

# Anti Money Laundering and Counter Terrorism Financing (AML/CTF) requirements

**Responsibility:**       (1) AML Officer  
                                  (2) Managing Director  
                                  (3) Board of Directors

**Reporting:**           (1) Quarterly Compliance Committee Meetings

## **Overview**

The Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (“the Act”) was introduced as part of a global legislative reform aimed at reducing the potential for countries financial and other transactional systems to be used to launder money.

To enforce the AML/CTF legislation, the Australian Transaction Reports and Analysis Centre (“AUSTRAC”) has been given similar powers to those of the Australian Securities and Investments Commission under the Corporations Act.

The Act replaces the Australian Financial Transaction Reporting requirements that previously applied to financial institutions to report cash transactions of \$10,000 or more in cash.

This policy sets out the manner in which UPA Investments Pty Ltd will address its responsibilities under the Act.

## **Obligations**

From 12th December 2007, UPA Investments Pty Ltd is required to comply with the customer identification requirements of an AML/CTF program.

Specifically UPA Investments Pty Ltd has established an “anti-money laundering and counter terrorism program” which outlines the procedures to be adopted for customer identification and verification procedures for all new clients, and existing clients to whom additional designated Services are provided.

Financial institutions and fund managers which UPA Investments Pty Ltd and its representatives are arranging transactions on behalf of are able to rely on the identification and verification procedures undertaken by UPA Investments Pty Ltd.

UPA Investments Pty Ltd is required to provide access to the information obtained about the client to the relevant financial institution and fund managers.

## **Risk Management**

UPA Investments Pty Ltd has undertaken a review of the potential risks to the organisation arising from its AML/CTF obligations. These risks have been incorporated within UPA Investments Pty Ltd risk management framework and will be monitored on an ongoing basis.

The AML Officer will be responsible for the implementation of the policy and procedure throughout the organisation, including ensuring staff and Authorised Representatives have received appropriate training on AML requirements.

Internal procedures and documents have been updated to incorporate monitoring of the AML/CTF obligations.

Any breaches of the requirements will be reported to the Compliance Committee together with details of the actions taken.

## **Identification Procedures**

UPA Investments Pty Ltd has developed and documented procedures for the identification and verification of customers. These procedures have been based on the IFSA/FPA industry guidance and the Act and the Rules.

All representatives are required to follow the established procedures for identification and verification when dealing with all new clients from 12 December 2007.

Authorised Representatives must ensure that the appropriate identification procedures have been undertaken before implementing a financial transaction on behalf of client.

Authorised Representatives will assist financial institutions when requested to provided or obtain additional information about a client prior to the completion of a financial transaction for the client, or for re-identification purposes. The legislation sets out what the different client types are as follows:

1. Individuals (including sole traders and individuals acting as agent, e.g. Power of Attorney)
2. Companies (including domestic, proprietary, foreign, etc)
3. Trusts (registered and non-registered)
4. Partnerships
5. Associations
6. Registered Co-Operatives
7. Government agencies
8. Foreign entities

See table at appendix 1 for further guidance on how to identify a client.

## **Suspicious Matters**

Where a representative has concerns regarding the veracity of a client's identification, suspicious activity by a client, or cash transaction requests they will contact the AML Officer immediately to discuss the matter. All suspicious matters reported to the AML Officer will be recorded in a central file with a separate incidence report for each matter.

## **Record Keeping**

UPA Investments Pty Ltd will keep records of suspicious matters for a period of seven (7) years. UPA Investments Pty Ltd will ensure that its representatives maintain records of identification and verification undertaken, including relevant supporting materials, for a period of seven (7) years.

The Board of UPA Investments Pty Ltd has approved this Policy and the associated Procedures. The Compliance Committee will review the continued appropriateness of the policy and procedures, particularly in light of further developments to the Act. The Board will be kept informed of any changes to the Policy and of any breaches of the Policy and Procedures.

