184(4)(c) of the AML/CTF Act.

Matters giving rise to infringement notice

 I have reasonable grounds to believe that Cryptolink contravened section 43(2) of the AML/CTF Act, by failing to give the AUSTRAC CEO reports of threshold transactions within 10 business days after the day on which the threshold transaction took place. AUSTRAC alleges that Cryptolink has contravened section 43(2) of the AML/CTF Act on three occasions. As there is more than one alleged contravention in this infringement notice, the details of each alleged contravention are details in Schedule 1 attached to this Notice as required by section 185(2).

Penalty amount

- 7. As Cryptolink is a company, the penalty payable for each alleged contravention of section 43(2) of the AML/CTF Act is \$18,780.
- 8. The total penalty specified in this Notice for three alleged contraventions of section 43(2) of the AML/CTF Act by Cryptolink is \$56,340.
- 9. The penalty is calculated in accordance with subsection 186B of the AML/CTF Act and section 4AA of the *Crimes Act 1914*.
- 10. The penalty is payable to the AUSTRAC CEO (on behalf of the Commonwealth of Australia).

If Cryptolink pays the penalty amount

- 11. If the penalty in this Notice is paid to the AUSTRAC CEO, within 28 days after service of the Notice on Cryptolink, being or before 13 October 2025, or other such period as approved by the AUSTRAC CEO, neither criminal nor civil penalty proceedings will be brought in relation to the matters giving rise to the alleged contraventions and any liability Cryptolink have for the alleged contraventions detailed in Schedule 1 to this Notice will be discharged.
- 12. Payment of the penalty amount is not an admission of guilt or liability.

If Cryptolink fails to pay the penalty amount

13. If the penalty in this Notice is not paid by Cryptolink on or before 13 October 2025, or such other time as approved by the AUSTRAC CEO, and the Notice is not withdrawn, the AUSTRAC CEO may choose to take further enforcement action in respect of the alleged contraventions. For example, it is open to the AUSTRAC CEO to commence civil penalty proceedings in the Federal Court of Australia seeking a pecuniary penalty of up to \$31,300,000 per contravention, and other orders.

14.	If Cryptolink think this Notice has been given in error or Cryptolink think it
	should be withdrawn, Cryptolink may write to the AUSTRAC CEO c/-
	Under section 187 of the
	AML/CTF Act, an infringement notice can only be withdrawn within 28 days
	after the infringement notice was given.

Payment methods

15. The penalty may be paid by electronic funds transfer or BPAY.

 If Cryptolink makes payment by electronic funds transfer, please use the following details and email the receipt to

Name of Bank: Reserve Bank of Australia

Bank Branch: Sydney

BSB:

Account Number:

Account name: AUSTRAC- Official Administered Receipts

Reference:

Reference:

17. If paying by BPAY, please use the following details and email the receipt to

Biller Code:

Date: 15 September 2025

Brendan Thomas
Chief Executive Officer, AUSTRAC