



Crown
Melbourne
Limited

Standard Operating Procedures

Cage Operations

Version 7.0

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1. DEFINITIONS

1.1 In these Standard Operating Procedures (SOPs) the following meanings apply:

'Account Holder' means the person named on the account or their authorised representative.

'Accountability Items' means documents recording transactions affecting the balance of the float – e.g. Credit and Fill Slips.

'Affiliated Chips or Plaques' means gaming chips or plaques used at any affiliated property.

'Affiliated Property' means casinos which may include, but are not limited to: Crown Melbourne, Crown Perth or Crown Sydney.

'Affiliated Chip Held Summary Sheet' means a form summarising the total number of chips held at Crown, from affiliated properties.

'Application for Deposit Form' means a form submitted by a patron, requesting approval to operate a Deposit Facility at Crown.

'Application for a Cheque Cashing Facility or Credit Facility' means a form submitted by a patron, requesting approval to operate a Cheque Cashing Facility or Credit Facility at Crown.

'Application for a Cheque Cashing Facility or Credit Facility Limit Change' means a form submitted by a patron, requesting a limit change to their Crown Cheque Cashing Facility or Credit Facility.

'Application for a Limited Cheque Cashing Facility Form' means a form submitted by a patron, requesting approval to operate a Limited Cheque Cashing Facility.

'Appropriate ID' means identification as defined in the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (AML/CTF Act) which includes by way of example: passport or driver's licence.

'AUD' means Australian Dollar Currency.

'Authority to Disperse Funds Form' means a form authorising the transfer of funds, containing at a minimum: patron name, patron Crown account number; dollar amount; date and reason for the funds transfer. In the event that the patron approaches Crown requesting to transfer money to a third-party, prior written approval of the Chief Operating Officer (Melbourne, Perth or Sydney) and the Group General Manager, Anti-Money Laundering will be required.

'Authority to Operate Credit Facility for Junkets Form' means a form sent to Crown by a Junket Operator authorising their agent to draw down funds from that Junket Operator's Credit Facility.

'Bank Transfer Slip' means a document used to record the transfer of chips from one Chip Bank or Main Bank location to another. A Bank Transfer Slip will contain the following, at a minimum: date, time, locations from and to, denominations and total.

'Bucket' means a device in which documents are stored.

'Cage Daily Banking Report' means a report listing Crown's daily banking figures which includes at a minimum, cash and cheques to be banked.

'Cage Drop Box' means a secured box where certain documents and currency are 'dropped' in exchange for gaming chips purchased at the Cage.

'Cage Management' means a person qualified to perform the functions of a Cage Higher Duties (HD) Area Manager (or above).

'Cage Representative' means a person employed by Crown who is working in the Cage department.

'Cage Turn-in Form' means a form detailing all items being turned-in, including, but not limited to cash, gaming chips, patron documents, game tickets, relevant signatures, as well as a breakdown by denomination and amount of the cash required in exchange.

'Cash Equivalent' means any 'negotiable' instrument including but not limited to gaming/bank cheques, affiliated casinos' chips, CPVs, EFT, cheque and game tickets.

'Cashier' means a person employed by Crown to the position of Cage Cashier (or above).

'Cashier Balance Slip' means a form used by a Cashier to verify cashless transactions processed on each cashless terminal.

'Casino of Origin' means the casino from which the affiliated chips or plaques originated.

'Change Slip' means a slip used by outlets within the complex to request change from the Cage, the slip includes the details of the outlet, date, funds being exchanged, and the change required.

'Cash Delivery/Cash Collection Offset Form' means a form used to record the total of the amount of cash banked, offset by the amount of funds being delivered, for a particular business day.

'Cheque Cashing Facility ('CCF') means a facility by which a patron exchanges cheques against a pre-approved limit, for Chip Purchase Vouchers ("CPVs"), gaming chips, cash or cash equivalent.

'Cheque Bank Balance Sheet' means a document used to record paperwork, according to transaction type, which is collated during a Cheque Bank Cashier's shift.

'Chip Accountability Report' means a report detailing Crown's total Chip Stock that includes, at a minimum:

- (a) Chip Stock held at gaming tables, by game type (total and total by denomination);
- (b) Chip Stock held at each operational Chip Bank (total and total by denomination);
- (c) Primary accountability (total and total by denomination);
- (d) Secondary accountability (total and total by denomination); and
- (e) Total outstanding (total and total of each denomination).

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'Chip Bank' means the area where the Cage stores, issues and receives the various types of Crown gaming chips.

'Chip Bank Opener' means a SYCO generated document, which lists the opening inventory in the Chip Bank.

'Chip Exchange Voucher' ('CEV') is a document used by patrons who do not have a Deposit Account but wish to exchange cash for gaming chips. Such patrons cannot obtain a CPV but may be issued with a CEV for use at a gaming table.

'Chip Purchase Voucher' ('CPV') is a voucher drawn on a patron's account to be exchanged for gaming chips.

'Chip Verification and Rotation Log' means a log maintained in each Chip Bank. The Cashier, performing the chip verification and/or rotation will complete the 'Chip Verification and Rotation Log' at the time of the verification and/or rotation. Details recorded in the log will include at a minimum: the date of the verification and/or rotation, the name and Crown ID number of the Cashier performing the verification and/or rotation and Chip denominations.

'Chip Runner' means a casino employee employed by the casino operator to facilitate player buy-ins, player seating and provide Fills for Poker tables.

'Chip Stock' means the entire Cash, Commission Based and Non-Negotiable chip inventory held by Crown.

'Chip Transfer Slip' is a request to a Chip Bank from a Cage location to issue a credit in exchange for gaming chips which will contain at a minimum: date; front window location and chip denomination and type.

'CMS' means Crown's Casino Management System.

'Collection Docket' means a document which records all currency prepared for banking and includes at a minimum: the dollar value and denomination of the currency, number of bundles or bags, the total dollar value of the collection and the signature of the Cashier preparing the docket.

'Commit/Rollback Event Form' means a form which confirms that a commit/rollback of a transaction has been successful.

'Consolidation Voucher' means a voucher which is issued when multiple Credit Markers or Counter Cheques are consolidated into one document.

'Consummate' means to complete or close-off.

'Count Room' is a secure locale within the confines of the Main Cage area and is where the revenue from gaming tables, eTGs and gaming machines and various Crown Outlets is counted, verified and accounted for.

'Counter Cheque' means a Crown issued document, which states the patron's bank account details and is a bankable document. A Counter Cheque is used by the patron in place of their own personal or company cheque (cheques cannot be drawn from a Trust Account).

'Credit Control' means Crown's Credit Control Department.

'Credit Facility' means a facility approved by Crown in accordance with the Cheque Cashing and Credit Facilities SOPs, by which a patron exchanges credit marker/s against a pre-approved limit, for Chip Purchase Vouchers ("CPVs"), gaming chips, cash or cash equivalent.

'Credit Marker' is a document drawn against a patron's pre-approved credit limit, acknowledging a debt owed to Crown. Credit markers are not bankable documents.

'Credit' means a request issued by a gaming location to a Chip Bank to remove excess gaming chips held by the gaming location.

'Crown' means Crown Melbourne Limited.

'Currency Inventory Report' means a report that lists all foreign currency that is due to be banked.

'Customer Dispute Form' means a form used to record details of a matter with a patron that cannot be immediately resolved.

'Deposit Facility (Deposit Account)' means an account established with the casino operator into which money, chips or cheques can be deposited or withdrawn for the purposes of gaming.

'Deposit Form' means a form which is issued upon the completion of a patron deposit transaction.

'Deposit and Withdrawal Form' means a document which is issued at the completion of a deposit and withdrawal in the same transaction.

'Documents' collectively means forms, slips, vouchers, transfers, cheques, markers and any other documents used in the operation of the Casino Cage functions.

'Document Transfer' means documents transferred to the Main/Cheque Bank when a player transacts on their account (including: CPVs, CCFs, Credit Documents, Exchange Vouchers, etc).

'Document Transfer Slip' means the form used to record the details of a Document Transfer.

'Domestic Patron' means a patron who ordinarily resides in Australia.

'EGM' means Electronic Gaming Machine.

'Electronic Funds Transfer' ('EFT') means the sending or receiving of electronic funds via Crown's bank account, by methods including but not limited to: telegraphic transfers, internet transfers or direct deposits.

'Emergency Ticket Stacker Slip' means the form used to record the details of an emergency Ticket Stacker replacement, which will include at a minimum: TRT number, date and time and reason for the exchange.

'eTG' means an electronic Table Game, including Semi Automated and Fully Automated Table Games.

'Exchange/Buy in Room' means a secure area where, with the prior approval of Cage Management, transfers of cash and/or goods of value may occur.

'F & B' means food and beverage.

'F&B Recap Report' means a report completed by the Count Team which records funds received from a Crown F & B outlet.

'FATGs' means Fully Automated Table Games.

'Fill' means a request to a Chip Bank from a gaming location to refill gaming chips held by that gaming location.

'Foreign Currency Banking Listing' means a report completed by Main Bank which lists the foreign currency to be banked.

'Foreign Currency Exchange Voucher' means a voucher issued to record the details of foreign currency exchanges.

'Foreign Currency Held Log' means a document which is used to record foreign currency held by Crown and contains at a minimum: date of transaction, foreign amount (if applicable), Australian Dollar amount and patron name.

'Front Window' means the area within a Cage which is occupied by a Cashier in the performance of their duties as a Cashier.

'Front Window Sign-off Report' means a SYCO generated report issued when a Front Window location is closed.

'Gaming Cheque' means a cheque issued in exchange for such things including but not limited to: gaming chips, deposit account balances and jackpot payments.

'Gaming Cheque Book Request Form' means a form completed by Cage Management which is used to replenish gaming cheque book stocks.

'Gaming Cheque Log Report' means a SYCO generated report which lists all Cage issued gaming cheques for a specific gaming date.

'Gaming Chip Vouchers' ('GCVs') means a complimentary bet voucher issued to patrons.

'Gaming Machine Win Report' means a report completed by the Count Team which is used to record the funds collected from the Gaming Machines Drop Collection.

'General Receipt' means a receipt issued for proof of funds received at a Cage.

'HKD' means Hong Kong Dollars.

'ID' means 'Appropriate Identification' as per the prescribed customer identification procedure required under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (AML/CTF Act)

'International Patron' means a patron who is not ordinarily resident in Australia.

'Joint AML/CTF Policies and Procedures' means Crown Resorts Limited Joint Anti-Money Laundering and Counter-Terrorism Financing Policy and Procedures.

'Joint AML/CTF Program' means Crown Resorts Limited Joint Anti-Money Laundering and Counter-Terrorism Financing Program.

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'Junket' means an arrangement whereby a person or a group of people is introduced to a Casino Operator by a Junket Organiser or promoter who receives a commission based on the turnover of play in the Casino attributable to the persons introduced by the organiser or promoter or otherwise calculated by reference to such play.

'Junket Agent' means a person who is authorised to act on behalf of a Junket Organiser.

'Junket Organiser' means a person who complies with the requirements of the Junket and Premium Player SOPs and is paid a commission or fee for introducing a person(s) to gamble.

'Lammer' means a marker used to denote cash in transfer.

'LIFO' means last-in-first-out.

'Main/Cheque Bank Close-out Sheet' means a document which, when completed, records the cash inventory and transactions which have been processed during a Main Bank shift.

'Main Bank Vault Chip Transfer' means a document which records the transfer of gaming chips from Main Bank to Chip Bank.

'IT' means Information Technology.

'Paperwork' means print copies of all SYCO transactions, which have been received during a shift. For example: deposit and/or withdrawal forms, cheque redemptions and cheques drawn for CPVs.

'Patron Enquiry Form' means a form used to facilitate patron enquiries, which will include at a minimum: the patron's name and contact details, ATS number, issue date, validation number, ticket number and the value of the ticket.

'Payout Voucher' means a voucher which records a payment made by the Cage.

'Preliminary Deposit Report' means a report which details all cheques due for banking on the next banking day.

'Premium Player' means a person who is domiciled outside of the state of Victoria and who participates in a Premium Player Program Agreement.

'Redeemed' means recovered by a payment.

'Redemption Voucher' means a voucher used to redeem a counter cheque or credit marker.

'Replacement Chip Purchase/Exchange Voucher Request Form' means a form which is completed when a CPV/CEV has been misplaced or damaged.

'Replacement Gaming Cheque Request Form' means a form which is completed when a gaming cheque has been misplaced or damaged.

'Representative' means a person employed by the relevant Crown Department or the external business as stated.

'Request for Gaming Cheque Form' means a form completed to facilitate the issue of a gaming cheque.

'Returned Cheques File' means the location where returned cheques are housed.

'Safe Deposit Record Card' means an application to record patron details to open a safe deposit box.

'Safe Keeping Account' is a holding account for patron's monies.

'SATGs' means Semi Automated Table Games.

'Settlement Sheet' means a form completed at the conclusion of a Junket Program or Premium Player Program, which is used to record the settlement details of that program.

'Shift-end Balancing' means the balancing of funds and documents in preparation for the documents to be forwarded to Revenue Audit.

'Signature Card' means a document containing a specimen of a patron's signature.

'Slug' means any coin, token or items other than an Australian \$1 coin, being used in place of an Australian \$1 coin.

'Slug Report' means a report completed by the Count Team to record all Slugs received during the Count process.

'Special Answer' means a notation on a cheque or electronic listing, requesting Crown's bankers or foreign exchange agency, to approve the clearance of the funds in an expedient time frame, without waiting the standard clearance time.

'Special Answer Request' means a report generated that lists all cheques due for banking that are sent as special answer to Crowns Bankers.

'Strap' means a device placed securely around a number of notes to define a particular value.

'Strap/Roll Variance Slip' means a form used to record a variance when a strap or roll of funds is incorrect.

'Substitution Voucher' means a voucher issued to replace a Crown issued Counter Cheque or Credit Marker with a personal or company cheque (cheques cannot be drawn from a Trust Account).

'SYCO' is Crown's Casino Management System.

'Telegraphic Transfer Request Form' means a form used to record the transfer of funds to a designated account.

'Telegraphic Transfer Log/Acknowledgment Form' means a form which confirms Crown, or an affiliated property, has received funds from a patron.

'This Trip Only' ('TTO') means a Temporary Cheque Cashing/Credit Facility Limit increase for a current trip.

'Transfer Slip' means a document which allows funds to be transferred between accounts held in different currencies. E.g. a transfer from an AUD SYCO account into a HKD SYCO account. A Transfer Slip will include, at a minimum: patron account number, exchange rate, date, currency type the funds were originally held in and currency type the funds were transferred into.

'TRT' means Ticket Redemption Terminal.

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'TRT Fill Slip' means a slip completed to indicate the amount of funds required to replenish a TRT machine.

'TRT Ticket Stackers' means a locked device housed in a TRT machine holding tickets.

'Turn-in' means an exchange of surplus gaming chips and documentation for cash, by a Front Window Cashier via Chip Bank and Main/Cheque Bank.

'Variance Slip' means a slip used to account for an error.

'VCGLR' means the Victorian Commission for Gambling and Liquor Regulation.

'Void Slip' means a slip generated when a cashless transaction is voided.

'Window Bank Count Sheet' means a form used to record all the inventory held in a Front Window which includes at a minimum: window, date, currency values by denomination, chip values by denomination, and total value of all currency and chips.

'Voucher Issuance Form' means a form completed when a gaming chip voucher is issued.

'Withdrawal Form' means a document issued upon the completion of a patron withdrawal.

2. JOINT AML/CTF PROGRAM

All functions in these SOPs will have consideration for, and where relevant be in accordance with, the Joint AML/CTF Program and Joint AML/CTF Policies and Procedures including, but not limited to:

2.1 The Cage is responsible for updating their:

- (a) Internal Policies;
- (b) Operations Manuals; or
- (c) Standard Operating Procedures

2.2 Customer Risk

2.2.1 When a patron:

- (a) joins Crown Rewards; or
- (b) becomes a financial customer based on a transaction requiring identification

and Crown has carried out the applicable customer identification procedure as set out in the Joint AML/CTF Program, the patron will be considered by Crown to be a Customer.

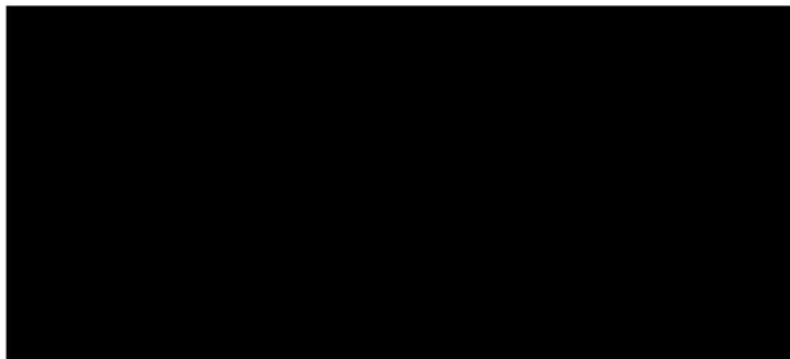
2.2.2 In the absence of any heightened risk attributes each Customer shall be initially deemed by Crown to be of 'Standard Risk'. A 'Standard Risk' Customer may be assessed as:

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- (a) 'Moderate Risk';
- (b) 'High Risk'; or
- (c) 'Critical Risk'

by Crown where the Customer demonstrates heightened risk attributes, including without limitation:

- (a)
- (b)
- (c)
- (d)
- (e)
- (f)



2.3 AML/CTF Employee Due Diligence

2.3.1 The Cage General Manager is responsible for undertaking and documenting the actions taken in respect of breaches of:

- (a) the Joint AML/CTF Program;
- (b) the AML/CTF EDD Policy; or
- (c) any underlying business processes relating to ML/TF

by any of their employee as set out in the ML/TF Breach Matrix set out in the Joint AML/CTF Policy and Procedures.

2.4 AML/CTF Risk Awareness Training Program

2.4.1 All Cage employees will undertake AML/CTF Risk Awareness Training (Risk Awareness Training) at appropriate intervals having regard to the ML/TF risk the employee may reasonably face in their role.

2.4.2 Cage Managers will ensure that their employees are completing their AML/CTF Training on time and will follow up relevant employees who are overdue in completing their AML/CTF Training.

2.4.3 The Cage is responsible for providing their employees with specific departmental procedural training relating to Crowns AML/CTF obligations under the Program and these Policy and Procedures. This may include engaging with the AML Team to develop tailored AML/CTF training content.

2.4.4 Risk Awareness Training will encompass the obligations of the Cage under the:

- (a) Joint AML/CTF Program;
- (b) Policy and Procedures;
- (c) AML/CTF Act;
- (d) AML/CTF Rules;
- (e) consequences of non-compliance with these obligations;
- (f) type of ML/TF risk that the Cage might face; and
- (g) potential consequences of such risk.

2.4.5 Crown's AML/CTF Risk Awareness Training will provide the following types of training:

- (a) induction training for new employees on commencement of employment;
- (b) an online AML/CTF Risk Awareness Training module to be completed:
 - (i) where the employee is involved in the provision of a Designated Services, before the employee commences in an operational environment; or
 - (ii) otherwise within eight (8) weeks of commencement of employment;

2.4.6 refresher training at appropriate intervals, having regard to ML/TF risk, as set out in the AML/CTF Policy and Procedures;

2.4.7 targeted Cage specific AML/CTF training as required; and

2.4.8 remedial training as required.

2.5 Unusual Activity Report (UAR)

2.5.1 Where a Cage employee identifies any unusual activity or potentially suspicious behaviour relating to the provision of a designated service, a UAR will be completed by the relevant employee using the designated UAR form, or through the Crown digital platform.

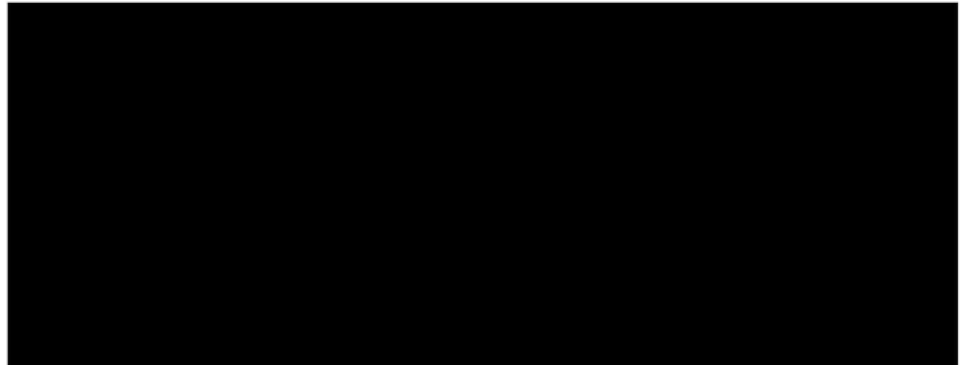
2.5.2 Completed UAR forms and relevant documentation will be sent to the AML Team via email or uploaded through the Crown digital platform for potential further investigation under the AML Department processes.

2.5.3 Unusual Activity may include, but is not be limited to:

- (a) Failure/refusal to provide appropriate Identification for a transaction of AUD10,000 or greater;
- (b) A patron reducing or splitting the amount of funds presented to avoid a TTR;
- (c) A patron completing a buy-in, having little or no play and cashing out (to create the impression the chips are winnings);

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- (d)
- (e)
- (f)
- (g)
- (h)



- 2.5.4 When a Cage employee notices Unusual Activity, they will discreetly notify a Cage Supervisor (or above).
- 2.5.5 When a Cage Supervisor (or above) notices or is informed of Unusual Activity, they will inform Surveillance so that a photo of the relevant person can be taken.
- 2.5.6 The Cage Supervisor (or above) will complete the 'Unusual Activity Report', including;
 - (a) Grounds for suspicion;
 - (b) Description of patron;
 - (c) Date;
 - (d) Time; and
 - (e) Staff involved.

2.6 Tipping Off

- 2.6.1 All Cage employees are prohibited from telling anyone other than AUSTRAC that Crown has formed a suspicion about a customer or that an SMR has been submitted. This includes:
 - (a) not revealing or disclosing any information that might reasonably lead a person to conclude that a suspicion has been formed about them or that AUSTRAC has received a report about that suspicion;
 - (b) not revealing or disclosing any requests AUSTRAC or law enforcement agencies may have made for information about an SMR; and
 - (c) not revealing or disclosing any information about a specific SMR to any external parties appointed to review Crown's Joint AML/CTF Program, including a review of Crown's SMR obligations.

2.6.2 Disclosing this information is an offence under the Act.

2.7 Transaction Monitoring

- 2.7.1 The Table Games, Electronic Gaming Machines, Cage, and VIP (both International and Domestic) departments (i.e. first line of defence) will need to demonstrate an

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appropriate degree of understanding and knowledge of their customers and their activities, transactions and behaviours in order to appropriately escalate any unusual or potentially suspicious activities in the first instance.

2.7.2 The Table Games, Electronic Gaming Machines, Cage, and VIP (both International and Domestic) departments are also required to maintain current and accurate knowledge of their Customers through carrying out and documenting periodic reviews of their top customers.

2.7.3 All requests for information relating to a Sentinel or Manual alert referred by the AML Team must be addressed and responded to by the Cage department within two (2) business days of first receiving the request.

2.8 IFTIs

2.8.1 Crown is required to make a report to the AUSTRAC CEO each time it is:

- (a) the sender of an international funds transfer instruction transmitted out of Australia; or
- (b) the recipient of an international funds transfer instruction transmitted into Australia.

