

iTeller Pty Ltd
RISK ASSESSMENT AND MANAGEMENT MATRIX

Item #	Identification	Assessment	Impact	Evaluation	Priority	Treatment
A. REGULATORY RISK						
	Type of Regulatory Risk	Likelihood	Impact	Overall Risk	Priority	Control
A.1	Failure to report suspicious matters	E	Cat.	Low.	High.	Refer to Section 24 in Part A of this Program
A.2	Failure to monitor customer transactions	E	Cat.	Low.	High.	Refer to Sections 23-26 in Part A of this Program
A.3	Customer Identification Requirements.	E	Maj.	Low.	High.	Refer to Part B of this Program.
A.4	Customer verification not done properly.	E	Maj.	Low.	High.	Refer to Part B of this Program.
A.5	Customer identification and/or verification completed by a third party.	E	Maj.	Low.	High.	Refer to Section 20 in Part A of this Program
A.6	Not having an AML/CTF program.	E	Maj.	Low.	High.	Refer to Section 8 in Part A of this Program
A.7	Not submitting an AML/CTF compliance report.	E	Maj.	Low.	High.	Refer to Sections 23 and 27 in Part A of this Program
A.8	Failure to appoint an AML/CTF Compliance Officer.	E	Maj.	Low.	High.	Refer to Section 11 in Part A of this Program
A.9	Failure to ensure approval and ongoing oversight of AML/CTF program by the Director	E	Maj.	Low.	High.	Refer to Section 10 in Part A of this Program
A.10	Failure to have oversight of responsible third parties	E	Maj.	Low.	High.	Refer to Section 20 in Part A of this Program
B. CUSTOMER TYPE AND TRANSACTIONS RISK						
	Type of Client/Account	Likelihood	Impact	Overall Risk	Priority	Control
B.1	Individual Client			Low.		No action required, proceed to identify and verify customer as per Part B of this Program. If an individual is identified as suspicious or as a Politically Exposed Persons, enhanced customer due diligence procedures as set out in Part B of this Program should be followed, and a suspicious matter report should be prepared and lodged with AUSTRAC if applicable.
B.2	Joint account - Husband/Wife with a same address			Low.		iTeller DOES NOT accept these customers.
B.3	Joint account - Different surnames with a same address			Med.		iTeller DOES NOT accept these customers.
B.4	Joint account - Different addresses			High		iTeller DOES NOT accept these customers.

B.5	Sole Trader			Low.		iTeller DOES NOT accept these customers.
B.6	Company - Individual Director			Med.		iTeller DOES NOT accept these customers.
B.7	Company - Corporate Directors			Low.		iTeller DOES NOT accept these customers.
B.8	Trust			Low.		iTeller DOES NOT accept these customers.
B.9	Trust - Trustee			Low.		iTeller DOES NOT accept these customers.
B.10	Trust - Beneficiary			Low.		iTeller DOES NOT accept these customers.
B.11	Partnership			Low.		iTeller DOES NOT accept these customers.
B.12	Associations			Low.		iTeller DOES NOT accept these customers..
B.13	Registered Cooperatives			Low.		iTeller DOES NOT accept these customers.
B.14	Government Bodies			Low.		iTeller DOES NOT accept these customers.iTeller DOES NOT accept these customers.

