

**TEMPLATE**

**ANTI MONEY LAUNDERING &  
COUNTER TERRORISM FUNDING**

**PROGRAM FOR VICTORIAN CLUBS**



## DISCLAIMER

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## ATTACHMENTS

1. EXTRACT FROM THE ACT - DESIGNATED SERVICES
2. RELIABLE & INDEPENDENT KYC DOCUMENTS
3. AUTHORISED PERSONS FOR CERTIFICATION
4. COMPANY KYC INFORMATION
5. NATIONAL PRIVACY PRINCIPLES



# 1. OVERVIEW

The AML/CTF Act was passed by the Federal Government in December 2006. The primary purpose of the Act is to ensure that Australia fulfils its international obligations by addressing matters of international concern including the need to combat money laundering and financing of terrorism. As well as international concerns, the Act also addresses the risks of local criminals laundering their illegal income. For clubs, the major purpose of the Act is to make it difficult for criminals such as tax avoiders, drug dealers, counterfeiters, etc (as well as international terrorists) to use our wagering facilities and gaming machines to provide a legitimate reason to have money that would otherwise be inexplicable.

Over time the requirements of the AML/CTF Act will replace those of the Financial Transactions Reports Act which currently deals with reporting of cash transactions over \$10,000 and suspicious cash transactions. The AML/CTF Act applies to cash *and* non-cash transactions.

## Summary of AML/CTF Requirements

- 1) Organisations that provide **designated services**<sup>1</sup> must have an AML/CTF program and must comply with that program.
- 2) Organisations that provide **designated services** become **reporting entities** and must comply with the Act.
- 3) Gaming machines and wagering are **designated services**, therefore all clubs that provide gaming machines and/or wagering facilities<sup>2</sup> are reporting entities and must comply with the Act<sup>3</sup>.
- 4) Briefly, reporting entities must:
  - a) **Verify** the identity of persons who collect ≥\$10,000 (12/12/07)
  - b) **Record** any suspicious matters (12/12/07)
  - c) **Report** any suspicious matters (12/12/08)
  - d) **Report** any *cash* payments of ≥\$10,000 (12/12/08)
  - e) Have an **AML/CTF program** (start implementation 12/12/07). Your program should be in place by the time the compliance report is to be lodged by (31/3/08)
  - f) Must register with AUSTRAC online in order to lodge the compliance report: <http://online.austrac.gov.au>,

***Note: Lotteries, which include Keno & Bingo, are exempt from AML/CTF Act requirements. This template program is designed for use by Victorian clubs with gaming and or wagering facilities.***

<sup>1</sup> There are other designated services besides wagering & gaming, most of which relate to financial services offered by financial institutions – it is anticipated that the only designated services that clubs provide will be gambling services. A full list designated services is contained section 6 of the Act – see attachment 1. Table 3 of section 6 sets out the list of the gambling services that are designated services – note that keno, bingo and lotteries are NOT designated services.

<sup>2</sup> We are currently awaiting advice from AUSTRAC as to whether Tabcorp or the clubs are the reporting entity in respect of wagering. For the purposes of this template we have assumed that clubs are the reporting entity in respect of wagering.

<sup>3</sup> Clubs that do not have gaming and wagering generally will not have to comply with the Act; however if your club provides financial facilities (eg, international money exchange) it will have to comply. A full list of designated services is set out in the Act, an extract of which is set out in attachment 1



## 2. DEFINITIONS

### **AML/CTF**

means anti-money laundering and counter-terrorism financing

### **AML/CTF Act / The Act**

means the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (*Cth*)

### **Designated service**

means the services designated in section 6 of the Act – see attachment 1. For the purposes of this template, designated services means gaming & wagering

### **E- currency**

means an Internet-based, electronic means of exchange that is known as any of the following:

- (i) e-currency;
  - (ii) e-money;
- (eg, electronic transfers but not cheques)

### **KYC information**

Means know your customer information being:  
Name, date of birth, residential address

### **ML/TF**

means money-laundering and/or terrorism financing

### **Program**

means the AML/CTF program prepared by completing Chapter 4 of this template

### **Reliable and independent KYC documentation/ KYC documentation**

Means the documents listed in attachment 2

### **RSG**

means responsible service of gaming

### **Rules**

means the Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007(No. 1) (*Cth*)

### **Suspicious matters**

has the meaning set out in chapter 5

≥ \$10,000



means more than or equal to \$10,000

### 3. HOW TO USE THIS TEMPLATE

This template is designed to assist ClubsVIC member clubs to prepare an AML/CTF program that complies with the Act and the Rules.

An AML/CTF program has two parts:

Part A): Requires the club to identify, mitigate and manage ML/TF Risk

Part B): Sets out how the club will meet its requirements to verify the identity of customers and make required reports

The Rules set out the issues that a program must address – each of those issues is covered in this template. The club should go step-by-step through the template. As far as possible, ClubsVIC has anticipated the responses that are required. However, each club should consider its own circumstances and where prompted should fill-in any issues that are particular to its own operations. There is space provided throughout the template for clubs to fill-in their responses.

As well, there are provisions in the template for the club to fill-in dates and names etc. For example, the club is required to fill-in the name of the compliance officer, the date on which the compliance officer is appointed and the date on which the compliance officer resigns (see page 25).

Once the club has completed this template for the first time, then the template becomes the club's program and it must be kept up to date. For example, the club will need to fill-in the details of when the board approves the program, and each time that the board receives its periodic report on the program. Maintaining the program is an on-going requirement for the compliance officer.

The Act requires the club to have a program and to comply with its program. If the club fails to comply with the Act and/or its program, it is liable to be penalised. The Act imposes hefty fines of up to \$11 million for non-compliance.



## 4. AML/CTF PROGRAM FOR CLUBS IN VICTORIA

.....  
Name of club



## Part A

# Identifying, managing and mitigating the ML/TF risk at the .....club

In Part A the club is required to identify, manage and mitigate the ML/TF risk.

## A1. Identifying designated services

Does the club offer a “designated service”?