2.8.2 The VIP Banking team will review Customer deposit accounts held with its domestic banking providers on a daily basis (business days) to identify any potential international funds transfers.

2.8.3 Where an international funds transfer is identified, VIP Banking will notify the Cage. At times, outside of business hours, the Cage may be required to identify IFTIs in the Customer deposit accounts.

2.8.4 Where the VIP Banking or Cage teams identify more information is required to complete an IFTI report this will be obtained from the Customer by the:

- (a) VIP Team;
- (b) International Sales and Hosting Staff; and/or
- (c) Domestic Sales and Hosting Staff

2.9 Enhanced Customer Due Diligence

2.9.1 Upon request from the AML Team, the Cage will:

- (a) Respond to enhanced customer due diligence (ECDD) requests within the stipulated timeframes outlined in any ECDD request; or
- (b) At the request of the AML Team, order external due diligence reports.

2.9.2 When conducting ECDD, employees will be mindful of the prohibitions against informing anyone other than AUSTRAC that Crown has formed a suspicion about a customer or that a UAR (Unusual Activity Report) or SMR (Suspicious Matter Report) has been submitted.

2.9.3 The Cage department will need to demonstrate an appropriate degree of understanding and knowledge of their customers and their activities, transactions and behaviours in order to appropriately escalate any unusual or potentially suspicious activities in the first instance.

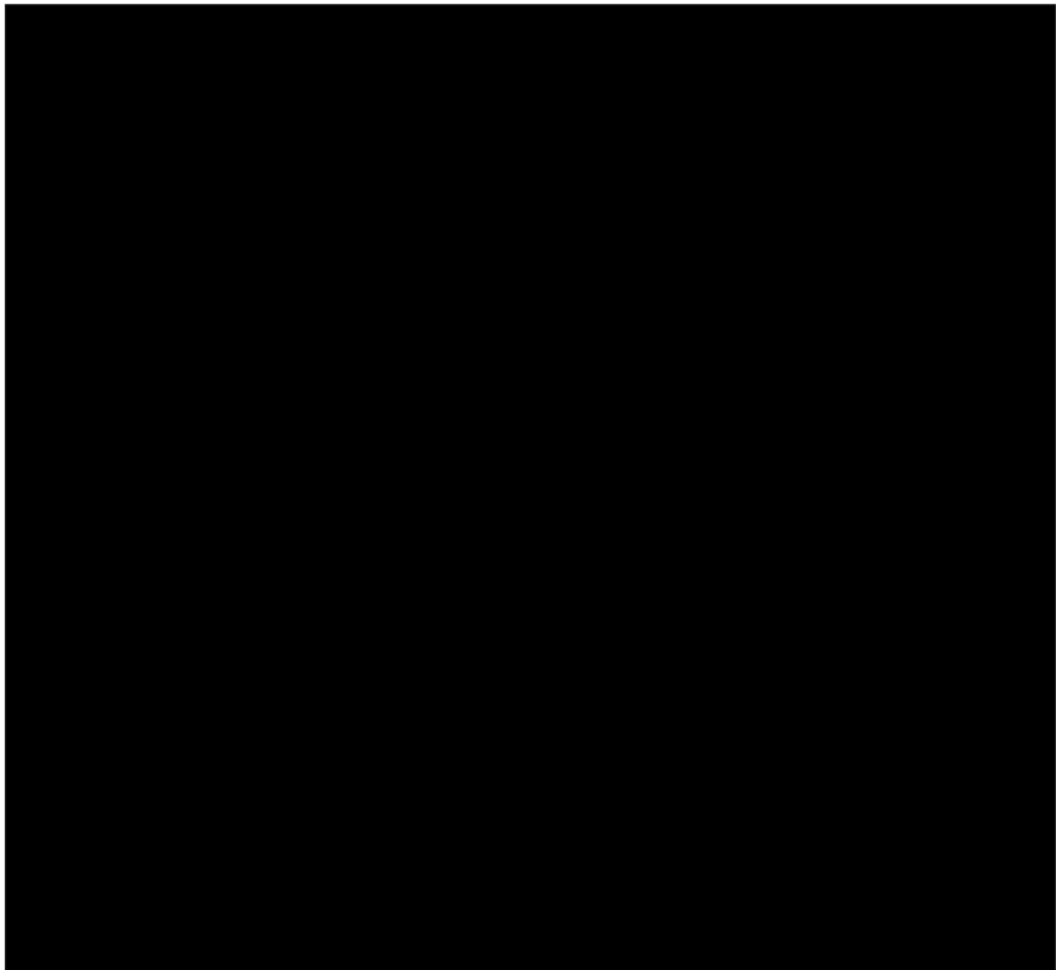
2.10 Risk Management: Monitoring and Reporting

2.10.1 In accordance with the Crown Resorts Limited Risk Management Strategy:

- (a) Department Executives and Senior Management are responsible for ensuring that appropriate reporting and monitoring processes are developed and implemented to escalate relevant information to CEO, Executives, Senior Management, the Risk Management Function and, if necessary, the Board; and
- (b) Monitor and report risk matters in a manner consistent with Board expectations.

2.11 AUSTRAC Reporting

Threshold Transactions



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- 2.11.4 Each day a Cage Manager will generate a TTR (Threshold Transaction Report) which highlights all cash transactions performed for \$10,000 or more.
- 2.11.5 The Cage Manager will review each TTR to ensure that the TTR contains the detail required under the Act and Rules and that all TTRs have been captured.
- 2.11.6 The review process involves:
- (a) running the TTR through the TTR Gate to identify common errors;
 - (b) review of reportable details for Threshold Transactions to ensure they have been recorded correctly; and
 - (c) review of the codes entered against each TTR to ensure the transactions are accurately recorded.
- 2.11.7 Following the review and when the Cage Manager is satisfied that all TTR entries are accurate on the report, the Cage Manager will upload all TTR's (in XML format) to AUSTRAC via the AUSTRAC on- line portal.
- 2.11.8 Upon receipt of a successful upload of the TTR report, Cage Management will send the AML team a copy of the XML file and receipt.
- 2.11.9 All TTR's will be uploaded within ten (10) business days to AUSTRAC to ensure compliance with the Joint AML/CTF Program.
- 2.12 EFT – Reporting
- 2.12.1 At the completion of each gaming day, Cage Management will run the TT listing report which highlights all TT's raised for the previous gaming day. A Cage Management member will review all TT's to ensure they have been entered correctly into the Casino Management System and that the corresponding paperwork is attached to each TT.
- 2.13 Quality Assurance
- 2.13.1 Cage Management must include a quality assurance process in their operating procedures to ensure that the required Threshold Transaction data captured when entering information into Crown's Customer and Gaming Management Systems is accurate and complete.
- 2.13.2 Cage Management must include a sample testing or assurance process in their operating procedures to ensure that the required International Funds Transfer Instruction data captured when entering information into Crown's Casino Management System (CMS) and/or the banking platform is accurate and complete.
- 2.14 Record Keeping
- 2.14.1 The Cage must keep records to comply with its AML/CTF obligations, including records of or about:
- (a) transactions; and
 - (b) customer identification procedures

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2.14.2 Records of Transactions

- (a) Where the records relate to providing a Designated Service to a Customer, The Cage must retain:
 - (i) records of the transaction; or
 - (ii) copies of the records that it creates; or
 - (iii) extracts from the records

for seven years after making the record.

2.14.3 Records of Customer Information relating to Designated Services

- (a) Where a Customer provides documents to the Cage relating to the provision of Designated Services, the Cage must retain:
 - (i) records of the documents; or
 - (ii) copies of the records that it creates; or
 - (iii) extracts from the records

for seven years after making the record.

2.14.4 Records of Customer Identification Procedures

- (a) When the Cage carries out a customer identification procedure (KYC) it must make and keep a record of:
 - (i) what procedures it undertook to identify the Customer; and
 - (ii) the identifying information the Customer presented

for seven years after making the record.

2.14.5 Copies of Customer Identification Documents

- (a) The Cage does not have to record a copy of documents, i.e. it may record details of a Customer's driver's licence or passport directly into its customer management system rather than taking copies of them.
- (b) However, if the Cage does take copies, they become records it must keep.
- (c) If it collects new customer information about a Customer, it must still keep the original customer identification procedure records.