B.15	Agents			Med.		iTeller DOES NOT accept these customers.
	Country of Residence	Likelihood	Impact	Overall Risk	Priority	Control
B.16	Client is ordinarily resident in any of the following countries: Afghanistan, Botswana, Burundi, Cameroon, Chad, The Democratic Republic of the Congo, Cote D'Ivoire, Cuba, Eritrea, Gambia, Ghana, Guinea, Haiti, Iran, Iraq, North Korea, Kyrgyzstan, Lebanon, Lesotho, Liberia, Libyan Arab Jamahiriya, Mali, Myanmar, Niger, Somalia, Sudan, Syria, Uganda, Yemen, Zimbabwe			High		iTeller DOES NOT accept these customers.
B.17	Client is ordinarily resident in any of the following countries: Angola, Bangladesh, Bahrain, Belarus, Bolivia, Burkina Faso, Cambodia, China, Central African Republic, Colombia, Comoros, Ecuador, Egypt, Equatorial Guinea, Ethiopia, Georgia, Greenland, Guatemala, Guinea-Bissau, Holy See (Vatican City State), Hong Kong, India, Indonesia, Israel, Jordan, Kazakhstan, Kenya, Kuwait, Lao People's Democratic Republic, Madagascar, Malawi, Malaysia, Mauritania, Nigeria, Oman, Pakistan, Palestine, Papua New Guinea, Peru, Philippines, Russian Federation, Qatar, Rwanda, Sao Tome and Principe, Saudi Arabia, Sierra Leone, Solomon Islands, Sri Lanka, South Africa, Tajikistan, Timor-Leste, Togo, Turkey, Turkmenistan, United Arab Emirates, Uzbekistan, Venezuela, Vietnam, Zambia			Med.		iTeller currently deals with some clients who are located in United Arab Emirates as classified under section B.17. iTeller will attempt to solve any issues by requested additional or better quality ID documentation. iTeller may also request certified documents from the client.
B.18	All other countries.			Low.		iTeller deals with clients who are not located in countries as classified under section B.16 or where the identity of the client has been appropriately verified in accordance with section B.17. No action required, proceed to identify and verify customer as per Part B of this Program.
	Beneficiaries' Country of Residence	Likelihood	Impact	Overall Risk	Priority	Control
B.19	Beneficiary is ordinarily resident in any of the following countries: Afghanistan, Botswana, Burundi, Cameroon, Chad, The Democratic Republic of the Congo, Cote D'Ivoire, Cuba, Eritrea, Gambia, Ghana, Guinea, Haiti, Iran, Iraq, North Korea, Kyrgyzstan, Lebanon, Lesotho, Liberia, Libyan Arab Jamahiriya, Mali, Myanmar, Niger, Somalia, Sudan, Syria, Uganda, Yemen, Zimbabwe			High		iTeller DOES NOT accept instructions from clients where the beneficiary address is located in the countries as classified under section B.19.

