



GUIDANCE – CASINO AND GAMING HOUSE “A” RISK EVALUATION QUESTIONNAIRE (REQ)

In line with Section 19 (J) of the Anti-Money Laundering and Combatting The Financing Of Terrorism And Proliferation (Miscellaneous Provisions) Act 2019 (*thereafter referred to as “AML/CFTP”*), the Gambling Regulatory Authority (*thereafter referred to as “GRA”*) may, in the discharge of its functions under this Act, require a member falling under its purview to furnish it with any information and produce any record or document within such time and at such place as it may determine.

In addition, in line with Paragraph 14 of the Financial Intelligence and Anti Money Laundering Regulations 2018 (*thereafter referred to as “FIAML”*), the Authority may require Casinos and Gaming Houses (*thereafter referred to as “subject persons”*) to submit periodical reports on the AML/CFT measures, policies, procedures and controls they are implementing. This is being done through an annual Risk Evaluation Questionnaire (*“REQ”*).

Unless otherwise stated, all subject persons licensed, as at end of June 2020 are bound to complete and submit the REQ by the Friday 31/07/2020. Failure to do so may entail administrative sanctions by the GRA.

This document clarifies the interpretation of specific questions and provides more information on the data being requested in particular sections within the REQ. It is highly recommended to go through this document prior to the completion and submission of the REQ. Subject persons are invited to call the GRA at any time during office hours on 260-2000 or send an e-mail to: graamlcftunit@gra.intnet.mu.

*This REQ covers the period **01 July 2019 to 30 June 2020** and reference throughout the REQ should be taken to refer to 01 July 2019 to 30 June 2020.*

Subject persons are required to complete the questionnaire in respect of the activity that falls within the definition of "relevant activity" and "relevant financial business" in accordance with Financial Intelligence & Anti Money Laundering Regulations 2018.

Various questions in this REQ have also been applied across other different sectors. As a result, generic terminology such as "you / your entity" and "entity" has been applied and should therefore be taken to refer to the subject person completing this REQ.

Unless otherwise stated, reference to monitoring system throughout the REQ should be interpreted to refer to both manual and automated systems.



Abbreviations

AML/CFT	Anti-Money Laundering / Combatting the Financing of Terrorism
BO	Beneficial owner
BRA	Business Risk Assessment
CDD	Customer Due Diligence
CRA	Customer Risk Assessment
EDD	Enhanced Due Diligence
EEA	European Economic Area
EU	European Union
FIAMLA	Financial Intelligence and Anti Money Laundering Act
FIAML Regulations	Financial Intelligence and Anti Money Laundering Regulations
FATF	Financial Action Task Force
FIU	Financial Intelligence Unit
FTE	Full-Time Equivalent
GRA	Gambling Regulatory Authority
ML/FT	Money Laundering / Funding of Terrorism
MLRO	Money Laundering Reporting Officer
NRA	National Risk Assessment
PDJ	Police des Jeux
PEP	Political Exposed Person
RTP	Return To Player
SDD	Simplified Due Diligence
SNRA	Supranational Risk Assessment [European Union]
SP	Subject Person
STR / SAR	Suspicious Transactions Report / Suspicious Activity Report
UBO	Ultimate Beneficial Owner