3. ACCESS

3.1 In Conjunction with Security Operations SOPs and Surveillance SOPs:

3.1.1



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3.1.2

3.1.3

3.1.4

3.2 Visitors

3.2.1

3.2.2

4. FRONT WINDOW

4.1

4.2

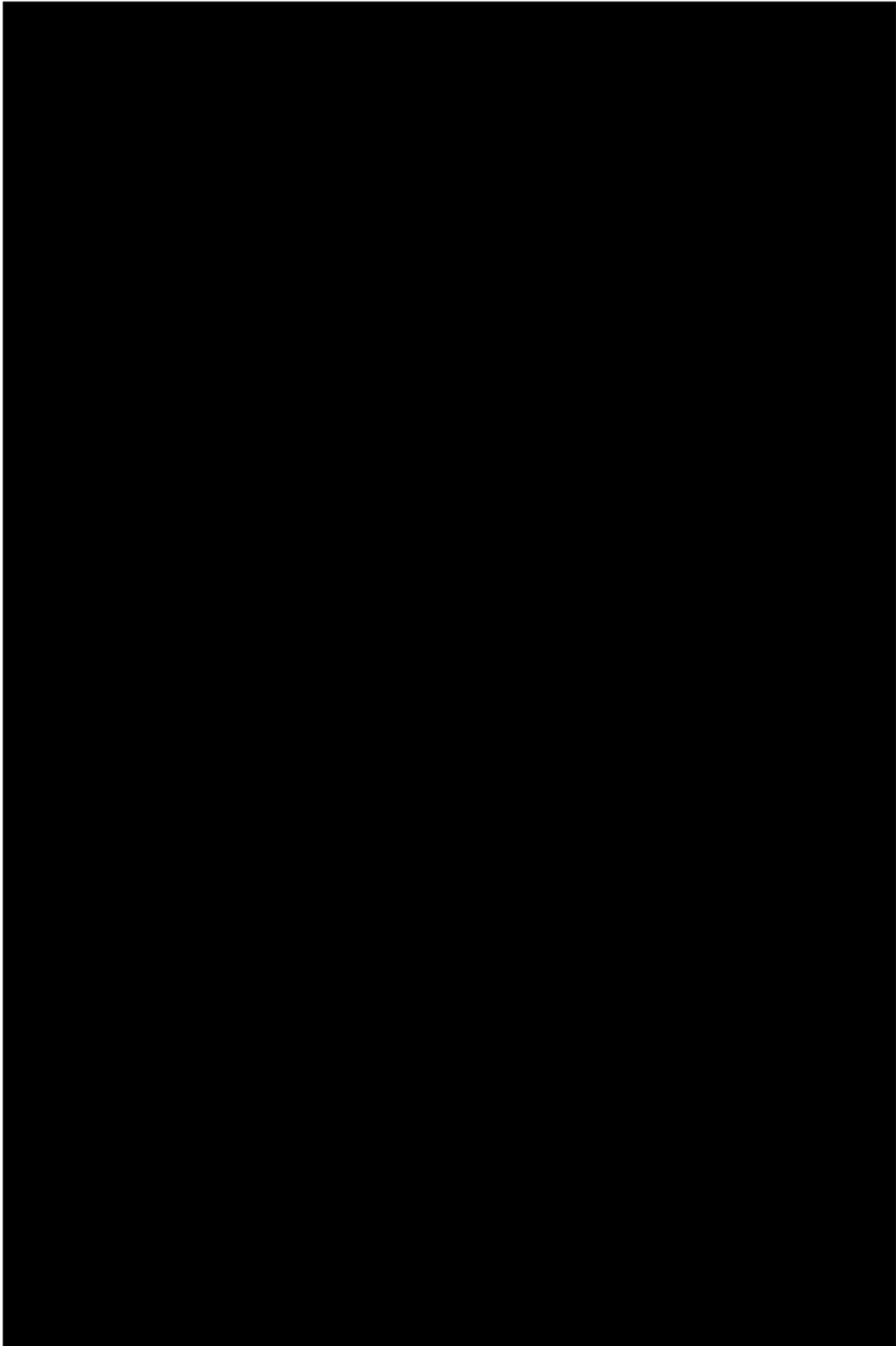
Crown Reviewed 12 October 2020

4.3



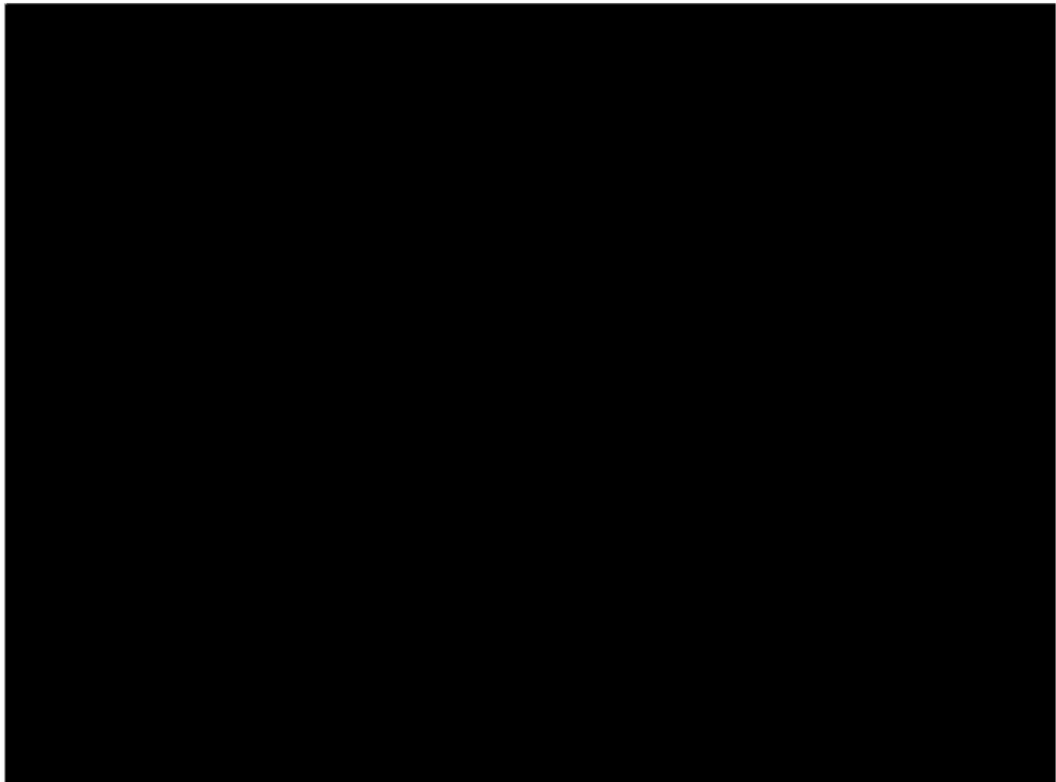
4.4

4.5



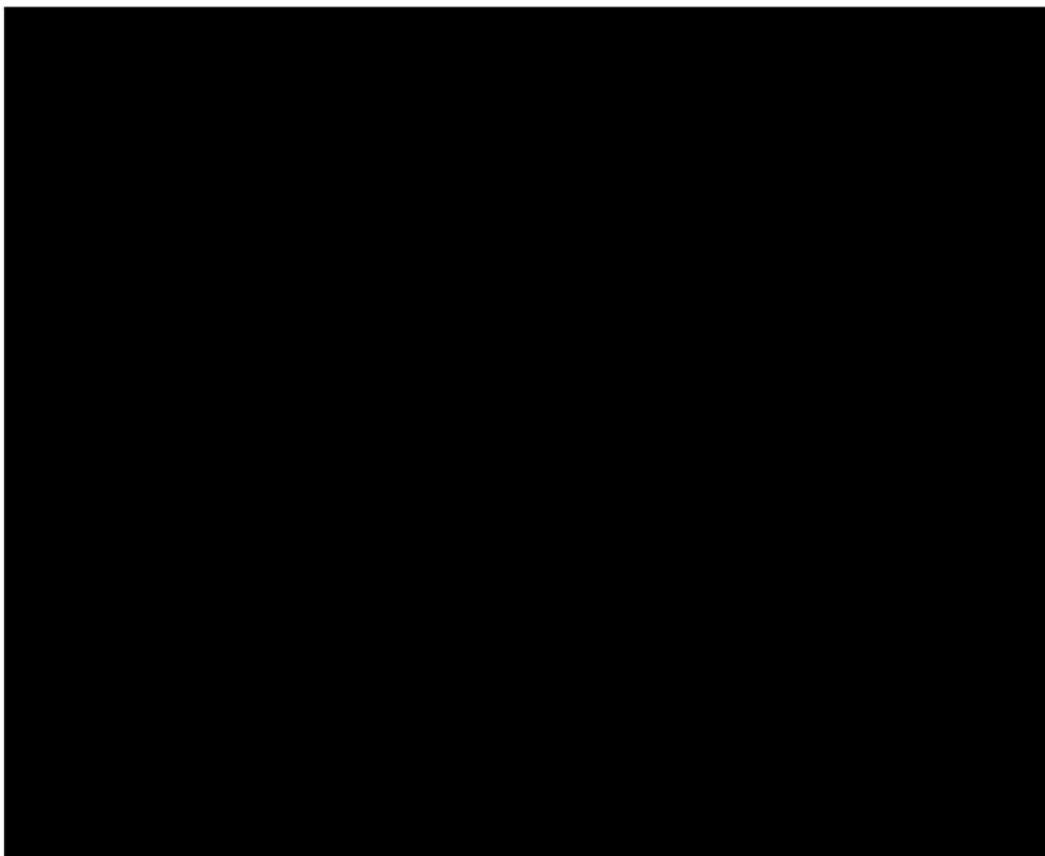
4.6

Crown Reviewed 12 October 2020



5. Electronic Funds Transfers (EFTs) and Telegraphic Transfers (TTs)

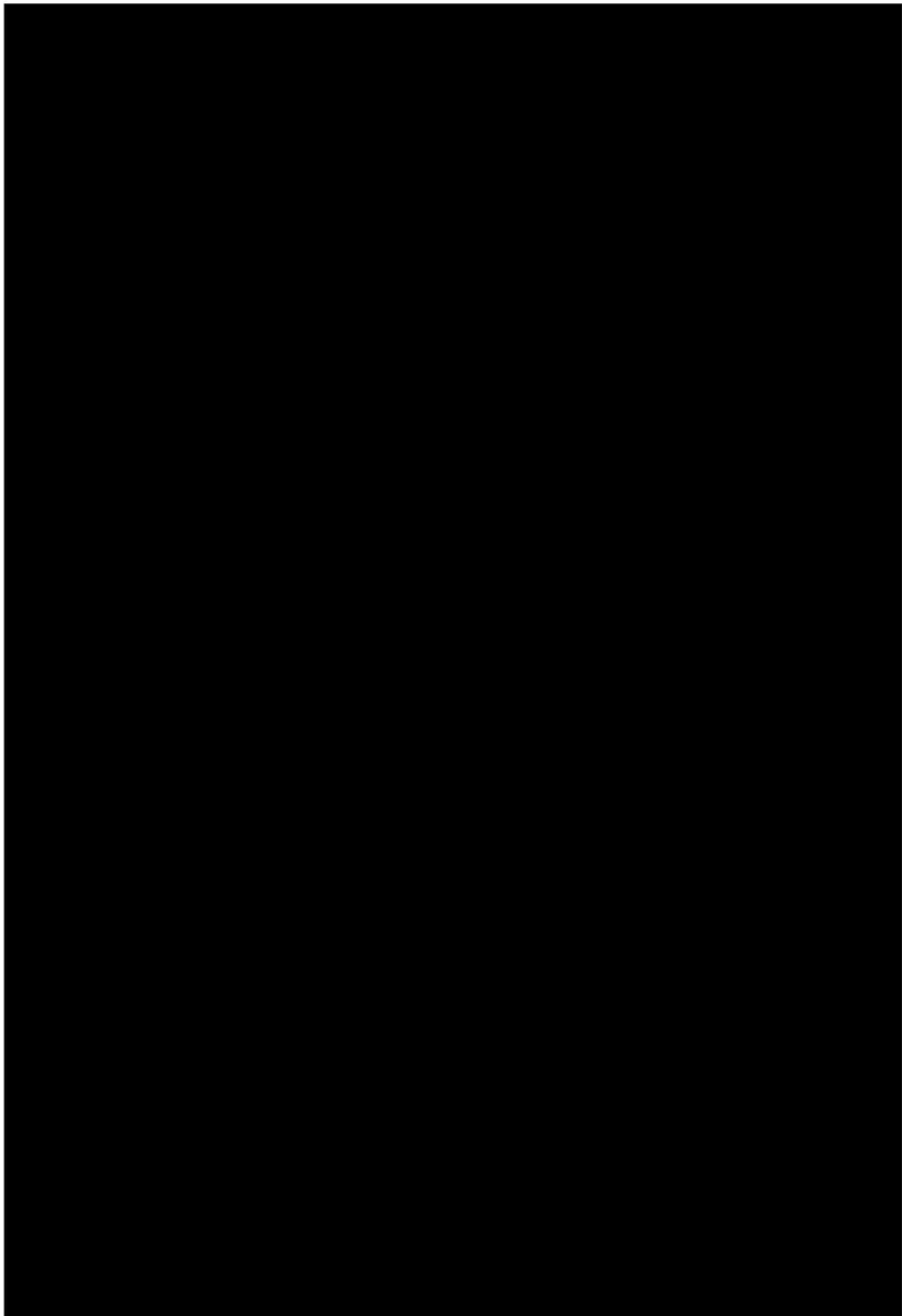
5.1



Crown Reviewed 12 October 2020

5.2





5.5

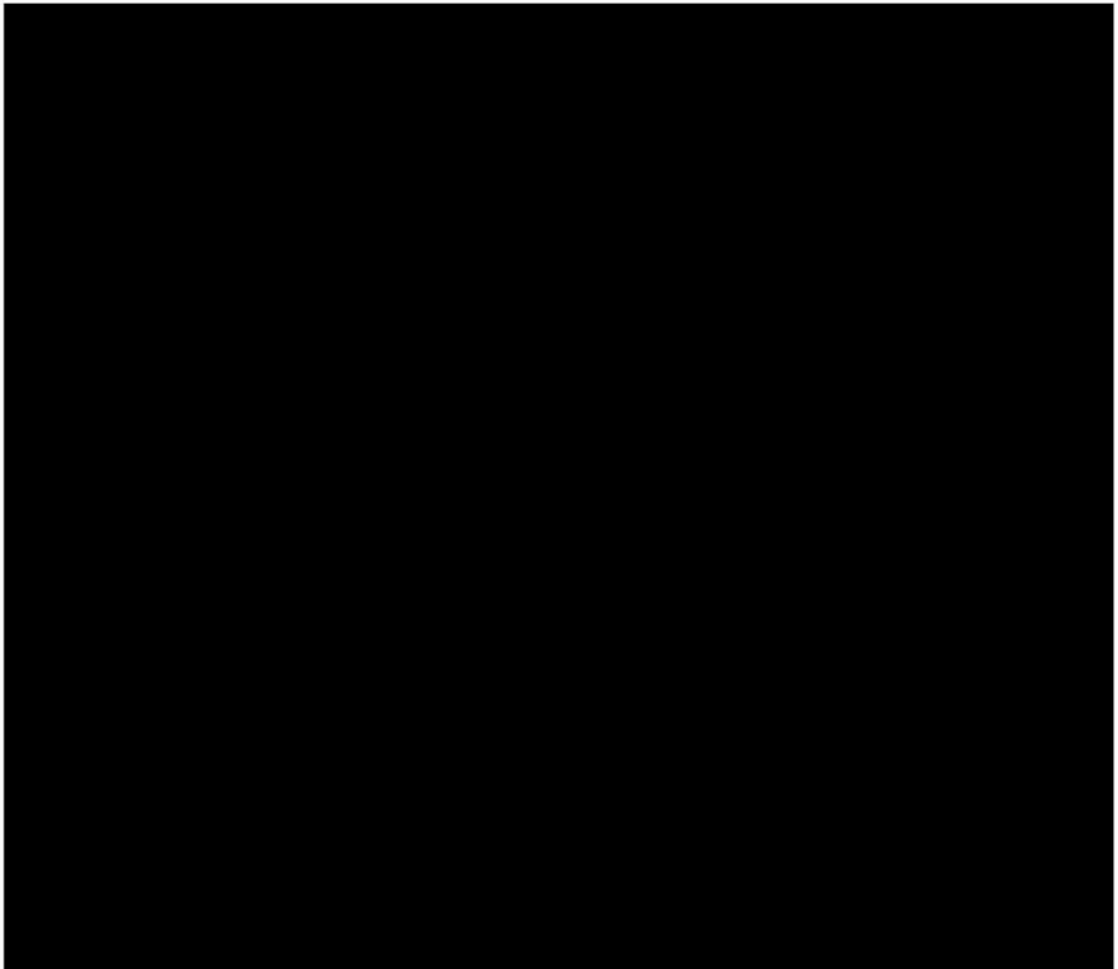
5.6

5.7



