



SUBJECT: Corporate Policy Statement
POLICY TITLE: Return of Funds
APPROVED BY: Stephen Hancock **REVIEWED:** 4th January 2021
VERSION: Version 1.0 **ISSUE DATE:** 4th January 2021

1. Statement of Purpose

- 1.1 The objective of this policy (**Return of Funds Policy**) is to set out the Crown Designated Business Group's (**Crown**) policy in relation to returning funds deposited or transferred into the Crown bank accounts used by patrons to deposit funds for gaming purposes (**Bank Accounts**) where such transfers are made other than in accordance with Crown's policies, procedures and directions.
- 1.2 This Policy should be read in conjunction with Crown's Third Party Transfers and Money Remitters Policy (**Third Party Policy**).
- 1.3 In December 2020, Crown circulated to patrons within its Platinum and Black membership levels a notification regarding the manner in which transfers must be made into Crown's Bank Accounts (**Bank Transfer Notification**). The Bank Transfer Notification informed patrons that:
- (a) Crown no longer accepts cash deposits paid into its Bank Accounts;
 - (b) Crown no longer accepts payments from third parties into its Bank Accounts;
 - (c) all payments into Crown's Bank Accounts must be from a patron's personal bank account;
 - (d) transfers into Crown's Bank Accounts must state the patron's full name and Crown Rewards number;
 - (e) international transfers into Crown's Bank Accounts must be supported with a receipt stating the branch address of the bank or financial entity from which the funds are being sent. If the receipt does not have the branch address, the customer must provide appropriate documentation with these details.
 - (f) any other description or narration contained in transfers into Crown's Bank Accounts must state that the purpose of the transfer is for gaming or gambling, or to repay a debt;
 - (g) descriptions or narrations contained in transfers into Crown's Bank Accounts must not be misleading as to the purpose of the transaction, for example but not limited to *'Investment'* *'Property Purchase'* or *'School Fees'*;
 - (h) if a receipt is not provided, either by email to [REDACTED] or upon arrival at Crown, the transferred funds will not be credited to the patron's account.
- 1.4 Crown's Bank Account information which includes the process on how to transfer funds will also be provided to patrons on request. This can be provided by email (if the patron does not have the details of the Bank Accounts) or in hard copy by the Cage staff if the patron is onsite.

2. Policy Statement

- 2.1 Crown will not knowingly accept funds from a third party.
- 2.2 Crown will only accept payments that are transferred into its Bank Accounts from the personal bank account of a patron.
- 2.3 Crown will return all payments made other than in accordance with the Third Party Policy and the Bank Transfer Notification. For avoidance of doubt, this includes:
 - (a) all cash deposits paid into its Bank Accounts, irrespective of whether the deposit was made by a patron or third party;
 - (b) funds transferred into its Bank Accounts from a company bank account or trust bank account, when the transfer is not approved under the Third Party Policy;
 - (c) funds transferred into its Bank Accounts by a third party (including a money remitter) for the benefit of a Crown customer, when the transfer is not approved in line with the Third Party Policy; or
 - (d) funds transferred into its Bank Accounts when Crown considers that the description or narration is misleading as to the purpose of the transfer.
 - (e) Funds transferred into its Bank Accounts and the customer has not provided a receipt or supporting documentation.
- 2.4 In order to allow a 'grace period' following dissemination of the Bank Transfer Notification, this Return of Funds Policy does not apply to deposits or transfers (other than cash deposits) made prior to 1 January 2021 if Crown considers, having made reasonable inquiry, that the patron was unaware of the Bank Transfer Notification at the time of the relevant deposit or transfer. There is no 'grace period' for cash deposits made after the date this Return of Funds Policy was adopted.

3. Procedure

- 3.1 Where a deposit or transfer is to be returned in line with clause 2.3 of this Policy, the relevant Crown business unit must send an email notification to '**VIP Banking**' email group requesting the funds be returned.
- 3.2 The email above must provide sufficient information for Crown to be able to affect the return and to record the circumstances in which the transfer or deposit was made, including the following details:
 - (a) name and identification details of the patron;
 - (b) name and identification details of the third party or registration information of the money remitter (if applicable);
 - (c) the date of the deposit or transfer;
 - (d) the amount of the deposit or transfer; and
 - (e) the reason for the return of funds.
- 3.3 The email should also be copied to 'AML Confidential' and the relevant department that the patron is associated with. The relevant departments and their respective contact details are as follows:
 - (a) GM VIP Customer Service - Table Games
 - (b) GM VIP Business Development & Service – Gaming Machines
 - (c) Senior VIP International Business Operations - International Department

3.4 When funds are to be returned under clause 2.3(a) of this Policy (cash deposits):



3.5 The following course of action will be taken with patrons if a cash deposit is received into a Crown Bank Account:

