



Standard Operating Procedures

Cheque Cashing & Credit Facilities

(Incorporating Debt Collection and the Discharge
of Patron Debts)

Version 165.0



**Cheque Cashing & Credit Facilities
(Incorporating Debt Collection and the Discharge of Patron Debts)**

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1. Definitions

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

'Appropriate Identification' means the prescribed customer identification procedure required under the **Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)**.

'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. At a minimum, this form will allow for the following information to be recorded:

(a) ~~(a)~~—Category of the applicant i.e. International or Domestic (note that a Credit Facility is not permitted for a Domestic Patron);

(b) ~~(b)~~—Applicant details including: full name, residential address and contact details;

(c) ~~(c)~~—Applicant Cheque Account details including: bank name, branch name, branch address, cheque account name, BSB and Account Number (trust cheque accounts not permitted);

(d) ~~(d)~~—Facilities held at other casinos by the applicant;

(e) ~~(e)~~—Facility limit requested;

(f) ~~(f)~~—Applicant signature and date;

(g) ~~(g)~~—Amount the facility is approved for and date of approval;

(h) ~~(h)~~—Authorising signatures, including ID Number;

(i) ~~(i)~~—Type/s of Identification presented and relevant details; and

(j) ~~(j)~~—All relevant Terms and Conditions.

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



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a minimum, this form will allow for the following information to be recorded:

- (a) ~~(a)~~ Patron number and date of request;
- (b) ~~(b)~~ Applicant details including: title and name;
- (c) ~~(c)~~ ~~(e)~~ Revised limit details including: current limit, new limit, restricted facility, permanent or TTO;
- (d) ~~(d)~~ Applicant signature and date;
- (e) ~~(e)~~ Authorising signatures; and
- (f) ~~(f)~~ All relevant Terms and Conditions.

‘Appropriate ID’ means the prescribed customer identification as defined under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth).

‘Approval Matrix’ means a list of personnel who have authorisation to approve Cheque Cashing Facilities and Credit Facilities (both permanent, TTO’s and restricted).

‘Cage Management’ means a person qualified to perform the functions of a Cage Area Manager (or above).

‘Central Credit’ means ‘Central Credit LLC’ which is an International Gaming Bureau based in Las Vegas. Casinos worldwide subscribe to Central Credit to source credit information to ascertain the suitability of patrons requesting a Cheque Cashing Facility or Credit Facility.

‘CEO’ means Chief Executive Officer.

‘CFO’ means Chief Financial Officer.

‘COO’ means Chief Operating Officer.

‘Cheque Cashing Facility (CCF)’ means a Facility, upon successful application, for the issuance of gaming chips in exchange for a cheque of an equal amount. When a cheque is accepted for a CCF, it must be banked in accordance with section 68 (7) of the Act.

‘Counter Cheque’ means a Crown issued, bankable document, which states the patron’s banking details. A Counter Cheque is used by the patron in place of their own cheque. The Counter Cheque must be signed by the patron and cannot be drawn from a Trust Account.



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‘Credit Control’ means the Crown department responsible for the processing, monitoring and maintenance of Cheque Cashing Facilities, Credit Facilities and debt collection.

‘Credit Facility’ means a form of credit available, upon successful application, by persons not ordinarily resident in Australia.

‘Credit Marker’ means a non-bankable instrument issued by Crown to a patron, which is used to indicate an amount owed to Crown by that patron.

‘Crown’ means Crown Melbourne Limited.

‘Debt’ means Gaming Debt.

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

‘Domestic Patron’ means a patron who is ordinarily a resident in Australia.

‘Executive Management’ means those positions as stipulated on the Cheque Cashing Facility and Credit Facility Approvals Matrix.

‘Facility’ means the Cheque Cashing or Credit Facility.

‘Gaming Debt’ means a dishonoured cheque or overdue Credit Marker.

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

Crown has adopted a Group AML/CTF Program in accordance with its obligations under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) and the *Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007* (No. 1).

‘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.

‘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.



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'[k]omment' means a comment placed in SYCO.

'**Partial Settlement**' means a settlement for only part of a Gaming Debt.

'**Patron Credit Profile**' means a summary of a patron's cheque cashing or credit history (including history at other Australian and International casinos) and relevant business information.

'**Premium Player**' means a player who is domiciled outside of Victoria and who signs a party to a Premium Player Program Agreement.

