

1 ENSURE YOUR AML/CTF PROGRAM IS TAILORED TO YOUR BUSINESS

AUSTRAC finds that many gaming machine venues take a 'one-size fits all' approach to identifying and managing money laundering risks.

However, every pub and club is different. The money laundering risks your venue faces and the ways you can respond are not the same as other venues. It is important that you have an anti-money laundering and counter-terrorism financing (AML/CTF) program tailored specifically for your business.

5 MAINTAIN ACCURATE, ELECTRONIC RECORDS OF TRANSACTIONS

You should ensure you maintain accurate records of transactions related to the designated services you provide.

AUSTRAC recommends that these records are kept electronically—for example, keeping your cheque register in a database/spreadsheet.

This makes monitoring transactions under your transaction monitoring program easier and helps you to meet your record-keeping obligations under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006*.



4 KEEP YOUR ENROLMENT DETAILS UP-TO-DATE

By keeping your enrolment details up-to-date, you will ensure you get useful publications and reminders to submit your annual compliance report. It is a legal obligation to update your enrolment details with AUSTRAC **within 14 days** of any changes occurring.

You can check and update your enrolment details by accessing the AUSTRAC website and going to AUSTRAC Online (<https://online.austrac.gov.au/ao/login.seam>). Details you should check and update include your business name, address, contact details, designated services, and the number of gaming machine entitlements you hold.

2 REPORT CUSTOMERS WHO RECEIVE A HIGH NUMBER OF GAMING PAYOUTS

Money laundering may occur even when a customer plays all of the money they deposit. It is critical that you have a transaction monitoring program that can capture this form of money laundering.

Many pubs and clubs have found it useful to report to AUSTRAC whenever a customer receives a high number of cheque payouts over a certain period. If you report this, the process should be included in the transaction monitoring program section of your AML/CTF program.

3 MONITOR YOUR VENUE FOR SUSPICIOUS ACTIVITY

To protect your business from money laundering, you should constantly monitor your venue for suspicious activity. This includes looking out for customers who are:

- buying winning tickets/cheques
- asking for cheques to be written in someone else's name
- regularly bringing very large amounts of cash to gamble and/or have very high turnover.

These are just some examples of many types of suspicious behaviour. If a customer shows these behaviours, you should consider submitting a suspicious matter report to AUSTRAC.