



Declaration 1 of 2017

Section 248 of the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006*

I, Richard Bunting, Acting National Manager, Strategic Intelligence and Policy, of the Australian Transaction Reports and Analysis Centre (AUSTRAC) and a delegate of the AUSTRAC CEO, pursuant to paragraph 248(1)(b) of the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (the Act)*, hereby declare that the definition of 'designated business group' in section 5 of the Act applies in relation to persons specified in paragraph 2 below, as if that definition were modified as specified in paragraph 1 below:

1. (i) immediately after '*designated business group* means' insert ', for the period from 02 October 2017 until 01 October 2019 only, '
 - (ii) paragraph (b): immediately before ';' insert ', and where the election is not made on the approved election form specified in 2.1.2(1) of the AML/CTF Rules, the election is made on an alternative form approved by AUSTRAC and provided to AUSTRAC by the Nominated Contact Officer'
 - (iii) paragraph (d): immediately before ';' insert ', and where each member does not satisfy the requirements specified in 2.1.2(4) of the AML/CTF Rules, each member is specified in paragraph 2 of Declaration 1 of 2017'
2. This declaration applies to the following persons (the 'Bennelong entities'):
 - (a) Bennelong Funds Management Limited ACN 111 214 085
 - (b) Bennelong Australian Equity Partners Pty Ltd ACN 131 665 122
 - (c) Bennelong Long Short Equity Management Pt Ltd ACN 118 724 173
 - (d) Kardinia Capital Pty Ltd ACN 152 003 186
 - (e) Avoca Investment Management Pty Ltd ACN 149 651 856
 - (f) Touchstone Asset Management Pty Ltd ACN 605 911 519
 - (g) 4D Infrastructure Pty Ltd ACN 604 979 259
 - (h) Quay Global Investors Pty Ltd ACN 163 911 586
 - (i) Wheelhouse Investment Partners Pty Ltd ACN 618 156 200

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Richard Bunting
Acting National Manager, Strategic Intelligence and Policy
AUSTRAC

2 October 2017

Important Notice to the person named in this declaration

1. Under sections 136 and 137 of the AML/CTF Act, it is an offence to provide false or misleading information or documents. If any of the information submitted by the applicant or its representatives is found to be false or misleading, the modification may be revoked and action initiated against the applicant.
2. The person granted the modification may request the AUSTRAC CEO to revoke or vary the modification at any time.
3. Any request to vary this modification must be submitted to the AUSTRAC CEO or an approved delegate no later than 14 days before the date the change is requested to commence.