

**SCHEDULE  
MONEY LAUNDERING PREVENTION  
EXAMINERS CHECKLIST**

Name of Licence Holder: \_\_\_\_\_

Interactive Gaming Licence: \_\_\_\_\_ Interactive Wagering Licence: \_\_\_\_\_

**LICENCE APPLICATION**

**Yes No**

- 1 You are required to review the information given on the Licence Application and Renewal forms. Is it correct to say that your review showed that no false or misleading information had been given?

If no, give details:

**MANAGEMENT REPORTS**

- 2 Did you write a report to management highlighting any inadequacies in their:
- |                                  |                          |                          |
|----------------------------------|--------------------------|--------------------------|
| Accounting                       | <input type="checkbox"/> | <input type="checkbox"/> |
| Client Acceptance                | <input type="checkbox"/> | <input type="checkbox"/> |
| Anti-money laundering procedures | <input type="checkbox"/> | <input type="checkbox"/> |
- 3 Did management respond to that report?
- 4 Is management taking adequate steps to correct these inadequacies?

Indicate the extent to which your recommendations have been met.

Identify the aspects still to be met.

- 5 Was a timeframe set for this?    
Give Details.

- 6 Have you attached a copy of the:  
Management Report    
Response    
Timeframe

### **KNOW YOUR CUSTOMER**

- 7 Does the operation have an adequate 'know your customer' procedure?

Describe the procedures.

Indicate the extent to which the procedures are inadequate and *planned* measures to reach an acceptable standard.

- 8 Is this applied to all customers?

- 9 Is this applied to larger customers only? Give details:

- 10 Do the procedures include – confirmation of identity?    
11 - Nationality    
12 - Confirmation of Age    
13 - Character references

- 14 Are addresses verified for credit card transactions?

### **ACCOUNTING**

- 15 Are the books and accounting records kept in a satisfactory manner by suitably qualified personnel?

Indicate extent to which they are:

Indicate the extent to which the procedures are inadequate and the planned measures to reach an acceptable standard.

16 Are management accounts records kept up to date?

Indicate extent to which they are kept:

Indicate the extent to which the procedures are inadequate and the planned measures to reach an acceptable standard.

17 Are management accounts produced on a regular basis?

Give details of timeliness.

18 Are Annual Financial Statements produced?

Give details of timeliness.

19 Are the Accounts audited?

20 Are you satisfied that the assets are fairly stated and proper provisions have been made for any diminution in value?

If no, explain.

- 21 Are you satisfied that the accounting system is set up so that all liabilities are properly recorded?

If no, explain.

- 22 Are you satisfied that the operation is solvent and able to meet its liabilities?

If no, explain.

- 23 Does the company set limits on wagers?

Give details.

- 24 If large wagers are made, does the operation have a system for laying off bets to control potential high losses?

If no, explain.

- 25 Are you satisfied that management has this aspect under control?

If no, explain.

- 26 Was the operation always able to pay winnings?

If no, explain.

27 Are records of transactions kept for at least 6 years?

 

**SUSPICIOUS ACTIVITY**

28 Are the steps taken to prevent money-laundering adequate?

 

Describe the procedures.

Indicate the extent to which the procedures are inadequate and the planned measures to reach an acceptable standard.

29 Are employees trained to recognize suspicious transactions?

 

Describe the training.

Indicate the extent to which the program is inadequate and the planned measures to reach an acceptable standard.

30 In there a procedure in place to report suspicious transactions?

Describe the procedure.

Indicate the extent to which the procedure is inadequate and the planned measures to reach an acceptable standard.

31 Are large transactions with minimum gambling reported?    
If no, explain.

32 Is gambling on both sides of an even bet by same player reported as a suspicious activity?

33 Are unusual deposits and withdrawal patterns monitored?

Describe the procedure.

34 Are counterfeit checks or attempted use of fraudulent credit cards reported?

If no, explain.

35 Are long term large credit balances on accounts monitored?

 

Describe the procedure.

36 Are the reasons for such balances established?

 

Describe the procedure.

Indicate the extent to which the procedure is inadequate and the planned measures to reach an acceptable standard.

37 In case of the substantial deposits, are there procedures for establishing the source of funds?

 

Describe the procedure.

Indicate the extent to which the procedure is inadequate and the planned measures to reach an acceptable standard.

38 Is a player restricted from having multiple credit or deposit accounts?

39 Is there a limit on maximum deposits?

 

Describe the policy.

40 Are cash deposits banned?

 

If no, give details.

41 Do you prohibit third party payments?

 

If no, give details.

42 Are payouts over \$25,000 reported to the Gaming Authority?

 

If no, give details

43 Are payouts always either to the same source that deposits were made from or mailed to the player at the account address?

 

If no, give details



## GENERAL

- 44 Is the client fully familiar with the requirements of the Interactive Gaming and Wagering regulations and the anti-money laundering legislation?
- 45 Is your client aware of the penalties under the Act for making a false statement?
- 46 Does the company screen its prospective employees to ensure that nobody with a criminal record is hired?

Describe the procedure

Indicate the extent to which the procedure is inadequate and the planned measures to reach an acceptable standard

- 47 Does the company employ a compliances officer whose function is to ensure the company is compliant with anti-money laundering legislation?

Describe the procedure.

Indicate the extent to which the procedure is inadequate and planned measures to reach an acceptable standard

- 48 Does the company take steps to ensure that employees are kept abreast of new developments and requirements under changes to legislation and regulations?

Describe the procedure.

49 Are employees kept abreast of new money laundering techniques, methods and trends?

 

Describe the procedure.

Indicate the extent to which the procedure is inadequate and the planned measures to reach an acceptable standard.