

AML/CTF POLICY

West Tamworth League Club Ltd is a reporting entity under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006*, as it provides designated gambling services.

As such, West Tamworth League Club Ltd has obligations to identify, mitigate, and manage the money laundering and terrorism financing risks arising from the provision of designated gambling services by West Tamworth League Club Ltd, including customer identification and verification. This policy outlines the procedures that West Tamworth League Club Ltd has implemented to fulfil its obligations in this regard.

If you require any clarification on this policy, please do not hesitate to contact the AML/CTF compliance officer or management.

WHAT IS MONEY LAUNDERING

Money laundering is the process of legitimising funds from illegal activities.

Criminals may generate large amounts of cash through arms deals, drug deals, and other illicit activities. They want to use the money to protect their criminal activities and organisations. Therefore, they aim to distance the money from the crime by creating a financial trail that makes it appear legitimate.

The steps in money laundering are:

- 1. Placement** – where the bulk of the money is injected into the financial system by breaking up large amounts into smaller amounts (structuring), or by putting money into gaming machines (feeding money in, betting minimal amounts, then cashing out and getting a winnings cheque/EFT payment) or giving to people in small amounts and putting into their bank accounts.
- 2. Layering** – is a series of transactions designed to conceal the origin of the funds. It is difficult to track, for example, through overseas currency transactions, shelf companies, bullion dealers, and artwork that can be later sold.
- 3. Integration** – where the money comes back and appears clean, having come back through legitimate means, such as commingling with legitimate funds.

In Australia, it is estimated that annual money laundering exceeds \$15 billion. Much of this is from drugs and fraud.



TERRORISM FINANCING

Defined as an act of providing financial support to terrorists or terrorist organisations to enable them to carry out terrorist acts, for example, education, accommodation, bombs, illegal charities, etc. These may be legitimate or illicit funds.

WHO IS AUSTRAC?

AUSTRAC aims to prevent money laundering and the financing of terrorism. It is a financial terrorism unit that receives reports from the financial sector, bullion dealers, bookmakers, pubs, clubs, and casinos. The unit analyses the information and passes it on to law enforcement agencies, such as the AFP, Police, Customs, and the Tax Office.

WEST TAMWORTH LEAGUE CLUB LTD OBLIGATIONS

Individuals who are deemed “cash dealers” have reporting obligations to ensure compliance with the Act. For example, people who provide gambling services when:

- Receiving a bet
- Paying out winnings
- Allowing a person to play a game on a gaming machine
- Opening an account for purposes of gambling e.g. TAB

PART A – GENERAL

A) IDENTIFY THE RISKS

West Tamworth League Club Ltd has identified the following designated gambling services that may inadvertently or otherwise be used for money laundering and terrorism financing activities:

- Receiving or accepting a bet placed or made by a person
- Placing or making a bet on behalf of a person
- Paying out winnings in respect of a bet
- Allowing a person to play a game on a gaming machine
- Paying out winnings or awarding a prize for a game played on a gaming machine

Some risks associated with the above designated services that West Tamworth League Club Ltd has identified include:

- Third party purchasing a prize payout entitlement (e.g. buying a gaming voucher or a winning TAB ticket off another individual who won it)



- Abnormal play (e.g. an individual puts in a significant amount of money, plays for minimal time, cancels the credits and cashes out, then asks for a cheque/EFT payment for that amount of money. This could be an everyday occurrence. However, it could become suspicious if the individual repeats this activity frequently.)
- Inserting maximum cash/credits or bets following a period of minimal play/turnover
- Credit redemption (e.g. exchanging cash for prize-winning cheques/EFT payments or gaming machine tickets)
- Stolen or counterfeit money exchange (e.g. inserting stolen or counterfeit notes in gaming machines or betting with stolen or counterfeit notes and then redeeming them after minimal or no play)
- Staff collusion (e.g. employees working with launderers to 'legitimise' dirty money)
- Using fake ID to open TAB accounts

After considering all factors, a reasonable suspicion arises that an individual is using West Tamworth League Club Ltd gaming services to launder money obtained through tax evasion, money laundering, terrorism, corporate crime, or other serious crimes **THE ABOVE WILL BECOME THRESHOLD TRANSACTIONS IF THE AMOUNT INVOLVED IS \$5000 OR MORE.**

However, smaller payments may be considered suspicious if West Tamworth League Club Ltd has reasonable grounds to believe they may be related to tax evasion, money laundering, terrorism, corporate crime, process crime, or other serious crimes.