FAQs

<p>If there was a change in MLRO in 2020, is it correct to assume that the current MLRO has to submit the REQ for 2019?</p>	<p>Yes, the current MLRO has to submit the REQ.</p>
<p>If the MLRO resigned some time ago and an interim MLRO has been appointed quite recently, can the designated employee submit REQ instead?</p>	<p>No. The REQ can <u>only</u> be submitted by an appointed MLRO/DMLRO.</p>
<p>Does a REQ need to be completed even if operations have just started?</p>	<p>The 2020 REQ covers the operating period July 2019 to June 2020, therefore subject persons who obtained their license in or prior to 2019 have to complete the 2020 REQ.</p>
<p>Does an entity which was liquidated in 2019 or is currently in the process of liquidation need to complete and submit a REQ?</p>	<p>As long as the entity is still licensed, it is still required to submit the REQ for the year 2020.</p>
<p>Is a separate REQ required to be completed for different entities?</p>	<p>Yes, each subject person has to complete a separate REQ and provide information that is specific to that subject person. Even if entities form part of the same group and controls may be the same, a separate REQ has to be completed and the inherent risk questions have to be completed to cover for the specific risk exposures of that subject person.</p>
<p>How should subject persons answer questions that require a monetary value?</p>	<p>All questions requiring the subject person to give monetary values require an answer in Mauritian Rupee. The rate of conversion that has to be utilised depends on the type of question that is being answered. If the value requested is the value at year end, then the subject person should use the last official exchange rate available for the year under review. On the other hand, where the value represents the sum total of a number of transactions which took place during the year, the subject person may either utilise the official daily exchange rate or in the absence thereof the official monthly / annual average exchange rates.</p>



<p>What is the difference between the "Not Available" and the "Not Applicable" answer options provided?</p>	<p>The "Not Applicable" option should only be selected in those instances where the question does not apply to the subject person answering the REQ, such as where the subject person does not offer a specific product / service or where the subject person may have only recently commenced operations. If, however a subject person does provide the service / product but registered no activity in the prior calendar year, then the respondent should input a '0' value.</p> <p>The "Not Applicable" option may also be availed of where the main question upon which all subsequent questions depend was answered in the negative.</p> <p>The "Not Available" option should only be selected in those instances where the subject person cannot reply to the question as it does not have the required or sufficient information at its disposal.</p>
<p>When the question requires an answer in numbers, currency or percentages, what is the difference between inputting "0", and selecting the 'not applicable' or 'not available' option?</p>	<p>Inputting "0" means that the question applies to the subject person, however the subject person had nothing to report.</p> <p>The 'Not Applicable' option should only be selected in instances where the question does not apply to the subject person answering the REQ such as where a product is not offered or the subject person has only recently commenced operations. The 'Not Applicable' option can also be availed of where the main question upon which all subsequent questions depend was answered in the negative.</p> <p>The 'Not Available' option should be selected in those instances where the question applies to the subject person, however the entity does not have sufficient information at its disposal to answer the said question.</p> <p>When a number/percentage is required to be input and the 'Not Applicable' option is not available, a '0' value should be input.</p>

<p>Why is there a reference to the Basel Index in the REQs?</p>	<p>In order to avoid the element of subjectivity which could undermine the ability of the GRA to compare data. The GRA included the reference to the Basel Index, together with other lists, to reduce this element of subjectivity.</p> <p>Subject persons should however, note that reference to the Basel Index is only being made for the purposes of this exercise and should not to be considered to have any form of official endorsement by the GRA.</p> <p>Subject persons are still required to make their own informed and autonomous decision as which jurisdictions represent a given level of risk. While they can make use of the Basel Index to inform their judgement, they are not to automatically rely thereon.</p> <p>Subject persons are expected to make use of the public version of the Basel Index.</p>
<p>Should all questions involving customers be taken to also include beneficial owners?</p>	<p>Unless the question makes specific reference to beneficial owners, reference to customers should only be taken to refer to the person or entity (excluding the BOs of the legal person) to whom the subject person provides the service.</p>
<p>Where a question refers / relates to subsidiaries, should we include all entities with common ownership?</p>	<p>Only entities that have the same ownership and share a common parent should be included. Simply having common ownership does not make a company a subsidiary, a common parent company is required.</p> <p>Where the REQ makes reference to a subsidiary of the subject person, only those subsidiaries that undertake a relevant activity / relevant financial business, should be taken into consideration in the subject person's response to the question.</p>
<p>If an engaged agent met the client face-to-face, but not the management of the entity directly, would this be considered as face-to-face relationship?</p>	<p>Yes, this is considered as a face-to-face relationship</p>
<p>To what extent can adverse media reports influence the classification of a client as high risk?</p>	<p>Not each and every adverse article found online should result in the increase of the subject person's risk classification. Adverse information should first be analysed before any changes to the risk classification is made.</p>

