
1. Purpose and Scope

RZ Finance Ltd ("Rentzone Finance", "the Company") is committed to complying with all obligations under the Anti-Money Laundering and Countering Financing of Terrorism Act 2009 (AML/CFT Act) and its associated regulations.

This policy applies to all directors, officers, employees, contractors, and agents of RZ Finance Ltd and governs all rent-to-buy finance arrangements offered by the Company.

RZ Finance Ltd is a reporting entity under the AML/CFT Act and is supervised by the Department of Internal Affairs (DIA).

2. Our Obligations as a Reporting Entity

As a non-deposit-taking lender offering consumer finance products, RZ Finance Ltd is required to:

- Conduct and maintain a written ML/TF risk assessment
- Establish and maintain a written AML/CFT compliance programme
- Conduct Customer Due Diligence (CDD) on all customers
- Report suspicious transactions and prescribed transactions to the New Zealand Police Financial Intelligence Unit (FIU)
- Keep records for a minimum of five (5) years
- Submit an annual report to the DIA on its risk assessment and programme
- Have its risk assessment and programme independently audited every three (3) years
- Appoint a Compliance Officer responsible for AML/CFT obligations

3. Risk Assessment

RZ Finance Ltd will maintain a current written risk assessment that identifies and assesses the money laundering and terrorism financing (ML/TF) risks it may reasonably face in the course of its business.

Our risk assessment considers the following factors:

- Nature, scale, and complexity of the business — rent-to-buy residential cabin finance
- Products and services offered — consumer credit finance with property component
- Customer types — New Zealand residents, primarily low-to-medium income households
- Delivery channels — in-person, online, and digital onboarding
- Geographic exposure — New Zealand domestic operations only
- Country risk — we do not engage in cross-border transactions

The risk assessment will be reviewed annually and updated whenever there are material changes to the business, its products, or the regulatory environment.

4. Customer Due Diligence (CDD)

4.1 Standard CDD — All Customers

Before entering into any rent-to-buy finance arrangement, RZ Finance Ltd will:

- Verify the identity of every customer using acceptable identity documents
- Verify the customer's date of birth and residential address
- Determine the nature and purpose of the proposed finance arrangement
- Obtain information on the source of funds for repayments where required

4.2 Acceptable Identity Documents

The following documents are acceptable for identity verification:

- New Zealand passport (current or expired within 2 years)
- New Zealand driver licence (current)
- New Zealand firearms licence (current)
- Foreign passport (current)
- NZ Kiwi Access Card (18+)

Address verification may be satisfied by a recent utility bill, bank statement, or government correspondence (dated within three months).

4.3 Enhanced CDD

Enhanced CDD will be applied where a customer or transaction presents a higher level of ML/TF risk, including:

- Politically Exposed Persons (PEPs) and their associates
- Customers from high-risk jurisdictions identified by FATF
- Transactions or structures that appear unusual or inconsistent with the customer's profile
- Customers who are reluctant to provide standard identity information

Enhanced CDD may involve requesting additional source of funds documentation, senior management sign-off, and ongoing enhanced monitoring of the business relationship.

4.4 Simplified CDD

Simplified CDD may be applied in limited circumstances where risk is assessed as low, consistent with the AML/CFT (Definitions) Regulations 2011 and DIA guidance.

4.5 Ongoing Customer Due Diligence

RZ Finance Ltd will conduct ongoing monitoring of all customer relationships, including:

- Reviewing and updating customer CDD information periodically
- Monitoring transactions to identify activity inconsistent with the customer's known profile
- Re-performing CDD where material changes in customer circumstances are identified

5. Politically Exposed Persons (PEPs)

RZ Finance Ltd will identify whether any customer is a Politically Exposed Person (PEP), a family member of a PEP, or a close associate of a PEP.

Where a customer is identified as a PEP, RZ Finance Ltd will:

- Apply enhanced CDD measures
- Obtain senior management approval before establishing or continuing a business relationship
- Take reasonable steps to establish the source of wealth and source of funds
- Conduct enhanced ongoing monitoring of the relationship

6. Suspicious Activity Reporting

All directors, officers, and employees have an obligation to report any suspicious activity or transactions to the Compliance Officer promptly.

A Suspicious Activity Report (SAR) will be filed with the NZ Police Financial Intelligence Unit (FIU) where there are reasonable grounds to suspect:

- A transaction involves proceeds of a criminal offence
- A transaction is connected to the financing of terrorism
- A customer is attempting to structure transactions to avoid AML/CFT obligations

SARs will be filed confidentially. No staff member may 'tip off' a customer that a SAR has been filed or is being considered.

7. Prescribed Transaction Reporting

RZ Finance Ltd will report to the FIU any physical cash transaction of NZD 10,000 or more (or the foreign currency equivalent) conducted by or on behalf of a customer within two (2) working days.

International wire transfers of NZD 1,000 or more will also be reported as required by the AML/CFT Act and 2024 amendment regulations.

8. Record Keeping

RZ Finance Ltd will maintain the following records for a minimum of five (5) years from the date the business relationship ends:

- Identity verification records for all customers
- Transaction records
- Account files and business correspondence
- SARs and prescribed transaction reports
- The AML/CFT programme and all risk assessments

Records will be stored securely and made available to the DIA upon request.

9. Compliance Officer

RZ Finance Ltd will appoint a suitably qualified and experienced Compliance Officer who will:

- Be responsible for the day-to-day implementation of this policy and the AML/CFT programme
- Report directly to the Board on AML/CFT matters
- Ensure annual reports are submitted to the DIA on time
- Oversee staff training on AML/CFT obligations
- Maintain the risk assessment and AML/CFT programme
- Act as the primary point of contact with the DIA

10. Staff Training

All staff involved in customer-facing or transaction-processing activities will receive AML/CFT training at induction and at least annually thereafter. Training will cover:

- The Company's AML/CFT obligations under the Act
 - How to identify suspicious activity and red flags
 - CDD procedures and acceptable identity documents
 - How to escalate concerns to the Compliance Officer
 - Tipping-off prohibitions and confidentiality obligations
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11. Independent Audit

RZ Finance Ltd will arrange for an independent audit of its risk assessment and AML/CFT programme at least every three (3) years, or at any other time requested by the DIA.

The audit will assess whether the risk assessment and programme are adequate and effective, and whether the Company is complying with its obligations under the Act.

12. Policy Review

This policy will be reviewed at least annually by the Compliance Officer and the Board. It will also be reviewed following any material change to the business, products, customer base, or applicable law.

The Board of Directors of RZ Finance Ltd approves and takes ultimate responsibility for this policy.