

# JETPAX

*Bespoke. Exclusive. Private.*

## AML & Client Due Diligence Notice

ANTI-MONEY-LAUNDERING · KNOW YOUR CLIENT

ISSUED BY	JETPAX Pty Ltd
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GOVERNING LAW	Queensland, Australia

This Anti-Money-Laundering & Client Due Diligence Notice sets out the checks **JETPAX Pty Ltd**, trading as **JETPAX**, carries out and what is required of the Client. It forms part of the Terms of Engagement.

### 1 Client due diligence

Before providing services, and from time to time during the relationship, we carry out client due diligence, which may include verifying:

- the Client's identity and, for a company, trust or other entity, the identity of beneficial owners and controllers;
- the identity of passengers, where required for security or regulatory reasons;
- the nature and purpose of the engagement; and
- the source of funds used for payment.

### 2 Information we may request

**2.1** We may request identity documents, evidence of address, entity and ownership documents, and information or evidence about source of funds. The Client agrees to provide this on request and to keep it current. We may use third-party identity-verification and screening providers.

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### 3 Sanctions screening

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- 3.1** We screen clients and counterparties against applicable sanctions lists, including those maintained under Australian law (administered by the Department of Foreign Affairs and Trade) and other regimes relevant to a trip or counterparty. We will not act for, or facilitate dealings with, sanctioned persons or entities, or where doing so would breach applicable sanctions.

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### 4 Right to decline or delay

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We may delay, decline, suspend or terminate an engagement, and may decline to process a payment, where:

- (a) we are unable to complete due diligence to our satisfaction;
  - (b) information provided is incomplete, inconsistent or appears inaccurate;
  - (c) a sanctions, money-laundering or financial-crime concern arises; or
  - (d) we are required to do so by law.
- 4.1** Where we are legally prevented from doing so, we may be unable to disclose the reason.

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### 5 Funds

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- 5.1** The Client warrants that funds used in connection with our services are from lawful sources and are not the proceeds of crime. We may return funds, or decline to accept them, where a concern arises.

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### 6 Reporting and records

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- 6.1** We comply with applicable financial-crime laws, which may require reports to regulators or authorities and the retention of due-diligence records for minimum statutory periods. Personal information collected for these purposes is handled in accordance with our Privacy Policy.

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### 7 Confidentiality

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- 7.1** We treat due-diligence information confidentially and use it only for compliance, legal and risk-management purposes.