<p>Is the internal audit function obligatory? If so, what is the expected frequency that audits are carried out.</p>	<p>Section 4.5 of the Guidelines on Prevention of AML/CFT for Casinos and GH Operators provides that "Casino and gaming house operators should conduct an independent audit on a periodical basis of at least once a year, which could be managed by either the entities' internal audit function (if applicable) or otherwise through an outsourced third-party service which specializes on AML/CFT compliance audits."</p> <p>It is thus possible for the subject person to engage an external consultant independent of the subject person to evaluate the adequacy of its internal controls, policies and procedures. This task may also be assigned internally to a person other than the MLRO or anyone else involved in the implementation or operation of the subject person's AML / CFT compliance program.</p>
<p>Does a business risk assessment by an independent firm cover the internal audit requirement?</p>	<p>Internal audit or independent testing is necessary to test the effective implementation of one's policies, controls, and measures.</p> <p>Through the carrying out of a business risk assessment one obtains an understanding of the risks that affect operations and the measures to manage such risks.</p> <p>On the contrary the internal audit or independent testing, in the context of the requirements of the Guidelines on Prevention of ML /CFT for Casinos and GH Operators, assesses the adequacy of the measures (controls) the subject person put in place to manage its risk exposure to ML/FT risk.</p>
<p>In response to AML/CFT training of employees, which employees are required to undergo training. We have a complement of 10 Full Time Equivalents. If 2 of these are a courier and a cleaner should we include all of them in the calculation of this percentage?</p>	<p>Awareness and training shall be provided to employees whose duties include the handling of either relevant financial business or relevant activity. It is safe to assume that members of staff holding the position of courier/cleaner do not fall within the definition 'relevant financial business or relevant activity'.</p>
<p>How should player deposits, wagered amounts and cash-outs be calculated for the purpose of completion of the REQ?</p>	<p>The question is best explained through an example. Therefore, if a player deposited Rs 20,000 but played only Rs 5,000, the total player deposit is Rs 20,000 while the total value wagered is Rs 5,000.</p> <p>If this same player won Rs 10,000 and played an additional Rs 5,000, the total player deposit is still Rs 20,000 while the total wagered is now Rs 10,000.</p> <p>If the player decides to cash-out the value on his account would be equivalent to Rs30,000 (total money deposited +</p>



	total money won).
When providing the number of high-risk clients, should the answer take into consideration the inherent risk or the residual risk following controls?	When providing the number of high-risk clients, the subject person should only take into consideration the inherent risk (i.e. before the controls are applied).
If players with deposits of less than Rs 100,000 do not classify as relevant activity, should such deposits be included in any reporting figures, such as total number of players?	Not reaching the said threshold is not tantamount to the customer not being exposed to services that fall within the definition of relevant activity but rather the contrary. Each business relationship formed (whether exceeding the Rs 100,000 threshold or otherwise) should still be considered to be relevant activity and for the purposes of answering the REQ should be included in determining the number of players.
In view of the fact that player deposits also include winnings, how is it possible to determine the actual player deposits?	Player deposits refers to real money deposits made by the player converted to Mauritian Rupees. Resultantly it excludes winnings, bonus monies or other similar promotional rewards received . The definition of "player deposits" is different to "amounts wagered". The latter refers to the total value of stakes placed by a player which may also include player winnings are subsequently played.
Basel index: there are various country risk databases of equal reliability. Is there a reason reference is only made to the Basel Index in the REQ?	The Basel Index was deemed to be the most frequently used. Whereas other indexes are also considered as reputable, the BASEL index was chosen purely for consistency patterns across the REQ.