B.20	Beneficiary is ordinarily resident in any of the following countries: Angola, Bangladesh, Bahrain, Belarus, Bolivia, Burkina Faso, Cambodia, Central African Republic, China, Colombia, Comoros, Ecuador, Egypt, Equatorial Guinea, Ethiopia, Georgia, Greenland, Guatemala, Guinea-Bissau, Holy See (Vatican City State), Hong Kong, India, Indonesia, Israel, Jordan, Kazakhstan, Kenya, Kuwait, Lao People's Democratic Republic, Madagascar, Malawi, Malaysia, Mauritania, Nigeria, Oman, Pakistan, Palestine, Papua New Guinea, Peru, Philippines, Russian Federation, Qatar, Rwanda, Sao Tome and Principe, Saudi Arabia, Sierra Leone, Solomon Islands, Sri Lanka, South Africa, Tajikistan, Timor-Leste, Togo, Turkey, Turkmenistan, United Arab Emirates, Uzbekistan, Venezuela, Vietnam, Zambia			Med.		iTeller currently deals with some clients where the beneficiary address is located in United Arab Emirates as classified under section B.20. Where the beneficiary address is located in a country listed in this section, iTeller will request further information and identification documents from the beneficiary to verify its identity.
B.21	All other countries.			Low.		iTeller deals with clients where the beneficiary address is not located in countries as classified under section B.19 or where the identity of the beneficiary has been appropriately verified in accordance with section B.20. No action required, proceed to identify and verify customer as per Part B of the AML/CTF Program.
Type of Regulatory Risk		Likelihood		Overall Risk		Control
B.22	iTeller is not satisfied about the true identity of the customer or the true intent of the transaction	D	Maj.	Med.	High.	*Conduct enhanced customer due diligence *Customer is unable to transact with iTeller, and iTeller will determine whether or not to proceed with the transaction/ transact with the customer in the future. *If suspicion is formed, lodge a suspicious matter report (SMR) with AUSTRAC.
B.23	Customer who does not deal face to face	A	Low.	Low.	Low.	*iTeller conducts most transactions online. If appropriate, iTeller will insist on meeting a customer face-to-face. *If iTeller is not satisfied with the information about the true identity of the customer or the true intent of the transaction, consider whether or not to proceed with the transaction. *If a suspicion is formed, lodge a suspicious matter report (SMR) with AUSTRAC.
B.24	Customer outside normal target customer base	C	Mod.	Med.	Med.	*Conduct enhanced customer due diligence *Customer is unable to transact with iTeller, and iTeller will determine whether or not to proceed with the transaction/ transact with the customer in the future.
B.25	Customer is not willing to produce evidence of identification or produces unsatisfactory documentation	C	Maj.	Med.	High.	*If iTeller is not satisfied with the information about the true identity of the customer or the true intent of the transaction, the customer will be unable to transact with iTeller, and *iTeller consider whether or not to proceed with the transaction/ transact with the customer in future. *If a suspicion is formed, lodge a suspicious matter report (SMR) with AUSTRAC.
B.26	Customer is a PEP	D	High.	Low.	High.	Refer to Section 70 of this Program. *iTeller does not have any PEP or other companies that pose an immediately obvious money laundering or terrorism financing risk. The AML/CTF Compliance Officer performs KYC procedures. Refer to Part B of this Program. *If a suspicion is formed, lodge a suspicious matter report (SMR) with AUSTRAC.
B.27	Customer wants to carry out a large one-off transaction	D	Maj.	Med.	High	*Limit the value of transactions *Conduct enhanced customer due diligence. *Make further enquiries about nature of transaction and the source of funds. *Consider whether or not to proceed with transaction. *If a suspicion is formed, lodge a suspicious matter report (SMR) with AUSTRAC.
B.28	Customer is engaged in a business that involves significant amounts of cash	C	High.	Med.	High.	*Conduct enhanced customer due diligence. *Make further enquiries about the transaction the customer wishes to undertake, including enquiries about beneficiary customer and the country of destination. *Consider whether or not to proceed with transaction. *If a suspicion is formed, lodge a suspicious matter report (SMR) with AUSTRAC.
B.29	Customer which is a company with complex ownership structure	E		Mod.		iTeller DOES NOT accept these customers.

