

Club Grandviews – Responsible Gaming Policy

1. Independent Review (October 2024)

An independent review of Club Grandviews' AML/CTF Program was conducted by Rathmore Group in October 2024. The review assessed effectiveness, compliance, implementation, and adherence.

Findings:

- Risk Assessment: Conducted by Barringtons in Nov 2024, approved by the Board.
- Program Approval: Board adopted current program in Nov 2024.
- Compliance Officer: Nathan Buhagiar (GM) appointed, with trained deputy available.
- Employee Due Diligence: Checks completed for staff.
- Training: Staff, Directors, and managers completed AML/CTF awareness training.
- Customer Due Diligence (CDD): Active program with transaction monitoring and enhanced checks.
- Reporting: SMRs, compliance reports, and AUSTRAC enrolment updates in place.
- AUSTRAC Feedback & Reviews: Procedures defined; last review Oct 2024.

Conclusion: Program complies with AML/CTF rules and is effectively implemented. Board must now formally adopt review and action recommendations.

2. AML/CTF Program (October 2024)

Prepared by Barringtons, the program outlines compliance with the AML/CTF Act (2006).

Part A – Core Program:

- Risk Assessment: Regular reviews required for new services/technologies.
- Compliance Officer: Nathan Buhagiar (GM), Board-approved.
- Employee Due Diligence: ID, reference, criminal and financial checks.
- Training: Induction, annual refreshers, Board/manager training.
- Ongoing CDD: Entry ID checks, transaction monitoring, enhanced CDD for high-risk customers.
- Reporting: SMRs filed within 24hrs (terrorism) or 3 days (ML/TF suspicions).
- Tipping Off: Explicitly prohibited.
- Oversight: AML/CTF is a standing Board agenda item; independent annual review required.

Part B – KYC & Records:

- Minimum KYC: Name, address, DOB, verified against ID.
- PEPs: Enhanced CDD mandatory.
- Records: Retained for 7 years, including program versions and customer details.

3. ML/TF Risk Assessment (October 2024)

Conducted by Barrington Corporate Risk, this review assessed inherent risks, controls, and treatments.

Operating Environment:

- Sole venue at Peakhurst with \$1.4m annual gaming revenue.
- Uses Ebet system with cashless capability.
- Georges River LGA records lower-than-average crime rates.
- Open daily, extended hours on weekends.

Key ML/TF Risks Identified:

1. Cash-in with minimal play and cash-out via cheque/EFT.
2. Purchasing credits/winnings from legitimate players.
3. Requests for payments to third parties.
4. Refusal or provision of false ID.
5. Regular large cash deposits.
6. Customers gambling beyond expected means.
7. Acting on behalf of third parties.
8. Structuring withdrawals below thresholds.

Controls in Place: Staff patrols, CCTV, transaction monitoring, training, reporting procedures.

Recommendations: Regular CCTV reviews, consider facial recognition, enhance data-driven monitoring, educate customers to report suspicious behaviour.

Conclusion

Club Grandviews has a robust AML/CTF compliance framework. The independent review confirms compliance and effectiveness, while the program and risk assessment outline strong governance and operational controls.