Definitions

Affiliate company	An affiliate company is a company that is related to another company. For example, an affiliate may be connected to another entity through common ownership or as part of the same group / organisation.
Basel Index	<p>Reference made to the Basel Index is only included for the purpose of this exercise and should not be taken or construed as being an exhaustive list of jurisdictions considered as non-reputable or high risk in line with their obligations under the relevant AML/CFT obligations. Subject persons are obliged to carry out the necessary jurisdiction risk assessments to understand the risk posed by such jurisdictions.</p> <p>The jurisdictions in the Basel Index can be found through the following link: https://www.baselgovernance.org/sites/default/files/2019-08/Basel%20AML%20Index%202019.pdf</p>
Beneficial owner / ultimate beneficial owner	<p>The interpretation of Beneficial Owners should be applied in accordance with the FIAML Regulations 2018 and the Guidelines on Prevention of AML/CFT for Casinos and GH Operators.</p> <p>“beneficial owner” –</p> <p>(a) means the natural person –</p> <p style="padding-left: 20px;">(i) who ultimately owns or controls a customer; or</p> <p style="padding-left: 20px;">(ii) on whose behalf a transaction is being conducted; and</p> <p>(b) includes those natural persons who exercise ultimate control over a legal person or arrangement and such other persons as specified in regulations 6 and 7;</p> <p>“business relationship” means an arrangement between a person and a reporting person, where the purpose or effect of the arrangement is to facilitate the carrying out of transactions between the person and the reporting person on a frequent, habitual or regular basis;</p>
Customers	<p>Customer is defined as natural person or a legal person /entity with whom the subject person has a business relationship or for whom the subject person carried out an occasional transaction. In this context, customers refer to “active customers”, as at the end of the prior calendar year.</p> <p>Reference to customers is made in respect of those clients that were provided with a relevant activity or relevant financial business by the subject person.</p>



Employees / relevant staff	<p>"Relevant staff" refers to employees and other company officials whose duties include the handling of either relevant financial business or relevant activity, irrespective of their level of seniority. This includes but is not limited to:</p> <ul style="list-style-type: none">a) directors;b) senior management;c) the MLRO and designated employee(s);d) compliance staff; ande) all members of staff involved in the activities of the subject person that fall within thef) definition of 'relevant financial business' and 'relevant activity'. <p>The term 'employees' should not only refer to individuals who have a contract of employment with the subject person but should be interpreted to also include individuals who are engaged by the subject person to carry out aspects of its business involving relevant activity or relevant financial business (such as temporary or contract staff).</p>
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<p>EU List identifying high risk 3rd countries with strategic deficiencies</p>	<p>The jurisdictions in the EU list identifying high risk 3rd countries with strategic deficiencies can be found through the following link:</p> <p>https://ec.europa.eu/info/policies/justice-and-fundamental-rights/criminal-justice/anti-money-laundering-and-counter-terrorist-financing/eu-policy-high-risk-third-countries_en#evolutionoftheeulistonhighriskthirdcountries</p>
<p>EU List of Non-Cooperative Jurisdictions for Tax Purposes</p>	<p>The EU list of Non-Cooperative Jurisdictions is a list that includes non-EU countries or territories that failed make sufficient commitments in response to EU concerns in terms of tax good governance. The list can be found in the following link:</p> <p>https://cfr.gov.mt/en/inlandrevenue/tcu/Pages/EU-List-of-non-cooperative-jurisdictions.aspx</p>
<p>Face-to-face</p>	<p>Face-to-face basis refers to the cases when the customer is physically present for verification purposes. Where a subject person makes use of video conferencing tools to onboard customers in accordance with the guidance provided in the Guidelines on Prevention of AML/CFT for Casinos and GH Operators to onboard customers, these should be considered to have been onboarded on a face-to-face basis.</p>
<p>FATF Lists</p>	<p>The Financial Action Task Force (FATF) identifies jurisdictions with strategic deficiencies in their frameworks to combat money laundering and the financing of terrorism and proliferation. It periodically publishes lists with high risk jurisdictions subject (black list) to a call for action and jurisdictions with strategic deficiencies (grey list).</p> <p>The jurisdictions in the FATF lists can be found through the following link:</p> <p>https://fiumalta.org/FATF</p>
<p>Inherent risk</p>	<p>Inherent risk is the risk to which a subject person is exposed to, prior to adopting and applying any mitigating measures, policies, controls, and procedures. Likelihood an impact will lead to the determination of the level of inherent risk to which a subject person is exposed to.</p>
<p>Non-face-to-face</p>	<p>Non-face-to-face refers to the cases when the customer (or its agent) was not physically present for verification purposes. It excludes those customers that were onboarded by the subject person through the use of video conferencing tools.</p>



