



4 October 2024

Scams Taskforce  
Market Conduct Division  
Treasury  
Langton Cres  
Parkes ACT 2600

Dear Scams Taskforce,

We thank you and Treasury for the opportunity to make a submission into the industry consultation on the draft legislation for the Scams Prevention Framework. Preventing scams and financial crime is an important objective for the protection of Australian consumers and for confidence in the financial system generally.

### **About Wise**

Wise is a global technology company, building the best way to move and manage money around the world. With the Wise account, people and businesses can hold over 50 currencies, move money between countries and spend money abroad.

Large companies and banks use Wise technology too; an entirely new cross-border payments network that will one day power money without borders for everyone, everywhere. However you use the platform, Wise is on a mission to make your life easier and save you money.

Co-founded by Kristo Käärmann and Taavet Hinrikus, Wise launched in 2011 under the name TransferWise. It is one of the world's fastest growing, profitable technology companies and is listed on the London Stock Exchange under the ticker, WISE.

16 million people and businesses use Wise, which processes around £9 billion in cross-border transactions every month, and in 2023 alone, we saved customers £1.5 billion in fees. We now welcome 100,000 new personal and business customers to the platform each week.

### **Consultation Response**

#### *Protection of Australian residents abroad*

Wise requests more clarity about the notion of protecting Australian residents (including Australians abroad), visitors to Australia, and small businesses from scams through this framework. As an international payments business, Wise has concerns about the reach of this proposal. We ask that there be greater clarity on the scope of

this intention including whether Australian residents who go abroad temporarily are covered by an Australian based scam. We would like to know more about the extraterritorial application of this legislation.

#### *Unsuccessful scam attempts*

Regarding unsuccessful scam attempts, we would like to know more about what defines an unsuccessful scam attempt. Would these may be attempts which never reach the stage of a customer attempting to fund an ultimately unsuccessful scam? Or potentially are these scams which are further along in the scam chain. Given the need to ensure that we are working to provide information on meaningful metrics and to ensure that there is a standard reporting structure for unsuccessful scam attempts, we require more clarity on this definition.

#### *28-day safe-harbour provision*

Wise requests additional information on this safe-harbour provision. Particularly, from when does the 28-day period commence? How can a firm respond to the scam within the 28-day window? How would firms competing obligations to other regulations relate to each other during this period while we investigate and/or wait for bank reports?

#### *Contact mechanisms to report scams*

Wise requests more information on the accessible mechanisms to report scams. What does Treasury define as an accessible mechanism? Wise suggests considerations be made to account for the digital nature of customer relationships in fintech companies which often doesn't involve large human based customer support model.

#### *Practical Challenges to Implementation*

Wise views a practical challenge as potentially ensuring that Australian residents living overseas or those who set up their accounts in Australia but are now overseas are not caught up in the localised provisions.

#### *Timeframe for transition*

Wise would view a 12-month period as sufficient to enact changes in our systems.

We thank Treasury for the opportunity to make this submission.

Yours faithfully,



Jack Pinczewski

Jack Pinczewski  
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Wise