



Australian Government
AUSTRAC

FIGHTING
FINANCIAL
CRIME
TOGETHER

AML/CTF tips for
PUBS AND CLUBS
with gaming machines

Understand your responsibilities around gaming machines. Protect your business and know the signs of financial crime.



Help protect your business from money laundering and terrorism financing

TAILOR AN AML/CTF PROGRAM TO SUIT YOUR BUSINESS



It's important gaming machine venues don't take a one size fits all approach to identifying and managing risk. You must have an anti-money laundering and counter-terrorism financing (AML/CTF) program tailored to your business.

MONITOR CUSTOMERS WHO RECEIVE A HIGH NUMBER OF GAMING PAYOUTS



It's critical for gaming machine venues to have a transaction monitoring program that identifies unusual activity such as customers who receive a high number of payouts without gambling.

MONITOR YOUR VENUE FOR SUSPICIOUS ACTIVITY



Be on the lookout for unusual activity, including customers who are:

- attempting to buy winning tickets from other patrons
- patrons with no known relationship sharing funds
- asking for cheques or EFTs to be written in someone else's name, or
- regularly gambling large amounts of cash and/or have very high turnover.

For a list of indicators of suspicious activity for pubs and clubs visit austrac.gov.au/pubsandclubs.

KEEP YOUR ENROLMENT DETAILS UP-TO-DATE



You have a legal obligation to provide your current contact details to AUSTRAC. This will ensure you receive useful publications and reminders to submit your annual compliance report.

MAINTAIN ACCURATE RECORDS



Maintaining accurate records of transactions helps you to meet your record-keeping obligations under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006*.

Criminals target pubs and clubs to launder the proceeds of crime

There are things you can do to protect your business and the community from serious and organised crime. If you see any of these behaviours of concern, it does not automatically mean your customer is breaking the law. But it is a red flag, and you should look out for it, manage it, and consider reporting it.

Remember, you can ask questions and do extra checks without tipping off the customer.



Be aware

Be aware: Are you seeing something that doesn't seem right? It may involve a regular or new customer.



Be alert

Be alert: Every staff member should be able to recognise suspicious behaviour.



Take action

Take action: Conduct additional Know Your Customer checks, increase your monitoring, review transactions, and submit a suspicious matter report (SMR) to AUSTRAC when required.

SMRs are an important obligation for pubs and clubs with gaming machines. Submit within 24 hours if you suspect terrorism financing, and within 3 business days for all other matters. Tips on how to report SMRs effectively are available on AUSTRAC's website. If you become suspicious about a customer, you must submit a SMR to AUSTRAC, even if you have already advised other agencies.

Understand the myths and facts relating to money laundering and terrorism financing

MYTH	VS	FACT
Pubs and clubs are low risk for money laundering.		Criminals use gaming machines to launder drug money, funds from other serious crimes, and to avoid tax.
Regular customers are unlikely to be money launderers.		Criminals may exploit the trust of patrons and staff to avoid detection.
Customers who both win and lose money are unlikely to be money launderers.		Criminals may be willing to lose some money as a cost of laundering their money.
My business will get into trouble if I report to AUSTRAC.		Reporting shows you take your responsibilities seriously. All reports to AUSTRAC are confidential.
Nothing will happen with the SMR submitted to AUSTRAC.		Every report is important to prevent, detect and disrupt financial criminal abuse.

AUSTRAC is responsible for detecting and preventing abuse of the financial system to protect the community from serious and organised crime. Criminals target businesses that don't safeguard against money laundering, and misuse gaming machines to clean illicit funds. You should have a thorough understanding of your AML/CTF obligations.