Occasional transaction	The FIAML Regulations 2018 defines an “occasional transaction” as any transaction carried out other than in the course of a business relationship;
Offshore	The term offshore refers to jurisdictions that have distinctive characteristics such as low or zero taxation, tax secrecy and possibly lack of transparency. You are kindly requested to refer to the EU list of Non-Cooperative Jurisdictions for Tax Purposes. The list can be found in the following link: https://cfr.gov.mt/en/inlandrevenue/tcu/Pages/EU-List-of-non-cooperative-jurisdictions.aspx
Onboarding	"Onboarding" refers to the process through which a business relationship is established, or an occasional transaction is carried out.
Outsourcing	Outsourcing refers to outsourced activities directly relating to the entity's relevant activity/relevant financial business and in the connection with its AML/CFT obligations. Subject persons whose AML /CFT obligations are, in whole or in part, undertaken by an entity forming part of its group should, irrespective of the legal and commercial arrangements consider this to be an outsourced operation.
PEP measures	Section 5.5 of Guidelines on Prevention of AML/CFT for Casinos and GH Operators states that: When a casino and gaming house operator has determined that a relationship with a PEP shall be established, the operator must assess the extent of enhanced due diligence measures applied. Always depending on the operator’s customer risk profile, risk tolerance of operators and the relevant control mechanism in place. For the avoidance of doubt, casino and gaming house operators are required, on a risk-sensitive basis, to: Have in place an appropriate risk management systems and procedures to determine whether a customer (or the beneficial owner of a customer) is a PEP, or a family member or known close associate of a PEP; <ul style="list-style-type: none"> • Have the relevant approval mechanisms in place from senior management for the establishing or continuing a business relationship with PEPs; • Take adequate measures to establish the SOW/SOF which involved in the proposed ‘business relationship’ or ‘occasional transaction’ with PEPs; and • Where a business relationship is entered, conduct enhanced ongoing monitoring of the business relationship.



Politically Exposed Person	<p>The definition of a PEP should be construed in accordance with Regulation 2 of FIAML 2018 and the Guidelines on Prevention of AML/CFT for Casinos and GH Operators</p> <p>The list of “family members” is not an exhaustive list and therefore subject persons should consider whether other family relationships in specific circumstances may be considered.</p>
Reliance on other subject persons	<p>The FIAML Regulations and Guidelines on Prevention of AML/CFT for Casinos and GH Operators permit subject persons to rely on the CDD measures carried out by other subject persons or by certain other third parties.</p> <p>A reliance arrangement can be set up between entities when those entities are servicing the same customer, or when that same customer is in contact with multiple entities to a transaction, with each entity being under a legal obligation to carry out CDD measures on the customer.</p> <p>Subject persons should take adequate steps to ensure that, on request, the entity relied on immediately forwards relevant copies of the identification and verification documents on the CDD measures undertaken. In this regard, subject persons should have a written formal agreement with the entity, signed by both parties, that would regulate the procedures and conditions on these requests to ensure that the data is made available immediately.</p>
Residence	<p>"Residence" refers to the customer's principal country of residence or for a legal entity the jurisdiction where it is incorporated or has its principal place of business. With respect to trusts and similar legal arrangement the country of residence should be the jurisdiction of the laws governing the trusts and / or similar legal arrangement.</p>
Residual risk	<p>Residual risk is the level of risk left after applying the mitigating measures, policies, controls and procedures to the level of inherent risk identified.</p> <p><u>Level of inherent Risk – Mitigating Measures = Level of Residual Risk</u></p>



