

Appendix 9.2 – Process A transactions

List of Process A transactions in the IB Deposit Sample

In the table below we set out each of the Process A deposits in the IB Deposit Sample, together with whether we were able to identify a corresponding client deposit into the account from which the funds paid to IBL originated.

BBYL - Schedule of IB Deposit Sample – Process A transactions									
No.	Account number	Account name	Account pool	Date	Deposit value	Currency	Process	Transit account	Corresponding client deposit
1	176820205	Smartrader Ltd	WLP Omnibus	21/02/2011	500,000.00	AUD	A	None	YES
2	176820205	Smartrader Ltd	WLP Omnibus	19/10/2012	500,000.00	AUD	A	None	YES
3	178726087	Smartrader Ltd	IB	25/01/2013	100,000.00	AUD	A	None	YES
4	553619321	IB Buffer	IB	24/03/2015	15,000.00	AUD	A	None	YES
5	553619321	IB Buffer	IB	23/03/2015	6,000.00	AUD	A	None	YES
6	553619137	WLP Omnibus	WLP Omnibus	2/10/2014	285,000.00	AUD	A	IB Buffer	YES
7	553619356	Saxo Buffer	Saxo	2/02/2015	200,000.00	AUD	A	None	YES
8	176820256	BBY Ltd eBridge Buffer	Saxo	7/09/2012	180,000.00	AUD	A	None	YES
9	553619268	FX Trust	FX	25/03/2015	10,943.08	AUD	A	IB Buffer	YES
10	204226SGD01	FX Trust SGD	FX	17/03/2015	101,518.22	SGD	A	None	NO
11	204226SGD01	FX Trust SGD	FX	23/03/2015	32,124.28	SGD	A	None	NO
12	204226SGD01	FX Trust SGD	FX	21/11/2014	2,729.09	SGD	A	None	NO
13	204226USD01	FX Trust USD	FX	31/07/2014	29,250.00	USD	A	None	YES
14	204226USD01	FX Trust USD	FX	6/05/2015	1,252.79	USD	A	None	YES
15	N/A	N/A	N/A	15/02/2012	284,735.00	USD	A	N/A	N/A

Note: Transfer from Saxo Buffer account

In relation to the transfer to IBL from the Saxo Buffer account, we were able to confirm that:

- a funds transfer request was made by a BBYL advisor on 2 February 2015 requesting a transfer of \$200,000 from FX account 85900018 to IB account U1446251 (the IB sub-account to which \$200,000 was allocated after the payment to IBL);
- the FX dealer report for 2 February 2015 shows a credit balance on the client's FX account of \$200,000; and
- the funds transfer request contains a "comment" which appears to refer to a BPAY payment of \$200,000 on 30 January 2015. There was a bulk BPAY receipt of \$284,000 into the Saxo Buffer account on 30 January 2015; and
- in email correspondence on 2 February 2015, the Cashiering Officer stated "we received a deposit via BPAY and the BPAY reference is 859000184". A client advisor responded to the email chain to request allocation of funds to IB account U1446251.

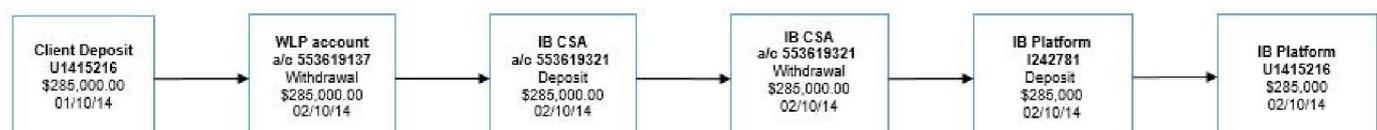
Based on the above, it appears that a BPAY deposit was received in respect of this client on 2 February 2015.

Note: Transfer of SGD101,518.22 from FX Trust SGD account

In relation to the transfer of SGD101,518.22 from the FX Trust SGD account, it appears that this transaction relates to a currency exchange effected for an Equity client of BBYL in respect of securities held through BBY Nominees on the IB Platform.

Example transaction 1

Based on our review we have identified the following funds flow in respect of this payment:



We reviewed the BBYL bank account statements and identified a deposit of \$285,000 into the WLP Omnibus account ending 137 on 1 October 2014. Using the bank statement description data we identified the client account number as U1415216.

The payment to IB appears to have been made to the IB Platform via the IB Buffer account ending 321 and WLP Omnibus account ending 137.

Refer to **Exhibit 9.6** for a copy of the IB master account activity statement evidencing receipt of payment from the IB Buffer account and **Exhibit 9.7** for a client activity statement evidencing allocation from the IB Platform master account to the client sub-account.

Example transaction 2

Based on our review we have identified the following funds flow in respect of this payment:



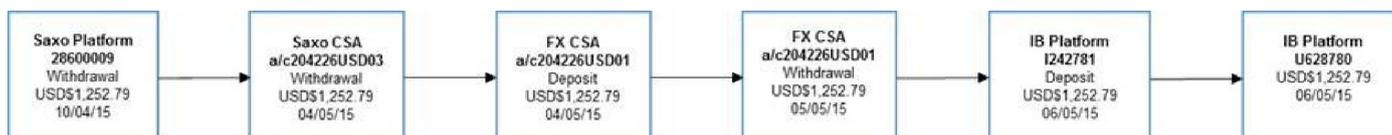
We reviewed the BBYL bank account statements and identified a withdrawal of \$10,943.08 from the AUD FX Trust account ending 268 was made on 25 March 2015. The same amount was deposited into the IB Buffer account ending 321 on the same day. On 25 March 2015, \$10,943.08 was allocated to the client's sub-account (U1289449) following a withdrawal from the IB Buffer account ending 321 and receipt of payment into the IB Platform master account.

Refer to **Exhibit 9.8** for a copy of the IB Master Platform account statement evidencing payment from the IB Buffer account and **Exhibit 9.9** for a copy of the client activity statement evidencing allocation from the master account to the client sub-account.

A review of the company books and records indicated that this client is also an FX client with FX account number 62300122. The Daily FX Financial Summary as at 25 March 2015 shows that the client's FX account was credited with \$10,943.08 on 25 March 2015 (refer to **Exhibit 9.10**).

Example transaction 3

Based on our review we have identified the following funds flow in respect of this payment:



On 4 May 2015 USD\$1,252.79 appears to have been withdrawn from the USD Saxo Buffer account ending USD03 and deposited into the FX Trust USD account ending USD01. This amount had been debited from Saxo Platform account S28600009 on 10 April 2015 (refer to **Exhibit 9.11**). On 5 May 2015, USD\$1,252.79 was withdrawn from the FX Trust USD account ending USD01 and was credited to the client's IB Platform sub-account (via the master account) on 6 May 2015. Refer to **Exhibit 9.12** for a copy of the IB Platform master account statement evidencing payment from the FX USD CSA and **Exhibit 9.13** for a copy of the client activity statement evidencing allocation from the master account to the client sub-account.

We have reviewed the BBYL client listings and note that this client held Saxo and IB accounts.