6. PATRON SIGNATURE &/OR VERBAL AUTHORITY

6.1

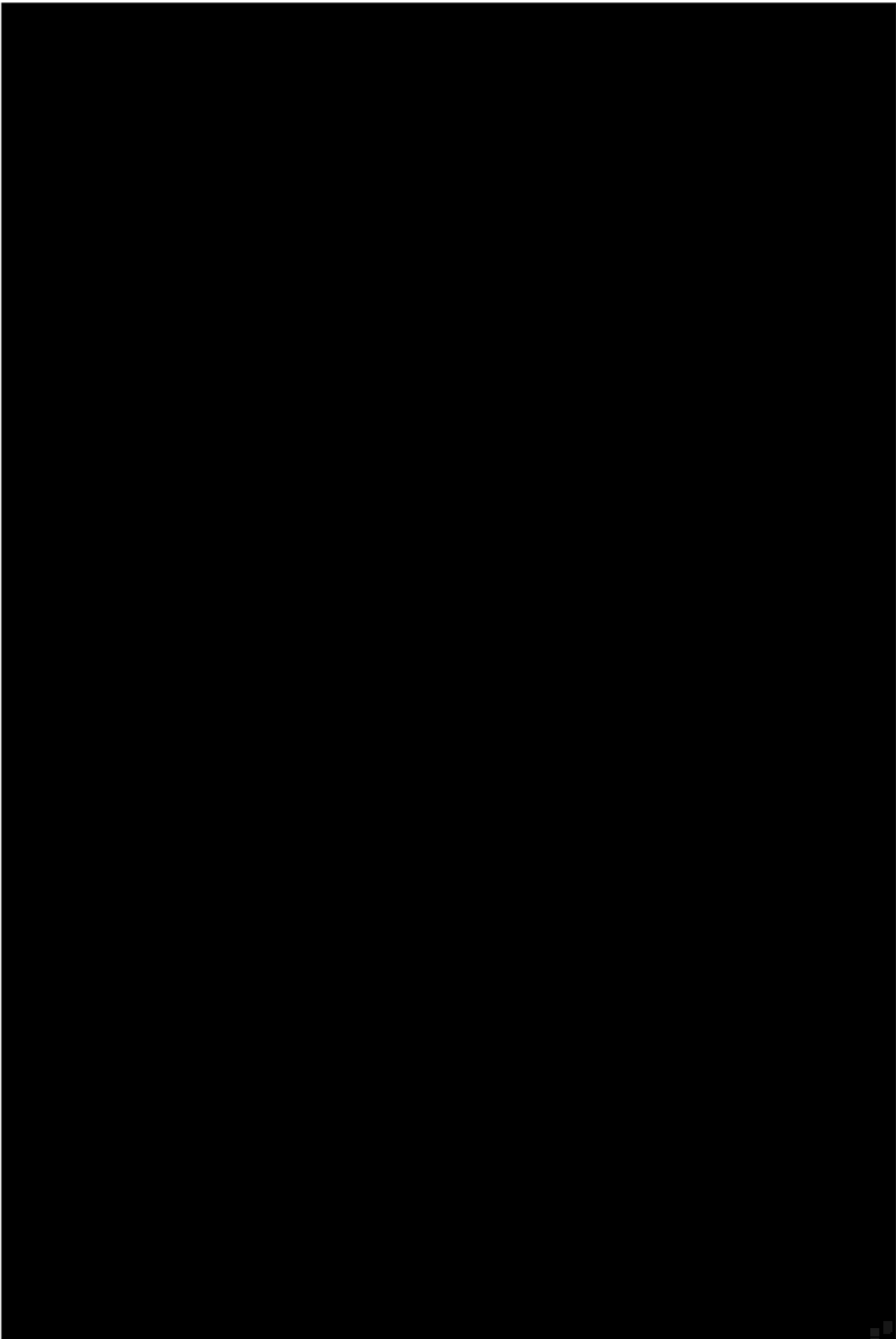


6.2

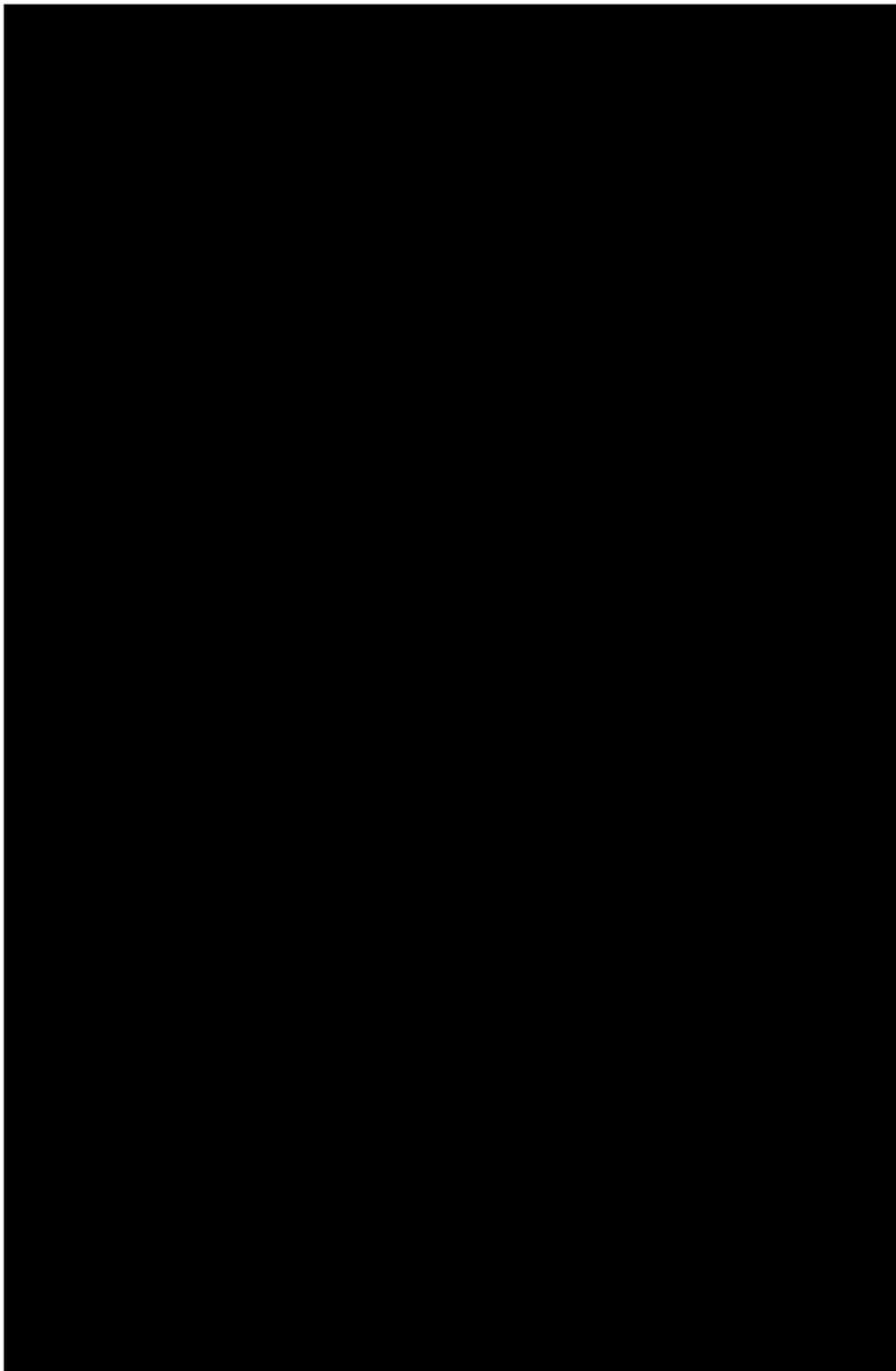
6.3

6.4

6.5



Crown Reviewed 12 October 2020



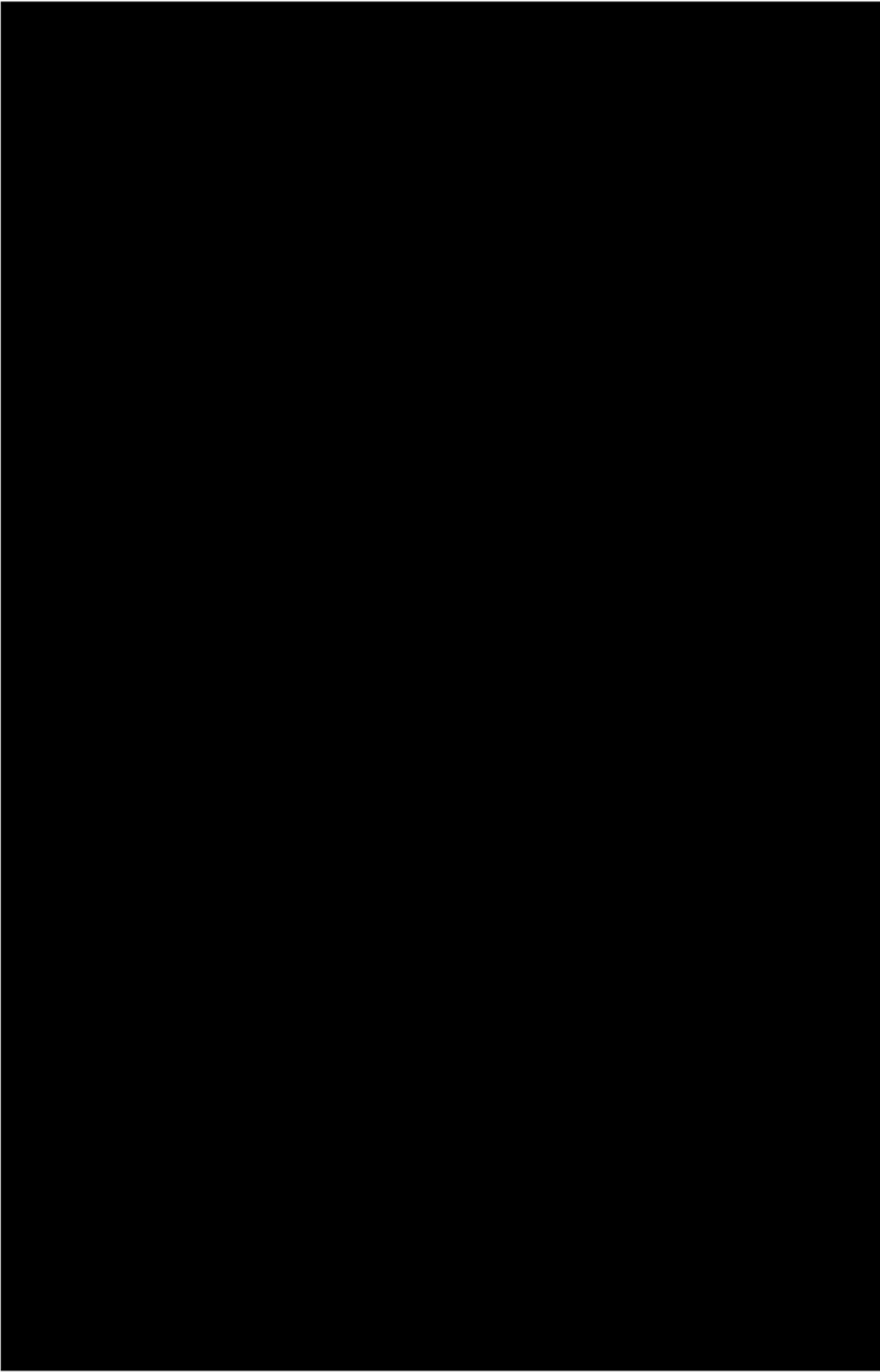
6.6

Crown Reviewed 12 October 2020

6.7

6.8

6.9

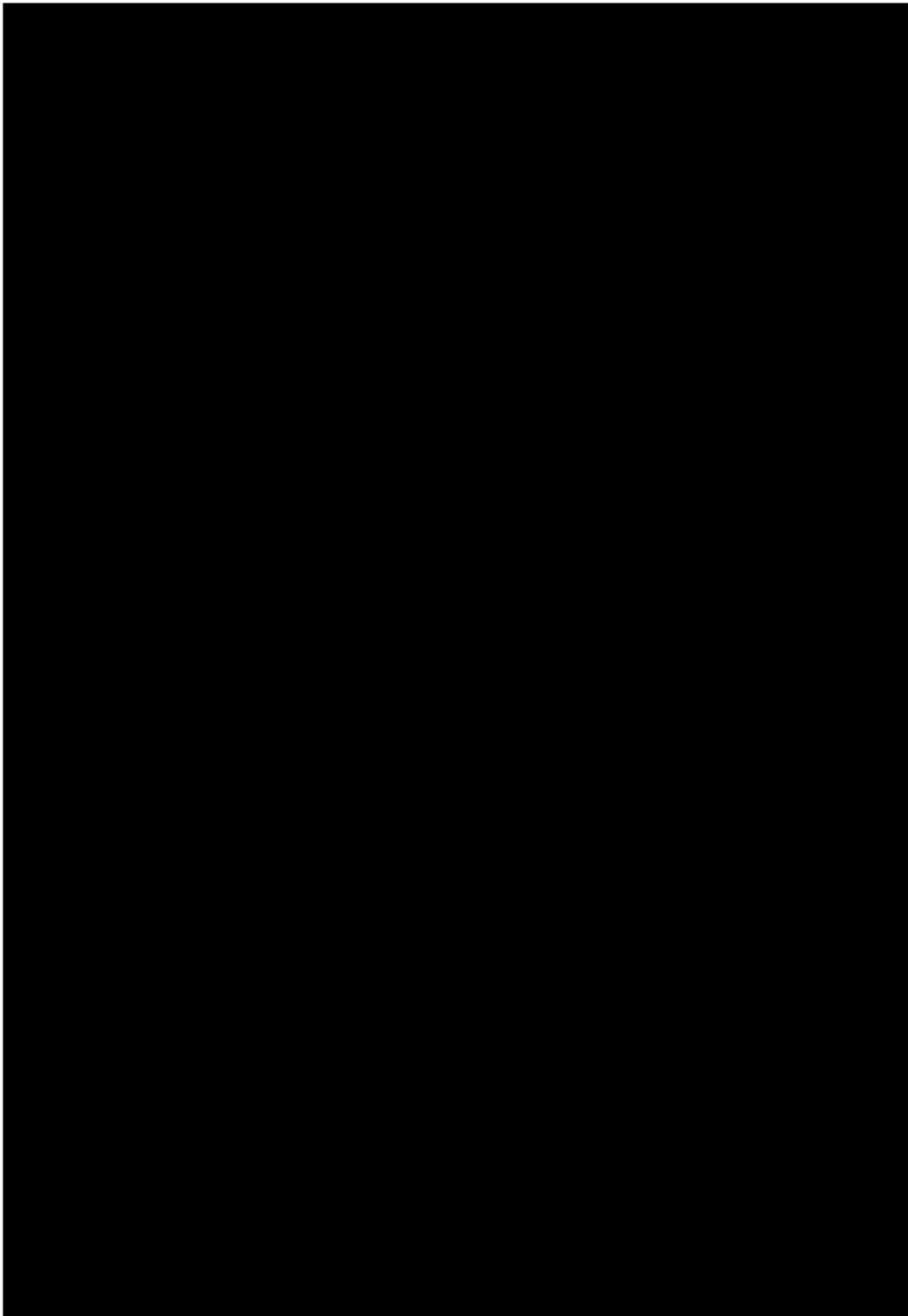


Crown Reviewed 12 October 2020

6.10

6.11

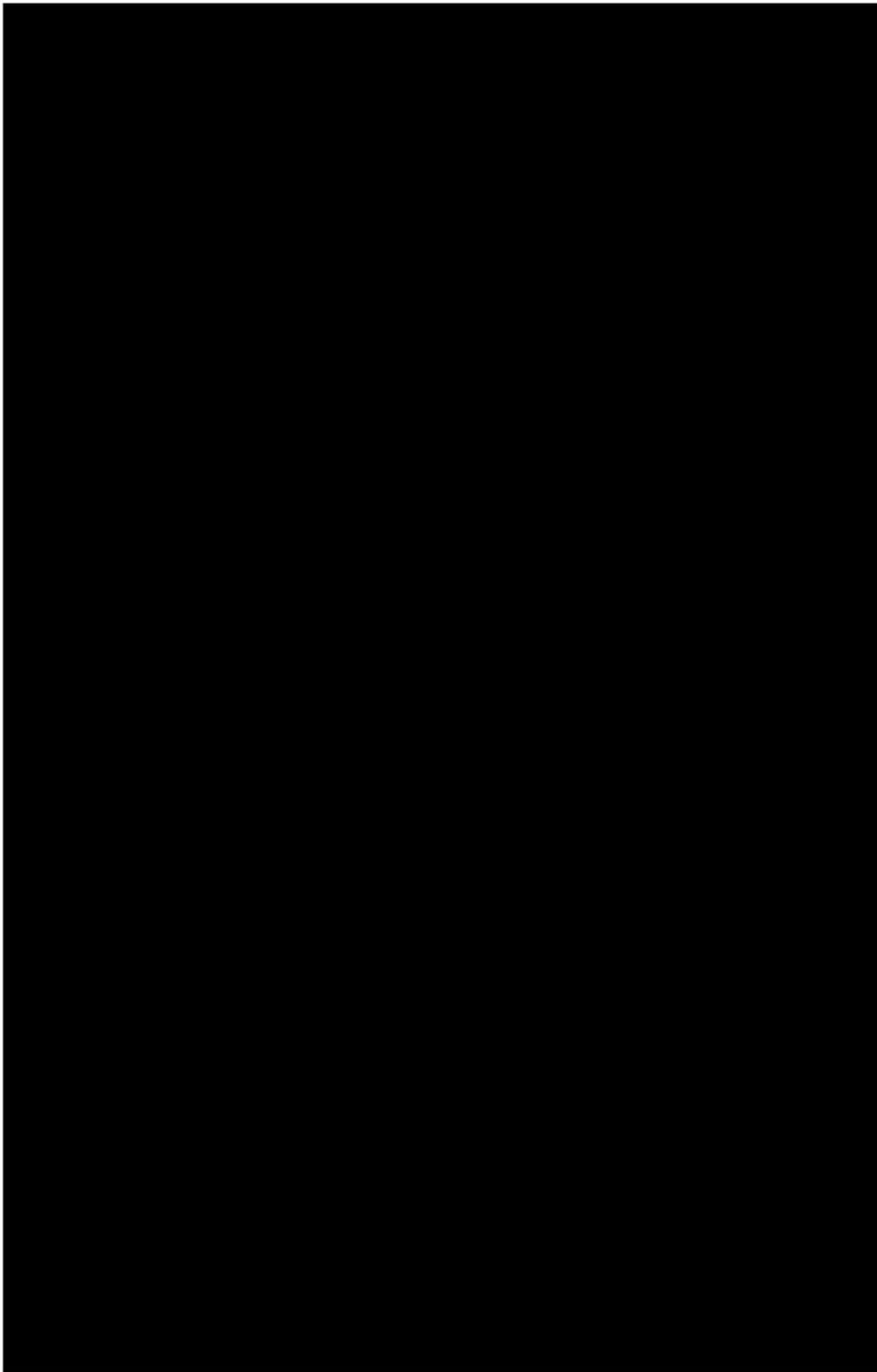
6.12



Crown Reviewed 12 October 2020

6.13

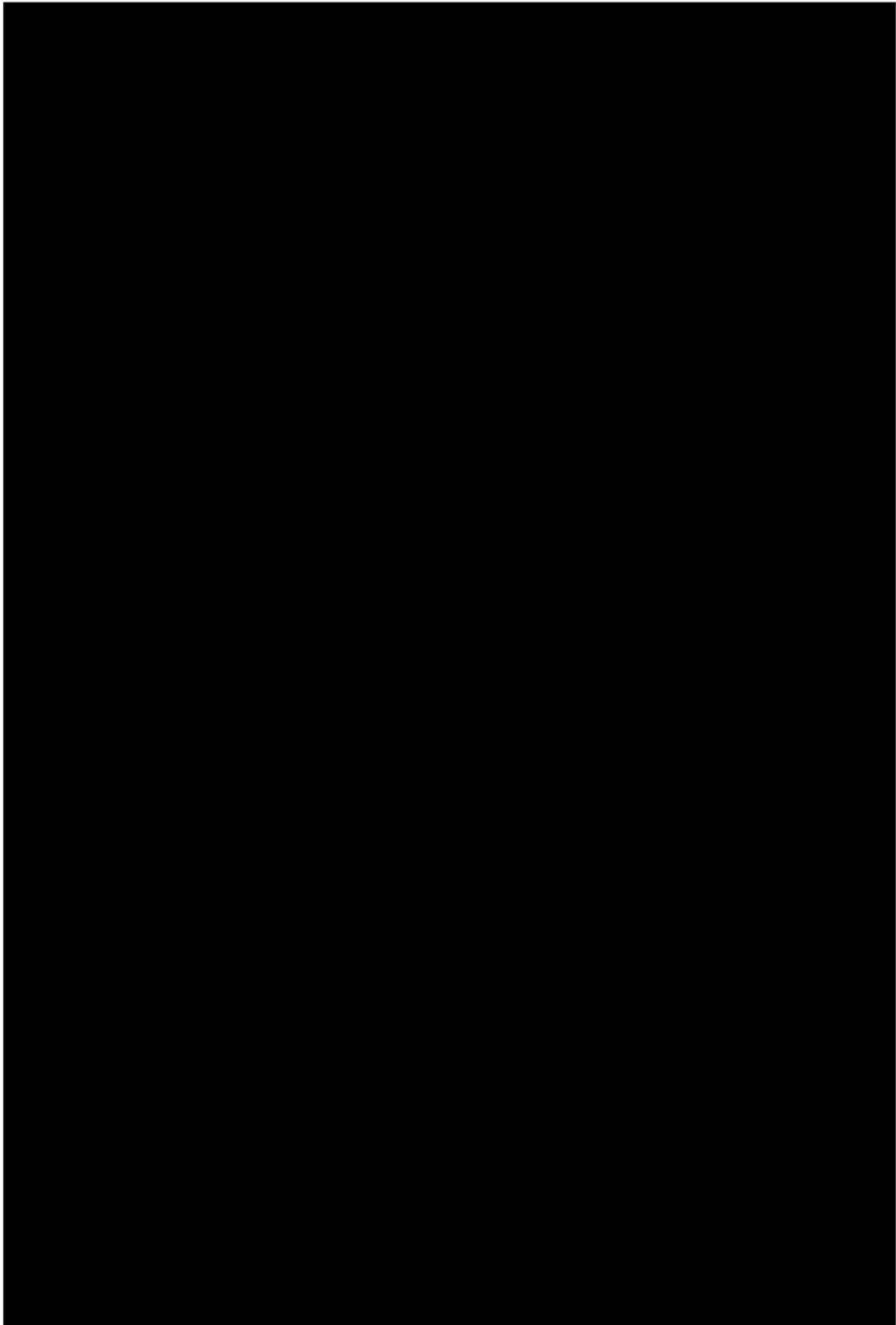
6.14



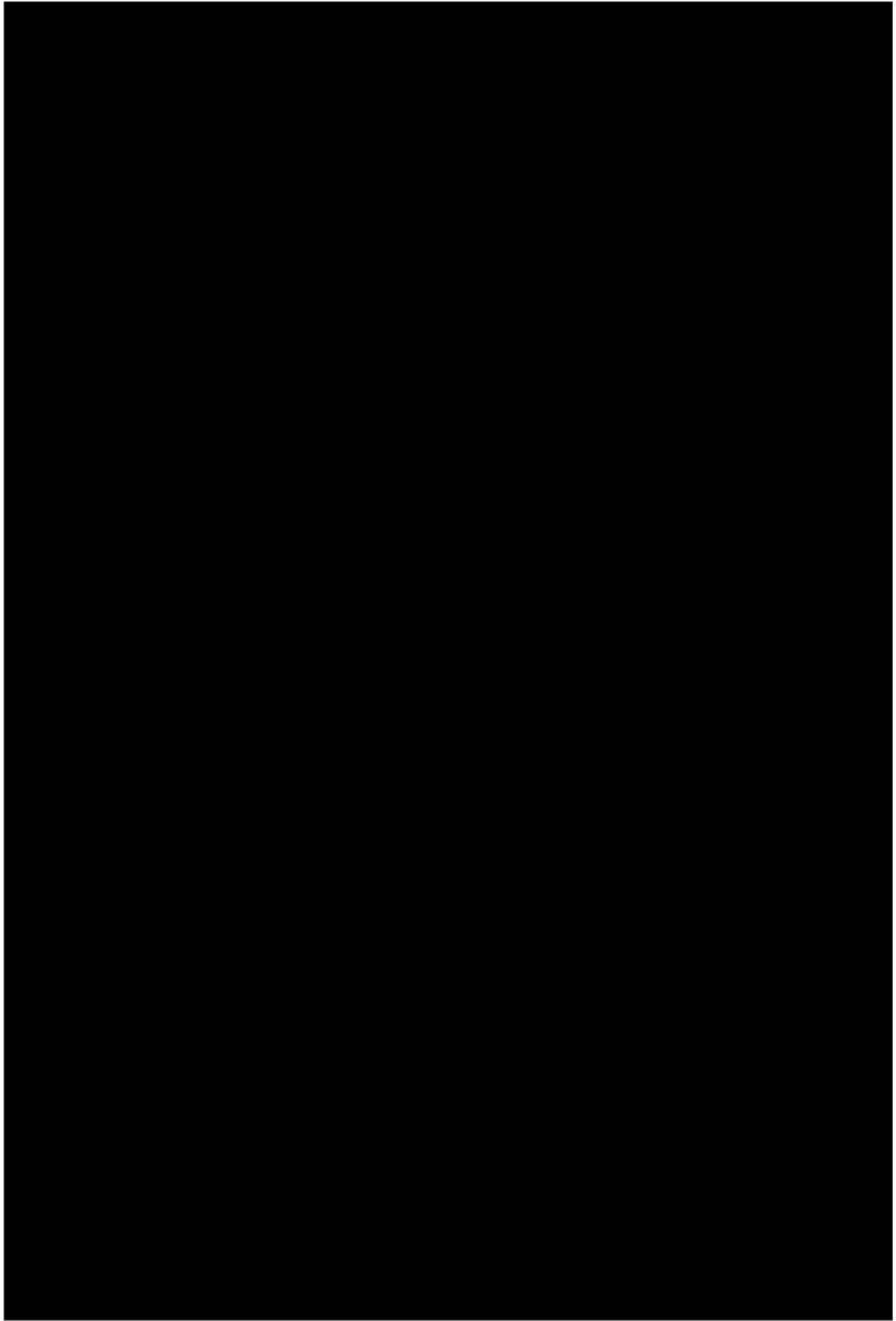
Crown Reviewed 12 October 2020

6.15

6.16



6.17



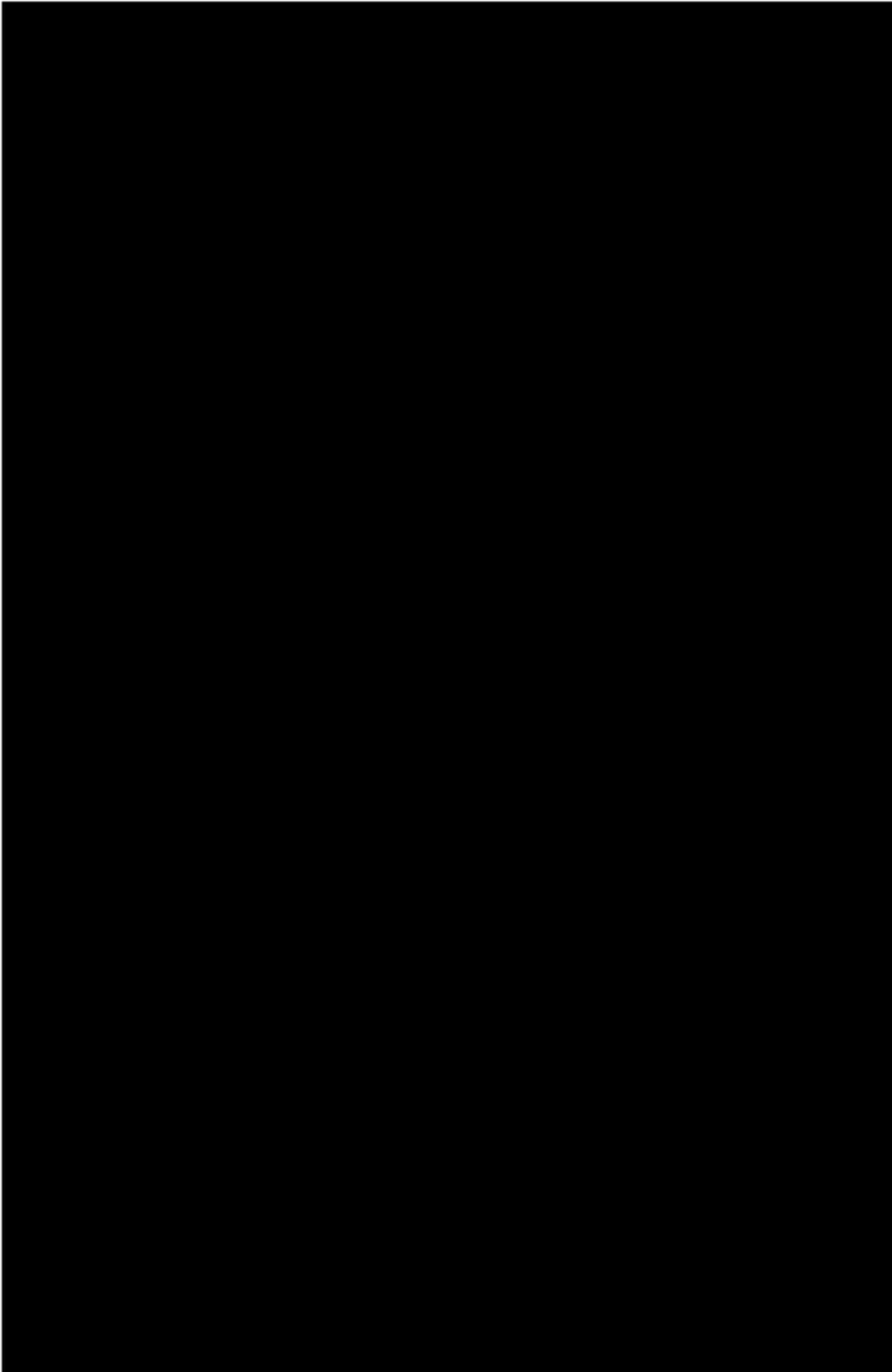
6.18