Senior management	The definition of “senior management” will depend on the type of body corporate or organisation setup of the entity. It intends to capture those individual(s): (a) who are responsible for taking strategic decisions that fundamentally effect the business operations or general direction of that entity; and (b) who exercise executive control over the daily or regular affairs of the entity through a senior management position.
Subsidiary entity	The definition of subsidiary shall be construed to mean the same as explained in the S3 of the Companies Act 2001. Companies that have the same ownership and share a common parent should be included within the definition of a subsidiary. On the other hand, entities simply having common ownership do not constitute a subsidiary, since there is no common parent entity.
Total number of cash-in transactions	Total number of cash-in transactions refers to the amount (count of transactions) of real money deposits.
Total number of cash-out transactions	Total number of cash-out transactions refers to the amount (count of transactions) of real money withdrawals.
Total value of cash-in transactions	Total value of cash-in transactions (player deposits) refers to value of real money deposits expressed in monetary terms, converted to Mauritian rupees at the official daily exchange rate or in the absence thereof, at the average monthly / annual Bank of Mauritius (BOM) exchange rate (or other official source) for the prior calendar year. The funds may be received either in cash or through credit or debit cards or otherwise by any other means, in exchange for casino chips or else for loading a casino card but shall exclude funds generated from winnings or gaming bonuses.
Total value of cash-out transactions	Total value cash-out transactions refer to the value of real money withdrawals expressed in monetary terms and should be converted to Rs at the official daily exchange rate or in the absence thereof, at the average monthly / annual BOM exchange rate (or other official source) for the prior calendar year.
Total value of winnings for player (RTP)	Total value of winnings for player (RTP) refers to the amount of total player winnings converted to Rs at the daily exchange rate or in the absence thereof, at the average monthly / annual BOM exchange rate (or other reputable source) for the prior calendar year.
Total value wagered by players	Total value wagered by players means the total amount of money that was gambled by the player expressed in monetary terms converted to Rs at the daily exchange rate or in the absence thereof, at the average monthly / annual BOM exchange rate (or other reputable source) for the prior calendar year.
VIP Customer	The player classification status of VIP is widely used across the gaming industry. There is however no standard industry definition of what constitutes a VIP. Respondents are required to reply to this question on the basis of their own internal classification as drawn up by their entity's procedures.

Question Specific Guidance

Q Number	Question	Guidance
1.02	Please indicate total annual turnover according to the latest available audited financial statements and/or tax declaration.	Respondents are required to indicate turnover on the basis of the latest available financial statements or submitted tax return. Where the latest available audited financial statements or submitted tax return does not correspond to the prior calendar year, subject persons are required to provide the required information from the latest available financial statement or submitted tax return available.
1.03	Please list all persons (name and surname) that fall within the definition of a "beneficial owner" (as defined by Mauritius Laws)	<p>Subject persons are only required to provide the requested information for customers that are natural persons or legal arrangements.</p> <p>"beneficial owner" –</p> <p>(a) means the natural person –</p> <p>(i) who ultimately owns or controls a customer; or</p> <p>(ii) on whose behalf a transaction is being conducted; and</p> <p>(b) includes those natural persons who exercise ultimate control over a legal person or arrangement and such other persons as specified in regulations 6 and 7;</p> <p>"business relationship" means an arrangement between a person and a reporting person, where the purpose or effect of the arrangement is to facilitate the carrying out of transactions between the person and the reporting person on a frequent, habitual or regular basis;</p>
1.06	Has your entity undergone significant changes in its management and control structure during the prior calendar year?	<p>"Management and control structure" refers to those bodies or individuals within the entity that either set the general direction of the entity in the pursuance of its activities (e.g. Board of Directors, Partners' Committee etc.) or that manage the entity's activities on a day-to-day basis (C-level e.g. Chief Executive Officer, Chief Financial Officer, Managing Partners etc.)</p> <p>Control structures refer to the entity's governance structures and their related setup and should exclude control structures established for the day-to-day operations of the entity.</p> <p>"Significant changes in its management and control structure" means any change to the governing body or to the management of the entity.</p>