B) MITIGATE THE RISKS

West Tamworth League Club Ltd will mitigate the risk of money laundering and terrorism financing activities through employee training, due diligence procedures, and appointment of an AML/CTF compliance officer as follows:

Employee Training

West Tamworth League Club Ltd will ensure employees are appropriately trained in AML/CTF Act requirements, in particular in the following key areas:

- Awareness and reporting of 'suspicious activities' to the designated AML/CTF compliance officer
- Procedures under the Liquor Act regarding entry requirements (e.g. identification and sign-in procedures)
- Procedures under the Gaming Act and Wagering Act regarding the conduct of gaming/wagering and payment of prizes (e.g. cash, cheque, EFT payments)
- Requirements of the AML/CTF Act regarding identification requirements applicable to threshold transactions
- General vigilance and common-sense approach in the detection of risk



Personnel Due Diligence

West Tamworth League Club Ltd will ensure that appropriate due diligence is conducted on both employees and service providers assisting the club in meeting its AML/CTF obligations. This involves reasonable background checks upon employment and reasonable behavioural monitoring during the term of employment of employees engaged in the designated services who may facilitate money laundering and terrorist financing activities, such as police background checks and character references.

AML/CTF Compliance Officer

West Tamworth League Club Ltd has designated Geoff Shanley as the AML/CTF compliance officer, responsible for ensuring the club complies with the requirements of the AML/CTF Act. Additionally, West Tamworth League Club Ltd has appointed Jaydon Hartin as a backup AML/CTF compliance officer.

C) MANAGE THE RISKS

West Tamworth League Club Ltd has implemented the following measures to manage the risks of money laundering and terrorism financing activities occurring at West Tamworth League Club Ltd:

- **Compliance commitment:** West Tamworth League Club Ltd managers and the designated AML/CTF compliance officer will ensure all procedures are adhered to regarding combating actual or potential money laundering and terrorism financing risks at West Tamworth League Club Ltd.
- **Ongoing oversight by management:** Seeking regular updates from the AML/CTF compliance officer on the money laundering and terrorism financing risks or activities presented at West Tamworth League Club Ltd and will require West Tamworth League Club Ltd to formulate appropriate policy responses to combat them. Management will exercise ongoing vigilance in this regard.
- **Annual review:** West Tamworth League Club Ltd will review the Compliance Program annually to ensure its currency and effectiveness.
- **Independent review:** The Compliance Program is subject to a biennial independent review to ensure it remains compliant with the AML/CTF Act and Rules.

PART B – CUSTOMER IDENTIFICATION















Significant Cash Transaction

West Tamworth League Club Ltd will require the following minimum identification in the event of a person involved in a threshold transaction (i.e. over \$5000).



- Full name
- Date of birth
- Residential address

This customer information must be recorded, and identification verified before any form of payment is made.