Crown Reviewed 12 October 2020

6.19

6.20

6.21

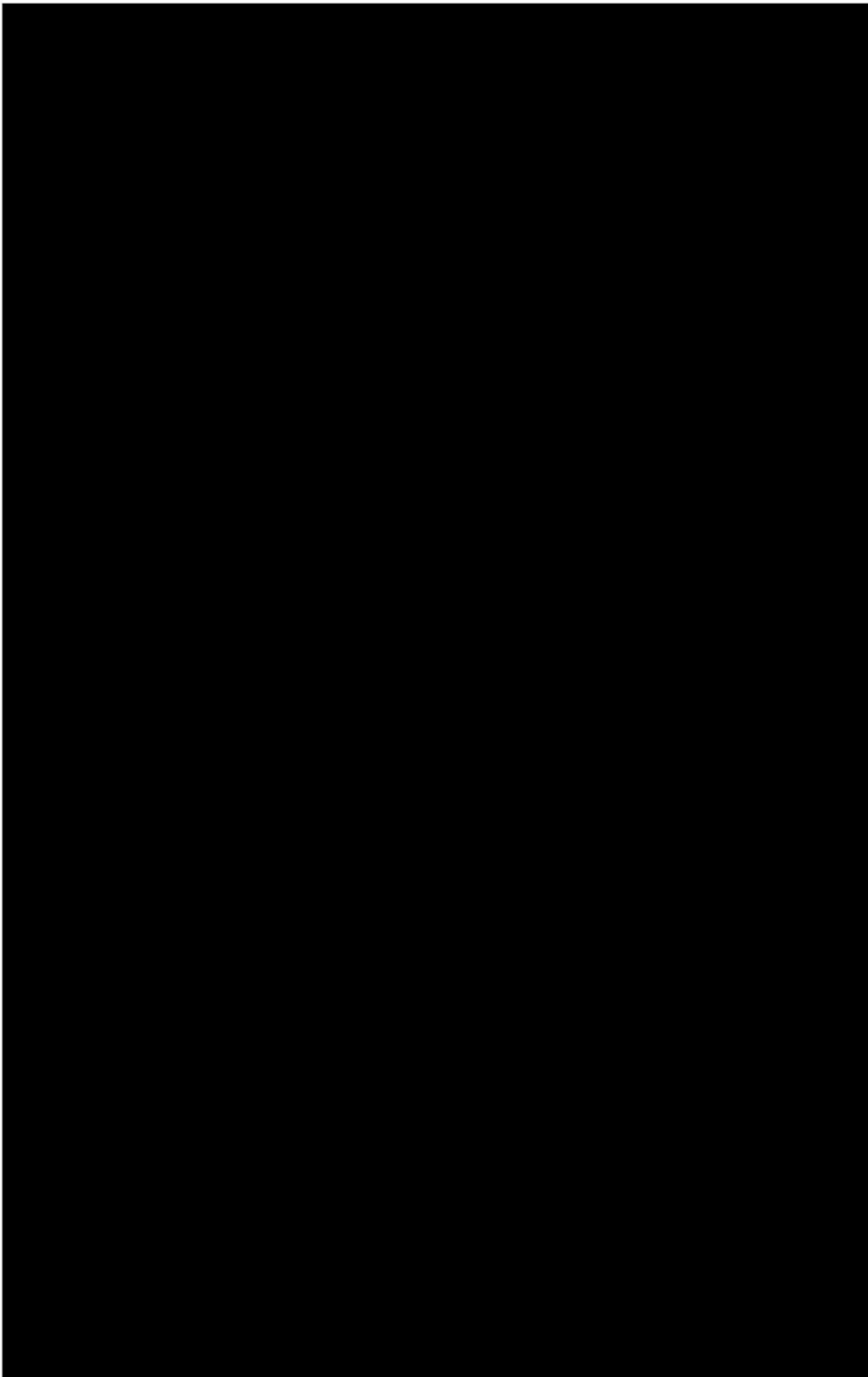


Crown Reviewed 12 October 2020

6.22

6.23

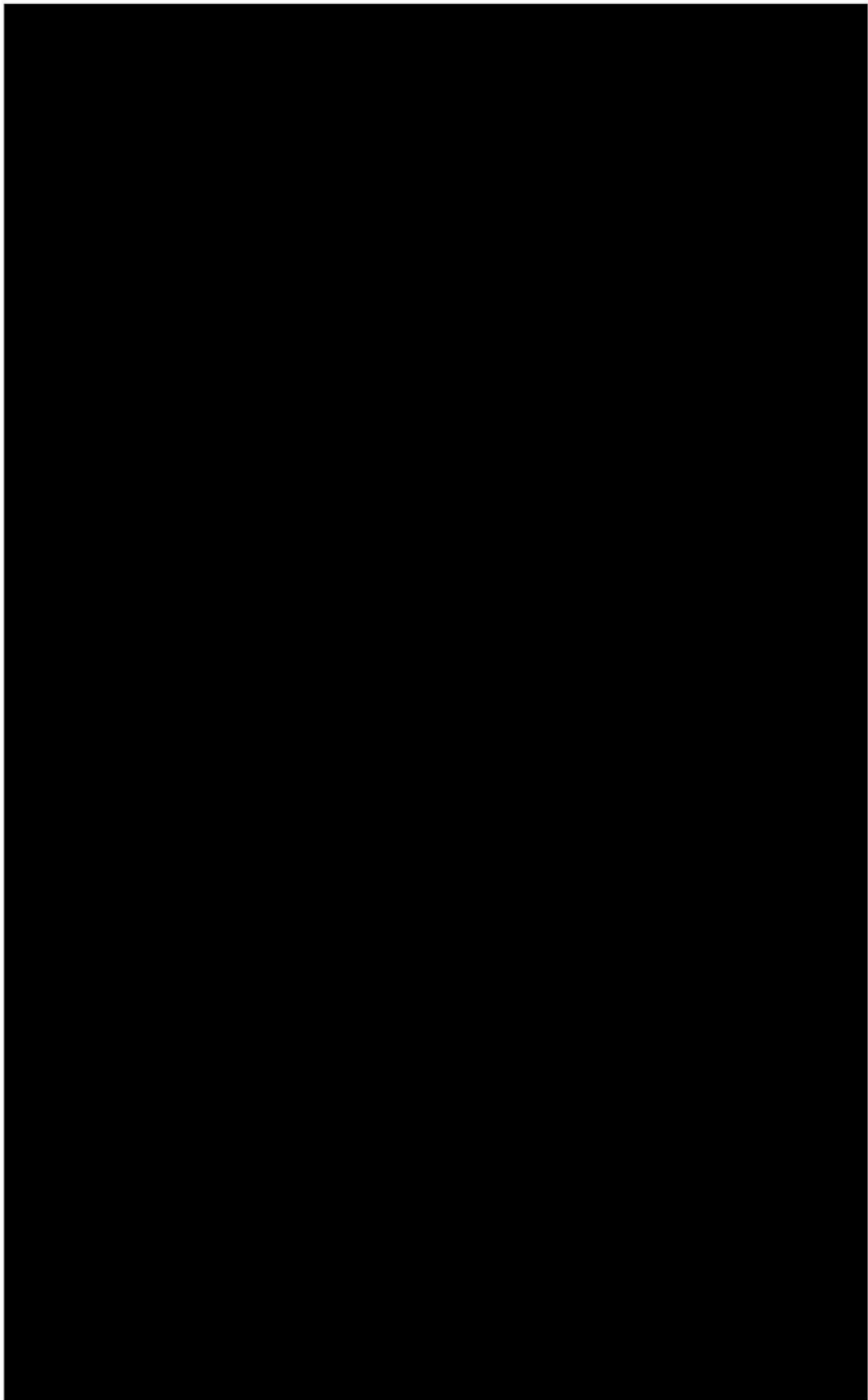
6.24



Crown Reviewed 12 October 2020

6.25

6.26



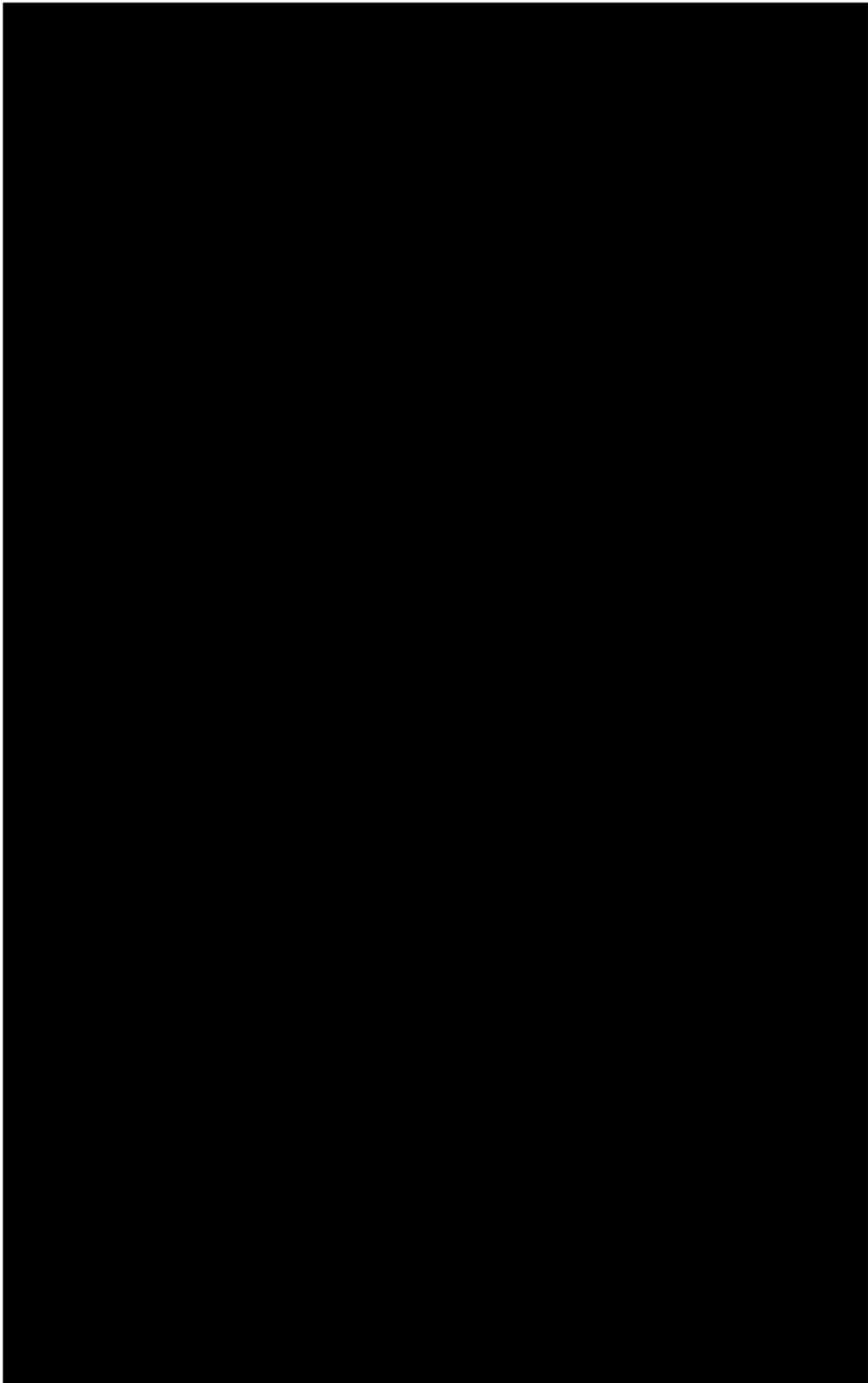
Crown Reviewed 12 October 2020

6.27

6.28

6.29

6.30



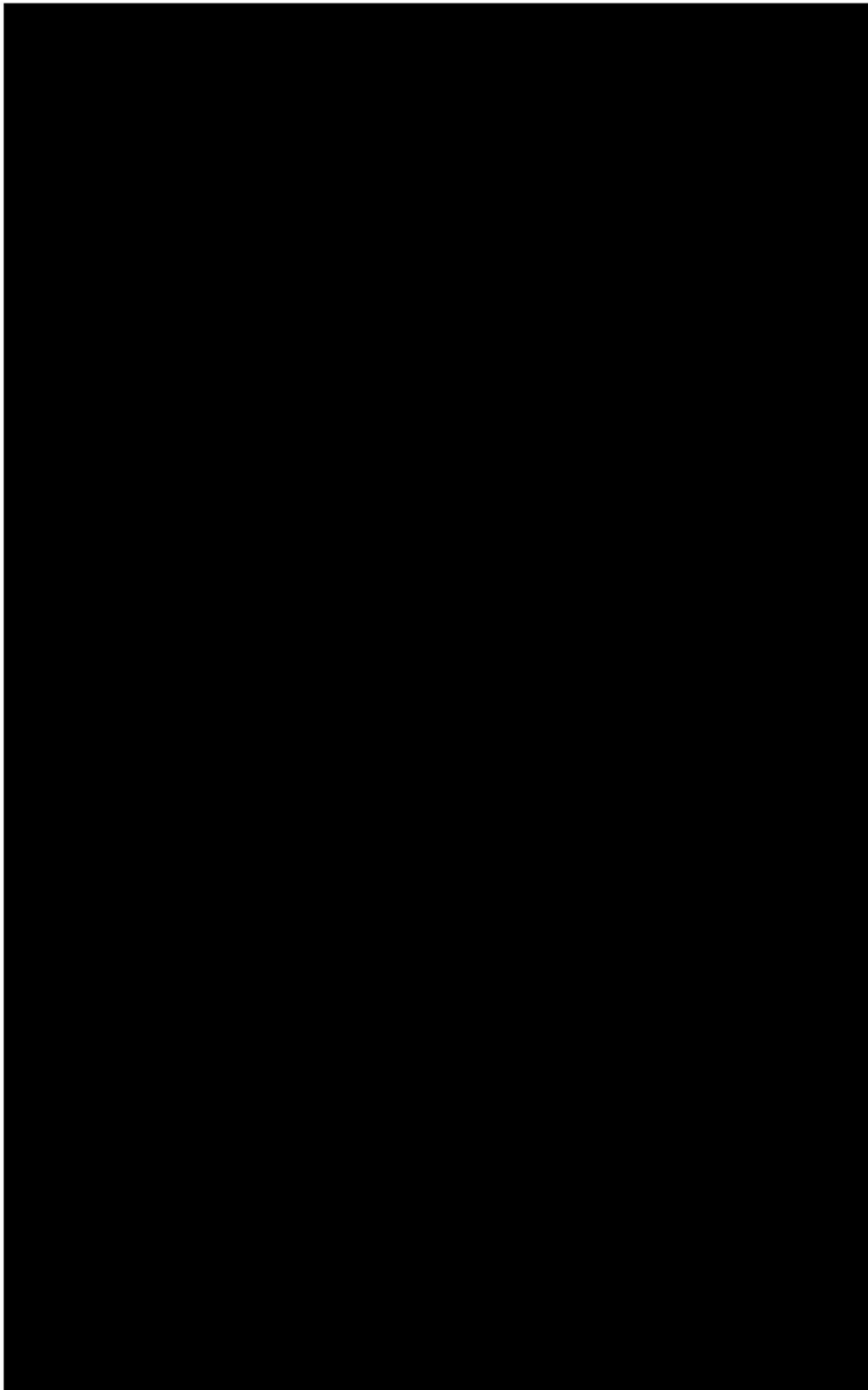
Crown Reviewed 12 October 2020

6.31

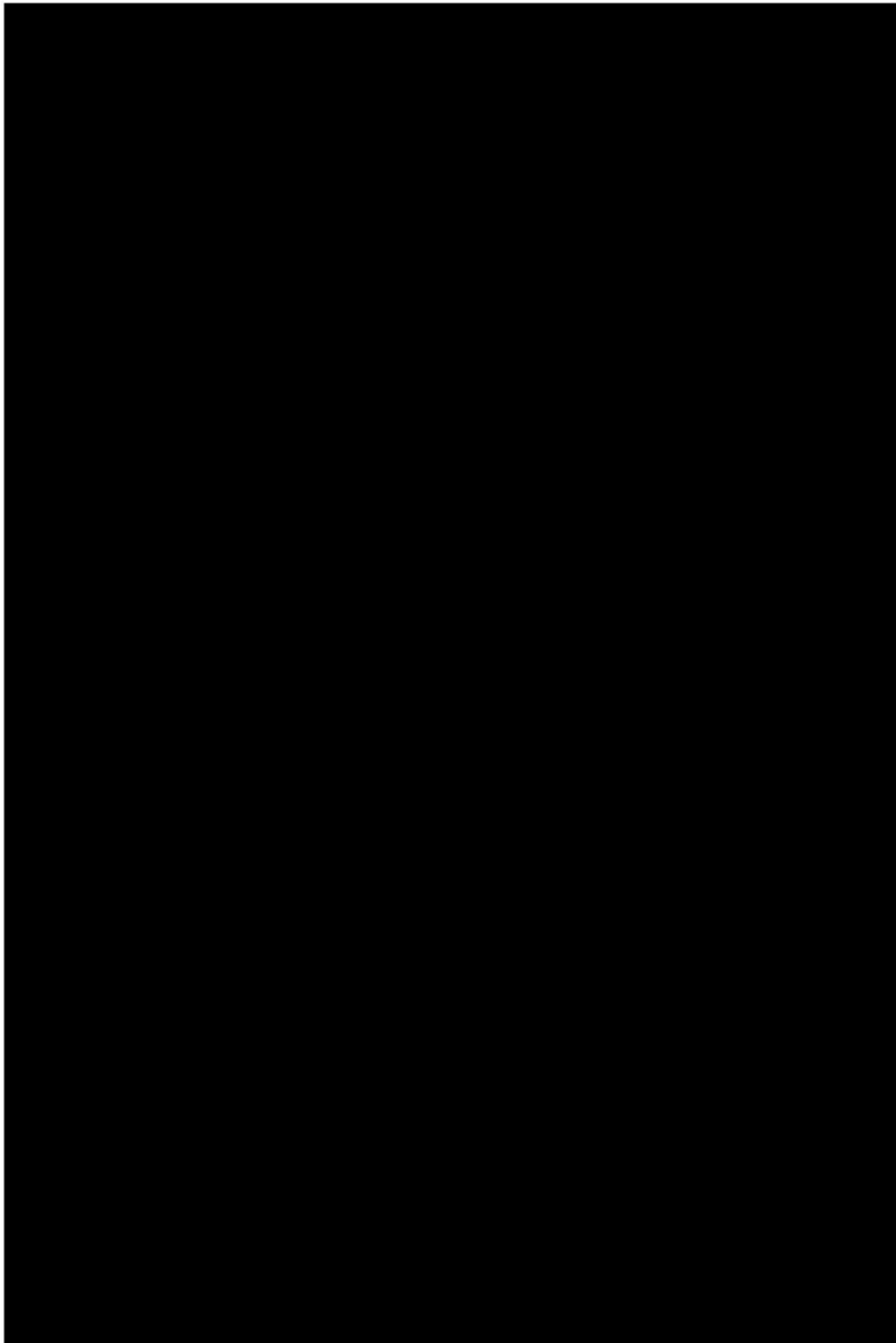
6.32

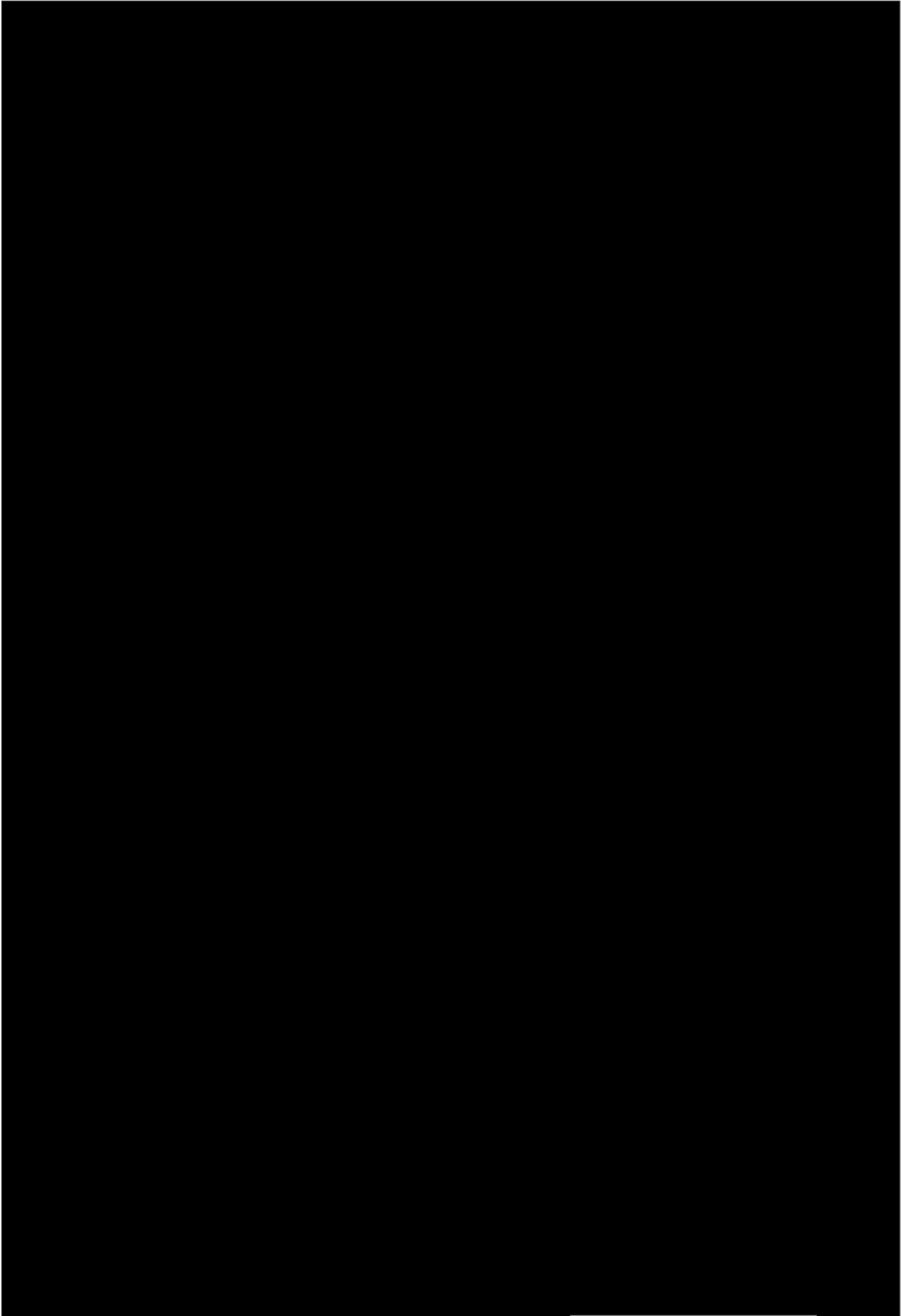
6.33

6.34

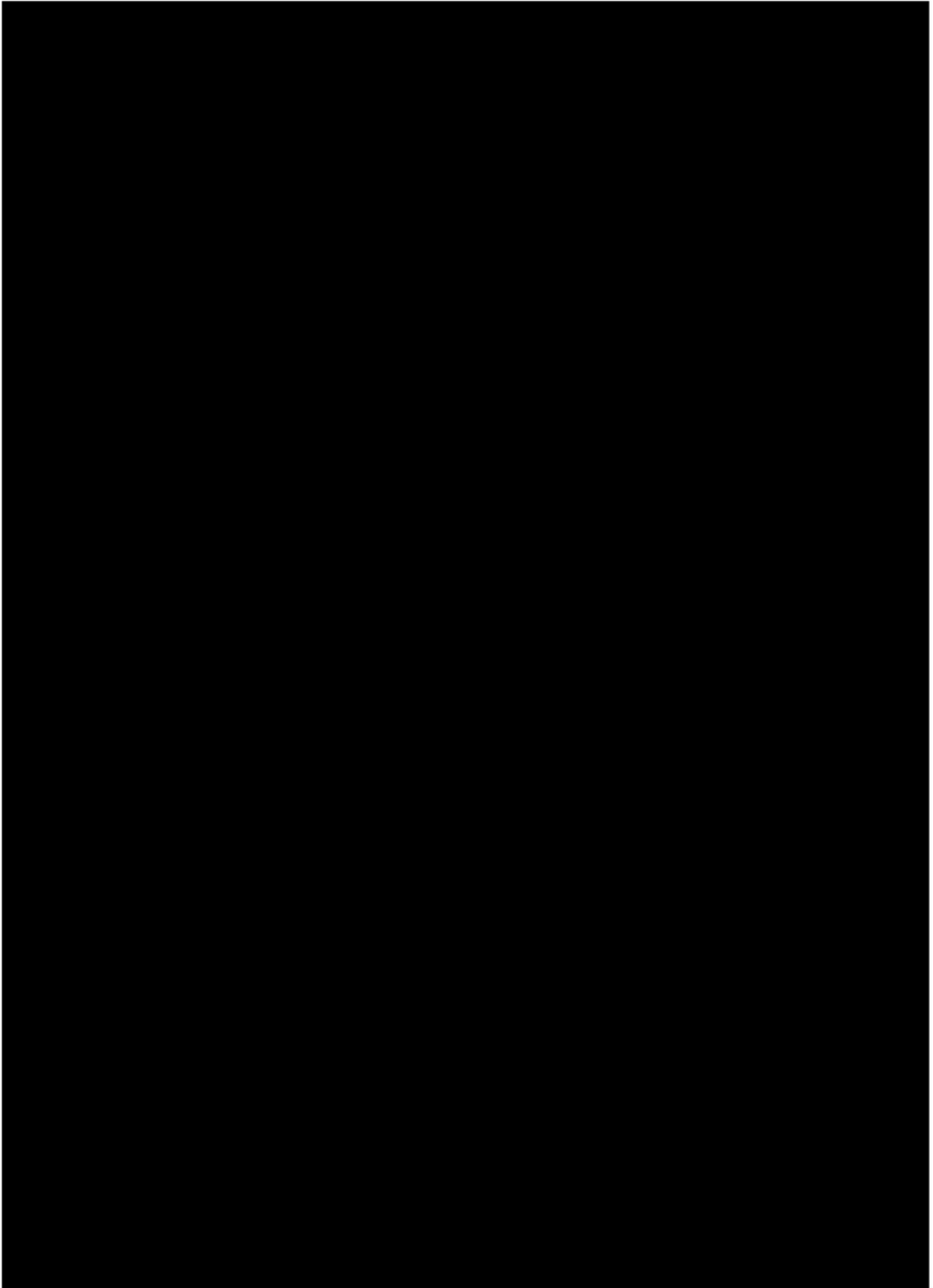


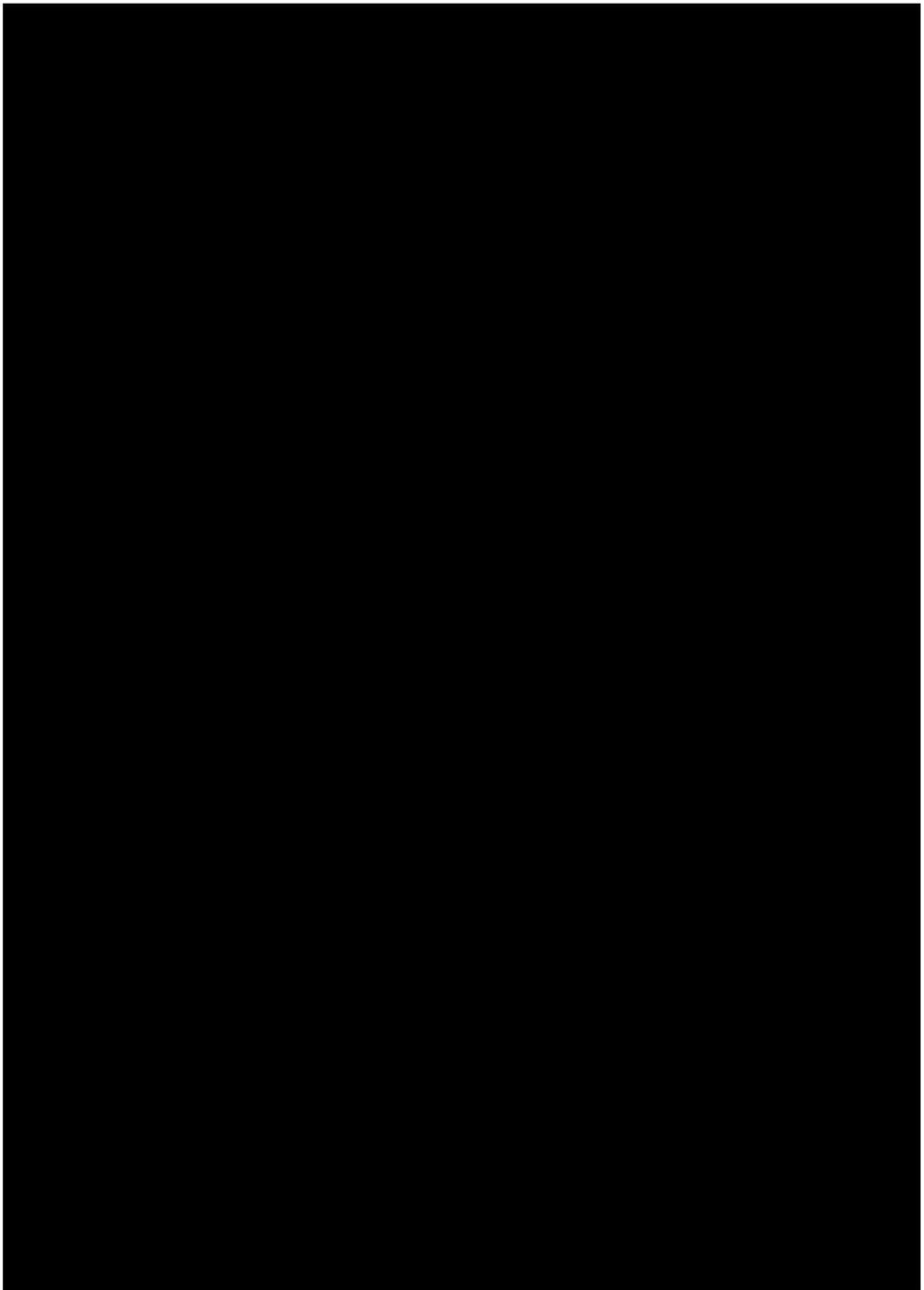
Crown Reviewed 12 October 2020



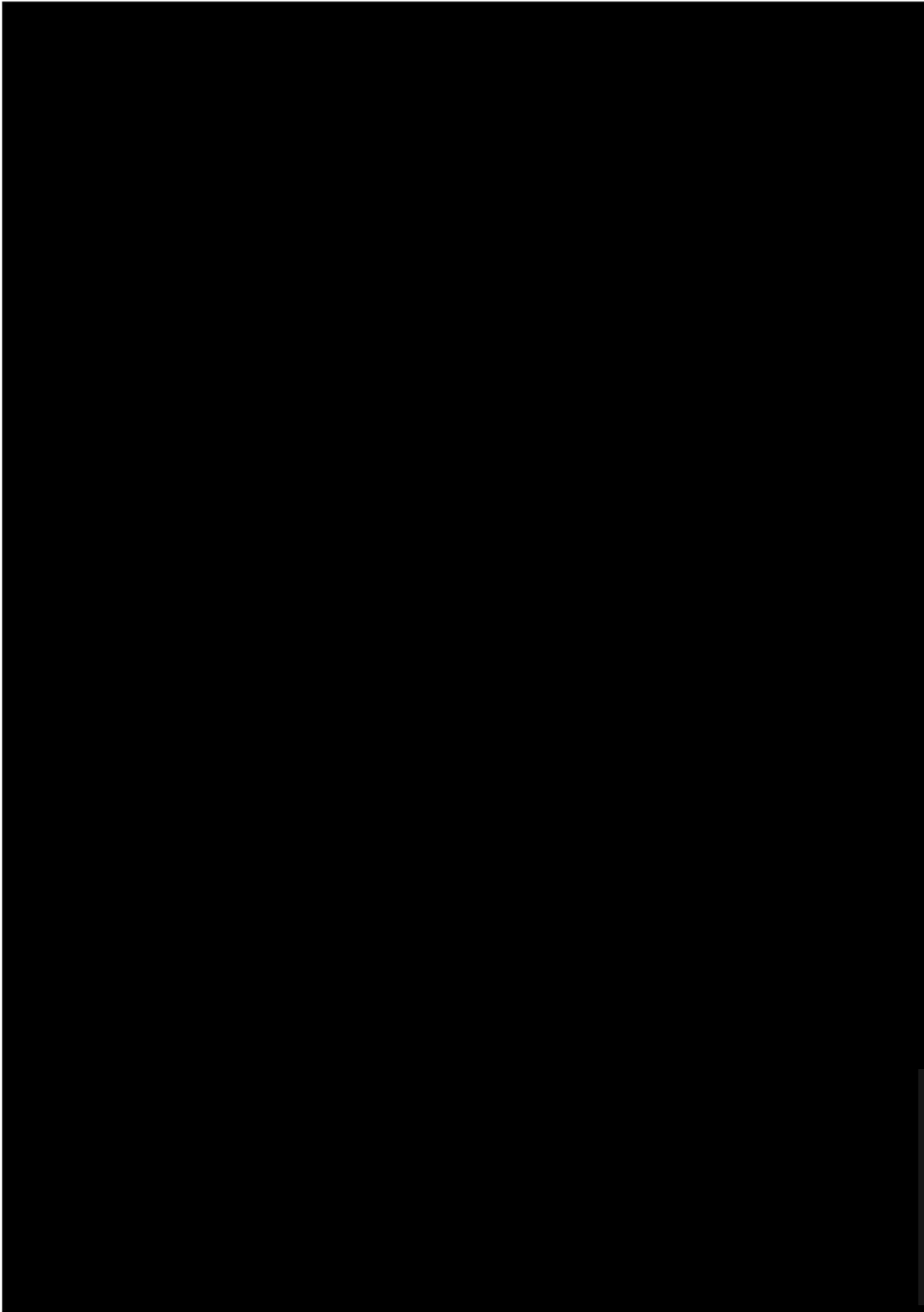