2.02	How many staff members, expressed as FTEs, are part of the AML/CFT Compliance team (if applicable)?	"AML/CFT team" refers to individual/s who are part of an organized setup within the entity whose responsibilities include the assistance / execution, in part or in whole, of the entity's obligations arising from the FIAMLA and Guidelines on Prevention of AML/CFT for Casinos and GH Operators, and the entity's policies and procedures.
4.01	Does your entity's policies and procedures require customers to be appropriately identified prior to entry in the casino/gaming house?	According to the Guidelines on Prevention of AML/CFT for Casinos and GH Operators, a casino licensee must not allow any person to enter the casino unless such person has been satisfactorily identified.
4.02	Do your entity's policies and procedures require due diligence to be undertaken on all customers carrying out transactions (individual or cumulative) that amount to or exceed Mur 50,000 or Mur 100,000?	<p>In terms of S105A (aa) of the GRA Act 2007, CDD measures should be applied when customers carry out transactions that amount to or exceed two thousand euro (Rs 50,000 for withdrawal and (Rs100,000 for deposits).-</p> <p>This applies both to business relationships (i.e., when casino or gaming houses open gaming accounts) as well as when carrying out an occasional transaction.</p>
4.03	Does your entity's policies and procedures require the entity to undertake a customer risk assessment prior to carrying out customer due diligence?	This is one of the obligations delineated in the sector guidance, I understand that sector may not be doing this yet but you need to factor the question in since it is a critical part of the framework - the likelihood is that everyone will answer no however I don't suggest you omit the question.
4.04	Does your entity's policies and procedures require that the identity of a person, exchanging chips or tokens to the value of Rs100,000 or more, is matched and reconciled to the identity of the person acquiring chips or tokens and to the respective winnings of the said person made while playing at the casino/gaming house?	<p>According to the FIAML Regulations, a casino licensee has to ensure that the particulars relating to the identity of a person exchanging chips or tokens to the value of Rs100,000 or more is matched with, and cross referred to, the particulars relating to the identity of the person exchanging cash, cheques or bank drafts, or making a credit or debit card payment in exchange for chips or tokens.</p> <p>SP's shall further ensure that chips or tokens are derived from winnings made whilst playing a game or games at the casino whether a person carries out transactions which are individually for an amount of less than Rs 100,000 but which in aggregate equal or exceed such amount or in any one gaming session.</p>
4.06	Please indicate, for all your customers or, depending on the risk, only for a specific part of your customers, whether you / your entity collects the following: -Nationality/Country of residence/ Information on the business / professional / employment activities and on the level of income or turnover/ Information on any sources of income aside from the business/professional income/ Information on the overall wealth of the	<p>This question applies to customer for whom the SP has undertaken due diligence prior to or upon reach the Rs100,000 threshold prescribed by the FIAML Regulations.</p> <p>The definition of a PEP should be construed in accordance with the FIAML Regulations and the guidance in the Guidelines on Prevention of AML/CFT for Casinos and GH Operators.</p>

