

Initialism WIPP

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Hi everyone

With all the moving parts this week I thought it useful to set out what Initialism has on its "to do list"

Below is the Work in Progress or Planned (WIPP) – it would be good to discuss prioritisation so we can meet needs

ML/TF Risk Assessment

- * Refine methodology with Crown
- * Engage with other stakeholders (Promontory etc) re their inputs to the ML/TF Risk Assessment
- * Work with Crown to collect data etc
- * Draft ML/TF Risk Assessments for Perth, Melbourne and Sydney

AML/CTF 1st and 2nd line oversight and testing plan

- * Work with Crown to finalise draft plan

AML/CTF Program Implementation Gap Analysis

- * Work with Crown to test implementation of key requirements of AML/CTF Program
- * Targeted review of IFTI operational compliance

Burswood Nominees and Crown Melbourne Bank Accounts

- * Replicate GT Analysis and Initialism Review for each account

Transaction Monitoring

- * Non-identification of potential structuring root cause analysis
- * Review of data sources used for current Transaction Monitoring (building on 2019 Report)

Nick and Adam let me know if I have missed anything

Happy to discuss prioritisation etc at our call on Monday

Best

Neil

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