



**NOTICE TO APPOINT AN EXTERNAL AUDITOR TO CONDUCT
COMPLIANCE AUDIT
SUBSECTION 162(2)
ANTI-MONEY LAUNDERING AND COUNTER-TERRORISM FINANCING ACT 2006**

TO: Airwallex Pty Ltd
ACN 609653312
Level 7, 15 William Street
Melbourne VIC 3000

Attention: The Proper Officer

1. I, Bradley Brown, National Manager, Regulatory Operations of the Australian Transaction Reports and Analysis Centre (**AUSTRAC**), as delegate of the Chief Executive Officer of AUSTRAC (**the AUSTRAC CEO**), have reasonable grounds to suspect that Airwallex Pty Ltd ACN 609653312 (**Airwallex**) is a reporting entity as referred to section 5 of the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (**AML/CTF Act**), has contravened and/or is contravening sections 36, 41, 81 and 82 of the AML/CTF Act.
2. Pursuant to subsection 162(2) of the AML/CTF Act, as delegate of the AUSTRAC CEO, I require Airwallex to appoint [REDACTED] (**the external auditor**), arrange for the external auditor to carry out an external audit of one or more specified aspects of Airwallex's compliance with the AML/CTF Act, AML/CTF Regulations and the AML/CTF Rules and provide a copy of the audit report to AUSTRAC in accordance with paragraphs [3] – [12] of this Notice and the Schedule.

Requirements under section 162(2)(b) of the AML/CTF Act

Within 14 days of the date AUSTRAC has authorised a Nominated Individual under section 164 of the AML/CTF Act, Airwallex must:

3. Engage the external auditor to conduct an audit covering the matters specified in the Schedule to this Notice including giving a written report (**the audit report**) to Airwallex.

Within 180 days of the external auditor being engaged, Airwallex must:

4. Give the AUSTRAC CEO a copy of the audit report setting out the external auditor's findings.

The matters to be covered by the audit:

5. The audit must cover the matters set out in the Schedule to this Notice.

The form of the audit report:

6. The audit report must be in a form that:



Australian Government
**Australian Transaction Reports
and Analysis Centre**

- a) Accords with any Australian standard applicable to that kind of audit report, or which in the opinion of the external auditor accords with the closest applicable Australian standard; or
- b) Accords with the format and style in which the external auditor would prepare a report suitable to annex to an expert witness affidavit the external auditor would make in Federal Court of Australia proceedings.

Submission of audit reports:

10. The audit reports are to be submitted to David Hawkins and Zhong Jiang at regulatoryoperations@austrac.gov.au

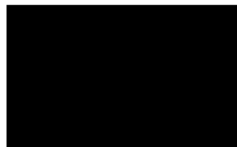
Consequences of not complying with a subsection 162(2) requirement in this notice:

11. Under section 162(7) a person commits an offence if:
 - (a) the person is subject to a requirement under section 162(2); and
 - (b) the person engages in conduct; and
 - (c) the person's conduct breaches the requirement.

Penalty: Imprisonment for 12 months or 60 penalty units, or both.

12. Section 162(8), which is a civil penalty provision, states that a reporting entity must comply with a requirement under section 162(2).

Dated this 22nd day of January 2026.



Bradley Brown
National Manager – Regulatory Operations
AUSTRAC



Schedule

Definitions

The following definitions apply to this schedule.

AML/CTF Act means the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006*.

AML/CTF Rules means the *Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No. 1)*.

Part A Program means Part A of:

- a joint anti-money laundering and counter-terrorism program as defined in subsection 85(2) of the AML/CTF Act.

Program means:

- a joint anti-money laundering and counter-terrorism program as defined in subsection 85(1) of the AML/CTF Act.

Relevant Period means the period 1 January 2024 to the date of this notice.

Sampling expectations:

1. The external auditor must determine sample sizes that are appropriate to the nature, size, complexity, and ML/TF risk of Airwallex's operations.
2. Sampling must ensure coverage across all relevant channels, product types, and risk levels. The audit must use a methodology that allows for:
 - a. Representative sampling based on transaction volume, customer base, and risk profile
 - b. Risk-based stratification where appropriate (e.g., high-risk corridors, SMR-linked customers, PEPs)
 - c. Justification of how the samples were selected in the context of the audit scope

Details to be included in the audit report:

3. The audit report must contain details of:
 - a. The external auditor's assessment of the matters set out in the Schedule.
 - b. The facts on which the external auditor has relied to make the assessment identified in paragraph [3.A].
 - c. Any measures which the external auditor believes Airwallex should implement to ensure that it complies with the AML/CTF Act and the AML/CTF Rules.
 - d. The capacity of Airwallex to implement the measures set out in paragraph [3.C].
 - e. The report must outline the rationale for the sampling approach, including how the selected samples are representative of Airwallex's business model, delivery channels, and identified AML/CTF risks.



