



POLICY: SUSPICIOUS MATTER

1. PURPOSE

Club Harrington recognises the objectives of the *Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) Act 2006 (the Act)* and its obligations under it. As a reporting entity, Club Harrington 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.

Club Harrington has put into practice the AML/CTF Suspicious Matter Policy to educate and inform management and employees about the Club's responsibilities and obligations under the *AML/CTF Act* regarding suspicious matters. The documentation within this policy and the Club Harrington AML/CTF Program sets out the approach that Club Harrington will undertake to implement and manage the suspicious matter procedures and associated systems.

The purpose of non-disclosure of information about an SMR to another person is to:

- Protect the privacy and reputation of the customer
- Ensure that the identity of the person submitting an SMR is kept confidential
- Ensure that law enforcement investigations are not affected by criminals taking additional steps to hide their activities and behaviours when they know that their actions led to suspicion.

2. SCOPE

- a. This policy applies to all Club members of the board, employees, management, and volunteers.
- b. This policy describes the Club's objectives and policies regarding AML/CTF obligations.

This policy replaces all other Suspicious Matter policies (whether written or not). This policy does not form part of the employee's contract of employment, nor does it form part of any other person's contract for service.

3. SUSPICIOUS MATTERS

Under the *AML/CTF Act 2006*, reporting entities must report a suspicious matter to AUSTRAC.

The suspicious matter report will consider the following:

- A description of the "reasonable grounds" used to form the suspicion

- Where possible further KYC information, if known about the customer, such as the full name, address and telephone number, occupation, citizenship of the individual and the documentation used to establish their identity
- If the identity is not known, then a description of the person and availability of any video surveillance and or other documentation could assist in identifying the individual.

The AMLCTF Compliance Officer will be responsible for completing any suspicious matter reporting associated with the Club Harrington AML/CTF Program. The General Manager-AML/CTF Compliance Officer will investigate to ascertain reasonable grounds to suspect that money laundering or terrorism financing activity is occurring. A Suspicious Matter Report (SMR) must be lodged within three (3) days if related to money and laundering and within 24 hours if connected directly to terrorism financing. Suspicious Matter Reports are submitted online, and copies are kept in a secure location only accessible to the AMLCTF Compliance Officer.

There are strict obligations around the reporting of suspicious matters. A Club employee should not disclose the information contained within an unusual matter report (internal) or suspicious matter report or that a report has been provided to AUSTRAC. The Club may share related information in several circumstances with external auditors. A breach of the tipping off offence provisions is a criminal offence and can result in a penalty of up to two years imprisonment, 120 penalty units or both.

Club employees must report unusual matters to the immediate Shift Supervisor or Duty Manager, who will record the issue on the SHIFT REPORT. Disclosure of information related to an unusual matter to the person, or any other person is not permitted unless it meets the purpose of this policy and follows the incident escalation process. Where it is suspected that reporting a suspicious matter, as required by this policy, may tip off a person involved in the suspicious matter, you must notify your suspicion directly to AUSTRAC. Please also refer to the Clubs Whistle-blower Policy.

For further information regarding this policy or the Club Harrington documented AML/CTF Program, please contact the General Manager.

4. SANCTIONS

The Club will handle the performance management and disciplinary process for breaches of this policy following the relevant policy contained within the Club Harrington Employee Handbook.

5. REFERENCES

- a. Procedure: Unusual Matter
 - b. Unusual Matter Report
 - c. Procedure: Enhanced Customer Due Diligence
 - d. Policy: Whistle-blower
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