B.30	Customer is willing to pay unusually high fees or insists on urgent transaction for no apparent good reason	E	High.	Med.	High.	iTeller rarely transacts with customers face-to-face. As transactions are via an online platform through the iTeller ATM, transaction fees are non-negotiable. However, in the event this risk arises, iTeller will: *Conduct enhanced customer due diligence. *Make further enquiries about nature of transaction and the source of funds. <i>*Consider whether or not to proceed with transaction/transaction with the client in the future.</i>
B.31	Customer is based in or conducting business through a high-risk country or a country with known higher levels of corruption, organised crime or drug production/distribution	D	Maj.	Maj.	High.	iTeller may not operate in that jurisdiction, but if the risk arises, iTeller will: *Conduct enhanced customer due diligence. *Check for any sanctions against the country with DFAT, AUSTRAC. *If a suspicion is formed, lodge a suspicious matter report (SMR) with AUSTRAC. *Employees AML/CTF risk awareness training program is implemented.
B.32	A significant change occurs in the way the customer conducts transactions, where a significant change occurs if the number of transactions carried out by a customer increases by 100% within a five (5) calendar day period	D	High.	Med.	High.	*Make further enquiries about the nature the transaction or the source of the funds. *If a suspicion is formed, lodge a suspicious matter report (SMR) with AUSTRAC.
B.33	Customer is engaged in a business that involves significant amounts of cash	C	High.	Med.	High.	*Conduct enhanced customer due diligence. *Make further enquiries about the transaction the customer wishes to undertake, including enquiries about beneficiary customer and the country of destination. *Consider whether or not to proceed with transaction. *If a suspicion is formed, lodge a suspicious matter report (SMR) with AUSTRAC.
B.34	Customer uses proxies, unverifiable IP address or geographical location, disposable email address or mobile number, ever changing devices used to conduct transactions	C	High.	Med.	High.	*Collect IP addresses and other device identifiers *Ongoing customer due diligence and transaction monitoring program in place *CDD procedures in place to identify and verify all customers *Employee AML/CTF risk awareness training program implemented *Procedures in place to identify suspicious matters and submit SMRs to AUSTRAC *Require the use of one time PINs sent to (Australian) mobile phone number to conduct digital transactions
B.35	Customer's transaction activity is of an unusual patterns (e.g. volumes, velocity, structuring to avoid detection/reporting obligations, source, destination)	C	High.	Med.	High.	*Procedures in place to identify suspicious matters and submit SMR to AUSTRAC
B.36	Transactions involving known blacklisted addresses such as 'darknet' market place transactions and tumblers	C	High.	Med.	High.	*Procedures in place to identify suspicious matters and submit SMR to AUSTRAC
B.37	Ransom-ware	C	High.	Med.	High.	*Procedures in place to identify suspicious matters and submit SMR to AUSTRAC *Employee AML/CTF risk awareness training program implemented
B.38	Transactions in higher risk or anonymous digital currencies	C	High.	Med.	High.	*Conduct enhanced customer due diligence *Employee AML/CTF risk awareness training program implemented *Procedures in place to identify suspicious matters and submit SMR to AUSTRAC
B.39	Employee collusion	D	High.	Med.	High.	*Procedures in place to identify suspicious matters and submit SMRs to AUSTRAC *Employee due diligence processes in place *Employee AML/CTF risk awareness training program implemented
C. DESIGNATED SERVICES AND METHODS OF DELIVERY RISK						
	Type of Client/Account	Likelihood	Impact	Overall Risk	Priority	Control

C.1	Type of designated services (a) Item 31 of section 6 of the AML/CTF Act; (b) Item 32 of section 6 of the AML/CTF Act; (c) Item 50 of section 6 of the AML/CTF Act and (d) Item 50A of section 6 of the AML/CTF Act	A	High.	Med.	High.	<ul style="list-style-type: none"> *iTeller applies more rigorous customer due diligence measures for high risk countries *Maintaining relationships with long-standing customers *Obtaining additional information on higher risk customers to more thoroughly verify their identity and/or any beneficial owners of funds transferred *Conducting more rigorous ongoing monitoring of the transactions and activity of customers *Ensuring all staff are aware of the money laundering and terrorism financing risks which iTeller faces and are trained in how to control those risks. *Limiting each transaction to \$5,000.00 AUD when depositing/withdrawing at ATMs. *Where iTeller accepts a payment from a customer for a digital currency transaction, iTeller only accepts physical cash through an ATM, or digital currency through L-Bank. *Where iTeller makes a payment to its customer for a digital currency transaction, iTeller will make payment by way of physical cash.
C.2(A)	Delivery method risk (a) Cash deposit and withdrawal at an iTeller ATM; (b) Digital Currency.	A	High.	Med.	High.	<ul style="list-style-type: none"> *iTeller applies more rigorous customer due diligence measures for high risk countries *Maintaining relationships with long-standing customers *Obtaining additional information on higher risk customers to more thoroughly verify their identity and/or any beneficial owners of funds transferred *Conducting more rigorous ongoing monitoring of the transactions and activity of customers *Ensuring all staff are aware of the money laundering and terrorism financing risks which iTeller faces and are trained in how to control those risks. *Limiting each transaction to \$5,000.00 AUD when depositing/withdrawing at ATMs. *Where iTeller accepts a payment from a customer for a digital currency transaction, iTeller only accepts physical cash -- or -- digital currency payments through L-Bank. *Where iTeller makes a payment to its customer for a digital currency transaction, iTeller will make payment by way of physical cash.
C.2(B)	Payment Risk Deposit and withdrawal methods used: (a) Cash deposit and withdrawal at an iTeller ATM; (b) Digital Currency.	A	High.	Med.	High.	<ul style="list-style-type: none"> *All payment methods offered by 3rd parties are governed by written agreements; * Limiting payment methods to Individuals * Requiring clients to use same payment method for deposit and withdrawal; * Not transferring money to high-risk countries OR applying more rigorous customer due diligence measures for high risk countries * Maintaining relationships with long-standing customers * Obtaining additional information on higher risk customers to more thoroughly verify their identity and/or any beneficial owners of funds transferred * Conducting more rigorous ongoing monitoring of the transactions and activity of customers * Ensuring all staff are aware of the money laundering and terrorism financing risks which iTeller faces and are trained in how to control those risks.
C.3	Jurisdiction Risk: Foreign Jurisdictions Dealt with - all other countries	A	High.	Low.	High.	<ul style="list-style-type: none"> * iTeller currently deals with clients who are not from countries as classified in C.5 or where the identity of the client has been appropriately verified in accordance with section C.4. * No action required, proceed to identify and verify customer as per Part B of this Program.

