

MANDATORY RANSOMWARE PAYMENT DISCLOSURE



72:00:00 CLOCK

Starts the moment the decision to pay is made.



CIVIL PENALTY

Can apply to entities with >\$3M AUD turnover. Seek legal advice on your specific obligations.

HRS 00:00-12

PHASE 1: THE FOUNDATION

Establish command structure before any technical work begins.

STEP 1. Trigger Definition Confirmed
A named team member has reviewed the Act's definition of 'ransomware payment'. **Legal ambiguity here is the single most common compliance failure point.**

STEP 2. Disclosure Lead Appointed
One named individual—and one backup—owns the ASD submission. This role must be independent of the incident recovery team.

STEP 3. Cyber Counsel on Standby
Specialist cyber legal counsel is on retainer and reachable 24/7. They must review the disclosure draft before lodgement.

HRS 12:00-36

PHASE 2: THE EVIDENCE LOG

Build the mandatory evidentiary record while the incident is live.

STEP 4. Attack Vector Mapped
The specific technical vulnerability is identified and documented. ASD requires this in the submission; **'unknown' is not an acceptable entry.**

STEP 5. Threat Actor Comms Preserved
All negotiation records are stored in an immutable, time-stamped log. Chain of custody must be unbroken.

STEP 6. Payment Provenance Documented
Cryptocurrency wallet address and transaction hash are recorded verbatim and verified against blockchain confirmation before submission.

HRS 36:00-60

PHASE 3: THE BOARDROOM

Governance must run in parallel with—not after—the technical response.

STEP 7. Board Decision Tree Activated
A pre-approved Pay/No-Pay framework with defined thresholds, escalation criteria, and sign-off authority governs the payment decision.

STEP 8. Board Attestation Obtained
The Board formally signs off on the disclosure as a true and accurate record. This attestation is a legal requirement, not a formality.

HRS 60:00-72

PHASE 4: THE SUBMISSION

Final review and lodgement. One opportunity to get this right.

STEP 9. ASD Reporting Template Lodged
The Australian Signals Directorate ransomware payment form is completed, reviewed by counsel, and submitted before hour 72.

STEP 10. Post-Disclosure Protocol Ready
The submission is not the end. ASD will issue a Request for Further Information within days. Without a documented response process, you will fail the post-disclosure audit.

HOW DID YOU SCORE?

10/10 Top 1%. Audit-ready. Go to sleep.

7-9/10 Under real stress you'll miss the window. Drill it now.

<7/10 Active civil regulatory risk. Act this week.

THE DISCLOSURE PROTOCOL SPRINT

One focused 2-hour session. I build your Board Decision Tree, populate your ASD Templates, and align your Exec Team. Finished documents delivered from the session. **Fixed fee — \$5,500.**

vyfority.com.au/ransomware