

Anti-Money Laundering Policy

INTRODUCTION

[Premier Casino] has a proven track record in safeguarding gaming businesses against criminal misuse and has implemented extensive anti-fraud and anti-money laundering processes, procedures, and staff training programs.

OBJECTIVES

Our AML policy objectives include:

- **Preventing Money Laundering:** We are committed to preventing and detecting money laundering activities within our operations.
- **Compliance Framework:** Establishing a robust AML compliance framework that ensures strict adherence to all applicable AML laws and regulations.
- **Training and Awareness:** Providing ongoing training to our employees to ensure a high level of awareness and competence in AML procedures.

RISK ASSESSMENT

This section outlines our processes for identifying and assessing money laundering risks, including:

- **Risk Identification:** Proactive methods for identifying and categorizing AML risks.
- **Risk Assessment:** Procedures for evaluating the likelihood and impact of identified AML risks within our operations.
- **Customer Due Diligence:** Thorough customer due diligence protocols to identify and verify customer identities, including an understanding of money laundering indicators.

AML COMPLIANCE FRAMEWORK

We describe the framework in place to ensure AML compliance, including:

- **Legal and Regulatory Requirements:** An overview of the relevant laws and regulations that apply to our casino group's AML efforts, particularly the Proceeds of Crime Act and Money Laundering indicators.
- **Compliance Roles and Responsibilities:** Clear assignment of roles and responsibilities for employees involved in AML compliance.
- **AML Monitoring:** Procedures for continuous monitoring of AML compliance, including transaction monitoring.
- **Suspicious Activity Reporting:** Protocols for reporting and addressing suspicious activities, with the MLRO responsible for submitting Suspicious Activity Reports.

- **'Know Your Customer' Policy:** Implementation of a comprehensive 'Know Your Customer' policy where applicable, which includes the thorough verification of patrons and requests for documents where criteria cannot be satisfied.
- **Thresholds and Velocities:** Setting thresholds/velocities for withdrawals and transactions, and the requirement for checks and approval for large transactions.
- **Enhanced Due Diligence:** Establishment of industry-accepted standards that trigger Enhanced Due Diligence, requiring further information for specific transactions.

SECURITY AND MONITORING

Our company implements measures and procedures to ensure security and safety, including:

- **Physical Security:** Maintaining a strong physical presence with well-trained security personnel and surveillance systems throughout our casino premises.
- **Record Keeping:** We keep records of surveillance footage and maintain these records in compliance with applicable laws and regulations. These records may be reviewed as needed to investigate any incidents or concerns.
- **Incident Reporting:** Our employees are trained to report any suspicious activity.
- **Access Control:** Access to sensitive areas and information are restricted to authorized personnel. This ensures that unauthorized individuals cannot interfere with operations.
- **Data Protection:** We maintain the security of physical records, including customer information, to prevent unauthorized access.

RESPONSIBLE RELATIONSHIPS

In our commitment to providing a secure and enjoyable gaming environment, we publish General Rules and Terms and Conditions that prioritize customer safety, the security of betting, and operational compliance. This includes:

- **Staff Training:** Appropriate training and escalation procedures for staff in cases of security concerns. Our employees are trained to respond effectively to security-related incidents, ensuring the safety of our patrons and the integrity of our operations.
- **Patron Education:** We believe in educating our patrons about responsible gaming practices, promoting safe and enjoyable gaming experiences.
- **Relationships:** We maintain transparent and compliant relationships with partners and vendors to uphold the highest standards of integrity and trustworthiness.