## **Related Documents**

- Risk Register
- AML Procedures
- FPA/IFSA Guidance Note No.24 and standard identification forms

**Appendix 1** The table below contains a summary of the source information that can be used for verification purposes for the various client types:

| <i>Client Type</i> | <i>Purpose of collecting information</i>   | <i>Identification: Minimum “KYC” information to be collected</i>  | <i>Verification</i>   |
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| Individual         | To determine that the customer, as an individual is the individual that he or she claims to be.                      | <p>As a minimum the Reporting Entity must have a procedure to ensure that the following KYC information is obtained as a minimum from an individual (excludes sole traders – see next section)</p> <p>(1) the customer’s full name;</p> <p>(2) the customer’s date of birth; and</p> <p>(3) the customer’s residential address.</p> | <p>Verification of:</p> <ul style="list-style-type: none"> <li>• <b><i>the customer’s name and</i></b></li> </ul> <p><b>either</b></p> <ul style="list-style-type: none"> <li>• <b><i>the customer’s residential address or</i></b></li> <li>• <b><i>date of birth, or both,</i></b></li> </ul> <p>from:</p> <ul style="list-style-type: none"> <li>• <b><i>an original or certified copy<sup>1</sup> of a primary photographic identification document<sup>2</sup> (eg licence or passport); or</i></b></li> </ul> <p><b>both:</b></p> <ul style="list-style-type: none"> <li>• <b><i>an original or certified copy of a primary non-photographic identification document; and</i></b></li> <li>• <b><i>an original or certified copy of a secondary identification document; and</i></b></li> <li>• <b><i>Verify that any document produced by the customer has not expired (other than in the case of a passport issued by the Commonwealth that expired within the preceding two years).</i></b></li> </ul> |
| Sole Trader        | To determine that the customer, as an individual is the individual that he or she claims to be. <i>(Rules 4.2.2)</i> | As a minimum the Reporting Entity must have a procedure to ensure that the following KYC information is obtained as a minimum from a customer who notifies the reporting entity that he or she is a customer of the reporting entity in his or her capacity as a sole trader:   | <p>Verification of:</p> <ul style="list-style-type: none"> <li>• <b><i>the customer’s name and</i></b></li> </ul> <p><b>either</b></p> <ul style="list-style-type: none"> <li>• <b><i>the customer’s residential address or</i></b></li> <li>• <b><i>date of birth, or both,</i></b></li> </ul>   |

<sup>1</sup> See Appendix 2 for a list of the people who can certify documents. This includes a financial planner with two years or more experience as an authorised representative.

<sup>2</sup> See Appendix 2 for list of acceptable primary and secondary identification documents. Secondary identification documents do not carry photographic identification.

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|                    |   | <ul style="list-style-type: none"> <li>the customer's full name;</li> <li>the customer's date of birth;</li> <li>the full business name (if any) under which the customer carries on his or her business;</li> <li>the full address of the customer's principal place of business (if any) or the customer's residential address; and</li> <li>any ABN issued to the customer.</li> </ul>   | <p>from:</p> <ul style="list-style-type: none"> <li><i>an original or certified copy<sup>3</sup> of a primary photographic identification document<sup>4</sup> (eg licence or passport); or</i></li> </ul> <p><i>both:</i></p> <ul style="list-style-type: none"> <li><i>an original or certified copy of a primary non-photographic identification document; and</i></li> <li><i>an original or certified copy of a secondary identification document; and</i></li> </ul> <p><i>Verify that any document produced by the customer has not expired (other than in the case of a passport issued by the Commonwealth that expired within the preceding two years).</i></p> |
| Company - domestic | To determine that the company details provided by a client operating as a domestic company, are as they have claimed to be. | <p>The following information must be collected as a minimum from a client operating as a domestic company:</p> <ul style="list-style-type: none"> <li>the full name of the company as registered by ASIC;</li> <li>the full address of the company's registered office;</li> <li>the full address of the company's principal place of business, if any;</li> <li>the ACN issued to the company;</li> <li>whether the company is registered by ASIC as a proprietary or public company; and</li> <li>if the company is registered as a proprietary company, the name of each director of the company;</li> </ul> | <p>Verification of the following information about a domestic company:</p> <ul style="list-style-type: none"> <li>the full name of the company as registered by ASIC;</li> <li>whether the company is registered by ASIC as a proprietary or public company; and</li> <li>the ACN issued to the company;</li> </ul>   |

<sup>3</sup> See definition for who can certify documents. This includes a financial planner with two years or more experience as an authorised representative.