'**Restricted Facilities**' means a Cheque Cashing Facility or a Credit Facility which is restricted in use to, well known, high profile individuals known to Crown.

'**Returned Cheque and Outstanding Debt Report**' means reports listing all dishonoured cheques and overdue Gaming Debts.

'**SMS**' means short messaging service.

'**SYCO**' means Crown's Patron Management System.

'**TTO**' means This Trip Only.

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

1.2 For the purposes of these SOPs, a Junket Operator or an Introducer is deemed to be a junket organiser or promoter as set out in the definition of a Junket in the *Casino Control Act 1991* (Vic).

1.

2. **PATRON CHEQUE CASHING FACILITIES AND CREDIT FACILITIES**

2.1 **2.1** Patron Cheque Cashing Facilities and Credit Facilities

2.1.1 **2.1.1** Credit Facilities are only available to International Patrons participating in a Junket or Premium Player Program with Crown.

(a) **(a)** Once approved to operate a Credit Facility, patrons will be issued Credit Markers, in the currency that the patron's Junket or Premium Player Program is opened and which is available for customer transactions.

(b) **(b)** The credit period for a Credit Marker is normally twenty (20) banking days from the date of issuance,



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unless approval is given by Executive Management to extend or reduce this period.

~~2.1.2~~ ~~2.1.2~~ Patrons approved to operate a Cheque Cashing Facility and as applicable, a Credit Facility will (providing Appropriate ID has been provided) automatically qualify to operate a Crown Deposit Account as described in the Standard Operating Procedures for ~~Casino~~ Cage Operations.

~~2.1.3~~ ~~2.1.3~~ Patrons may operate their Cheque Cashing Facility by utilising a Crown Counter Cheque.

~~1.1.1~~ —

~~2.1.4~~ ~~2.1.4~~ Where an International Patron uses a personal or company cheque (cheques cannot be drawn from a Trust Account) or Counter Cheque, the cheque will be banked no later than twenty (20) banking days after issuance unless redeemed beforehand or approval is given by Executive Management to extend this period.

~~2.1.5~~ ~~2.1.5~~ Where a Domestic Patron uses a personal or company cheque (cheques cannot be drawn from a Trust Account) or Counter Cheque, the cheque will be banked no later than five (5) banking days after issuance unless redeemed beforehand or approval is given by Executive Management to extend this period.

~~2.1.6~~ ~~2.1.6~~ Verbal instructions received from a patron in relation to his/her ~~Cheque Cashing Facility or Credit~~ Facility may be acted upon, but must be documented via a file note or similar. For example, where telephone instructions are given by a Junket Operator to Crown whilst he or she is overseas, written confirmation will be forwarded by Crown to the Junket Operator.

~~1.1.2~~ —

~~2.1.7~~ ~~2.1.7~~ Patron Cheque Cashing Facility and Credit Facility files are maintained by Credit Control. Records of transactions and balances are maintained on the SYCO system.

~~2.2~~ ~~2.2~~ Initial Application for a Cheque Cashing Facility or Credit Facility

~~2.2.1~~ ~~2.2.1~~ When applying for a Cheque Cashing Facility or Credit Facility, a patron must submit an Application for Cheque Cashing Facility or Credit Facility

~~1.1.3~~ —

~~2.2.2~~ ~~2.2.2~~ Where available, copies of the following will be appended to the Application for Cheque Cashing Facility or Credit Facility:



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- ~~(a)~~ ~~(a)~~ — Passport;
- ~~(b)~~ ~~(b)~~ — Government issued ID Card;
- ~~(c)~~ ~~(c)~~ — Drivers Licence;
- ~~(d)~~ ~~(d)~~ — Business Card;
- ~~(e)~~ ~~(e)~~ — Personal or company cheque (cheques cannot be drawn from a Trust Account); or
- ~~(f)~~ ~~(f)~~ — Proof of residential address.

~~2.2.3~~ ~~2.2.3~~ Having consideration for the conditions of clause 2.3.4, once completed and signed, and relevant documents described in clause 2.2.2 appended, the Application for Cheque Cashing Facility or Credit Facility will be forwarded to Credit Control for processing.

~~2.3~~ ~~2.3~~ — Processing Applications for Cheque Cashing Facilities or Credit Facilities.

