

**SCB13QW(e):**

How frequently have you reported to AUSTRAC on a scheduled basis over the past decade?

**Answer:**

From 17 December 2008 to 19 December 2019, Suncorp has completed the following scheduled reports:

- 8421 Suspicious Matter Reports (SMR) (as noted above)
- 562607 International Funds Transfer Instructions (IFTIs) reports
- 397408 Transaction Threshold Reports (TTRs)
- 11 Annual Compliance Reports, which are submitted by the AML/CTF Compliance Officer every year by the 31st of March
- 9 Industry Levies (commenced in 2011), which are submitted by the AML/CTF Compliance Officer on an annual basis by the census date of 1st July.

**SCB13QW(g):** Over the past decade, how many AUSTRAC investigations into the bank have been:

**SCB13QW(g)(i):** opened

**Answer:** There has only been one investigation conducted by AUSTRAC into Suncorp which related to the self-reported TTR breach identified above.

However, Suncorp has been included in a number of industry level compliance reviews conducted by AUSTRAC during the period. These reviews were conducted across multiple AUSTRAC reporting entities, including Suncorp and included a focus on:

- Suspicious Matter Reports data quality
- Independent Reviews conducted by Suncorp on its Program Part A
- TTR and IFTI data quality
- Implementation of the Customer Due Diligence arrangements

**SCB13QW(g)(ii):** completed with penalties

**Answer:** None

**SCB13QW(g)(iii):** completed without penalties

**Answer:** Refer to SCB13QW(g)(i) response.

**SCB13QW(g)(iv):** abandoned

**Answer:** None

**SCB13QW(h):**

How many fines have been paid to AUSTRAC over the past decade, and what were their values?

**Answer:**

None

**SCB13QW(i):**

Have any AUSTRAC notifications or investigations resulted in terminations of employment or other penalties for employees?

**Answer:**

No

**SCB13QW(j):**

Have any AUSTRAC notifications or investigations resulted in terminations of employment or other penalties for executives?

**Answer:**

No

**SCB13QW(k):**

What staff training is provided to assist anti-money laundering and other serious crime detection?

**Answer:**

All staff in Banking & Wealth and staff in some specialised roles across Suncorp complete the mandatory online training module *Introduction to Anti-Money Laundering and Counter Terrorism Financing*. This module introduces the Anti-Money Laundering and Counter Terrorism Financing legislation and is designed to create an awareness and build knowledge for Suncorp's employees regarding the facilitating of money laundering and terrorism financing activities and Suncorp obligations under the AML/CTF Act and Rules. As part of the completion of the online training module, staff are required to complete a test, which has a pass grade of 100%, with the following objectives:

- To define Money Laundering and Terrorism Financing and to describe AUSTRAC's role
- To describe Suncorp's and staff obligations under AML/CTF Act and Rules and to explain the consequences of non-compliance with AML/CTF Act and Rules
- To recognise and to report suspicious matters

Front-line staff (Stores and Contact Centres) are also required to complete 6-monthly modules on specific AML/CTF compliance topics which relate directly to their roles. The three modules relate to:

- Transaction Threshold Reports
- Suspicious Matter Reports
- Beneficial Ownership and Know Your Customer (KYC)

Suncorp continues to support and enhance AML/CTF capability by leveraging off industry and law enforcement contacts to provide insights into ML/TF risks and potential vulnerabilities to Suncorp's business.

In March 2019, an AML/CTF expert conducted workshops to provide various Suncorp teams that are engaged in AML/CTF activities, with knowledge and understanding of their role in supporting AML/CTF compliance, including case studies and general AML obligations. Over 200 staff members across investigations, front-line, senior management and senior leadership roles attended the training sessions. Specific training was held for those in front-line roles and the AML/CTF operations team.

Investigators are trained to identify criminal and suspicious activity and their processes take an agnostic view to crime as opposed to targeting specific crimes. Also, investigators review AUSTRAC's typologies and methodologies papers on an ongoing basis, which increase their awareness of specific crimes.

Suncorp attends the Association of Certified Anti-Money Laundering Specialists (ACAMS) forums and special presentations (AUSTRAC) by industry specialists and overseas counterparts in AML/CTF. Additionally, some staff in 1<sup>st</sup> LoD and AML Investigations have completed the Association of Certified Anti-Money Laundering Specialists (ACAMS) certification.