AML/CTF PAYOUTS REQUIRING CHEQUE OR EFT PAYMENT – CIP FORM			
PATRON DETAILS:			
Date	/ /	Time	AM / PM
Patron Full Name			
Business/Residential Address (Not a PO Box)			
State:	Postcode:	Country:	
Phone/Contact Number #	Date of Birth (DD/MM/YYYY)		
To process the win, you must collect 30 points of identification – if the patron cannot provide 30 points you must NOT pay out the win and immediately notify your Compliance Officer/Duty Manager.			
CATEGORY A – Primary Government Issued Photographic Identification – (only 1 required) 30 points per document			
 OR  Digital ID <input type="checkbox"/> Drivers Licence <input type="checkbox"/> Doc No: _____ Exp Date: ____/____/____ Name, address & DOB match <input type="checkbox"/>	 Passport Doc No: _____ Exp Date: ____/____/____ Name, address & DOB match <input type="checkbox"/>	 Govt. Proof of Age Card Doc No: _____ Exp Date: ____/____/____ Name, address & DOB match <input type="checkbox"/>	 Immi Card Doc No: _____ Exp Date: ____/____/____ Name, address & DOB match <input type="checkbox"/>
			Note: KeyPass is not a Government ID and cannot be accepted.  Points Collected = <input type="text"/>
CATEGORY B – Secondary Government Issued Non-Photographic Identification (minimum 2 required) 15 points per document			
 Centrelink Card Doc No: _____ Exp Date: ____/____/____ Name, address & DOB match <input type="checkbox"/>	 Aust Citizen Certificate Doc No: _____ Exp Date: ____/____/____ Name, address & DOB match <input type="checkbox"/>	 Birth Certificate Doc No: _____ Exp Date: ____/____/____ Name, address & DOB match <input type="checkbox"/>	Note: You cannot accept a Medicare Card or a Statutory Declaration.  Points Collected = <input type="text"/> +
CATEGORY C – Alternative Non-Photographic Identification (Collect 1 only & must collect 1 Category B document first) 15 points per document			
 ATO Notice Name and address match <input type="checkbox"/>	 Local Govt. Notice Name and address match <input type="checkbox"/>	 Utility Notice Name and address match <input type="checkbox"/>	Note: only 1 document can be accepted from Category C. No Bank Statements No Medicare Card No Statutory Declaration  Points Collected = <input type="text"/> = <small>Max 15</small>
BSB:	ACC:	Cheque/TITO Ticket/EFT Receipt photocopied	Compliance Officer Signature: _____
		Cashier Name: _____	
SM reported to Compliance Officer (if any) <input type="checkbox"/>		Cashier Signature: _____	

Suspicious Cash Transaction

West Tamworth League Club Ltd will collect the above information using independent and reliable sources in the event of a person suspected of being involved in a Suspicious Threshold Transaction (i.e. over \$5000).

Employees should also complete a Suspicious Matter Report, noting the following items:

- Identification details, e.g. membership file, verified by driver's license
- How long have they been coming to the club
- What is their gambling pattern? Has it changed significantly? When?
- What led to the suspicion? Why?
- Describe the activity
- Amount of the transaction/s
- CCTV footage if available



Should the customer refuse to provide the required information, West Tamworth League Club Ltd will withhold the designated services, including any payouts, until satisfactory identification is produced.

West Tamworth League Club Ltd will collect personal information in accordance with the *Privacy Act 1988*, irrespective of any exemption. While privacy laws allow a person to access and seek correction of the information held by West Tamworth League Club Ltd about them, the secrecy obligations under AML/CTF override these obligations.

West Tamworth League Club Ltd will submit the Suspicious Matter Report within 3 days of verifying identified activity or within 24 hours if it relates to terrorism financing.

AUSTRAC Reporting

The AML/CTF compliance officer will provide any report required by AUSTRAC in a timely manner. In addition, the AML/CTF compliance officer will report to AUSTRAC on threshold and suspicious transactions.

For domestic currency, threshold transactions must be reported within 10 days, and suspicious transactions/activity must be reported within 3 days.

Record Keeping

West Tamworth League Club Ltd will maintain records of designated services, threshold or suspicious transactions, customer personal information, and any other relevant information for a period of seven years.

These records will be kept securely at West Tamworth League Club Ltd and in a readily accessible format (hardcopy or electronic).

DOCUMENT CONTROL

Policy name: AML/CTF Policy
Approved by: Finance Committee
Date approved: 31 March 2026
Frequency of review: Annually
Last reviewed: 31 March 2026
Next review date: 31 March 2027

