



**SUBJECT:** AML/CTF Policy Statement  
**POLICY TITLE:** Third Party Transfers and Money Remitters  
**APPROVED BY:** Nick Stokes                      **REVIEWED:**  
**VERSION:** Version 1.0                      **ISSUE DATE:** 16 November 2020

## 1. Statement of Purpose

1.1 The objective of this policy (**Policy**) is to set out the Crown Designated Business Group's (**Crown**) policy in relation to transfers into and out of Crown's bank accounts used by patrons to deposit funds for gaming purposes (**bank accounts**):

- (a) third parties; and
- (b) money remitters.

where such transfers are for the benefit of a Crown customer.

## 2. Policy Statement

2.1 Crown:

- (a) does not accept payments from third parties (including money remitters) into its accounts for the benefit of a Crown customer; and
- (b) will not make payments to third parties (including money remitters) on behalf of a Crown customer.

unless prior written approval for the relevant transfer has been obtained from the property Chief Operating Officer (**COO**) and the AML/CTF Compliance Officer in accordance with the procedure set out below.

2.2 To assist in any determination as to whether there should be a departure from the default position set out in clause 2.1 of this Policy, the Crown staff member who has received the request must refer the request to the AML Team of the relevant Crown property.

## 3. Procedure

3.1 Where approval is sought for a transaction referred to at clause 2.2 above, the relevant Crown staff member must request that the AML Team prepare a written recommendation to assist in the determination as to whether the third party transfer should proceed (**Third Party Transfer Recommendation**).

3.2 The requesting business unit must collate and provide to the AML Team:

- (a) name and identification details of the customer;
- (b) name and identification details of the third party or registration information of the money remitter;
- (c) information in relation to the third party's connection to, and relationship with, the customer and purpose of the proposed transfer;
- (d) a summary of recent gaming activity (including any transfers to or from their patron account);



- (e) a summary of any historical adverse information held about the patron (including the results of any ECDD); and
- (f) a statement of the business rationale for departing from the default position.

The request and collated information referenced in (a) to (f) above must be approved by the head of the relevant business unit before it can be sent to the AML Team.

3.3 Following a request from a Crown staff member, once complete information referenced in 3.2 has been provided, the AML Team must prepare a Third Party Transfer Recommendation. The Third Party Transfer Recommendation must:

- (a) set out the history of the customer's risk ratings within Crown, including (if applicable) the dates and reasons for the escalation of the customer's risk rating;
- (b) set out the AML Team's views on the money laundering and terrorism financing (**ML/TF**) risks presented by the proposed transfer;
- (c) include the results of Dow Jones screening in relation to the third party;
- (d) provide the AML Team's recommendation as to whether the proposed transfer should proceed, having regard to the ML/TF risks presented by the proposed transfer; and
- (e) be approved by the AML/CTF Compliance Officer.

3.4 Where the Third Party Transfer Recommendation recommends that the proposed transfer not proceed, then the proposed transfer must not proceed.

3.5 In all other cases, the Third Party Transfer Recommendation should be provided to the property COO for approval. The proposed transfer must only proceed once the property COO has approved the Third Party Transfer Recommendation.