<sup>4</sup> See definition for list of applicable primary and secondary identification documents. Secondary identification documents do not carry photographic identification. (confirm)

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| <p>Company – foreign registered</p> | <p>To determine that the company details provided by a client operating as a foreign registered company, are as they have claimed to be.</p> | <p>The following information must be collected as a minimum from a client operating as a registered foreign company:</p> <ul style="list-style-type: none"> <li>• the full name of the company as registered by ASIC;</li> <li>• the full address of the company’s registered office in Australia;</li> <li>• the full address of the company’s principal place of business in Australia (if any) or the full name and address of the company’s local agent in Australia, if any;</li> <li>• the ARBN issued to the company;</li> <li>• the country in which the company was formed, incorporated or registered;</li> <li>• whether the company is registered by the relevant foreign registration body and if so whether it is registered as a private or public company or some other type of company; and</li> <li>• if the company is registered as a private company by the relevant foreign registration body - the name of each director of the company;</li> </ul> | <p>Verification of the following information about a registered foreign company:</p> <ul style="list-style-type: none"> <li>• the full name of the company as registered by ASIC;</li> <li>• whether the company is registered by the relevant foreign registration body and if so whether it is registered as a private or public company; and</li> <li>• the ARBN issued to the company;</li> </ul> |
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| <p>Company – foreign unregistered</p> | <p>To determine that the company details provided by a client operating as a foreign unregistered company, are as they have claimed to be.</p> | <p>The following information must be collected as a minimum from a client operating as an unregistered foreign company:</p> <ul style="list-style-type: none"> <li>• the full name of the company;</li> <li>• the country in which the company was formed, incorporated or registered;</li> <li>• whether the company is registered by the relevant foreign registration body and if so: <ul style="list-style-type: none"> <li>(i) any identification number issued to the company by the relevant foreign registration body upon the company’s formation, incorporation or registration;</li> <li>(ii) the full address of the company in its country of formation, incorporation or registration as registered by the relevant foreign registration body; and</li> <li>(iii) whether it is registered as a private or public company or some other type of company by the relevant foreign registration body;</li> </ul> </li> </ul> | <p>Verification of the following information about an unregistered foreign company:</p> <ul style="list-style-type: none"> <li>• the full name of the company; and</li> <li>• whether the company is registered by the relevant foreign registration body and if so: <ul style="list-style-type: none"> <li>(i) any identification number issued to the company by the relevant foreign registration body upon the company’s formation, incorporation or registration; and</li> <li>(ii) whether the company is registered as a private or public company.</li> </ul> </li> </ul> |
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| Trustees | <p>To determine where a person notifies the reporting entity that the person is a customer of the reporting entity in the person's capacity as the trustee of a trust, that:</p> <p>(1) the trust exists; and</p> <p>(2) the name of each trustee and beneficiary, or a description of each class of beneficiary, of the trust has been provided.</p> | <p>The following information must be collected as a minimum from a client under a trust structure:</p> <ul style="list-style-type: none"> <li>• the full name of the trust;</li> <li>• the full business name (if any) of the trustee in respect of the trust;</li> <li>• the type of the trust;</li> <li>• the country in which the trust was established;</li> <li>• if any of the trustees is an individual, then the additional information required about the individual must also be collected (see requirements for an individual)</li> <li>• if any of the trustees is a company, then the information required about the company must also be collected. (see requirements for companies); and</li> </ul> | <p>Verification of the following information about a trust:</p> <ul style="list-style-type: none"> <li>• the full name of the trust</li> </ul> <p>from</p> <ul style="list-style-type: none"> <li>○ a trust deed, certified copy, or</li> <li>○ certified extract of the trust deed,</li> <li>○ reliable and independent documents relating to the trust, or</li> <li>○ reliable and independent electronic data;</li> </ul> <ul style="list-style-type: none"> <li>• if any of the trustees is an individual, then in respect of one of those individuals – the individual verification requirements also apply;</li> <li>• if any of the trustees is a company, then in respect of one of those companies – the company verification requirements also apply; and</li> </ul> |