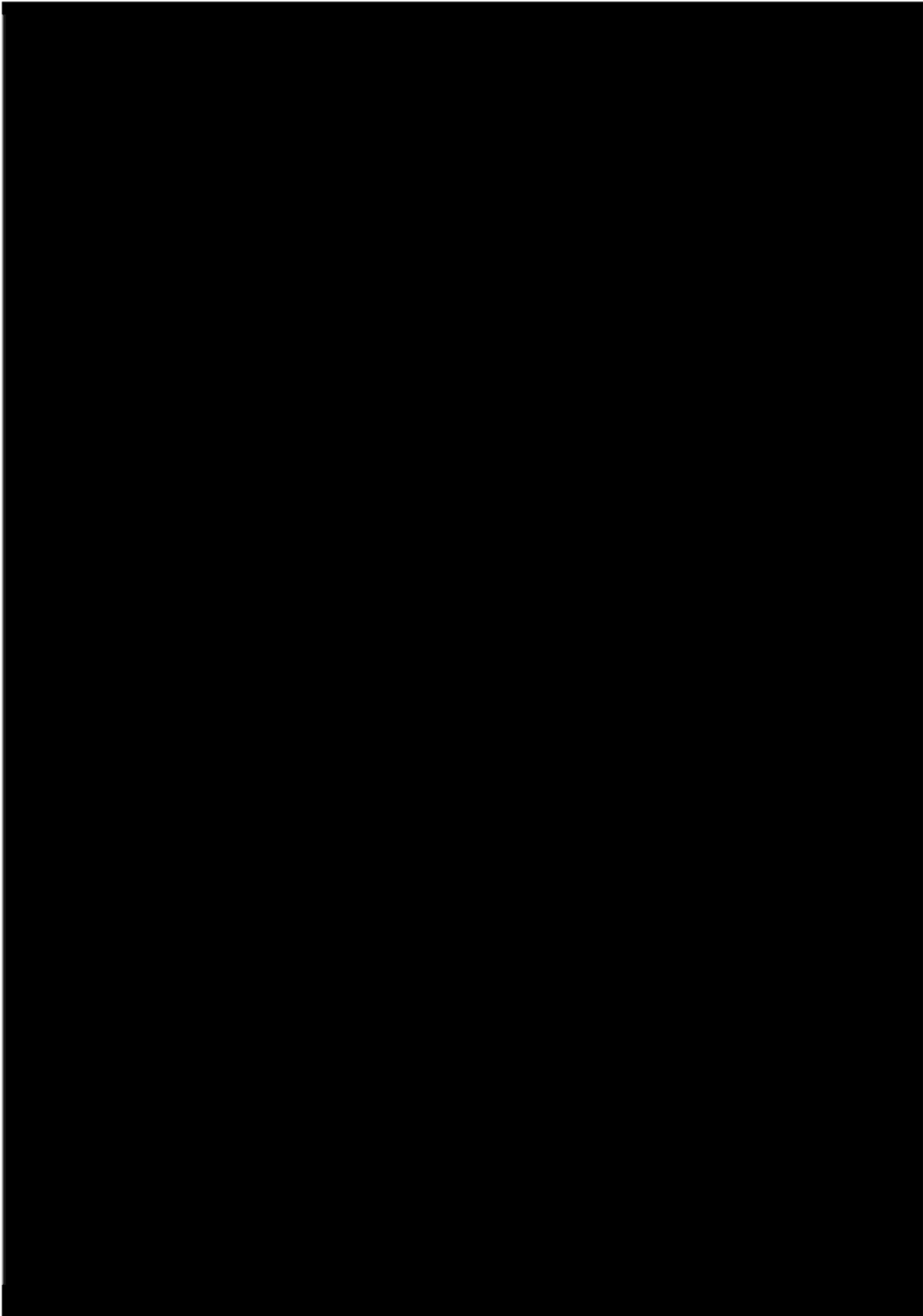
Crown Reviewed 12 October 2020

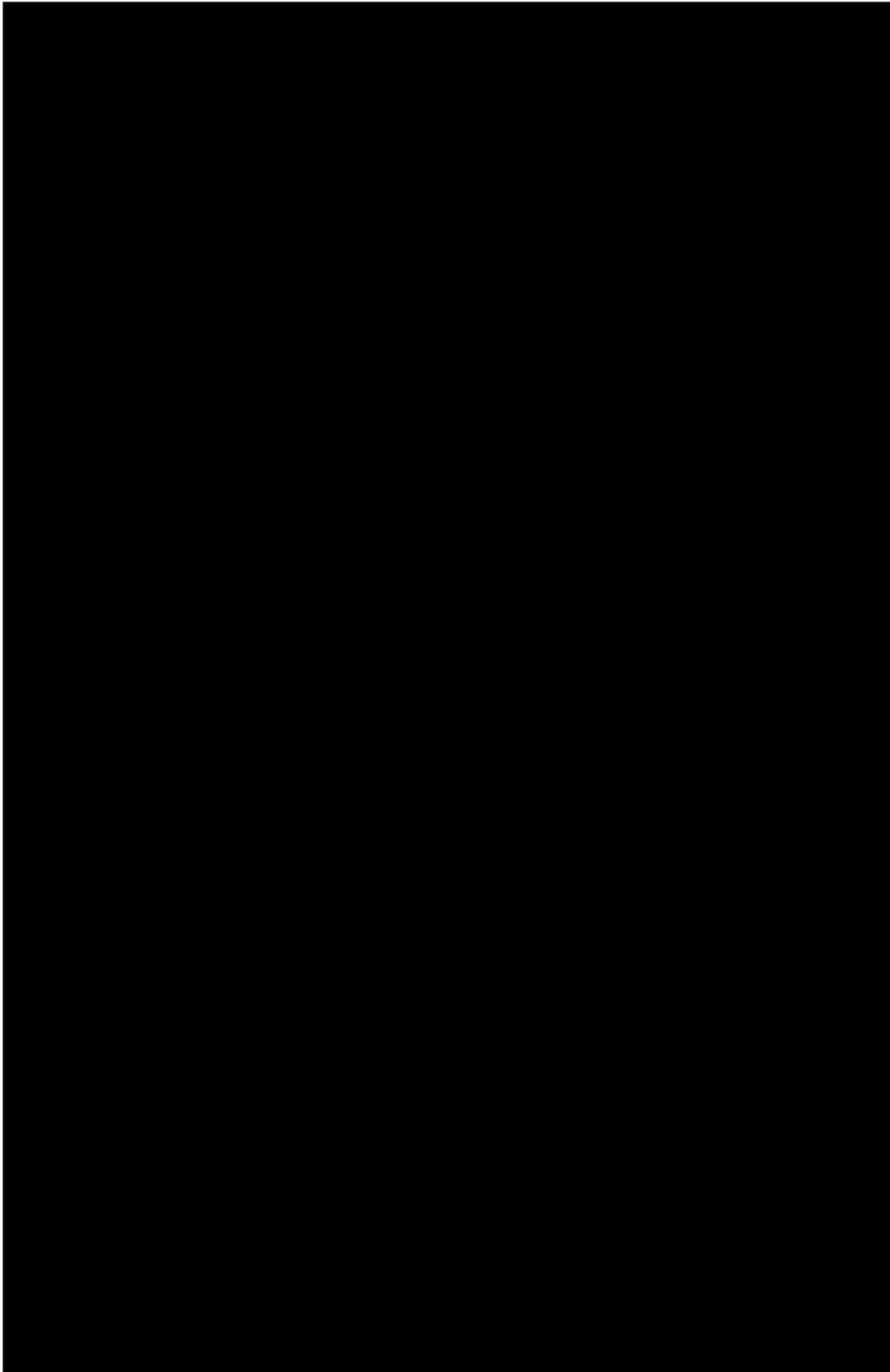


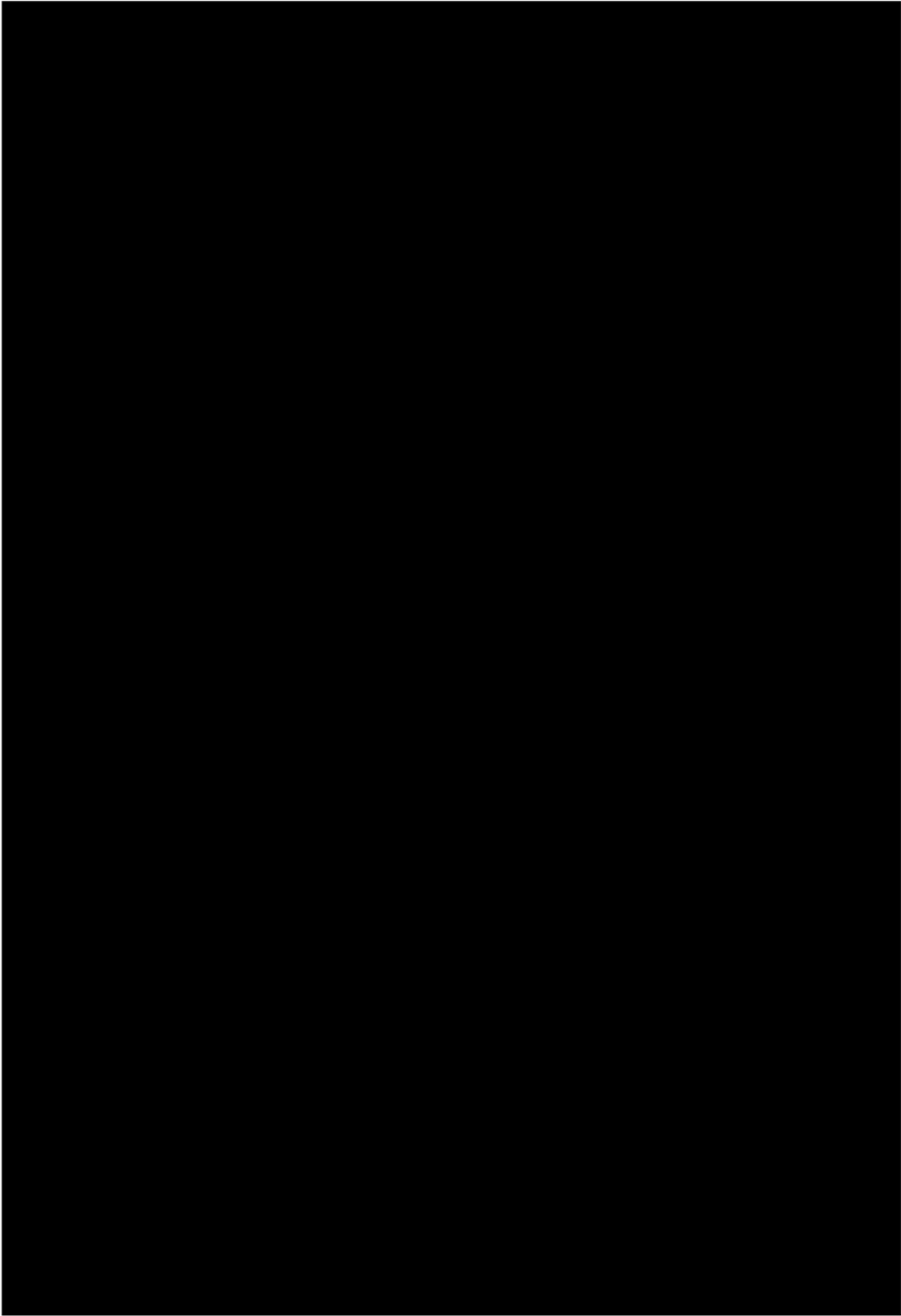


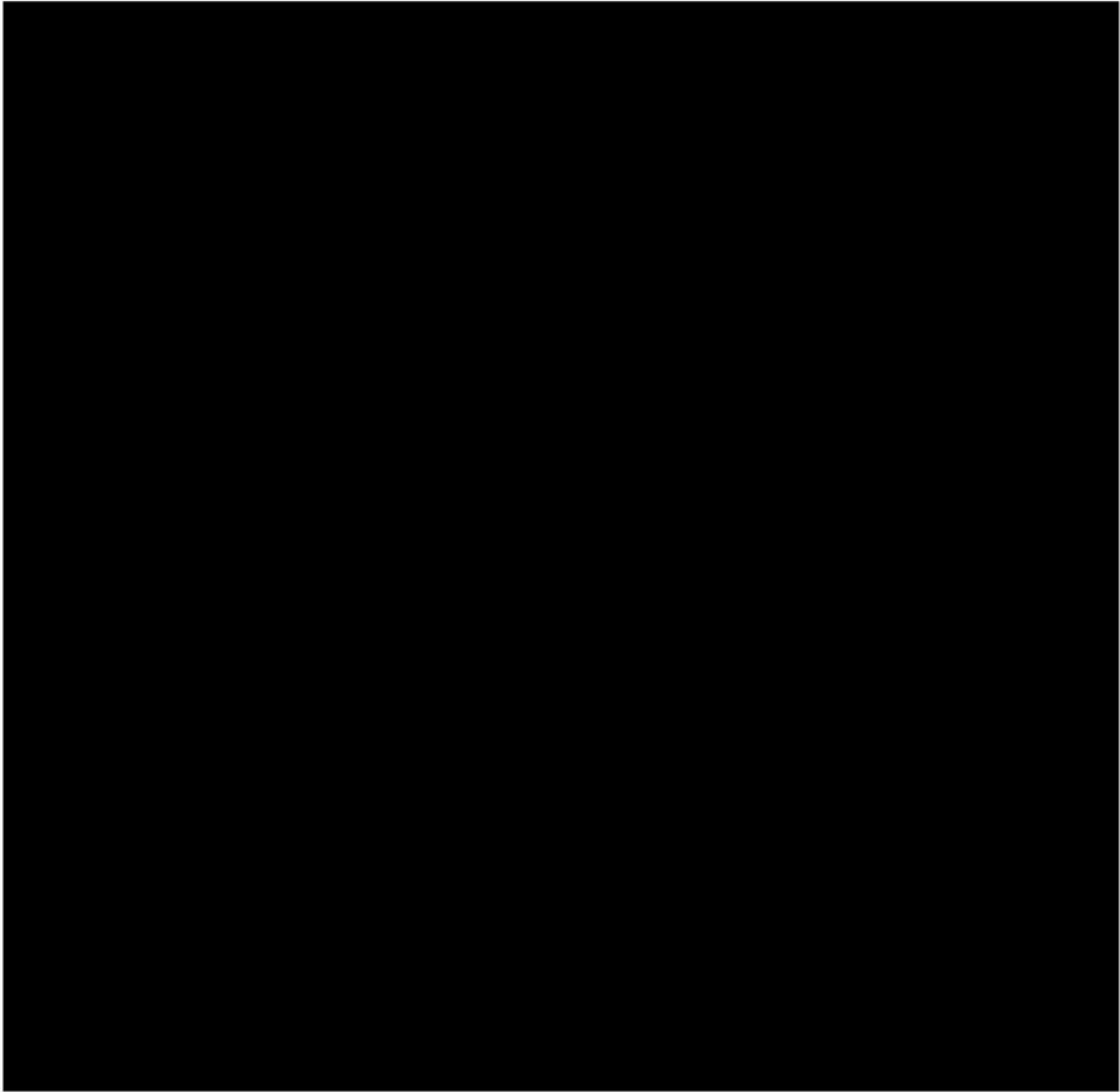
Crown Reviewed 12 October 2020





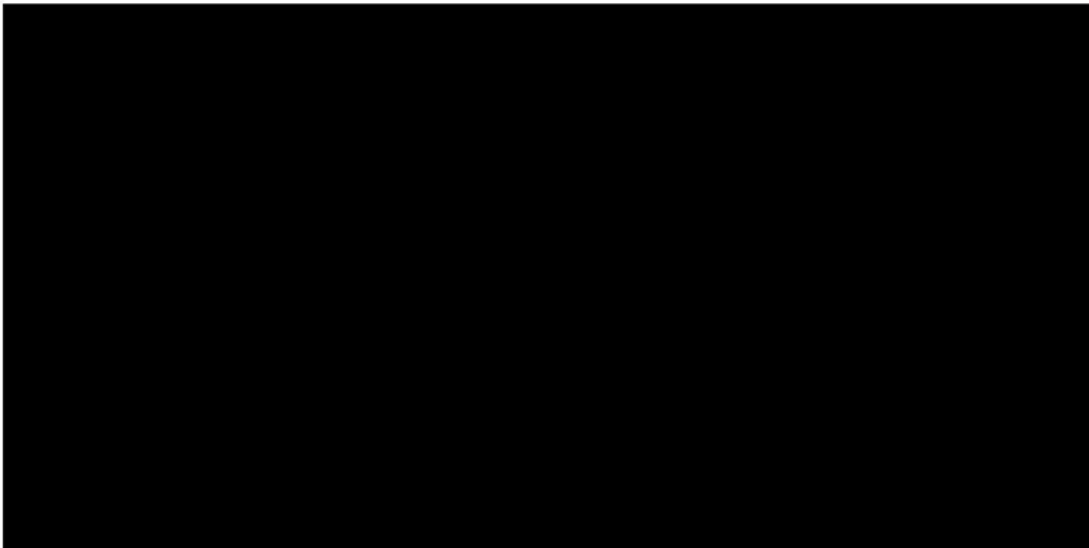






7. CHIP BANK

7.1

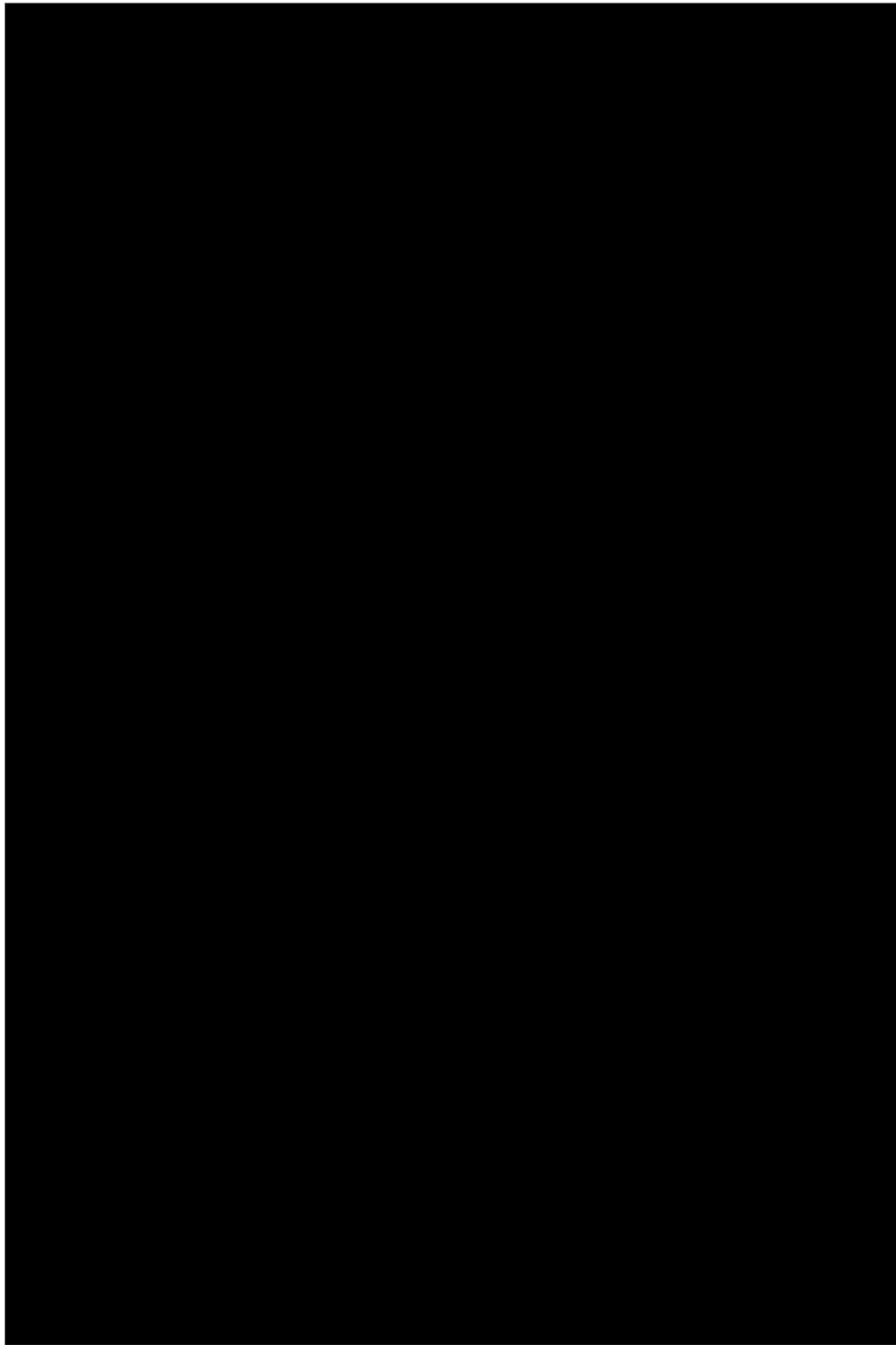


7.2

7.3

7.4

7.5

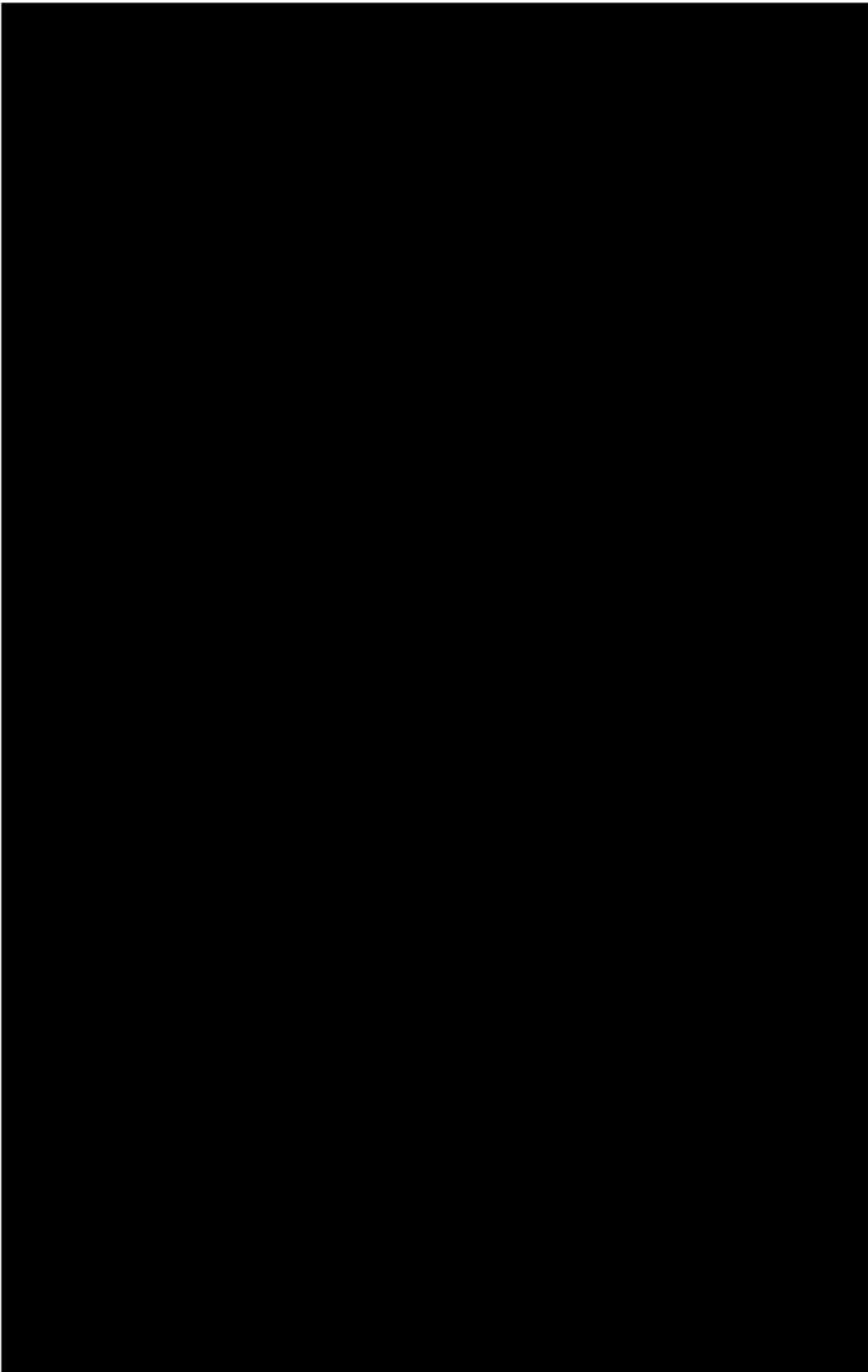


Crown Reviewed 12 October 2020

7.6

7.7

7.8

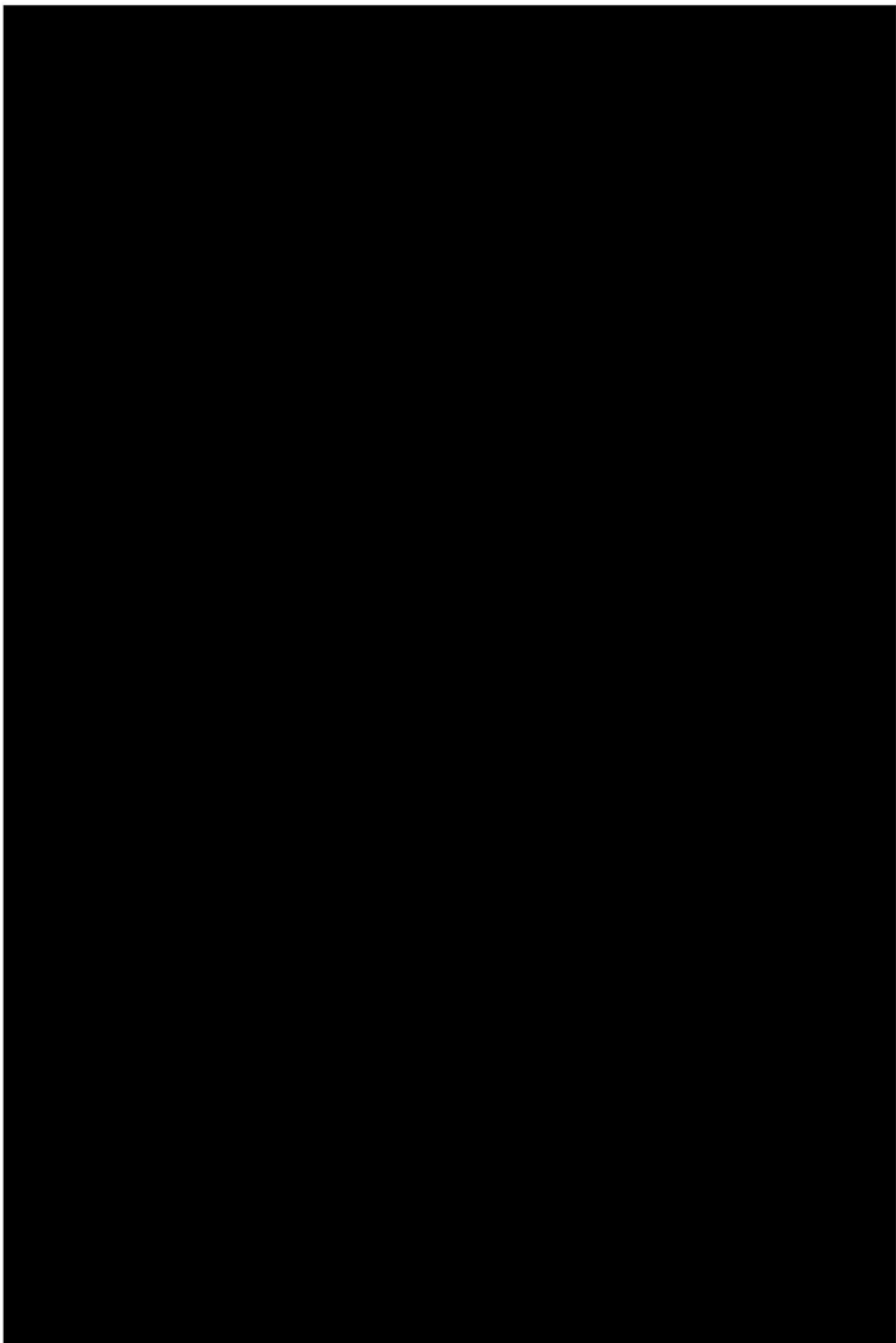


Crown Reviewed 12 October 2020

7.9

7.10

7.11



Crown Reviewed 12 October 2020

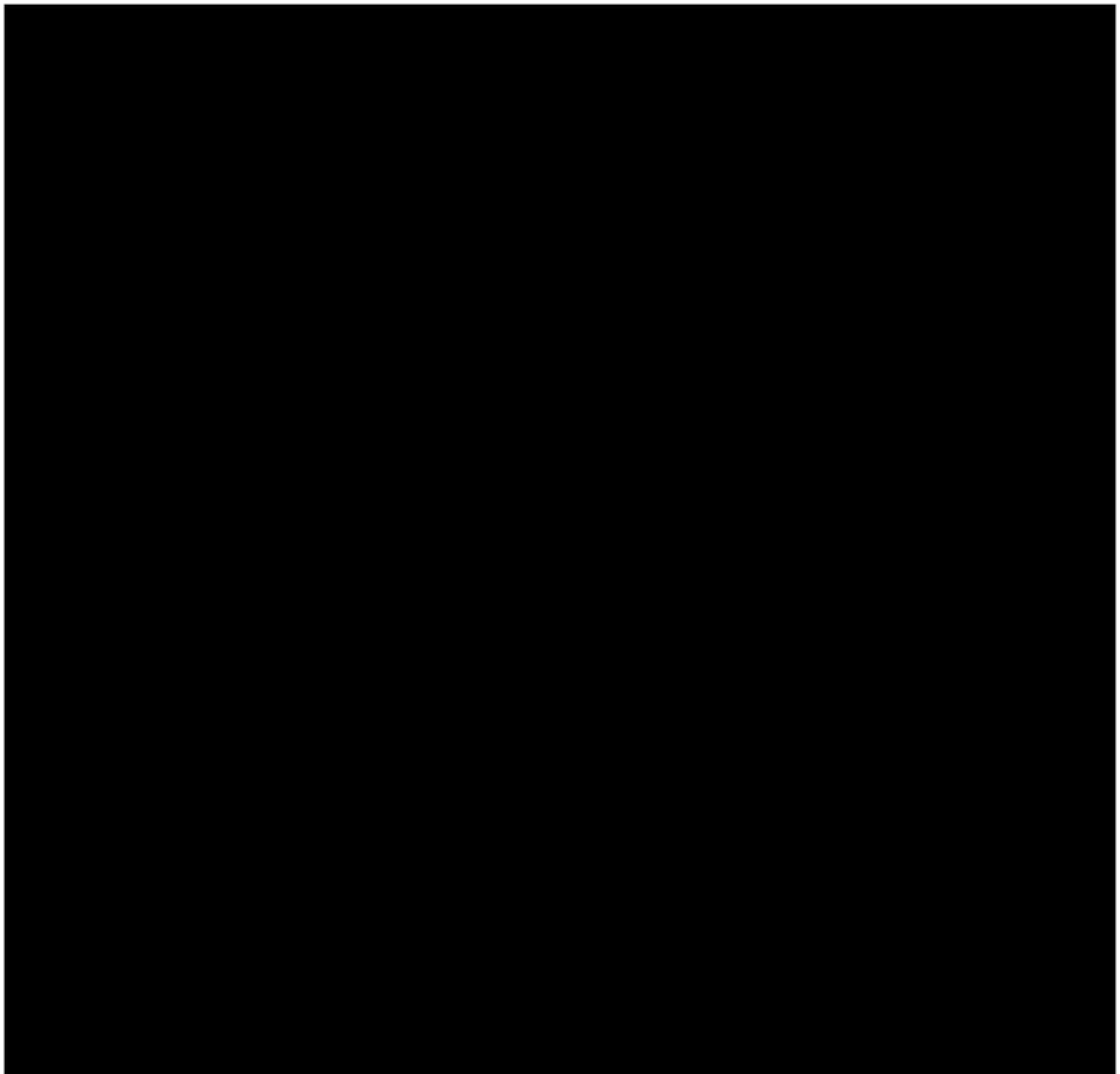


8. MAIN BANK / CHEQUE BANK

