



**Executive Office
MEMORANDUM**

To: Mark Mackay, Tom Rickard, Tim Barnett, Peter Lawrence, Wayne Hooke, Jacinta Maguire, Roland Theiler, Ishan Ratnam, Stephen Hancock, Nick Stokes, Adam Sutherland, Michelle Fielding, Anne Siegers, Sean Counihan, Scott Howell, David Brown, Cori Cairns, Shannon Blake, Richard Smith, Tony Godfrey, Sasha Grist, Denise Vanderklau, Claude Marais, Vasula Kessel, Sean Knights

Copy: Executive Office, Barry Felstead, Josh Preston, Alan McGregor, Peter Crinis

From: Xavier Walsh, Lonnie Bossi

Date: 31 July 2020

Subject: **Prohibition on Third-party Transfers – Commonly Asked Questions**

Further to the Executive Office Memorandum of 8 April 2020 (**enclosed**), Crown no longer makes or receives payments to or from third parties.

In the event that a customer approaches Crown requesting to transfer money to a third-party, or requesting that a third-party transfer money to Crown, prior written approval of the Chief Operating Officer (Melbourne, Perth or Sydney) and the Group General Manager, Anti-Money Laundering will be required.

This exception applies to all scenarios set out below.

To that end, please find below responses to a number of frequently asked questions:

A. General

1. **Can a third-party deposit funds into another customer's casino account?**
No. This is an example of a third-party transfer.
2. **Can Crown send or receive funds to or from joint bank accounts?**
Yes, provided at least one of the names of the bank account holders(s) appears on the casino account.
3. **Can players send or receive funds between each other via casino accounts?**
No. This is an example of a third-party transfer.
4. **Can Crown send or receive funds to or from Money Service Businesses (i.e. remitters and money changers)?**
Yes, provided the ultimate transferor and the ultimate transferee are the same person.
5. **Can Crown send or receive funds to or from other casinos?**
Yes, provided the ultimate transferor and the ultimate transferee are the same person.



6. **Can the Cage release funds 'early' when the patron's bank receipt does not adequately demonstrate the source of funds?**
 No. Unless the patron can prove the funds have come from their own personal bank account and not from a third-parties' personal bank account, the funds are not to be released.

B. Spouses

7. **Can funds be received from a spouse's bank account for deposit into a players' casino account?**
 No. This is an example of a third-party transfer.
8. **Can a player request to TT winnings/commission from their casino account to a spouse's bank account?**
 No. This is an example of a third-party transfer.

C. JKO's and Premium Players

9. **Can a key player transfer funds from their bank account to Crown (via its domestic bank account) for the benefit of a JKO's casino account?**
 No. Customers are now required to transfer funds directly to the JKO's bank account.
10. **Can Crown send or receive funds from a JKO to another JKO (internal DAB transfer)?**
 No. The first JKO is now required to transfer funds to their own bank account then transfer the funds to the other JKO's bank account. The funds can then be transferred to Crown in favour of the 2nd JKO's casino account
11. **Can an authorised JKR transfer funds from their bank account to the JKO's casino account?**
 No. This is an example of a third-party transfer.
12. **Can a JKO request to transfer winnings/commission to a Key Player directly to a Key Player's bank account or Crown deposit account?**
 Yes, payments from a JKO's casino account with Crown to a key player remain permissible provided the proposed transfer of funds is consistent with or match the key player's gaming activity recorded under the relevant junket program.

As the breakdown of front money likely will not be known, we will only facilitate the transfer of confirmed winnings.

Please distribute this memorandum to all members of your teams and take any necessary steps to ensure relevant processes are implemented in accordance with this practice.

Regards

Xavier Walsh
 Chief Operating Officer - Crown Melbourne

Lonnie Bossi
 Chief Operating Officer - Crown Perth

(Sent via electronic mail)



**Executive Office
MEMORANDUM**

To: Jacinta Maguire, Ishan Ratnam, Roland Theiler, Tim Barnett, Mark MacKay, Cori Cairns, Shannon Blake

Copy: Xavier Walsh, Lonnie Bossi, Alan McGregor, Joshua Preston, Stephen Hancock, David Brown, Nick Stokes, Jan Williamson

From: Barry Felstead

Date: Wednesday 8 April 2020

Subject: **Prohibition on Third-Party Payments**

Crown is committed to continually reviewing and enhancing its Customer Due Diligence control measures. As part of this ongoing commitment we have reviewed our practices regarding transfer and receipt of funds, particularly with regard to the way our customers can remit, transfer, deposit and/or withdraw funds in and out of their Crown deposit accounts or between Crown deposit accounts.

As a result, please be advised that effective immediately Crown will no longer make or receive payments to or from third parties. We note this change applies to all local, domestic and international customers who should be advised accordingly.

We note however that payments from a junket operator's deposit account with Crown to a key player remain permissible provided the proposed transfer of funds is consistent with or match the key player's gaming activity recorded under the relevant junket program.

In the event that a customer approaches Crown requesting to transfer money to a third party, or requesting that a third party transfer money to Crown, prior written approval of the Chief Operating Officer (Melbourne, Perth or Sydney) and the Group General Manager, Anti-Money Laundering will be required.

Please distribute this memorandum to all members of your teams and take any necessary steps to ensure relevant processes are implemented in accordance with this practice.

Regards,

Barry Felstead
Chief Executive Officer – Australian Resorts

(Sent via electronic mail)