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| Trustees and beneficiaries | To determine where a person notifies the reporting entity that the person is a customer of the reporting entity in the person's capacity as the trustee of a trust, that the person is the individual that he or she claims to be. | <p>The following information must be collected as a minimum from a client in their capacity as a trustee of a trust:</p> <ul style="list-style-type: none"> <li>• the full name and address of each trustee in respect of the trust; and</li> </ul> <p>either:</p> <ul style="list-style-type: none"> <li>• the full name of each beneficiary in respect of the trust; or</li> <li>• if the terms of the trust identify the beneficiaries by reference to membership of a class – details of the class.</li> </ul> <p>These requirements do not apply where the trust is:</p> <ul style="list-style-type: none"> <li>• a managed investment scheme registered by ASIC;</li> <li>• a managed investment scheme that is not registered by ASIC and that: <ul style="list-style-type: none"> <li>(a) only has wholesale clients; and</li> <li>(b) does not make small scale offerings to which section 1012E of the <i>Corporations Act 2001</i> applies; or</li> </ul> </li> <li>• a government superannuation fund established by legislation.</li> </ul> | <p>Verification of information about the trustees and beneficiaries can be based on:</p> <ol style="list-style-type: none"> <li>(1) a trust deed, certified copy or certified extract of a trust deed;</li> <li>(2) reliable and independent documents relating to the trust;</li> <li>(3) reliable and independent electronic data; or</li> <li>(4) a combination of (1) to (3) above.</li> </ol> |
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| <p>Partners in a partnership</p> | <p>Where a person notifies the reporting entity that the person is a customer of the reporting entity in the person's capacity as a partner in a partnership, that:</p> <ul style="list-style-type: none"> <li>• the partnership exists; and</li> <li>• the name of each of the partners in the partnership has been provided</li> </ul> | <p>The following information must be collected as a minimum from a client in their capacity as a partner in a partnership:</p> <ul style="list-style-type: none"> <li>• the full name of the partnership;</li> <li>• the full business name (if any) of the partnership as registered under any State or Territory business names legislation;</li> <li>• the country in which the partnership was established;</li> <li>• in respect of the partners - then the additional information required about the individual must also be collected (see requirements for an individual)</li> <li>• the full name and residential address of each partner in the partnership except where the regulated status of the partnership is confirmed through reference to the current membership directory of the relevant professional association.</li> </ul> | <p>Verification of the following minimum information:</p> <ul style="list-style-type: none"> <li>• the full name of the partnership</li> </ul> <p>from</p> <ol style="list-style-type: none"> <li>(1) a partnership agreement, certified copy or certified extract of a partnership agreement;</li> <li>(2) a certified copy or certified extract of minutes of a partnership meeting;</li> <li>(3) reliable and independent documents relating to the partnership;</li> <li>(4) reliable and independent electronic data; or</li> <li>(5) a combination of (1) to (4) above.</li> </ol> <ul style="list-style-type: none"> <li>• information about the individual partners</li> </ul> |
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| <p>Associations - incorporated</p> | <p>Where a customer notifies the reporting entity that it is an incorporated or unincorporated association, that:</p> <ul style="list-style-type: none"> <li>• the association exists; and</li> <li>• the names of any members of the governing committee (howsoever described) of the association have been provided.</li> </ul> | <p>As a minimum, the following information must be collected from an incorporated association:</p> <ul style="list-style-type: none"> <li>• the full name of the association;</li> <li>• the full address of the association's principal place of administration or registered office (if any) or the residential address of the association's public officer or (if there is no such person) the association's president, secretary or treasurer;</li> <li>• any unique identifying number issued to the association upon its incorporation by the State, Territory or overseas body responsible for the incorporation of the association; and</li> <li>• the full name of the chairman, secretary and treasurer or equivalent officer in each case of the association.</li> </ul> | <p>Verification of the following information:</p> <ul style="list-style-type: none"> <li>• the full name of the incorporated association; and</li> <li>• any unique identifying number issued to the incorporated association upon its incorporation;</li> </ul> <p>from</p> <ol style="list-style-type: none"> <li>(1) the constitution or rules of the association or a certified copy or certified extract of the constitution or rules of the association;</li> <li>(2) the minutes of meeting of the association or a certified copy or certified extract of minutes of meeting of the association;</li> <li>(3) in the case of an incorporated association, information provided by ASIC or by the State, Territory or overseas body responsible for the incorporation of the association;</li> <li>(4) reliable and independent documents relating to the association;</li> <li>(5) reliable and independent electronic data; or</li> <li>(6) a combination of (1)–(5) above.</li> </ol> |