~~2.3.1~~ ~~2.3.1~~ Except as described in clause 2.3.4, Applications for Cheque Cashing Facility or Credit Facility both International and Domestic, are processed by Credit Control.

~~2.3.2~~ ~~2.3.2~~ Credit Control will prepare a Patron Credit Profile. The minimum requirements for inclusion in a Patron Credit Profile are:

- ~~(a)~~ ~~(a)~~ — For International Patrons - results of a Central Credit check must be obtained from Central Credit and details of the check included in the patron's file even where the patron has not indicated that a Cheque Cashing and/or Credit Facility is held at another casino; or
- ~~(b)~~ ~~(b)~~ — For Domestic Patrons – results of a domestic credit reference check.

A Patron Credit Profile may also include:

- ~~(a)~~ ~~(e)~~ — Results of other casino checks (both Australian and International);
- ~~(b)~~ ~~(d)~~ — Other credit reference checks; and
- ~~(c)~~ ~~(e)~~ — A recommendation from a Crown Marketing Office Manager.

~~2.3.3~~ ~~2.3.3~~ Once all relevant information has been obtained, the Patron Cheque Cashing Facility or Credit Facility file and/or



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the Patron Credit Profile will be forwarded to the relevant authoriser(s) for approval as set out in clause 3.1.

~~1.1.42.3.4~~ ~~2.3.4~~ From time to time, an Application for Cheque Cashing Facility or Credit Facility may be processed by the Casino Cage. A member of Cage Management will:

- ~~(a)~~ ~~(a)~~ Undertake the required Central Credit check and other casino checks, as applicable;
- ~~(b)~~ ~~(b)~~ Once the Central Credit Check has been completed, communicate the results of these checks to the authoriser(s); and
- ~~(c)~~ ~~(c)~~ Prepare and sign a Patron Credit Profile and forward it to Credit Control for inclusion in the patron's Cheque Cashing Facility and/or Credit Facility file.

~~2.4~~ ~~2.4~~ TTO Increases

~~2.4.1~~ ~~2.4.1~~ A TTO increase is a temporary Cheque Cashing Facility or Credit Facility limit increase, requested by a patron for a current visit.

~~2.4.2~~ ~~2.4.2~~ When applying for a TTO increase, an Application for a Cheque Cashing Facility or Credit Facility Limit Change will be prepared by Cage Management. Such applications will only be processed when completed and signed.

~~2.4.3~~ ~~2.4.3~~ A member of Cage Management must obtain the relevant approval from the authoriser(s) listed in the Approvals Matrix described in clause 3.1. Once approval has been obtained, the TTO increase will be entered into SYCO for the relevant period (i.e. number of days).

~~2.4.4~~ ~~2.4.4~~ A new Application for a Cheque Cashing Facility or Credit Facility Limit Change must be completed and signed each time a TTO increase is requested.

~~2.5~~ ~~2.5~~ Permanent Increases

~~2.5.1~~ ~~2.5.1~~ A patron may request a permanent increase in his/her Cheque Cashing Facility or Credit Facility.

~~2.5.2~~ ~~2.5.2~~ When applying for a permanent increase, the patron must submit, at a minimum, an Application for a Cheque Cashing Facility or Credit Facility Limit Change to Credit Control for processing.

~~2.5.3~~ ~~2.5.3~~ Permanent increases are processed in accordance with clause 2.3.

~~2.6~~ ~~2.6~~ Permanent Decrease/Cancellation



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~~2.6.1~~ ~~2.6.1~~—A patron's Cheque Cashing Facility or Credit Facility may be reduced or cancelled as deemed appropriate.

~~2.6.2~~ ~~2.6.2~~—Any reduction or cancellation of a patron's Cheque Cashing Facility or Credit Facility limit will be entered into SYCO in accordance with clause 3.5 and within two business days of the reduction or cancellation occurring.

~~2.6.3~~ ~~2.6.3~~—Instances where a patron's Cheque Cashing Facility or Credit Facility may be cancelled include, but are not limited to:

~~(a)~~ ~~(a)~~—Notification of dishonoured cheque;

~~(b)~~ ~~(b)~~—Overdue Credit Marker;

~~(c)~~ ~~(c)~~—Receipt of derogatory information; or

~~(d)~~ ~~(d)~~—Inactivity.