The Act sets out the designated services, most of which relate to financial institutions and are irrelevant to clubs.<sup>4</sup> The most relevant designated services for clubs are listed below

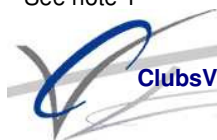
- a) Receiving or accepting a bet in the course of a business
- b) Paying out winnings in respect of a bet in the course a business
- c) Allowing a person to play a game on a gaming machine at a venue in the course of a business
- d) Paying out winnings or awarding a prize in respect of a game, where:
  - (1) the game is played on a gaming machine located at a venue; and
  - (2) the winnings are paid out, or the prize is awarded, by the controller as agent of the owner or lessee of the gaming machine; and
  - (3) the service is provided in the course of carrying on a business
- e) Opening an account for the purposes of gambling

***Keno & bingo are not designated services.***

**In essence, clubs that provide gaming and/or wagering facilities provide designated services and must have a program. If the club provides other designated services, you cannot use this template and you must contact ClubsVIC**

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<sup>4</sup> See note 1



## **A2. What are the ML/TF risks associated with the designated services offered by the club**

In other words, how would launderers use the club's gaming and/or wagering facilities to launder money?

ClubsVIC has identified some risky behaviours that may occur in Victorian clubs. In all these instances, the launderer will probably consider any "house margin" to be a "business cost" of laundering the money.

### **A2.1 THIRD PARTY PURCHASE OF CREDITS**

The purpose of the purchase of credits is to legitimize funds which have been obtained from illegitimate activities.

This occurs when the person who collects the winnings is not the person who won the prize. Third party purchasing of cheques is more likely to happen in Victorian gaming rooms because of the requirement to pay all winnings over \$1,000 by cheque. Winners who do not want to take their winnings in cheque will be especially prone to being exploited in this way.

The launderer gives the winner cash for the winning ticket. The launderer uses the winning ticket to collect a cheque from the club. The launderer therefore has a legitimate source for the money that was actually the proceeds of illegal activity. The winner has cash rather than a cheque. Often the launderer will offer the winner more cash than the winning ticket/credit is worth. So if a winner has a win of \$5,000, a launderer may offer the winner \$6,000 cash for the ticket. The exchange has cost the launderer \$1,000, but that is simply the cost of getting a legitimate source for \$5,000 of illegal gains.

### **A2.2 ABNORMAL PLAY**

Launderers may adopt unusual playing behaviour. For example, the launderer may arrive with heaps of cash, load it into the gaming machine and play for a short period, then take out the credits and have a ticket to provide a legitimate source for the cash. The launderer will have spent some money in order to get the ticket, but that is the cost of laundering the money.

Another example of abnormal play is where the launderer keeps payments under \$10,000, and collect credits of less than \$10,000 frequently. The launderer is aware that any payments  $\geq$ \$10,000 will require documentation to identify the launderer, hence, the launderer will play for a time and collect a cheque for \$9,000, and then play again and collect a cheque for \$9,000 and so on. So the launderer can be provided with a legitimate source of income for many thousands of dollars without having to provide any KYC documentation.





### **A3. Assessing the ML/TF risk level**

Having identified the ML/TF risks that the club's designated services pose, now it is necessary to assess the level of the risk – is it high, medium or low?

The Rules set out what is to be considered when assessing the level of ML/TF risk. They are listed below from A3.1 to A3.5. We have done much of the thinking work for you by listing and explaining each of the issues set out in the Rules, and then providing responses to those issues which are common to most Victorian clubs.

Starting with the responses provided by ClubsVIC, the club must consider its own gaming and wagering operations and determine the appropriateness of ClubsVIC responses and assess the likelihood that money laundering will occur at the club's premises.

#### **A3.1 NATURE, SIZE & COMPLEXITY OF THE CLUB OPERATIONS**

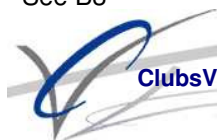
- a) Number of gaming machines: \_\_\_\_\_ (Max 105)
- b) One room for gaming machines
- c) Monitored play
- d) Signing-in procedures in accordance with the liquor laws
- e) Operator pay-out procedures
- f) No \$100 bills
- g) Mandated max spin
- h) Does your club have wagering kiosks  
 YES (higher risk)  NO (lower risk)

#### **A3.2 CUSTOMER TYPES**

- a) Natural persons
- b) Does the club provide cheques payable to companies<sup>5</sup>  
 YES (higher risk)  NO (lower risk)
- c) Relatively regular customer base  
 YES (lower risk)  NO (higher risk)
- d) Age group of players – usually mature \_\_\_\_\_
- e) Sign-in procedures adhered to (not for racing clubs), authorised gaming visitors must have ID documentation
- f) No PEPs (politically exposed persons)

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<sup>5</sup> ClubsVIC recommends that no cheques of ≥\$10,000 be made payable to companies. See B3



g) Cash customers – increases risk



### A3.3 TYPES OF DESIGNATED SERVICES

- a) Allowing persons to play gaming machines and offering wagering<sup>6</sup>
- b) Payment of credits for gaming and wagering

It would be most unusual for clubs to have any other types of designated services – check the list of designated services set out in attachment 1 (especially table 3) and if your club provides any other services contact ClubsVIC.

The types of services proved by Victorian clubs tend to increase the ML/TF risk, but the responses to the other issues in A3.1 – A3.5 tend to reduce the risk.

### A3.4 METHODS OF DELIVERY OF DESIGNATED SERVICES

To a large extent this issue has been addressed in A3.1 above. But there are some further considerations to be taken into account when considering the methods of delivery of gaming and wagering in Victorian clubs:

- a) All gaming machines in one room
- b) Ticket & book pays (limited coin drop)
- c) Payment of credits >\$1,000 by cheque
- d) Does the club have wagering kiosks  
 YES (higher risk)  NO (lower risk)
- e) High labour requirements
- f) Ability of EGMs to take large amounts (increased risk)

### A3.5 DEALING WITH FOREIGN JURISDICTIONS

This issue applies to the risk posed by any dealings the club may have with foreign jurisdictions. It is anticipated that clubs do not deal with foreign jurisdictions. If the club deals with foreign jurisdictions you may not be able to use this template and you should contact ClubsVIC.

**Considering each of the issues listed in A3.1 to A3.5, are there any further issues relevant to the club’s designated services which have not been listed?**

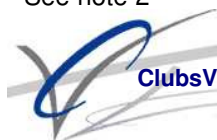
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<sup>6</sup> See note 2



### A3.6 IDENTIFY SIGNIFICANT CHANGES IN THE ML/TF RISK

The club must assess the ML/TF risk posed by all new designated services prior to introducing them to the market.