8.1

8.2

8.3

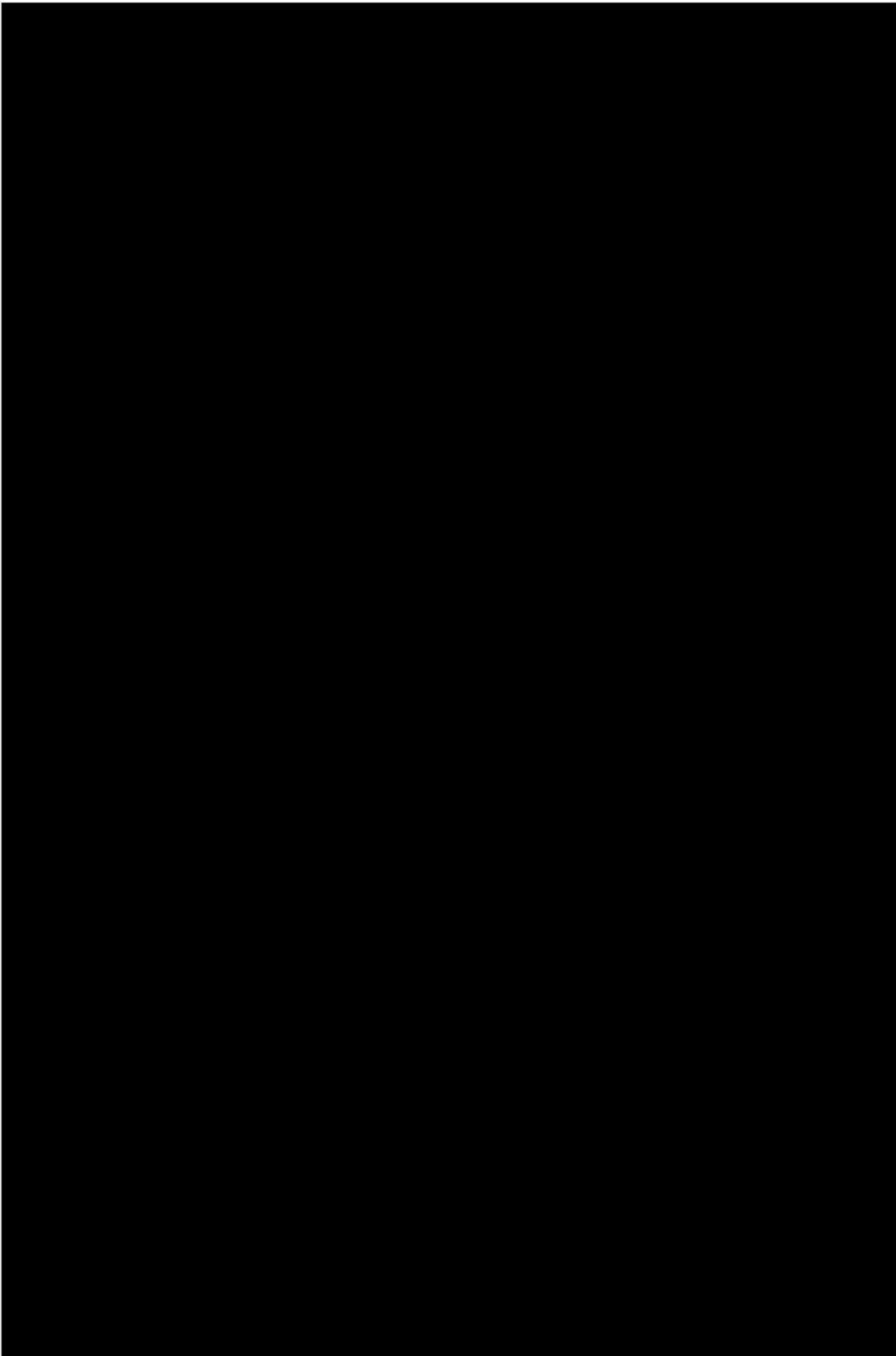


Crown Reviewed 12 October 2020

8.4

8.5

8.6



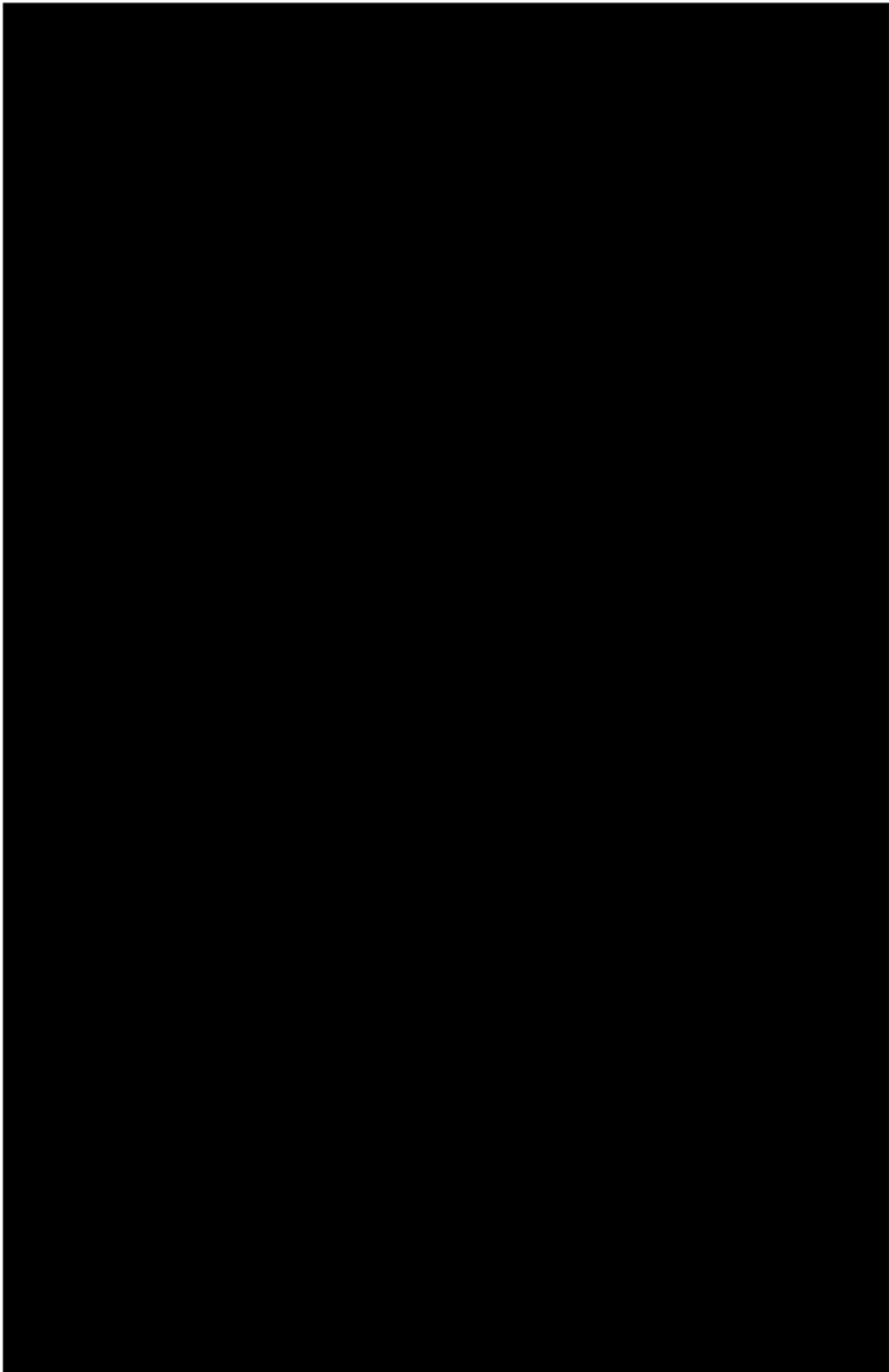
Crown Reviewed 12 October 2020

8.7

8.8

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8.10



Crown Reviewed 12 October 2020

8.11

8.12

8.13

8.14

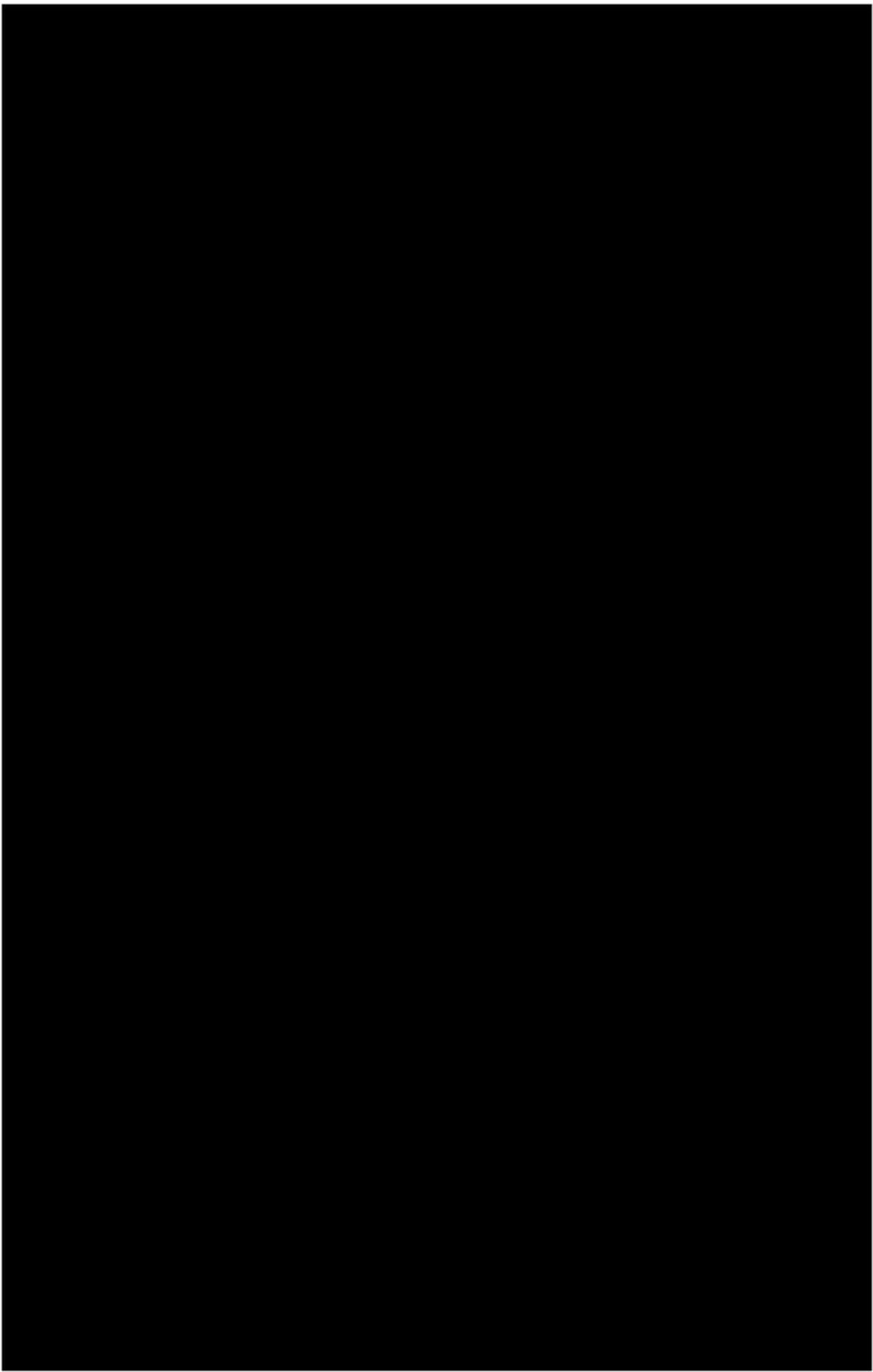
Crown Reviewed 12 October 2020

8.15

8.16

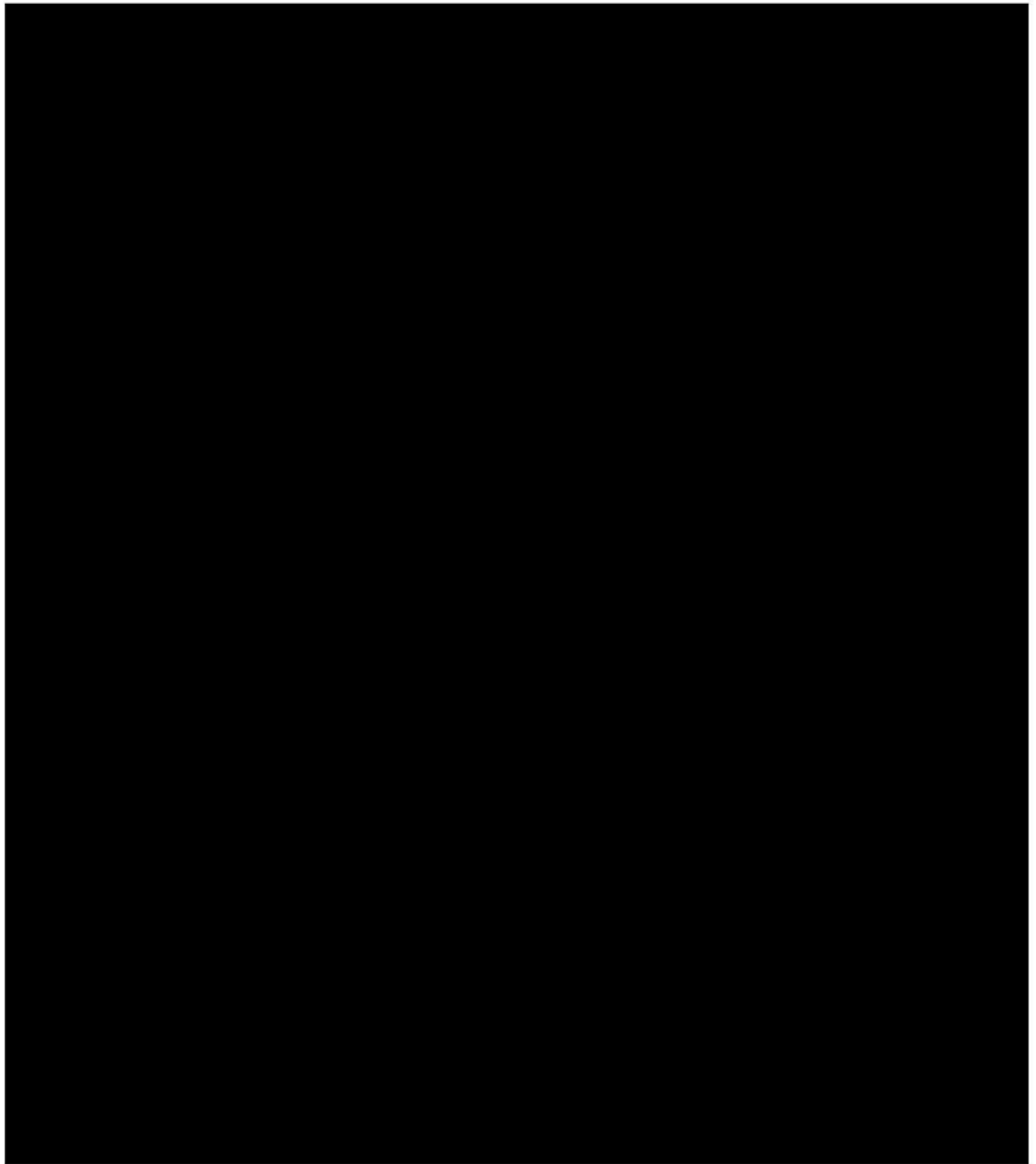
8.17

8.18



Crown Reviewed 12 October 2020

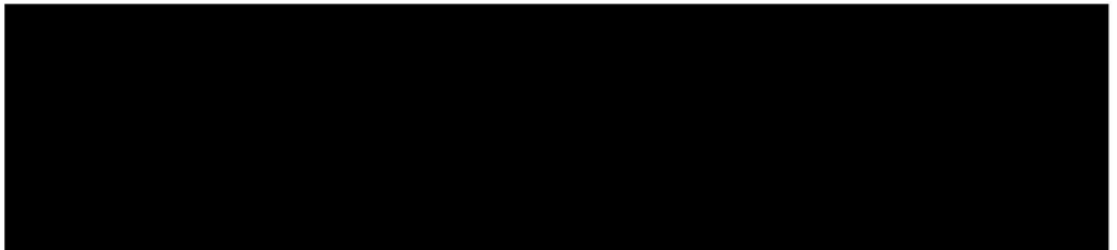
8.19



9. POKER ROOM CAGE OPERATIONS

9.1 General Cage Operations

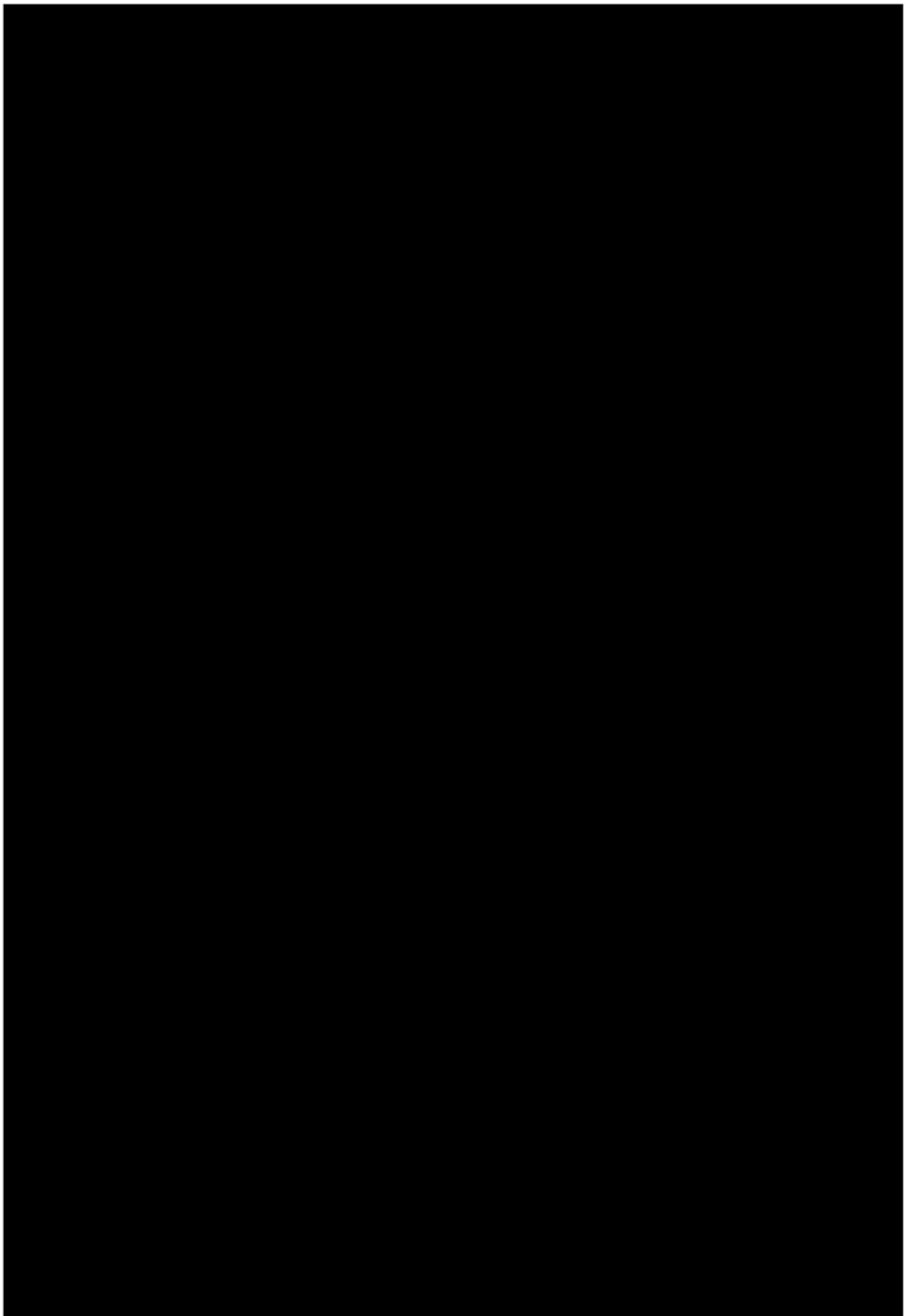
9.2



9.3

9.4

9.5