~~2.6.4~~ ~~2.6.4~~—A cancelled Cheque Cashing Facility or Credit Facility may only be reinstated by completing the procedures required for the establishment of an initial facility as described in clause 2.2.

~~2.7~~ ~~2.7~~—Suspension

~~2.7.1~~ ~~2.7.1~~—A patron's Cheque Cashing Facility or Credit Facility may be suspended as deemed appropriate.

~~2.7.2~~ ~~2.7.2~~—Cheque Cashing Facilities or Credit Facilities for International Patrons will be suspended after each visit. Suspended facilities may be reinstated, following a review of the relevant file. A Central Credit check will be undertaken where deemed appropriate.

~~3.~~ ~~3~~—APPROVALS - CHEQUE CASHING FACILITIES AND CREDIT FACILITIES

~~3.1~~ ~~3.1~~ Approval for initial Cheque Cashing Facilities and Credit Facilities, permanent increases and TTO increases must be authorised in accordance with the Approvals Matrix.

~~3.2~~ ~~3.2~~—Verbal, ~~or~~ SMS ~~or~~ email authorisation may be obtained from the authoriser(s) listed on the Approvals Matrix however, the signature(s) of the authoriser(s) must be obtained as soon as practical after the verbal, ~~or~~ SMS ~~or~~ email approval, is received.

~~3.3~~ ~~3.3~~—Each category of signatory listed on the Approvals Matrix may be substituted by an employee 'acting' in that position during periods of absence.



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~~3.4~~ ~~3.4~~—Approvals for TTO increases must not exceed more than 50% of the authoriser(s) maximum Cheque Cashing/Credit Facility approval limit as described in the Approvals Matrix.

~~3.5~~ ~~3.5~~—Once approval has been obtained from the relevant authoriser(s), the Cheque Cashing Facility or Credit Facility limit will be entered into SYCO, together with the licence number of the authoriser(s).

~~3.6~~ ~~3.6~~—Only Credit Control personnel and members of Cage Management have the authorisation to enter Cheque Cashing Facility and Credit Facility limits into SYCO.

~~3.7~~ ~~3.7~~—The Approvals Matrix is approved by the CEO - Australian Resorts or his/her delegate when the CEO is not available.

~~3.8~~ ~~3.8~~—A current copy of the Approvals Matrix will be provided to the VCGLR as requested.

~~4.~~ ~~4~~—**CHEQUE CASHING FACILITIES AND CREDIT FACILITIES MAINTENANCE AND REVIEW**

~~4.1~~ ~~4.1~~—Cheque Cashing Facility Maintenance Report

~~4.1.1~~ ~~4.1.1~~—Credit Control will generate the Cheque Cashing Facility Maintenance Report on a daily basis. This report verifies that all Cheque Cashing and Credit Limit changes have been approved and that the relevant documentation has been received, where necessary.

~~4.2~~ ~~4.2~~—Patron Stop Code Activity Report

~~4.2.1~~ ~~4.2.1~~—Credit Control will run the Patron Stop Code Activity Report to review Stop Codes added or deleted on patron's SYCO files.

~~5.~~ ~~5~~—**GAMING DEBT COLLECTION**

~~5.1~~ ~~5.1~~—Cheque Dishonours

When advised of a dishonoured patron cheque by Crown's bank or Agent, Credit Control will:

~~5.1.1~~ ~~5.1.1~~—Place a [k]omment on the patron's SYCO file;

~~5.1.2~~ ~~5.1.2~~—Where applicable suspend or cancel the patron's Cheque Cashing Facility and/or Credit Facility;

~~5.1.3~~ ~~5.1.3~~—Place a copy of the dishonour notice along with a file note on the patron's file;

~~5.1.4~~ ~~5.1.4~~—Advise Executive Management of the dishonour, where necessary; and



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5.1.5 5.1.5 After updating SYCO accordingly, forward the notification to the Casino Cage.

5.2 ~~5.2~~ Follow-Up of Gaming Debts





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6. ~~6~~ — RELEASE OR DISCHARGE OF A GAMING DEBT

6.1 ~~6.1~~ — Release or Discharge of a Gaming Debt

6.1.1 ~~6.1.1~~ As provided in section 68(2) of the *Casino Control Act 1991* (Vic) Crown or its Agents are not permitted to wholly or partly release or discharge a Gaming Debt without approval from the VCGLR. The VCGLR have granted approval for Crown to discharge patron's debts of [REDACTED] or less, in accordance with the procedure outlined in clause 6.1.5 of these SOPs.