ClubsVIC has listed below some potential new services/new ways of delivering designated services which the club may offer in the future. If and when these changes occur the assessment of the risk level must be done again with these new services taken into account:

- a) Multiplayer games
- b) Smart cards
- c) Increased lines/value per spin
- d) Wagering kiosks
- e) Booth play

Each time the club changes a gaming or wagering service or the means of delivery of the gaming or wagering service, you should consider whether any of the considerations set out in A3.1 to A3.5 are altered by the change and whether it impacts on the assessment of the club's ML/TF risk level. Every time there is a change, the club should fill-in the section below, noting that it has considered the impact on the ML/TF risk level.

Description of new service or new way of offering identified designated services: _____ _____
Date of introduction of new service or new way of offering designated service: _____
Date of re-assessment of risk _____

Description of new service or new way of offering identified designated services: _____ _____
Date of introduction of new service or new way of offering designated service: _____
Date of re-assessment of risk _____



Description of new service or new way of offering identified designated services:

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Date of introduction of new service or new way of offering designated service:

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Date of re-assessment of risk

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Description of new service or new way of offering identified designated services:

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Date of introduction of new service or new way of offering designated service:

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Date of re-assessment of risk

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Description of new service or new way of offering identified designated services:

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Date of introduction of new service or new way of offering designated service:

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Date of re-assessment of risk

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Description of new service or new way of offering identified designated services:

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Date of introduction of new service or new way of offering designated service:

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Date of re-assessment of risk

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Description of new service or new way of offering identified designated services:

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Date of introduction of new service or new way of offering designated service:

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Date of re-assessment of risk

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Description of new service or new way of offering identified designated services:

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Date of introduction of new service or new way of offering designated service:

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Date of re-assessment of risk

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### **A3.7 CONCLUDE WHAT LEVEL OF ML/TF RISK THE CLUB POSES**

Taking into consideration all the issues listed in A3.1 to A3.5, ClubsVIC has assessed the general ML/TF risk level for clubs in Victoria as very low.

If you have identified issues other than those listed by ClubsVIC in A3.1 to A3.5, it is necessary for you to assess whether those other issues raise the risk level of the club to a level higher than very low.

Each time a new service/new way of delivery is introduced (A3.6), it will be necessary to re-assess the risk level.

It is anticipated that no Victorian club will have a higher risk factor than medium/low.

<b>Level of risk posed by the club</b>	
<b>Very Low</b>	<input type="checkbox"/>
<b>Low</b>	<input type="checkbox"/>
<b>Medium/Low</b>	<input type="checkbox"/>
<b>Medium</b>	<input type="checkbox"/>
<b>Medium/High</b>	<input type="checkbox"/>
<b>High</b>	<input type="checkbox"/>

**If you have assessed the risk level at the club as higher than medium/low, the club cannot use this template. This template is designed for clubs with medium/low, low or very low risk.**

**Please contact ClubsVIC if you have assessed the risk at the club as higher than medium/low.**



## A4. Managing & Mitigating the ML/TF Risk

Having identified the risk level posed by the club as being very low (or maybe low or medium/low) <sup>7</sup> it is necessary to implement measures to *manage* this risk and to try to reduce the risk level – (ie to *mitigate* the risk).

The Rules set out some measures which the club is obliged to implement in order to manage and mitigate the ML/TF risk. These measures are set out below in A4.2 - A4.7. All clubs are required to implement these measures and there are penalties for non-compliance.

In A4.1 ClubsVIC has identified some measures in addition to those set out in the Rules. The additional measures set out in A4.1 will assist the club to manage and mitigate the risk of money laundering occurring.

### A4.1 GENERAL MEASURES TO MANAGE AND MITIGATE RISK

In Victoria the provision of gaming and wagering products and the pay-out of gaming and wagering credits are highly regulated, especially in clubs. It is anticipated that simply by complying with the liquor and gaming laws, most clubs will meet the general requirement to manage and mitigate the ML/TF risk.

Listed below are some of the regulations that will assist Victorian clubs to manage and mitigate their ML/TF risks:

- a) Sign-in procedures (not racing clubs)
- b) Mandated compliance amongst staff/members/guests with rules and sign-in procedures
- c) Winnings of  $\geq$  \$1,000 to be paid by cheque
- d) Mandatory licensing of gaming room staff
- e) Mandatory approval of individuals associated with a gaming venue
- f) Compulsory RSG training of gaming staff
- g) Compulsory adoption of Code of Practice for gaming & wagering venues

### A4.2 STAFF TRAINING IN AML/CTF

The Rules require all staff who are involved in the delivery of designated services to be trained. This training must include explanation of:

- a) The club's obligations to comply with the program
- b) How compliance with the program relates to the staff
- c) The type of ML/TF risk that the club poses

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<sup>7</sup> If the club assesses the risk as higher than medium/low contact ClubsVIC



- d) Requirement for documentation to verify identity for pay-outs ≥\$10,000 and for suspicious matters
- e) How to obtain verification of identity (ie the *customer identification procedure* - see Part B2)
- f) What to do when identity cannot be verified (see Part B3)
- g) The possibility that other staff may be involved in the laundering activities
- h) The requirement to be aware of, and to record, suspicious matters (see chapter 5)
- i) AUSTRAC reporting requirements (12/12/08)
- j) The prohibition against tipping off a person who has been reported to AUSTRAC in a suspicion matter report (see chapter 6)
- k) The consequences of non-compliance with the program and legislation

The club can meet the staff training requirements in any reasonable manner. Set out below are the most common ways for clubs to meet the staff training requirements. You should record how and when each staff member received the required training either by filling-in the information below or recording the information on the individual employee's employment file.

**Staff Meetings Included AML/CTF Advice**

Date of staff meetings that included AML/CTF advice:

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**Staff Bulletins Included AML/CTF Advice**

Date of staff bulletins that included AML/CTF advice:

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**Staff completed ClubsVIC AML/CTF Staff Training Manual Quiz**

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Name: \_\_\_\_\_ Date: \_\_\_\_\_





### A4.3 STAFF DUE DILIGENCE

The Rules require the club to take reasonable measures to ensure that its employees are not involved in money laundering.