Crown Reviewed 12 October 2020

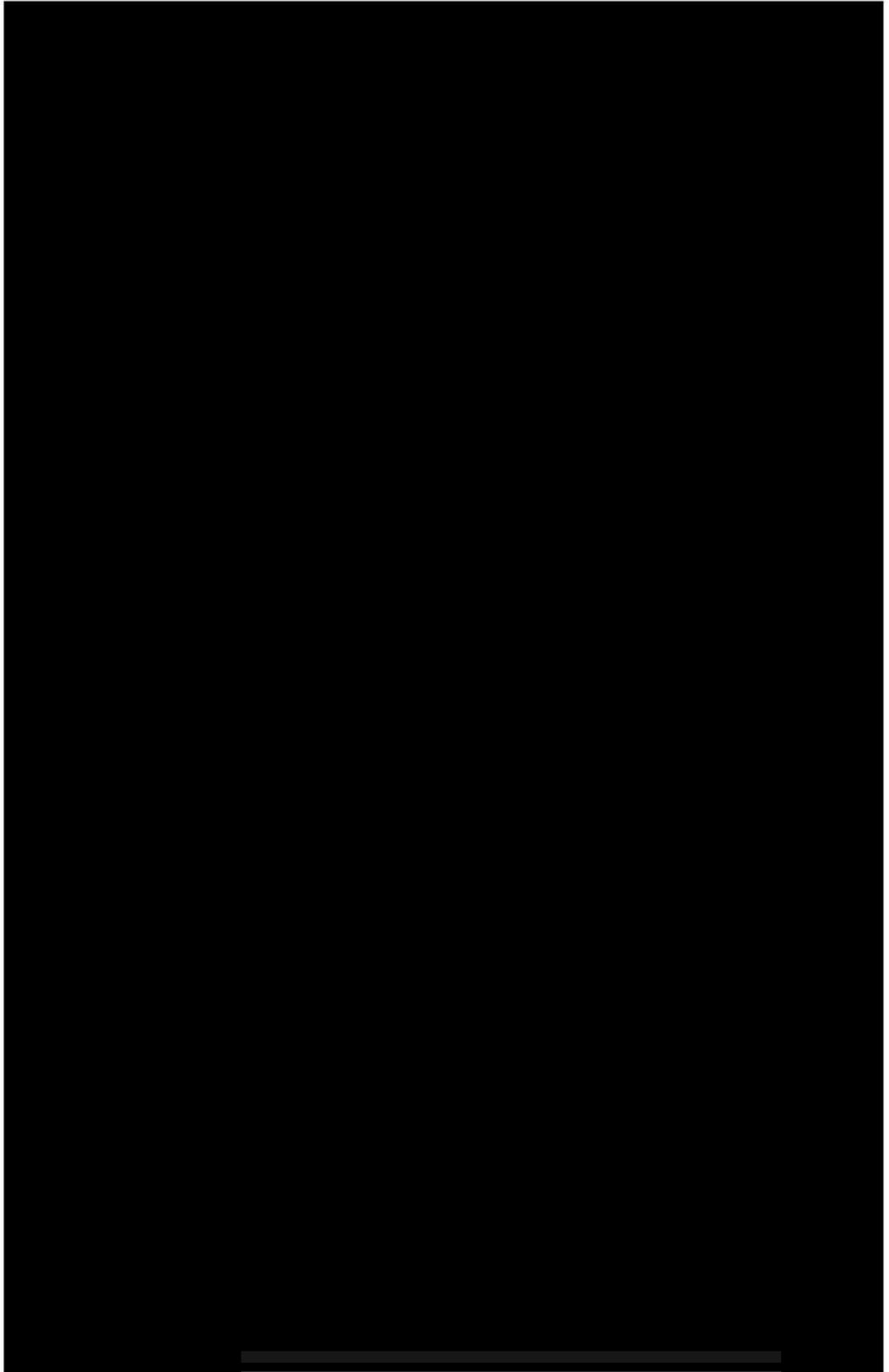
9.6

9.7

10. GAME TICKETS - GAMING MACHINES and eTGs.

10.1 Issue of Game Tickets

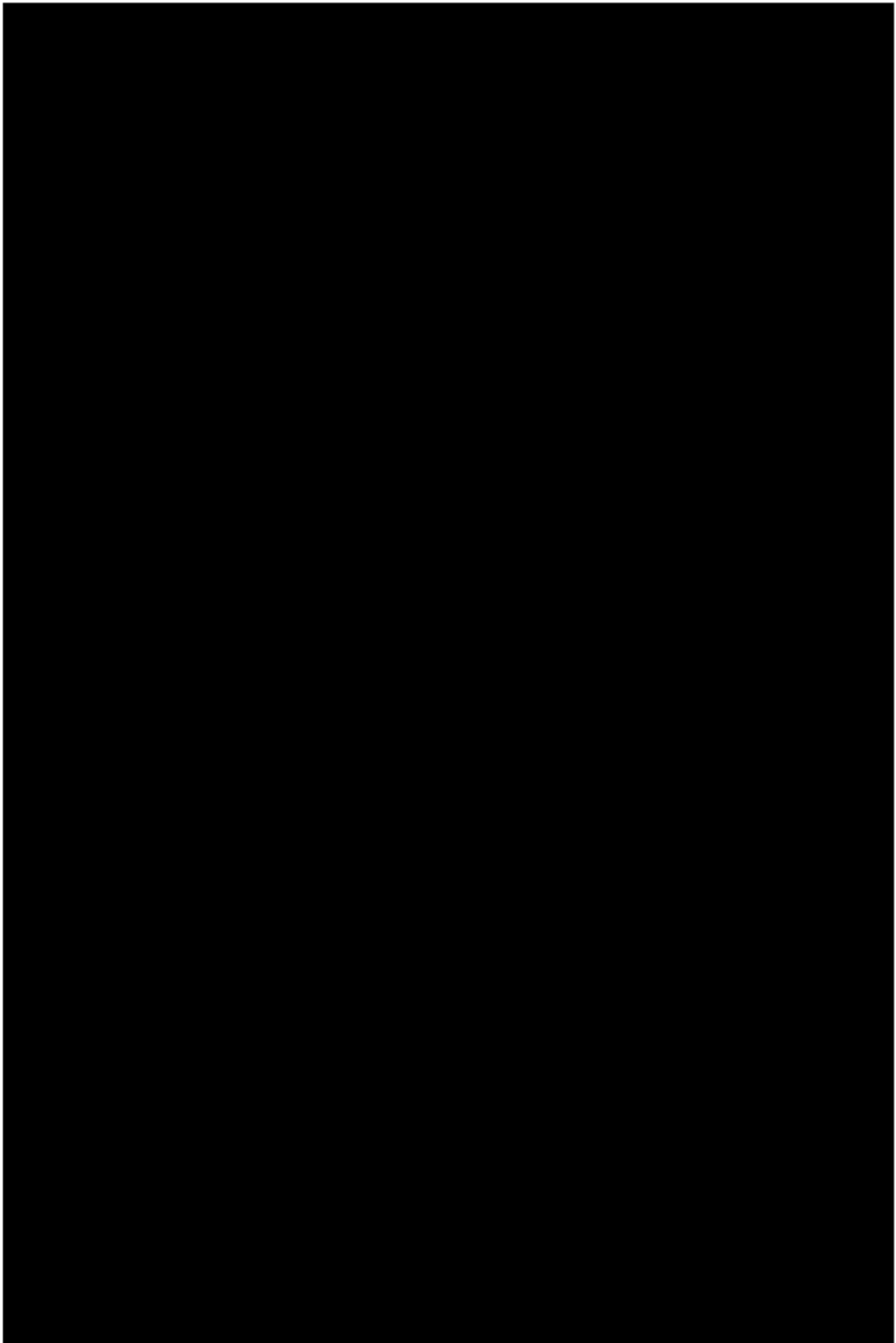
10.2



10.3

10.4

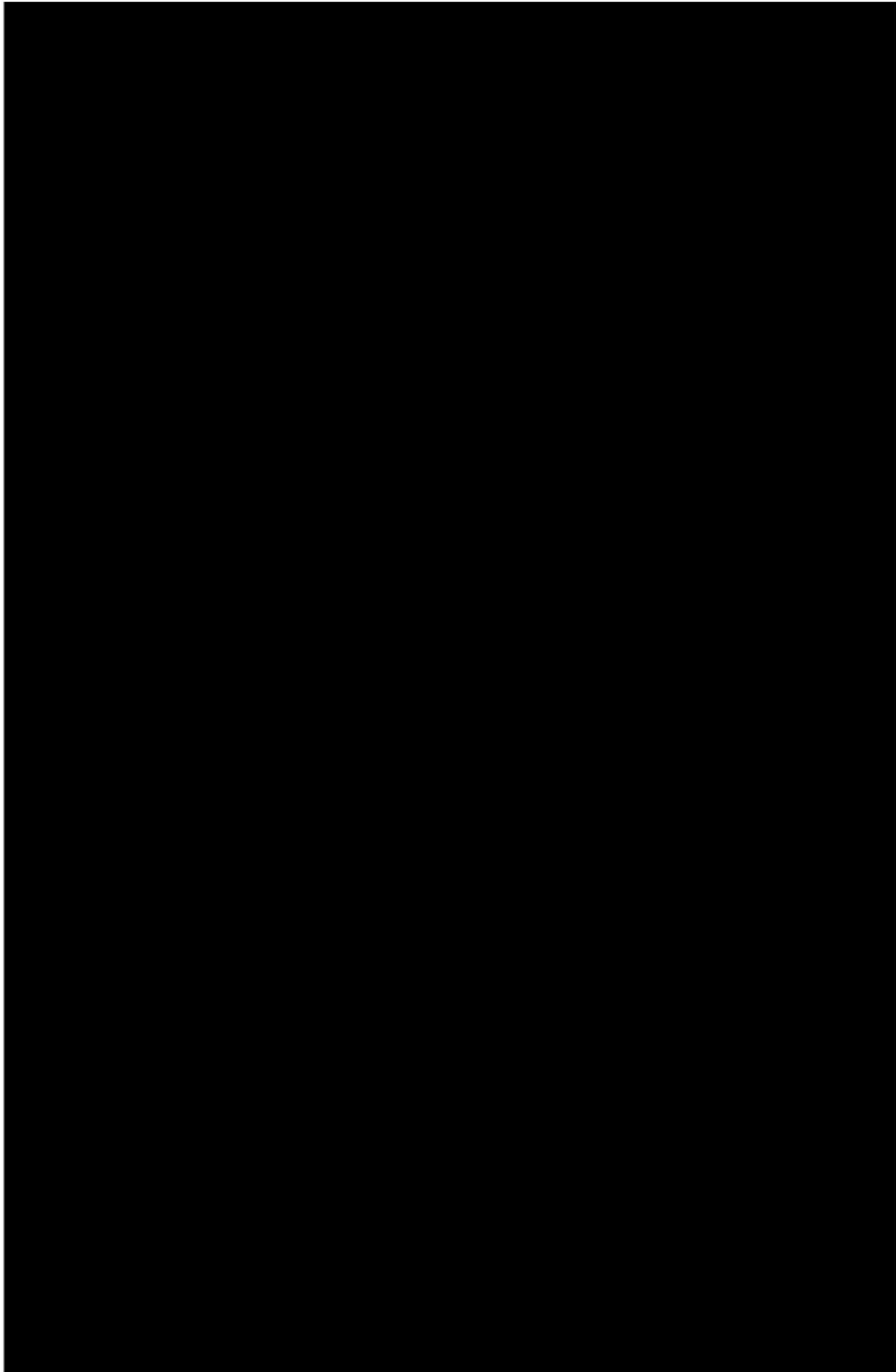
10.5



10.6

10.7

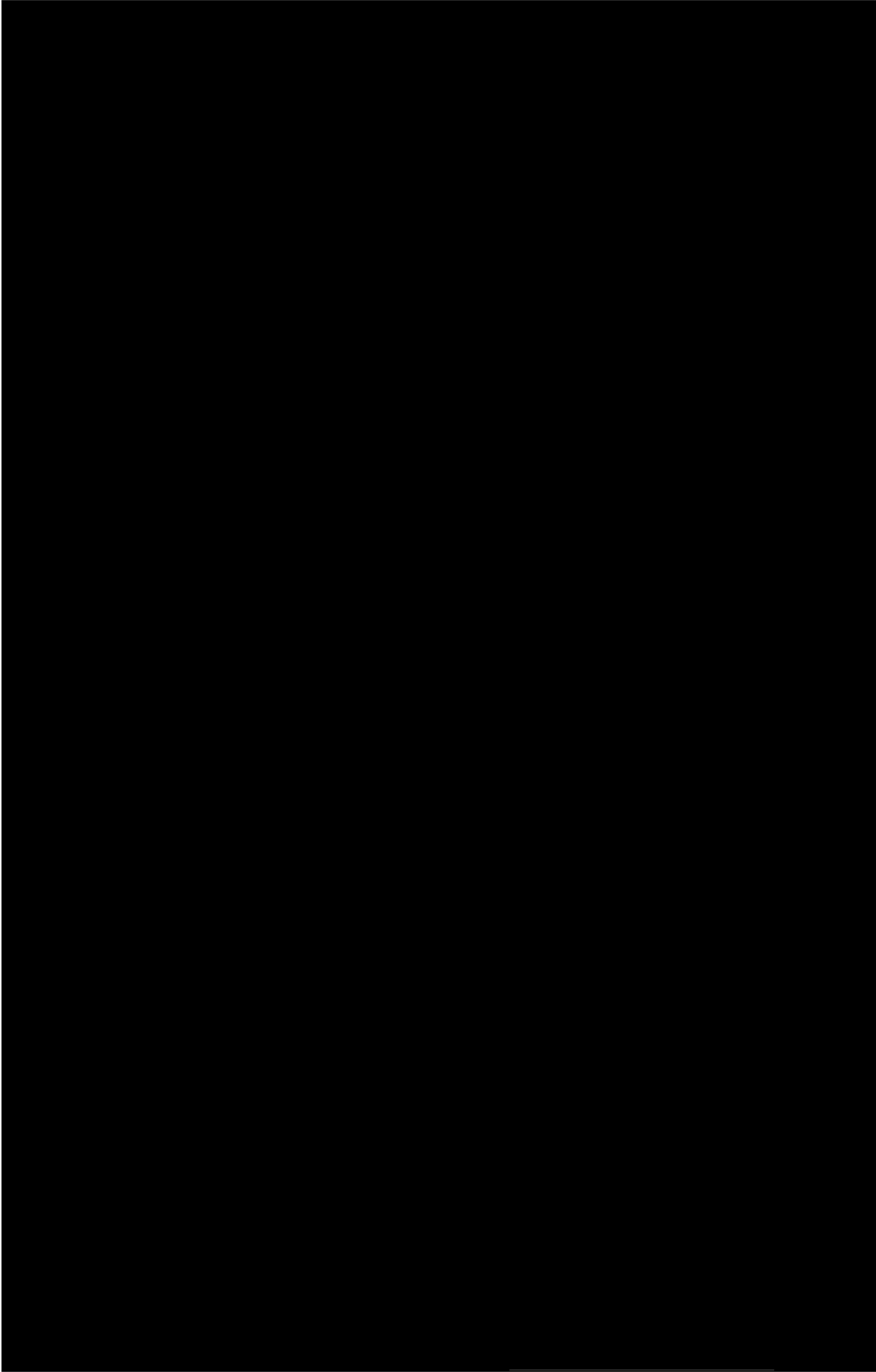
10.8



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10.9

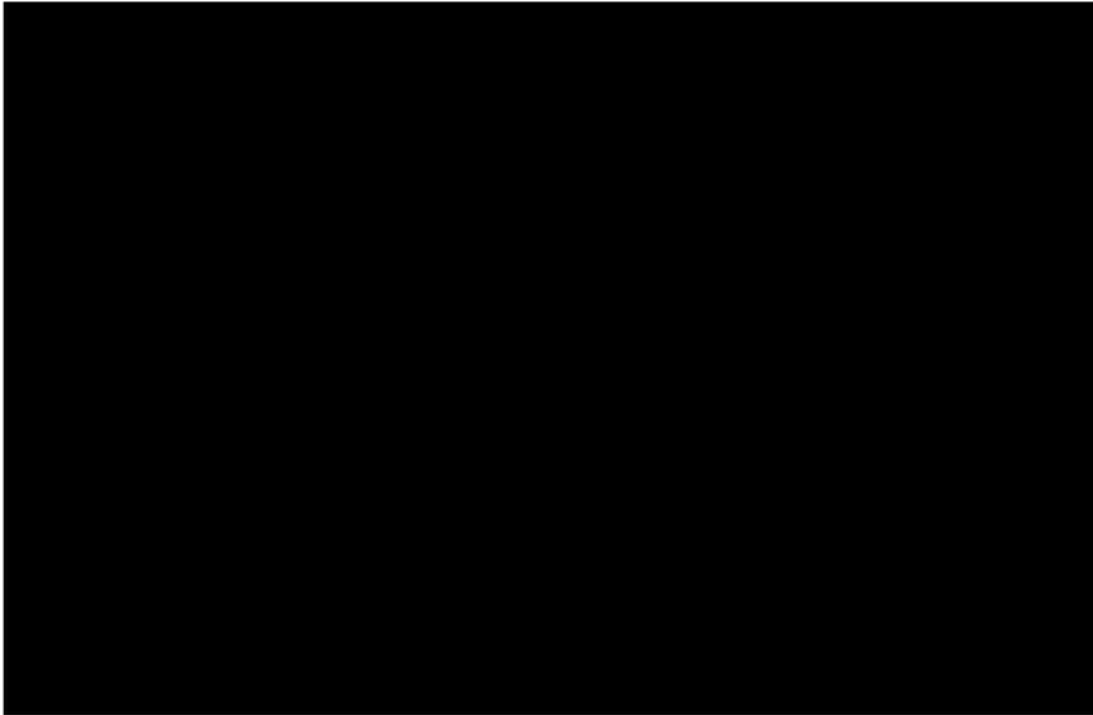
10.10



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10.11

10.12

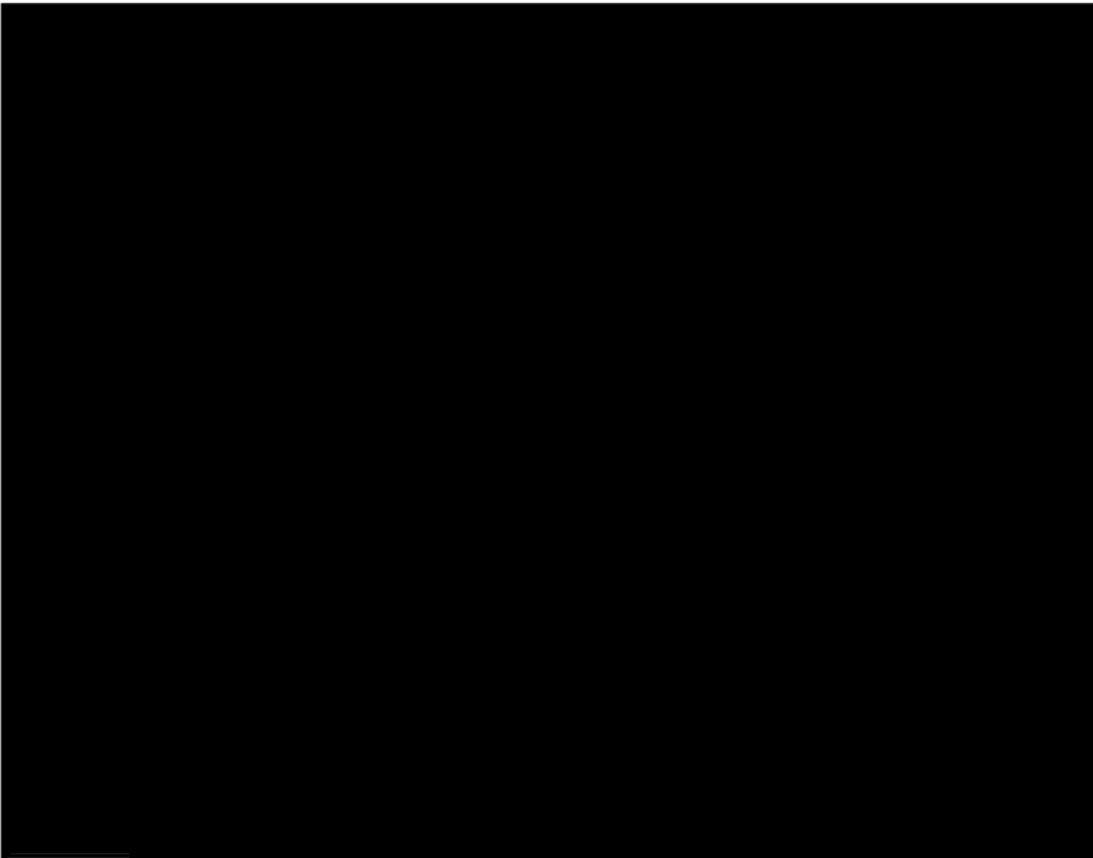


11. POWER FAILURE (Loss of Power / Black-Out Procedure)

11.1

11.2

11.3



Crown Reviewed 12 October 2020