6.1.2 ~~6.1.2~~ Records relating to all discharged Debts must be retained in accordance with the Internal Control Statement for Cheque Cashing and Credit Facilities (incorporating Debt Collection and the Discharge of Patron Debts).





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7. 7 RESTRICTED FACILITIES

7.1 7.4 A Restricted Facility may be used in instances where a patron is either known to, or referred to Crown and where Executive Management considers that the full application details described in procedure 2 are not required.

7.2 7.2 A Restricted Credit Facility is only available to patrons who do not ordinarily reside in Australia and who participate in a Premium Player arrangement with Crown.

4.2 7.3 To open a Restricted Facility, the minimum requirement is an Application for a Cheque Cashing Facility or Credit Facility signed by the patron.

7.3

7.4 7.4 Each transaction issued under the Restricted Facility will be recorded on an Application for a Cheque Cashing Facility or Credit Facility Limit Change as applicable, and will be signed by the approved authoriser(s) in accordance with clause 3.1.

8. 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:

8.1 ~~Each Business Unit~~ VIP International is responsible for updating their:

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

8.2 Customer Risk

8.2.1 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.

8.2.2 In the absence of any heightened risk attributes each Customer shall be initially deemed by Crown to be of



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'Standard Risk'. A 'Standard Risk' Customer may be assessed as:

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

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



8.3 AML/CTF Employee Due Diligence

8.3.1 ~~The Business Unit~~ VIP International General Managers ~~is~~ are 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.

8.4 AML/CTF Risk Awareness Training Program

8.4.1 All ~~Crown~~ VIP International 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.

8.4.2 Each relevant ~~VIP International Business Unit~~ Manager 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.



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8.4.3 Each Business UnitVIP International 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.

8.4.4 Risk Awareness Training will encompass the obligations of VIP InternationalCrown 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 Crown EntitiesVIP International might face; and
- (g) potential consequences of such risk.

8.4.5 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;

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

8.4.7 targeted business-unitVIP International specific AML/CTF training as required; and

8.4.8 remedial training as required.

8.5 Unusual Activity Report (UAR)



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8.5.1 Where a Credit Control 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.

8.5.2 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.

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



8.5.4 When a Credit Control employee notices Unusual Activity, they will notify a Credit Control Supervisor (or above).

8.5.5 The Credit Control 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.

8.6 Tipping Off

8.6.1 All Crown 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;



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- (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.

8.6.2 Disclosing this information is an offence under the Act.

8.7 Transaction Monitoring

8.7.1

8.7.2

8.7.3

8.8 IFTIs

8.8.1 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.

8.8.2 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.

8.8.3 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.



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8.8.4 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.

8.9 Enhanced Customer Due Diligence

8.9.1 Upon request from the AML Team, VIP Internationalthe patron's relevant business unit 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.

8.9.2 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.

8.9.3 VIP International staff (as applicable) 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.

8.10 Risk Management: Monitoring and Reporting

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

- (a) VIP International Senior Management (and delegates) 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.

8.11 Record Keeping



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8.11.1 Where the records relate to providing a Designated Service to a Customer, Crown must retain:

- (a) records of the transaction; or
- (b) copies of the records that it creates; or
- (c) extracts from the records

for seven years after making the record.

8.11.2 Where a Customer provides documents to Crown relating to the provision of Designated Services, Crown must retain:

- (a) records of the documents; or
- (b) copies of the records that it creates; or
- (c) extracts from the records

for seven years after making the record.

8.11.3 When Crown carries out a customer identification procedure (KYC) it must make and keep a record of:

- (a) what procedures it undertook to identify the Customer; and
- (b) the identifying information the Customer presented

for seven years after making the record.

8.11.4 Crown does not have 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.

- (a) However, if the Crown does take copies, they become records it must keep.
- (b) If it collects new customer information about a Customer, it must still keep the original customer identification procedure records.

8.11.5 If Crown use the Document Verification Service (DVS) as part of its applicable customer identification procedures, it must keep a record of the results for seven years after making the record.



Cheque Cashing & Credit Facilities
(Incorporating Debt Collection and the Discharge of Patron Debts)