C.4	Jurisdiction Risk: Foreign Jurisdictions Dealt with Angola, Bangladesh, Bahrain, Belarus, Bolivia, Burkina Faso, Cambodia, China, Central African Republic, Colombia, Comoros, Ecuador, Egypt, Equatorial Guinea, Ethiopia, Georgia, Greenland, Guatemala, Guinea-Bissau, Holy See (Vatican City State), Hong Kong, India, Indonesia, Israel, Jordan, Kazakhstan, Kenya, Kuwait, Lao People's Democratic Republic, Madagascar, Malawi, Malaysia, Mauritania, Nigeria, Oman, Pakistan, Palestine, Papua New Guinea, Peru, Philippines, Russian Federation, Qatar, Rwanda, Sao Tome and Principe, Saudi Arabia, Sierra Leone, Solomon Islands, Sri Lanka, South Africa, Tajikistan, Timor-Leste, Togo, Turkey, Turkmenistan, United Arab Emirates, Uzbekistan, Venezuela, Vietnam, Zambia	A	High.	Med.	High.	* iTeller currently deals with some clients who are located in United Arab Emirates as classified under section C.4. * iTeller has a physical presence in the United Arab Emirates. * iTeller will attempt to solve any issues by requested additional or better quality ID documentation. iTeller may also request certified documents from the client.
C.5	Jurisdiction Risk: Foreign Jurisdictions Dealt with Afghanistan, Botswana, Burundi, Cameroon, Chad, The Democratic Republic of the Congo, Cote D'Ivoire, Cuba, Eritrea, Gambia, Ghana, Guinea, Haiti, Iran, Iraq, North Korea, Kyrgyzstan, Lebanon, Lesotho, Liberia, Libyan Arab Jamahiriya, Mali, Myanmar, Niger, Somalia, Sudan, Syria, Uganda, Yemen, Zimbabwe	E		High.		iTeller DOES NOT accept these clients.
D. EMPLOYEE RISK						
	Type of Employee Risk	Likelihood	Impact	Overall Risk	Priority	Control
D.1	Failure to screen employees	E	Maj.	Low.	High.	Refer to Section 18 in Part A of this Program
D.2	Failure to train staff adequately.	E	Maj.	Low.	High.	Refer to Section 19 in Part A of this Program

KEY For Above Document			
Likelihood of Occurrence		Impact if Occurred	
A	Almost certain, is expected to occur in most circumstances.	Low	Insignificant, no or very low probability that money laundering or terrorism financing will be facilitated.
B	Likely, will probably occur in most circumstances.	Min	Minor probability that money laundering or terrorism financing will be facilitated.
C	Possibly, might occur in some circumstances.	Med	Moderate probability that money laundering or terrorism financing will be facilitated.
D	Unlikely, could occur in some circumstances.	Maj	Major probability that money laundering or terrorism financing will be facilitated.
E	Rare, may occur only in exceptional circumstances.	High	Significant priority should be given to take appropriate actions to address the issue.
		Cat	Catastrophic, huge loss. Money laundering or terrorism financing will be facilitated.