- f. AUSTRAC recommends that the findings and insights from the audit report be actively considered as part of Airwallex's preparation for the forthcoming reforms to the AML/CTF Act and Rules, scheduled to commence in 2026. The results should inform updates to compliance frameworks, risk assessments, and control measures to ensure compliance with the new AML/CTF regulatory requirements.

Matters to be covered by the audit

Money Laundering and Terrorism Financing Risk Assessment

4. Whether Airwallex has during the Relevant Period complied with the requirements of Part 9.1 of the AML/CTF Rules.

Transaction Monitoring Program (TMP)

5. Assess whether Airwallex's Part A Program has during the Relevant Period complied with the requirements of paragraphs 15.4, 15.5, 15.6, and 15.7 of the AML/CTF Rules.
6. Evaluate the effectiveness of its TMP, including:
 - a. escalation procedures.
 - b. alert review, prioritisation and typology coverage.
 - c. change management and testing controls.
7. Evaluate the effectiveness of Airwallex's TMP to detect and escalate transactions indicative of the full array of financial crime risks the business is exposed to. The evaluation must cover specific ML/TF risk assessments, financial crime guides, and other AUSTRAC publications and associated red flags and typologies relevant to Airwallex. This includes Child Sexual Exploitation risks.
8. When determining Airwallex's compliance with the matters outlined in paragraphs 3, 4 and 5 above, include the methodology for conducting the audit, in addition to sampling and data collection.

Suspicious Matter Reporting (SMR)

9. Assess whether Airwallex has during the Relevant Period complied with the requirements of section 41 of the AML/CTF Act.
 - a. Evaluate whether Airwallex's processes support timely and risk-based SMR submissions, across all ML/TF risks and crime types it is exposed to.
 - b. Include testing of alerts and case escalations
 - c. Evaluate the timeliness of SMRs. This includes evaluating whether SMRs were initiated independently or in response to queries or notices from AUSTRAC or other Government agencies and identifying patterns that may indicate a reactive rather than proactive compliance posture.
 - d. Review matters that were escalated for review but did not result in SMRs being submitted, including analysis of decision-making processes and documentation to determine whether suspicion should reasonably have been formed under section 41.
 - e. Sample must include SMRs tied to high-risk customers and jurisdictions.



Enhanced Customer Due Diligence (ECDD) Program

10. Whether Airwallex's Part A Program has during the Relevant Period complied with the requirements of paragraphs 15.8, 15.9, 15.10 and 15.11 of the AML/CTF Rules.
11. When determining Airwallex's compliance with the matters outlined in paragraph above:
 - a. the methodology for conducting the audit by the external auditor must include sampling and data collection; and
 - b. the external auditor must have regard to how Airwallex met its obligations with reference to customers subject to SMRs, PEPs and high-risk corridors to which Airwallex was required to apply its ECDD Program during the Relevant period.
12. The audit should assess Airwallex's policies and procedures for off boarding high-risk customers, including those subject to SMRs and must review decision making, consistency and timeliness associated with off boarding decisions.

Compliance with ongoing customer due diligence (OCDD)

13. Whether Airwallex has complied with section 36 of the AML/CTF Act during the Relevant Period.

KYC information

14. Whether Airwallex's Part A Program has during the Relevant Period complied with the requirements of AML/CTF Rules 15.2 and 15.3 across all channels.
15. Evaluate the adequacy of controls to identify duplicate customer accounts and how to manage the risks associated with duplicate accounts, including as new accounts are opened.
16. Evaluate controls for verifying customer identities during onboarding and for high-risk corridors.

Governance and Oversight

17. Review the effectiveness of Airwallex's AML/CTF governance during the Relevant Period, in accordance with section 81 of the AML/CTF Act including:
 - a. Internal audit independence and coverage of internal audits
 - b. Board and executive oversight
 - c. Effectiveness of quality assurance over the TMP and prevention and detective controls.