The club is required to vet potential employees and to monitor employees' conduct in relation to the delivery of designated services.

Under the *Gambling Regulation Act 2003 (Vic)* gaming employees are required to obtain and maintain a gaming employee's licence. The club is entitled to rely on this criterion with respect to the engagement of gaming employees, especially as a police check is required in order to obtain the licence. The club should be vigilant regarding the requirement for all gaming staff to obtain and maintain a current gaming employee's licence.

There is no similar requirement for wagering staff. The club should ask any potential wagering employees if they have a criminal record<sup>9</sup>, and assess the risk that they will be involved in money laundering activity.

If the club is aware that an employee (or potential employee) associates with known criminals, the club should be conscious of the impact this may have on the club's assessment of the ML/TF risk level and take appropriate action.

All employees should be made aware of the potential for other employees to be involved in ML/TF activities – eg staff may act as “spotters” for launderers, fail to report suspicious matters, or be the actual launderer.

Employees are to report any incidents of suspected staff involvement to the compliance officer as a suspicious matter<sup>10</sup>, and the compliance officer must complete the register at chapter 8 of the program and lodge the required AUSTRAC report (after 12/12/08). Note it is not appropriate to record suspected staff involvement in the register if that staff member has access to the register. This may tip-off<sup>11</sup> the staff member.

Listed below are common measures that the club can take to ensure staff due diligence – strike out any measures not adopted by the club.

- a) Application for employment form asks about applicant's criminal record
- b) All gaming staff are licensed gaming employees
- c) Staff training includes awareness of other staff and reporting procedures

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<sup>9</sup> At the time of printing criminal record was not a protected attribute under discrimination legislation. This may change and clubs are advised to stay abreast of this issue via ClubsVIC circulars.

<sup>10</sup> See chapter 5

<sup>11</sup> See chapter 6





## **A.4.3A ON-GOING CUSTOMER DUE DILIGENCE**

### ***Collecting further KYC Information and up-dating &/or verifying existing KYC Information***

In order to meet the requirements in the Rules for on-going maintenance of KYC information, the club should ensure **each** time the club pays-out  $\geq$  \$10,000, the club collects the appropriate KYC information and follows the procedures set out in Part B.

Do not rely on KYC information collected in relation to an earlier pay-out. If customers complain they should be told that this is a legal requirement.

Further, every time a staff member thinks that he/she has witnessed suspicious matters<sup>12</sup>, the club should collect the appropriate KYC information and follow the procedures set out in Chapter 5, even if the persons involved have provided this information previously.

### ***Transaction monitoring Program***

Staff should be trained to identify suspicious matters, and in particular to know when customers are involved in transactions that are identifiable as risky behaviour.<sup>13</sup> These are unusual patterns of transactions, which may have no apparent economic or lawful purpose.

Suspicious matters is defined in Chapter 5, and the types of transactions that are risky behaviours are set out in section A2 of this Template.

The staff should be alert to any of these risky behaviours, and if customers exhibit any of these behaviours, the staff should implement the procedures set out in Chapter 5.

### ***Enhanced customer due diligence***

Clubs who are using this Program have determined that their ML/CT risk is low.<sup>14</sup>

If a staff member has identified a suspicious matter, the staff member is to follow the procedures set out in Chapter 5 for due diligence and collection of KYC information.

In particular it will be necessary for the club to:

1. Collect further information from the customer or from third party sources in order to:
  - a. clarify or update the customer's KYC information;
  - b. obtain any further KYC information;
  - c. consider the nature of the suspicious behaviour.
2. KYC information ought to be verified or re-verified in accordance with the customer identification program.
3. a suspicious matter report ought to be lodged.

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<sup>12</sup> See Chapter 5 of this template for a definition of "suspicious matter".

<sup>13</sup> The required training is covered in the Staff Training Manual that accompanies the Program

<sup>14</sup> See section A3





#### A4.4 BOARD & SENIOR MANAGEMENT OVERSIGHT

The Rules require that the board approve and provide continuing oversight of the program. Although strictly this relates only to Part A, ClubsVIC recommends that Parts A and B be subject to oversight by the board.

When you have completed filling in this template, it will be the club's program. Include the completed program as a board meeting agenda item so that the whole program can be approved by the board.

Following the initial approval of the program, a regular board agenda item should be added ie. monthly, quarterly or half-yearly, depending on the risk level or other circumstances. Given that the vast majority of Victorian clubs will be very low risk, ClubsVIC recommends that the program report to the board be no more than six-monthly.

The club should record the dates for reports to the board.

In the event that the board provides any feedback, the club should complete the board feedback section below.

<b>Reports to Board</b>		
<b>Half yearly</b>	<input type="checkbox"/>	
<b>Quarterly</b>	<input type="checkbox"/>	
<b>Monthly</b>	<input type="checkbox"/>	
<b>Date of approval of the program:</b> _____		
<b>Dates of report to the board of the program:</b>		
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____



## Board Feedback

Date: \_\_\_\_\_

Action required: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Date action undertaken: \_\_\_\_\_

Date: \_\_\_\_\_

Action required: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Date action undertaken: \_\_\_\_\_

Date: \_\_\_\_\_

Action required: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Date action undertaken: \_\_\_\_\_

Date: \_\_\_\_\_

Action required: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Date action undertaken: \_\_\_\_\_



#### **A4.5 APPOINTMENT OF COMPLIANCE OFFICER**

The club is required to appoint a compliance officer. There are no specific duties or qualifications set out in the Rules or the Act for the compliance officer. However, compliance with the program dictates that the compliance officer is charged with implementation of the program and is fully trained in the requirements of AML/CTF.

The compliance officer must be a senior level employee or a board member, and may have other duties. It is not a full-time compliance role, eg the compliance officer could be the assistant manager and also be the RSG liaison officer. The compliance officer does not need to be always on the premises. Clubs are not prevented from appointing additional compliance staff to assist the compliance officer, however there must only be one compliance officer.