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| <p>Associations - unincorporated</p> | <p><i>As above</i></p> | <p>As a minimum, the following information must be collected from a customer in his or her capacity as a member of an unincorporated association:</p> <ul style="list-style-type: none"> <li>• the full name of the association;</li> <li>• the full address of the association’s principal place of administration (if any);</li> <li>• the full name of the chairman, secretary and treasurer or equivalent officer in each case of the association; and</li> <li>• (d) in respect of the member – then the additional information required about the individual must also be collected (see requirements for an individual)</li> </ul> | <p>Verification of the following information:</p> <ul style="list-style-type: none"> <li>• the full name (if any) of the association</li> </ul> <p>from</p> <ul style="list-style-type: none"> <li>○ the rules or constitution of the association or</li> <li>○ from a certified copy or</li> <li>○ certified extract of the rules or</li> <li>○ constitution of the association or</li> <li>○ from reliable and independent documents relating to the association or</li> <li>○ from reliable and independent electronic data; and</li> </ul> <ul style="list-style-type: none"> <li>• information about the member.</li> </ul> |
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| Registered Co-Operative | <p>To ensure that where a customer notifies the reporting entity that it is a registered co-operative, that:</p> <ul style="list-style-type: none"> <li>• the co-operative exists; and</li> <li>• the names of the chairman, secretary or equivalent officer in each case of the co-operative have been provided.</li> </ul> | <p>As a minimum the following information from a registered co-operative:</p> <ul style="list-style-type: none"> <li>• the full name of the co-operative;</li> <li>• the full address of the co-operative's registered office or principal place of operations (if any) or the residential address of the co-operative's secretary or (if there is no such person) the co-operative's president or treasurer;</li> <li>• any unique identifying number issued to the co-operative upon its registration by the State, Territory or overseas body responsible for the registration of the co-operative; and</li> <li>• the full name of the chairman, secretary and treasurer or equivalent officer in each case of the co-operative.</li> </ul> | <p>Verification of the following information</p> <ul style="list-style-type: none"> <li>• the full name of the co-operative; and</li> <li>• any unique identifying number issued to the co-operative upon its registration.</li> </ul> <p>from</p> <ol style="list-style-type: none"> <li>(1) any register maintained by the co-operative or a certified copy or certified extract of any register maintained by the co-operative;</li> <li>(2) any minutes of meeting of the co-operative or a certified copy or certified extract of any minutes of meeting of the co-operative;</li> <li>(3) information provided by the State, Territory or overseas body responsible for the registration of the co-operative;</li> <li>(4) reliable and independent documents relating to the co-operative;</li> <li>(5) reliable and independent electronic data; or</li> <li>(6) a combination of (1)–(5) above.</li> </ol> |
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| <p>Government Bodies</p>   | <p>Where a customer notifies the reporting entity that it is a government body, that:</p> <ul style="list-style-type: none"> <li>• the government body exists; and</li> <li>• where sought by the reporting entity, information about the beneficial ownership of the government body has been provided</li> </ul> | <p>As a minimum the following information must be collected from a government body:</p> <ul style="list-style-type: none"> <li>• the full name of the government body;</li> <li>• the full address of the government body's principal place of operations;</li> <li>• whether the government body is an entity or emanation, or is established under legislation, of the Commonwealth; and</li> <li>• whether the government body is an entity or emanation, or is established under legislation, of a State, Territory, or a foreign country and the name of that State, Territory or country.</li> </ul> | <p>Verification of the minimum information must be based on</p> <ul style="list-style-type: none"> <li>• reliable and independent documents relating to the government body</li> <li>• reliable and independent electronic data</li> </ul> |
| <p>Agents of Customers</p> | <p>Where a customer has appointed an individual to act as an agent authorised to act for or on behalf of the customer that the agent is who he or she claims to be.</p>  | <p>As a minimum, the following information must be collected from the customer about his or her agent(s)</p> <ul style="list-style-type: none"> <li>• the full name of each individual who purports to act for or on behalf of the customer with respect to the provision of a designated service by the reporting entity; and</li> <li>• evidence (if any) of the customer's authorisation</li> </ul>   | <p>Verification of the minimum information must be based on</p> <ul style="list-style-type: none"> <li>• reliable and independent documents relating to the government body</li> <li>• reliable and independent electronic data</li> </ul> |

