

## Ipswich Jets

# Policy: Suspicious Matters

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### 1. PURPOSE

Ipswich Jets recognises the objectives of the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (AML/CTF Act)* and its obligations under it. As a reporting entity, Ipswich Jets recognises that it is essential to implement a SUSPICIOUS MATTER POLICY to mitigate the risks associated with customer acceptance, customer identification and verification, transaction monitoring and overall risk management.

### 2. SCOPE

Ipswich Jets will implement the SUSPICIOUS MATTER POLICY to educate and inform management and employees about the Club's responsibilities and obligations regarding suspicious matters under the AML/CTF Act. Under the AML/CTF Act, Ipswich Jets is obligated to report suspicious matters to AUSTRAC.

The documentation referred to within this policy and the AML/CTF Program sets out the approach that Ipswich Jets will take to implement and manage suspicious matter reporting and associated systems.

The key objectives of the SUSPICIOUS MATTERS POLICY are to:

- Ensure that the customers with which we deal are legitimate.
- Ensure that customers are properly identified.
- Verify and identify customers using reliable and independent documentation.
- Monitor customer transactions to prevent or detect illegal activities.
- Implement procedures to manage the risks posed by customers who may attempt to misuse the Club's facilities.

### 3. RESPONSIBILITIES

Under the AML/CTF Act, the Club must report suspicious matters to AUSTRAC.

The suspicious matter report will consider the following:



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- A description of the “reasonable grounds” used to form the suspicion.
- Where possible, provide the full name, address and telephone number, occupation, citizenship, and documentation used to establish the individual's identity.
- If the individual's identity is not known, a description of the person and the availability of any video surveillance or other documentation that could assist in identifying the individual should be provided.
- Further KYC information, where known.

The AML/CTF Compliance Officer will be responsible for completing any reporting associated with the Ipswich Jets AML/CTF Program.

An internal investigation will be conducted into matters that are reported as unusual. The internal investigation aims to ascertain reasonable grounds to suspect that money laundering or terrorism financing activity is occurring.

The suspicious matter report (SMR) must be lodged within 3 days if related to money laundering and within 24 hours if related directly to terrorism financing. The SMR will be lodged online.

The Club's AML/CTF Compliance Officer will submit suspicious matter reporting through AUSTRAC's online facility at [www.austrac.gov.au](http://www.austrac.gov.au).<sup>1</sup>

Feedback to staff members on the results of suspicious matters will occur as determined by the AML/CTF Compliance Officer in consultation with the General Manager.

#### 4. POLICY

There are strict obligations around the reporting of suspicious matters. The information contained with the report and the fact that such a report has been provided to AUSTRAC must not be disclosed to anyone other than senior management or AUSTRAC.

The escalation of unusual matters must occur as per the UNUSUAL MATTER PROCEDURE.

Records are required to be kept. Where you suspect that reporting a suspicious matter, as required by this policy, may tip off a person involved in the suspicious matter, you must report your suspicion directly to AUSTRAC.

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<sup>1</sup> <https://online.austrac.gov.au/ao/login.seam>. The role of AML/CTF Compliance Officer role is held by the Club Operations Manager.



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For further information regarding this policy or the Clubs AML/CTF PROGRAM, please get in touch with the Club Operations Manager.

**5. RELATED DOCUMENTS:**

- PROCEDURE: AML/CTF \$10 K Customer Payout Form – Appendix 10
  - PROCEDURE: ENHANCED CUSTOMER DUE DILIGENCE – Appendix 8
  - PROCEDURE: POLITICALLY EXPOSED PERSON – Appendix 9
  - PROCEDURE: UNUSUAL MATTER – Appendix 7
  - FORM: UNUSUAL MATTER REPORT – Appendix 12
  - POLICY: KNOW YOUR CUSTOMER – Appendix 6
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