The following factors are relevant when considering the appointment of the compliance officer:

- a) Independence (for example from the internal reviewer of the program - see A4.6)
- b) Seniority
- c) Accountability
- d) Access to the board
- e) Any relevant skills and general competence in the area

The program requires the compliance officer to attend a ClubsVIC AML/CTF Session.<sup>15</sup>

If the compliance officer discontinues in the role of compliance officer, ceases to be employed by the club or ceases to be a board member, it will be necessary for the club to appoint a new compliance officer and fill in the section below.

Name of compliance officer: _____
Date of appointment as compliance officer: _____
Date of attendance at training by compliance officer: _____
Date ceased to be compliance officer: _____

<sup>15</sup> Contact ClubsVIC for dates of ClubsVIC AML/CTF training sessions and alternate training



*\*(More space for compliance officer updates over page)*

Name of compliance officer: \_\_\_\_\_

Date of appointment as compliance officer: \_\_\_\_\_

Date of attendance at training by compliance officer: \_\_\_\_\_

Date ceased to be compliance officer: \_\_\_\_\_

Name of compliance officer: \_\_\_\_\_

Date of appointment as compliance officer: \_\_\_\_\_

Date of attendance at training by compliance officer: \_\_\_\_\_

Date ceased to be compliance officer: \_\_\_\_\_

Name of compliance officer: \_\_\_\_\_

Date of appointment as compliance officer: \_\_\_\_\_

Date of attendance at training by compliance officer: \_\_\_\_\_

Date ceased to be compliance officer: \_\_\_\_\_

Name of compliance officer: \_\_\_\_\_

Date of appointment as compliance officer: \_\_\_\_\_

Date of attendance at training by compliance officer: \_\_\_\_\_

Date ceased to be compliance officer: \_\_\_\_\_



## A4.6 REGULAR INDEPENDENT REVIEW

The Rules provide that the club must regularly review Part A of the program to ensure that it continues to provide adequately for the identification, management and mitigation of the ML/TF risks. ClubsVIC recommends that the independent review takes Part B into account as well. However Part A is the principle focus of the review.

How often the review takes place will depend on the club's ML/TF risk level.

Most Victorian clubs are very low level risk and consequently ClubsVIC recommends an annual review as being acceptable. Higher level risk will require reviews to be undertaken more frequently:

How often is the review to take place:

Monthly

Half yearly

Annually

The review can be internal (conducted by club personnel or a board member) or external (conducted by an AML/CTF auditor). For low risk entities like Victorian clubs an internal review is acceptable. But the review must be independent. Hence, ClubsVIC suggests that the review be undertaken by a sub-committee of the board and not by the manager or the compliance officer. The results of the review must be provided to the board.

The review must address:

- a) Whether Part A of the program identifies, mitigates and manages the ML/TF risks
- b) Whether Part A of the program complies with the Rules
- c) Whether Part A of the program has been effectively implemented; and
- d) Whether the club has complied with Part A of its program

If the club completes this template it is reasonable to assume that a), b) and c) will be met.

Meeting d) will depend on the club continuing to comply with the program.

ClubsVIC recommends that the club also review the procedures set out in Part B of its program to ensure that the procedures are relevant and implemented.



## AML/CTF Review Sheet

1. Has the club changed the “designated services”  
*Go to page 8 of the AML/CTF Program to ascertain if the club has introduced any new designated services*  
*It will be most unlikely that a club has introduced new designated services – so default answer is NO*

YES  OR NO

2. Has the club identified any new risks associated with the designated services  
*Review the risks listed on pages 9 & 10 of the AML/CTF Program to ascertain if the club can identify any new risks – include any new risks in the space provided on page 10 of the AML/CTF Program*  
*It will be most unlikely that a club has identified new risks – so default answer is NO*

YES  OR NO

3. Is the ML/TF risk level still medium/low, low or very low  
*Review pages 11-16 inclusive of the AML/CTF Program.*  
*It will be most unlikely that a club has an altered risk level – so default answer is YES*

YES  OR NO

*If the risk level has increased above medium/low, the club cannot continue to use the AML/CTF Program and should contact ClubsVIC immediately*

4. Has the club complied with the measures to manage and mitigate the risk  
Review pages 17 – 30 of the AML/CTF Program.
- a. Have all the sections of the AML/CTF Program been completed  
If there are section of part A.4 not completed, the board member should note this and direct that the sections be completed immediately, and oversee the completion of the sections. Then answer YES

YES  OR NO

- b. Are there any measures to manage & mitigate the risk not included in pages 17 -30 of the AML/CTF Program.  
*It will be most unlikely that there will be measures not included – so default answer is NO*

YES  OR NO



Date of review: \_\_\_\_\_

Internal  OR External

Action required: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Name of reviewer: \_\_\_\_\_

Date of review: \_\_\_\_\_

Internal  OR External

Action required: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Name of reviewer: \_\_\_\_\_

Date of review: \_\_\_\_\_

Internal  OR External

Action required: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Name of reviewer: \_\_\_\_\_



#### A4.7 FEEDBACK FROM AUSTRAC

The club may receive feedback from AUSTRAC in response to a report about a suspicious matter or a payment or on the appropriateness of the club's program. The club must respond to any feedback from AUSTRAC in the manner specified by AUSTRAC.

Date feedback received from AUSTRAC: _____
Action required: _____
_____
_____
Date action undertaken: _____

Date feedback received from AUSTRAC: _____
Action required: _____
_____
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Date action undertaken: _____

Date feedback received from AUSTRAC: _____
Action required: _____
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Date action undertaken: _____
Date feedback received from AUSTRAC: _____



Action required: \_\_\_\_\_  
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Date action undertaken: \_\_\_\_\_

Date feedback received from AUSTRAC: \_\_\_\_\_

Action required: \_\_\_\_\_  
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Date action undertaken: \_\_\_\_\_

Date feedback received from AUSTRAC: \_\_\_\_\_

Action required: \_\_\_\_\_  
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Date action undertaken: \_\_\_\_\_

Date feedback received from AUSTRAC: \_\_\_\_\_

Action required: \_\_\_\_\_  
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\_\_\_\_\_

Date action undertaken: \_\_\_\_\_



## Part B

### How the club meets the requirements under the Act to verify the identity of customers and to make reports

#### B1. When must the club verify the identity of customers

The club must verify the identity of customers in the following circumstances:

- a) Prior to making any pay-outs of  $\geq$  \$10,000; and
- b) In the event of a suspicious matter occurring

#### B2. How does the club verify the identity of customers: *The customer identification procedure*

Firstly the relevant employee will ask the customer to provide the following KYC information:

- a) Name
- b) Date of Birth
- c) Residential Address

This information is to be recorded in the register at chapter 8.

