



## POLICY: KNOW YOUR CUSTOMER

### 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 the know your customer (KYC) policy to mitigate the risks associated with customer acceptance, customer identification and verification, accounts and transaction monitoring and overall risk management.

Club Harrington has put into practice the AML/CTF Know Your Customer (KYC) policy to educate and inform management, employees, members, guests, and the local community about the Clubs responsibilities and obligations under the *AML/CTF Act 2006* regarding customer identification. 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 KYC procedure and associated systems.

The KYC Policy key objectives are to:

- Ensure that customers with which the Club deals are legitimate
- Ensure that customers are appropriately identified and they understand the associated risks to Club Harrington
- Collect customer KYC information required under the *AML/CTF Act and Rules*
- 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.

### 2. SCOPE

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

This policy replaces all other Know Your Customer (KYC) 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.

Club Harrington must collect and verify information about a customer before paying out winning and or accumulated credits or awarding a prize on a gaming machine involving an amount of \$10,000 or more – the Club must complete this process for all payments made in cash, EFTPOS, cheque or other means.

The Club has a Liquor, and Gaming NSW cash approved limit of \$5,000 and will require patrons to provide

proof of identification for payment processing and the collection of cheques. Club Harrington will collect at a minimum the following information about a customer:

- Full name (first, middle and surname)
- Full residential address, and
- Date of birth.

The Club must verify at a minimum:

- The customer’s full name (first, middle and surname), and
- Either the customer's date of birth or the customer's residential address.

The Club will check details provided by the customer against customer identification documents. The identification documentation will be required to be an original document. Where the customer cannot provide original documents, certified copies of the originals must be provided. Copies of this documentation will be made and kept on file at the Club as the 'Transaction Records'. A list of acceptable identification is captured in the AML/CTF Procedure: \$10,000 Payouts and Prize Winner Form.

The AMLCTF Compliance Officer must be notified if a customer cannot provide acceptable identification. The Club will not make payment until one of the identification verification methods has been met; additionally, the Club will only make payment to the person who is the legitimate prize-winner. Any distinguishable difference between a claimed identity and the documentation provided will be recorded and subject to a customer's further enquiry of the customer. In this event, the AMLCTF Compliance Officer must be notified.

**3. SANCTIONS**

- a. 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.

**4. REFERENCES**

- a. PROCEDURE: \$10,000 PAYOUTS
- b. PROCEDURE: PRIZE WINNER FORM