



# **AML/CTF Policy Template**

## Key Information

**Approving Official(s):**

Senior administrator(s) responsible for approving the policy.

**Responsible Office:**

Office responsible for policy dissemination, updates, and reviews.

**Effective Date:**

Month, day, and year the policy (or revision) takes effect.

**Next Review Date:**

Month, day, and year for the initial or next scheduled review. New policies or major revisions should be reviewed within one year; subsequent reviews should occur at least once every three years.

## 1. Policy Statement

A clear and concise statement of the Company's intent regarding the policy's subject matter, including its scope and applicability.

## 2. Purpose

Explain the rationale for the policy, including any legal, regulatory, or business requirements it addresses.

## 3. Audience

Identify the stakeholders affected by the policy, such as "All employees," "Subcontractors," or "Third-party suppliers."

## 4. Definitions

Define key terms with specialized meanings relevant to the policy.

## 5. Policy Implementation

Outline how the policy will be carried out, including key responsibilities and any necessary procedures. Use subheadings for clarity. If procedures are documented separately, specify the responsible department for oversight.

### 5.1 Business Risk Assessment

Outline business risk assessment carried out to identify the ML/TF risks the operator is exposed to and ensure that the policies, controls and procedures adopted are adequate to prevent and mitigate those risks. The risk assessment should address the ways in which the casino's products and services could be used to launder money, finance terrorism and finance proliferation, and the extent of the risk that this will happen.

### 5.2 Customer Risk Assessment

The Customer Risk Assessment will assess the particular risks the casino will be exposed to when providing its services or products to players. The information collected to draw up the CRA will formulate the customer's risk profile. The customer specific risk assessment must be carried out during establishing a business relationship.

### 5.3 Customer Acceptance Policy

Based on the CRA, the proper level of CDD can then be applied as stipulated in the Customer Acceptance Policy (CAP). When drawing up its CAP the casino must comply with its obligations regarding Politically Exposed Persons (PEP) and Sanctions Screening.

### 5.4 Customer Due diligence

Describe which measures are used for customer due diligence including PEP and sanction screening. Including the process of freezing of funds and reporting to Curacao authorities.

### 5.5 Ongoing Monitoring

Describe the measures employed for ongoing monitoring of customers identity and transactions.

### 5.6 Reliance on third parties to perform customer due diligence.

Describe if the operator relies on third parties for CDD and how that is arranged.

### 5.7 Reporting of unusual transactions

Describe the process in place to recognize and report unusual transactions to the Curacao FIU.

### 5.8 Anti-Money Laundering Compliance program

An AML program should be risk based and designed to mitigate the money laundering and terrorist financing risks the organization may encounter. The AML program should establish minimum standards for the organization that are designed to comply with Curacao laws and regulations. Including the procedure to block accounts based on suspicion of money laundering.

## 6. Compliance and Consequences of Non-Compliance

Describe the risks and potential consequences of violating the policy, including disciplinary actions, legal implications, or business risks.

## 7. Related Information

Provide links or references to related policies, legal or regulatory frameworks, guidelines, or relevant forms and templates.

## 8. Contact Information

For any questions regarding this policy, please contact:

Insert name/office, phone number, and email address.

## 9. Policy History

Indicate whether this is a new policy or if it replaces an existing one. List previous versions with effective dates and revisions, if applicable.

## 10. Policy URL (if applicable)

Indicate where the policy can be accessed online if published on the Company website.