ClubsVIC has determined that, given the low risk status of Victorian clubs, it is not necessary to collect any further KYC information than name, date of birth and residential address. If the club has assessed its risk as higher than medium-low it cannot use this template and you need to contact ClubsVIC.

Next the employee must *verify* the customer's name, together with one or both of the customer's date of birth and residential address. This is done by the employee viewing *reliable and independent KYC documentation*<sup>16</sup> that verifies the customer's name together with one of date of birth and residential address. Note the difference between KYC **information** and KYC **documentation**. KYC documentation verifies KYC information.

A list of the all documents that are *reliable and independent KYC documentation* is attached<sup>17</sup>. The staff can use any of the documents in attachment 2 to verify the identity of the customer. The employee must ask the customer to produce one or more of the documents listed in attachment 2. The employee uses the document to fill-in the required details in the register at chapter 8 of this template. If possible the employee should take a copy of the document and store it with the register at chapter 8 of the program.

<sup>16</sup> See definition and attachment 2 – or KYC documentation:

<sup>17</sup> Attachment 2



The documents must be original documents or certified copies.<sup>18</sup>

**Even if the customer is known to the employee (as is often the case in clubs) it is still necessary to collect the documentation *prior* to making any payouts of ≥ \$10,000.**

If the identity of the customer is still suspect after the employee has viewed the KYC documentation provided, and the employee suspects ML/TF activity then the employee should ask for more KYC documentation to verify the identity of the customer.

It is acceptable for the customer to provide the required KYC documentation at a later date<sup>19</sup>. The payout is to be withheld until the KYC documentation is provided. If after 14 days the documentation is not provided the matter must be reported to AUSTRAC as a suspicious matter.<sup>20</sup> The customer is to be paid the winnings when they produce the required KYC documentation even if it is after 14 days and after the matter has been reported as a suspicious matter. Note the requirements in chapter 7 about tipping off - the employee should not alert the customer that a suspicious matter has been reported. The compliance officer should notify AUSTRAC if the KYC documentation is produced after the report has been lodged.

### **B3. What does the club do if the customer's identity cannot be verified**

If the identity of the customer cannot be verified, ie the employee is still not satisfied that the customer is who they say they are, or the documents have not been provided within 14 days, the matter then becomes a suspicious matter. The employee must report the failure to verify to the compliance officer who must report it to AUSTRAC from 12/12/08.

**The employee is required to withhold the pay-out of the winnings to the customer until the customer's identity can be verified. Remember only pay-outs of ≥ \$10,000 can be withheld. Pay-outs of less than \$10,000 are not to be withheld.**

If the employee is unable to collect the required KYC documentation from the customer, the report to AUSTRAC should include as much information, descriptions of the person/s involved and their behaviour as is available.

Remember: if the pay-out is in **cash** then regardless of whether or not the customer's identity has been verified, a report must be made to AUSTRAC. (reporting requirements commence on 12/12/08).

<sup>18</sup> A certified copy is a copy that has been signed by a person authorised to witness a statutory declaration. The authorised person must certify that the copy is a true copy of the original which it purports to be. See attachment 3 for a list of authorised persons.

<sup>19</sup> Correct accounting procedures should be implemented to ensure that the money is identified as being payable to the winner from the time of winning – the winnings do not belong to the club even if the money is not paid-out

<sup>20</sup> If the payout is ≥\$10,000 **cash** – it must always be reported – see B5



**Note: amounts by cheque do not need to be reported even if the amount is  $\geq$  \$10,000 unless the customer's identity cannot be verified.**

#### **B4. Third Party Payments of $\geq$ \$10,000**

If a customer asks for a payment to be made to a third person – for example if the cheque is to be payable to a company or to someone other than the winner, then the employee must get the required details from the person to whom the payment is being made (ie the third party), and the club should also get the details from the actual winner if the employee suspects money laundering.

This template has been designed primarily for customers who are natural persons, not companies. It is strongly recommended that clubs do not make gaming or wagering pay-outs of  $\geq$ \$10,000 to companies. If the club does allow pay-outs to be made to companies there are extra KYC information and KYC documentation that must be collected. The extra information and documentation are set out in attachment 4 to this template and are very onerous. It is repeated: ClubsVIC strongly advises that the club does not allow payouts of  $\geq$ \$10,000 to companies.

#### **B5. What does the club do with the KYC documentation**

The staff should fill-in the KYC information in the register<sup>21</sup> for each pay-out of  $\geq$  \$10,000 and every suspicious matter. If possible, the staff should photocopy any KYC documentation that is viewed and file the photocopy with the program.

The KYC information must be kept for 7 years. The same obligation applies to all records relating to your AML/CTF program.

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<sup>21</sup> See chapter 8



## B6. Reporting Requirements

### When must the club make a report to AUSTRAC?

- a) Periodically as directed by AUSTRAC
- b) Compliance report in March 08
- c) When there is a *cash* pay-out of  $\geq$  \$10,000 (12/12/08)
- d) When there is a suspicious matter (12/12/08)  
*Note: a suspicious matter includes when a customer's identity cannot be verified by using the procedure set out in B2*

If, after following the procedures in B2, the employee is satisfied that the identity of the customer has been verified, there is no requirement to report any pay-out that is made by cheque – even if that pay-out is over  $\geq$  \$10,000.

Only *cash* and e-currency pay-outs of  $\geq$  \$10,000 are reportable to AUSTRAC. Suspicious matters are reportable regardless of the amounts involved.

If, after following the procedures in B2, the employee is **not** satisfied that the identity of the customer has been verified then the matter becomes a suspicious matter and must be reported to AUSTRAC.

Club staff should report suspicious matters and cash pay-outs of  $\geq$  \$10,000 to the compliance officer.

The compliance officer is required to use the AUSTRAC forms kept with the program and report the suspicious matter and cash pay-out within three business days. The compliance officer should file copies of all reports lodged with AUSTRAC in a secure place where they will not be accessible by the staff or the public. Reports to AUSTRAC are subject to the tipping off prohibition<sup>22</sup>, and should be handled carefully.

