

Keep it clean

Anti-money laundering checklist

Working in a gaming venue requires you to be alert to the possibility of money laundering. This includes understanding the key warning signs, and what to do if you detect any warning signs of money laundering in your venue.

All gaming venue staff must act honestly, cooperate with the VGCCC and actively prevent criminal influence or exploitation, including money laundering, while working in a gaming venue.

The following checklist will help you to assess if you are ready to detect and report money laundering in your gaming venue.

Complete this checklist and act on your anti-money laundering and counter terrorism financing (AML/CTF) obligations.

Read and display the [Keep it Clean poster](#) in your staff area.

AML basics	Yes	No	Action
I know what money laundering and terrorism financing (ML/TF) are.	☐	☐	Ensure you're up to date with your AML/CTF risk awareness training. You are required to complete this as part of your gaming venue's AML/CTF program.
I understand the harm of ML/TF, and why it is important to prevent these activities.	☐	☐	Ensure you're up to date with your AML/CTF risk awareness training. You are required to complete this as part of your gaming venue's AML/CTF program.
I know who the AML/CTF compliance officer is at my gaming venue.	☐	☐	Ask your manager who the AML/CTF compliance officer is, ensure you know how to contact them to escalate any concerns.
I understand the key ML/TF risks at our gaming venue, and how someone may launder money through our electronic gaming machines.	☐	☐	Read page 25 of the AUSTRAC Regulatory Guide 'possible indicators of suspicious activity for pubs and clubs', and any additional ML/TF risks your venue has identified.

Patron behaviour	Yes	No	Action
I am aware of the types of patron and customer behaviour that may be considered suspicious and display the signs of ML/TF, and monitor all people in the gaming venue with this in mind.	☐	☐	Read page 25 of the AUSTRAC Regulatory Guide and familiarise yourself with suspicious patron behaviours.
I actively observe people loitering without playing, exchanging large	☐	☐	Read page 25 of the AUSTRAC Regulatory Guide and familiarise

volumes of cash, or trying to buy other patron's tickets or credits.			yourself with suspicious patron behaviours.
I check that patrons are not using false identification when seeking the payment of winnings, and ensure that the identification matches the patron.	☐	☐	Put up this poster from AUSTRAC in your back office to ensure that suspicious player-behaviour is top of mind.
I understand that a player who places a significant amount of money into an EGM, without any evident game play or wins, may be a sign of money laundering.	☐	☐	Put up this poster from AUSTRAC in your back office to ensure that suspicious player-behaviour is top of mind.
I familiarise myself with patrons, and note any sudden large increases in gambling activity which are inconsistent with their profile.	☐	☐	Put up this poster from AUSTRAC in your back office to ensure that suspicious player-behaviour is top of mind.

Reporting	Yes	No	Action
I know who at my venue to report unusual ML/TF behaviours and suspicious activities to.	☐	☐	Know how to contact your AML/CTF compliance officer, as well as the types of matters to escalate to them.
I know not to tell anyone if I have escalated suspicions to our AML/CT Compliance Officer.	☐	☐	Read page 26 and 27 of the AUSTRAC Regulatory Guide

If you have any concerns about patron behaviour at your venue, contact your compliance officer. You can also contact the VGCCC on 1300 599 759 or contact@vgccc.vic.gov.au