



PROCEDURE: UNUSUAL MATTER – LEVEL 1

1. PURPOSE

To assist Club Harrington, meet with suspicious matter reporting obligations under the *Anti-Money Laundering & Counter-Terrorism Financing Act 2006*.

2. RESPONSIBILITIES

All Staff

3. INDICATORS OF UNUSUAL MATTER/RED FLAGS

Club Harrington considers the following as red flags/unusual matters for transaction monitoring purposes:

- Unusual transactions or circumstances are evident
- Known business background of the customer may be considered suspicious
- Production of unusual or false identification
- The use of aliases and, or a variety of similar addresses
- Customer sources of funds are suspected to be linked to criminal activity – patron is a known criminal, money launderer or terrorism financier, patron is involved in a suspicious matter
- Customer asking for cheques to be made out below \$10,000 or in the name of a third party
- Customer in the gaming machine area that appear to have no visible intention of playing gaming machines, customer inserts cash into a gaming machine with little or no legitimate game play
- Customers who approach other customers to purchase payout vouchers, credits on machine or prize-winning cheques
- Customer profile does not match the amount of funds they are gambling — low income versus large amounts of gambled funds i.e. It is known that a customer receives Centrelink benefits or has a low paying job, but they gamble significant sums of money. Ask yourself, how they got access to that kind of money
- Customers who gamble with large amounts of cash and do not use the ATM
- Customers asking for cheques to be made out below \$10,000, or in the name of a third party
- Customers in the gaming machine areas that appear to have no visible intention of playing gaming machines
- Customers who approach other customers to purchase payout vouchers.
- Customer who may request for a cheque to be written in the name of a third party
- High redemptions over a short period
- Sum of transactions adds up to significant amounts of money
- Customer preferring to use CRT to avoid staff contact and possible detection of high number of transactions
- A customer receiving a volume of cheques [two (2) cheques within a specific period that is beyond that of which would be considered to be a reasonable amount of winnings by one person



- A customer receiving multiple cheque payments on a single day beyond that of which would be considered to be a reasonable amount of winnings by one person for one day
- The customer involved in a transaction is considered a high risk politically exposed person.

4. PROCEDURE

- 1) Where a staff member identifies a matter which may be considered unusual, they are required to report the matter, as soon as is reasonably practicable, to their immediate Shift/Duty Manager.
- 2) A SHIFT REPORT (FULL) will be completed by the Supervisor or Duty Manager, making note of the unusual matter.

Gaming Incidents If yes, please complete a GAMING INCIDENT REPORT	Yes
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- 3) A witness statement will be obtained from the staff members involved, when appropriate.
- 4) The Supervisor or Duty Manager will open a GAMING INCIDENT REPORT.

Location of incident	<input type="text"/>
Incident details	Hold down the CTRL key to make multiple selections <ul style="list-style-type: none">Third party approach (for self-exclusion)Anti-social behaviourAsked to leaveUnusual matter (please specify)
Unusual matter	<input type="text"/>

- 5) If possible, inform the customer that the Club needs to update its records and will request the patron to complete a new MEMBERSHIP NOMINATION FORM
- 6) If the customer is not already a member, encourage them to join explaining all benefits of being a member
- 7) The AML/CTF COMPLIANCE OFFICER:
 - a. Will conduct further investigation as may be required
 - b. May conduct employee interviews as needed at any stage in the investigation.
- 8) The AML/CTF COMPLIANCE OFFICER (or in their absence, the ASSISTANT AML/CTF COMPLIANCE OFFICER) will open an UNUSUAL MATTER REPORT and conduct further investigation as may be required.

5. Related Documents:

FORM: UNUSUAL MATTER REPORT

MEMBERSHIP APPLICATION FORM

PROCEDURE: PRIZE WINNERS FORM

PROCEDURE: ENHANCED CUSTOMER DUE DILIGENCE

PROCEDURE: UNUSUAL MATTER LEVEL 2