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<sup>22</sup> See chapter 6 of this template for information relating to the prohibition on tipping off.



## 5. WHAT IS A “SUSPICIOUS MATTER”

Suspicious matters are:

- (a) Matters that would lead a reasonable person to suspect that illegal activity is underway. It includes matters relevant to investigation of all offences against any Australian law generally including tax evasion, drug dealing, theft, family law avoidance, etc. Suspicious matters are not limited to ML/TF
- (b) Where a customer is not the person they claim to be
- (c) When the staff is unable to verify the identity of the customer (when required) by applying *The customer identification procedure* set out in B1 - B5

All suspicious matters must be recorded and then reported to AUSTRAC from 12/12/08.

If a pay-out of  $\geq$  \$10,000 is involved and the identity of the person cannot be verified by applying *The customer identification procedure* set out in B1 - B5 then the winnings must be withheld.

The club should identify behaviour that could amount to a “suspicious matter”. On the whole these will be the matters identified in Part A2. Part A2 sets out behaviour that is related to ML/TF. Staff should also be alert to other types of illegal activity eg theft, drug dealing, tax avoidance etc. The definition of suspicious matter is broad and encompasses any illegal activity.

Staff who witness a suspicious matter should report it to the compliance officer if the compliance officer is on duty – if not, to their supervisor. If the matter includes a payout of  $\geq$ \$10,000 the employee should record the required KYC information and view the required KYC documentation and make the appropriate entries in the register at chapter 8. If the suspicious matter does not involve payouts of  $\geq$ \$10,000, do not complete the register, and report the suspicious matter to the compliance officer or supervisor on duty.

The compliance officer or supervisor should assess the situation, and if it is appropriate the compliance officer or supervisor should apply the *customer identification procedure* set out in B1 - B5. If it is not appropriate to apply these procedures (eg if doing so would tip-off the person or the compliance officer/supervisor considers it dangerous to approach the person) then the supervisor complete and lodge the AUSTRAC Suspicious Matter Report with as much information as is available. A Suspicious Matter Report must be lodged within 3 day, and copies of the reports are to be filed in a secure place to avoid tipping off.<sup>23</sup>

*Note:* Customers who win  $\geq$ \$10,000 and do not provide the necessary KYC documentation have 14 days to produce the KYC documentation. However, if the employee forms the opinion that the person is not who they claim to be,

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<sup>23</sup> See chapter 6 of this template for information relating to the prohibition on tipping off.



then the suspicious matter arises at the time that the employee forms this opinion, NOT 14 days later.

## 6. TIPPING OFF & SECRECY

It is an offence to tip off any person that a suspicious matter has been recorded and reported to AUSTRAC. The club must not disclose to anyone other than AUSTRAC that a suspicious matter report has been lodged.

Staff must be very careful when handling information relating to suspicious matters to ensure they do not disclose the information to a third party. The staff must comply with the procedures set out in this template for recording and reporting suspicious matters<sup>24</sup>, and must not discuss the matters with anyone other than the compliance officer and if the compliance officer is not present the supervisor in charge. The suspicious matter should not be discussed with anyone else either at the club premises or outside.

Care must be taken to ensure that unintentional tipping-off does not occur. For example, when recording the suspicious matter in the register customers may be able to view what is being recorded, or staff may leave the register open or unattended, and during this time unauthorized people may read about a suspicious matter.

Staff must also be careful when reporting suspicious matters relating to other staff.<sup>25</sup> Staff involvement in suspicious matters should not be recorded in the register as this may tip off the staff member who has access to the register. Suspicious matters involving other staff should be reported to the compliance officer or the supervisor in charge. In the event the suspicious matter involves the compliance officer or the supervisor then a member of the board should be notified.

Generally, staff should always handle any information relating to suspicious matters with great care.

The tipping off provisions are not subject to the Privacy Act and individuals concerned cannot have access to this information.

The examples discussed above are not exhaustive. Clubs should ensure that their staff are adequately trained in relation to the risk of breach of the tipping off laws in the staff training sessions.<sup>26</sup>

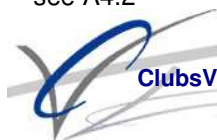
The tipping off provisions contain heavy penalties. Both the club and the persons who tip off are subject to the penalties.

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<sup>24</sup> see chapter 5 and A4.3

<sup>25</sup> see A4.3

<sup>26</sup> see A4.2



## 7. PRIVACY

All clubs are now subject to the Privacy Act in relation to the handling of information under the Act (except for suspicious matters)<sup>27</sup>.

In summary the Privacy Act requirements are:

- (a) Only collect the information the club needs in order to comply with the program
- (b) Advise the person of the use to which the information will be put. eg when the club collects KYC information in accordance with Part B, the club should tell the customer that the information will be kept for the purposes of the AML/CTF Act (but NOT suspicious matters)
- (c) Do not disclose the KYC information to any unauthorized persons, eg marketing companies, without obtaining specific consent from the customer first
- (d) Take reasonable steps to ensure that the KYC information is correct and up to date
- (e) Store the register and any copies of KYC documentation in a manner which protects it from misuse, loss or unauthorized access
- (f) Destroy the KYC entries and documentation after 7 years
- (g) Provide the customer with access to the information that relates to the customer (but NOT suspicious matters)
- (h) Correct any false information relating to the customer

**Suspicious matters are *not* subject to the Privacy Act. Any information collected and recorded in response to a suspicious matter cannot be disclosed to anyone other than to AUSTRAC. If the information is disclosed, in particular to the person/s noted in the suspicious matter report, the club and the person who does the tipping off will be breaching the tipping off laws and liable for penalties.**

More information regarding privacy can be found at [www.privacy.gov.au](http://www.privacy.gov.au). A summary of the National Privacy Principles is contained in attachment 5 to this template.

