

provided with all details that would otherwise be available to the RE covering a period of 2 years before the day of enquiry			
--	--	--	--

ACSA approach

ACSA members with clients that are REs that do not meet the Class Order prescribed NTA would need to consider the requirements set out in the in the matrix above according to the instrument type. Whilst ACSA members would generally employ similar approaches there may be variations in the operating models based on their own legal, regulatory, risk, client base and organisational structures.