**Appendix 2** The AML/CTF Act provides a list of the people able to certify documents on behalf of clients:

A **certified copy** means a document that has been certified as a true copy of an original document by one of the following persons:

- (1) a person who is enrolled on the roll of the Supreme Court of a State or Territory, or the High Court of Australia, as a legal practitioner (however described), eg a lawyer;
- (2) a judge of a court;
- (3) a magistrate;
- (4) a chief executive officer of a Commonwealth court;
- (5) a registrar or deputy registrar of a court;
- (6) a Justice of the Peace;
- (7) a notary public (for the purposes of the *Statutory Declaration Regulations 1993*);
- (8) a police officer;
- (9) an agent of the Australian Postal Corporation who is in charge of an office supplying postal services to the public;
- (10) a permanent employee of the Australian Postal Corporation with 2 or more years of continuous service who is employed in an office supplying postal services to the public;
- (11) an Australian consular officer or an Australian diplomatic officer (within the meaning of the *Consular Fees Act 1955*);
- (12) an officer with 2 or more continuous years of service with one or more financial institutions (for the purposes of the *Statutory Declaration Regulations 1993*);
- (13) a finance company officer with 2 or more continuous years of service with one or more finance companies (for the purposes of the *Statutory Declaration Regulations 1993*);
- (14) **an officer with, or authorised representative of, a holder of an Australian financial services licence, having 2 or more continuous years of service with one or more licensees.**
- (15) a member of the Institute of Chartered Accountants in Australia, CPA Australia or the National Institute of Accountants with 2 or more years of continuous membership.

**A *primary non-photographic identification document*** means any of the following:

- (1) a birth certificate or birth extract issued by a State or Territory;
- (2) a citizenship certificate issued by the Commonwealth;
- (3) a citizenship certificate issued by a foreign government that, if it is written in a language that is not understood by the person carrying out the verification, is accompanied by an English translation prepared by an accredited translator;
- (4) a birth certificate issued by a foreign government, the United Nations or an agency of the United Nations that, if it is written in a language that is not understood by the person carrying out the verification, is accompanied by an English translation prepared by an accredited translator;
- (5) a pension card issued by Centrelink that entitles the person in whose name the card is issued, to financial benefits.

**A *primary photographic identification document*** means any of the following:

- (1) a licence or permit issued under a law of a State or Territory or equivalent authority of a foreign country for the purpose of driving a vehicle that contains a photograph of the person in whose name the document is issued;
- (2) a passport issued by the Commonwealth;
- (3) a passport or a similar document issued for the purpose of international travel, that:
  - (a) contains a photograph and the signature of the person in whose name the document is issued;
  - (b) is issued by a foreign government, the United Nations or an agency of the United Nations; and
  - (c) if it is written in a language that is not understood by the person carrying out the verification - is accompanied by an English translation prepared by an accredited translator.
- (4) a card issued under a law of a State or Territory for the purpose of proving the person's age which contains a photograph of the person in whose name the document is issued.
- (5) a national identity card issued for the purpose of identification, that:
  - (a) contains a photograph and the signature of the person in whose name the document is issued;
  - (b) is issued by a foreign government, the United Nations or an agency of the United Nations; and
  - (c) if it is written in a language that is not understood by the person carrying out the verification - is accompanied by an English translation prepared by an accredited translator.

A **secondary identification document** means any of the following:

- (1) a notice that:
  - (a) was issued to an individual by the Commonwealth, a State or Territory within the preceding twelve months;
  - (b) contains the name of the individual and his or her residential address; and
  - (c) records the provision of financial benefits to the individual under a law of the Commonwealth, State or Territory (as the case may be);
  
- (2) a notice that:
  - (a) was issued to an individual by the Australian Taxation Office within the preceding 12 months;
  - (b) contains the name of the individual and his or her residential address; and
  - (c) records a debt payable to or by the individual by or to (respectively) the Commonwealth under a Commonwealth law relating to taxation;
  
- (3) a notice that:
  - (a) was issued to an individual by a local government body or utilities provider within the preceding three months;
  - (b) contains the name of the individual and his or her residential address; and
  - (c) records the provision of services by that local government body or utilities provider to that address or to that person.
  
- (4) In relation to a person under the age of 18, a notice that:
  - (a) was issued to a person by a school principal within the preceding three months;
  - (b) contains the name of the person and his or her residential address; and
  - (c) records the period of time that the person attended at the school.