<sup>27</sup> Even if the club's turnover is less than \$3 million, the Privacy Act will still apply for issues regarding AML/CTF



# 8. REGISTER

1) Date: \_\_\_\_\_ 2) Name of employee \_\_\_\_\_

3) Type of report:

- a) Pay-out  $\geq$  \$10,000
- b) Cheque pay-out  $\geq$  \$10,000
- c) Suspicious matter  Go directly to 6

4) KYC documentation provided by customer:

Name: \_\_\_\_\_

Residential address: \_\_\_\_\_

Date of birth: \_\_\_\_\_

5) KYC documentation viewed (eg, driver's licence, pension card).  
*Must verify name and one of residential address or date of birth  
...If possible take a copy and attach to the program*

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

6) Any other relevant information: \_\_\_\_\_

\_\_\_\_\_

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\*\*\*If insufficient space use a separate sheet and attach to the register



1) Date: \_\_\_\_\_ 2) Name of employee \_\_\_\_\_

3) Type of report:

- a) Pay-out  $\geq$  \$10,000
- b) Cheque pay-out  $\geq$  \$10,000
- c) Suspicious matter  Go directly to 6

4) KYC documentation provided by customer:

Name: \_\_\_\_\_

Residential address: \_\_\_\_\_

Date of birth: \_\_\_\_\_

5) KYC documentation viewed (eg, driver's licence, pension card).  
*Must verify name and one of residential address or date of birth  
...If possible take a copy and attach to the program*

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6) Any other relevant information: \_\_\_\_\_

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\*\*\*If insufficient space use a separate sheet and attach to the register



1) Date: \_\_\_\_\_ 2) Name of employee \_\_\_\_\_

3) Type of report:

- a) Pay-out  $\geq$  \$10,000
- b) Cheque pay-out  $\geq$  \$10,000
- c) Suspicious matter  Go directly to 6

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Residential address: \_\_\_\_\_

Date of birth: \_\_\_\_\_

5) KYC documentation viewed (eg, driver's licence, pension card).  
*Must verify name and one of residential address or date of birth  
...If possible take a copy and attach to the program*

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6) Any other relevant information: \_\_\_\_\_

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\*\*\*If insufficient space use a separate sheet and attach to the register



1) Date: \_\_\_\_\_ 2) Name of employee \_\_\_\_\_

3) Type of report:

- a) Pay-out  $\geq$  \$10,000
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- c) Suspicious matter  Go directly to 6

4) KYC documentation provided by customer:

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Residential address: \_\_\_\_\_

Date of birth: \_\_\_\_\_

5) KYC documentation viewed (eg, driver's licence, pension card).  
*Must verify name and one of residential address or date of birth  
...If possible take a copy and attach to the program*

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6) Any other relevant information: \_\_\_\_\_

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\*\*\*If insufficient space use a separate sheet and attach to the register



1) Date: \_\_\_\_\_ 2) Name of employee \_\_\_\_\_

3) Type of report:

- a) Pay-out  $\geq$  \$10,000
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4) KYC documentation provided by customer:

Name: \_\_\_\_\_

Residential address: \_\_\_\_\_

Date of birth: \_\_\_\_\_

5) KYC documentation viewed (eg, driver's licence, pension card).  
*Must verify name and one of residential address or date of birth  
...If possible take a copy and attach to the program*

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6) Any other relevant information: \_\_\_\_\_

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\*\*\*If insufficient space use a separate sheet and attach to the register



1) Date: \_\_\_\_\_ 2) Name of employee \_\_\_\_\_

3) Type of report:

- a) Pay-out  $\geq$  \$10,000
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Date of birth: \_\_\_\_\_

5) KYC documentation viewed (eg, driver's licence, pension card).  
*Must verify name and one of residential address or date of birth  
...If possible take a copy and attach to the program*

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6) Any other relevant information: \_\_\_\_\_

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\*\*\*If insufficient space use a separate sheet and attach to the register



1) Date: \_\_\_\_\_ 2) Name of employee \_\_\_\_\_

3) Type of report:

- a) Pay-out  $\geq$  \$10,000
- b) Cheque pay-out  $\geq$  \$10,000
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Date of birth: \_\_\_\_\_

5) KYC documentation viewed (eg, driver's licence, pension card).  
*Must verify name and one of residential address or date of birth  
...If possible take a copy and attach to the program*

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6) Any other relevant information: \_\_\_\_\_

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\*\*\*If insufficient space use a separate sheet and attach to the register



1) Date: \_\_\_\_\_ 2) Name of employee \_\_\_\_\_

3) Type of report:

- a) Pay-out  $\geq$  \$10,000
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- c) Suspicious matter  Go directly to 6

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Date of birth: \_\_\_\_\_

5) KYC documentation viewed (eg, driver's licence, pension card).  
*Must verify name and one of residential address or date of birth  
...If possible take a copy and attach to the program*

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6) Any other relevant information: \_\_\_\_\_

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\*\*\*If insufficient space use a separate sheet and attach to the register



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- a) Pay-out  $\geq$  \$10,000
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5) KYC documentation viewed (eg, driver's licence, pension card).  
*Must verify name and one of residential address or date of birth  
...If possible take a copy and attach to the program*

\_\_\_\_\_  
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6) Any other relevant information: \_\_\_\_\_

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1) Date: \_\_\_\_\_ 2) Name of employee \_\_\_\_\_

3) Type of report:

- a) Pay-out ≥ \$10,000
- b) Cheque pay-out ≥ \$10,000
- c) Suspicious matter  Go directly to 6

4) KYC documentation provided by customer:

Name: \_\_\_\_\_

Residential address: \_\_\_\_\_

Date of birth: \_\_\_\_\_

5) KYC documentation viewed (eg, driver's licence, pension card).  
*Must verify name and one of residential address or date of birth  
...If possible take a copy and attach to the program*

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6) Any other relevant information: \_\_\_\_\_

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\*\*\*If insufficient space use a separate sheet and attach to the register



1) Date: \_\_\_\_\_ 2) Name of employee \_\_\_\_\_

3) Type of report:

- a) Pay-out  $\geq$  \$10,000
- b) Cheque pay-out  $\geq$  \$10,000
- c) Suspicious matter  Go directly to 6

4) KYC documentation provided by customer:

Name: \_\_\_\_\_

Residential address: \_\_\_\_\_

Date of birth: \_\_\_\_\_

5) KYC documentation viewed (eg, driver's licence, pension card).

*Must verify name and one of residential address or date of birth  
...If possible take a copy and attach to the program*

\_\_\_\_\_  
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6) Any other relevant information: \_\_\_\_\_

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\*\*\*If insufficient space use a separate sheet and attach to the register