	customers (including the funds not held by your entity/ Information on the PEP status of the customer	
4.10	Do your policies and procedures specify hierarchical authorization levels within your entity to, on a risk basis, accept a customer or approve a transaction?	The application of hierarchical authorization levels refers to both customers accepted at on-boarding stage and resulting from changes in customer risk assessment throughout the business relationship.
4.12	Do you / your entity's policies and procedures require EDD to be applied in particular scenarios with players?	<p>Subject persons are required to establish the variables and risk parameters, in line with its risk appetite and as applied in the customer risk assessment, to identify and determine those instances and circumstances that result in a "higher risk situation". This should be appropriately documented in the entity's policies and procedures.</p> <p>The FIAML Regulations require subject persons to carry out enhanced due diligence when dealing with PEPs and also with complex and unusually large transactions.</p> <p>Further to the above, regulation 12 of FIAML, requires the application of EDD in relation to the following situations:</p> <p>In relation to activities or services that are determined by the FIU to represent a high risk of AML /CFT, having taken into consideration the findings of any national risk assessment and any other relevant factors, as may be deemed appropriate;</p>
5.01	Is your entity's process/system for monitoring transactions fully automated?	"Fully Automated" refers to relying on automated systems that require little or no human intervention. "Partially Automated" refers to relying on automated systems requiring human intervention regularly, whilst "Manual" refers to relying on control system data, manual / scheduled reports and intensive employee intervention.
5.02	Does your monitoring system utilize rules-based criteria and profiling techniques to monitor customer activity?	<p>"Rule-based criteria" refers to a set of pre-established rules that are applied in a system. The monitoring system will take a pre-defined action (flag, block etc.) on any transaction /activity that meets the criteria within the rule/s.</p> <p>"Profiling" refers to the process of construction and application of user profiles generated through the analysis of data. This typically relates to the use of algorithms or other mathematic techniques that allow for the discovery of patterns or correlation in large quantities of data. When these patterns or correlations are used to identify or represent persons they are referred to as profiles.</p>

5.04	How many alerts were generated by the automated monitoring system that have resulted in internal investigations during the prior calendar year? [If Applicable]	The number should reflect the total number of alerts that were raised by the system and resulted in an analysis / investigation by the subject person to be able to determine whether these should be cleared or whether they should be escalated further through the filing of an internal report.
5.07	Does your entity have an expected transaction profile for every customer?	An expected transaction profile is created on the basis of information obtained at customer onboarding stage and throughout the business relationship in order to establish a profile of the expected activity for a particular customer.
7.01	Has the entity, given the size and nature of its business, appointed an independent audit function to test its AML/CFT measures, policies, controls and procedures.	<p>An independent audit does not necessarily require the creation of an internal audit function, since it is possible for the subject person to engage an external consultant independent of the subject person to evaluate the adequacy of its internal controls, policies and procedures.</p> <p>Alternatively, the subject person may assign this task internally to a person other than the MLRO or anyone else involved in the implementation or operation of the subject person's AML/CFT compliance programme.</p>
8.01	Please provide the % of staff outside the AML/CFT unit that completed AML/CFT training throughout the prior calendar year.	Staff outside the AML / CFT unit refers to employees of the entity who undertake relevant activity / relevant financial business. Self-employed persons who principally work for the entity should all be included in your response.
10.01	Please provide the total deposits, wagers and RTP's (winnings) information recorded in the prior calendar year (2019):	Wagering represents the total amount of deposits made by players in a given year and RTP (return to player) represents the total winnings made by players in a given year.
11.04	From the total number of players, what is the number of players that effected single deposits or aggregate deposits in one gaming session amounting to Rs100,000 or more but less than Rs500,000 in the prior calendar year?	<p>The number of single deposits and aggregate deposits here should represent the number of instances whereby players have amounted their wagering to Rs 100,000 but less than Rs500,000 in a single transaction or in a single gaming date (aggregate).</p> <p>For the purpose of this questionnaire, a single gaming date consists of a period of 24 hours starting at 10 am and ending at 10 am on the following day.</p>
11.05	From the total number of players, what is the number of players that effected single deposits or aggregate deposits in one gaming session amounting to Rs500,000 or more in the prior calendar year?	<p>The number of single deposits and aggregate deposits here should represent the number of instances whereby players have amounted their wagering to Rs 500,000 or more in a single transaction or in a single gaming date (aggregate).</p> <p>For the purpose of this questionnaire, a single gaming date consists of a period of 24 hours starting at 10 am and ending at 10 am on the following day.</p>