

The logo for Little Vegas, featuring the words "LITTLE VEGAS" in a bold, yellow, sans-serif font. The text is centered on a solid red rectangular background. Below the letters, there is a horizontal line of small yellow dots.

CHONGIE ENTERTAINMENT LIMITED

CUSTOMER DUE DILIGENCE AND "KNOW YOUR CUSTOMER" PROCEDURES

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1. INTRODUCTION

All gambling businesses are subject to the Proceeds of Crime Act (POCA) and have a responsibility to keep crime, including money-laundering, out of gambling. This procedure is supplementary to the Proceeds of Crime and Anti Money Laundering Policy (POCAML) and the Compliance Pack.

2. POTENTIAL RISKS

There are a number of potential risks which may be posed by a customer and it is vital that staff identify whether they need to carry out a Customer Interaction (as outlined in the Compliance Pack) in order to carry out due diligence checks. This is compounded if it is known or suspected that the customer may launder money.

Suspicious behaviour is covered in the POCAML and staff must exercise caution if they are suspicious of a customer.

Possible suspicious behaviour may include the use of stained or forged bank notes; the feeding of notes into TiTo machines and cashing out before playing; feeding large numbers of notes into change machines or refusing to provide personal details such as their name.

3. CUSTOMER DUE DILIGENCE

Staff must approach customers on a risk based approach. This may differ between venues and will be informed by the Money Laundering Risk Assessment which is required under LCCP 12.1.1.

The basic due diligence includes:

- Name, verified with ID such as a driving licence or passport
- Address, verified with ID as above or a utility bill no older than 3 months

This must be recorded in the Customer Interaction spreadsheet.

Staff must be aware that an interaction may have already taken place with a customer which will have been recorded, for example in the Challenge 25 register.

4. ENHANCED DUE DILIGENCE

Staff must approach customers on a risk based approach. This may differ between venues and will be informed by the Money Laundering Risk Assessment which is required under LCCP 12.1.1.

A customer may require enhanced due diligence if they meet any of the thresholds deemed appropriate for that venue, or if a member of staff, having consulted with senior management, deems it appropriate in the circumstances.

This must be recorded in the Customer Interaction spreadsheet.

Staff must ensure they also consider the behaviour of established customers when deciding when enhanced due diligence may be appropriate.

In the event there is increasing level of suspicion of money laundering, or even actual knowledge of money laundering, senior management must be alerted immediately and a decision made on a case by case basis whether or not the customer may be allowed to continue gambling, whether the MLRO must be notified or whether any other action is to be taken. The MLRO will then decide whether a SAR is appropriate. The MLRO is [REDACTED]

5. RECORDING

All customer due diligence and enhanced due diligence interactions must be recorded in the Customer Interaction spreadsheet.

Further, these interactions must be monitored and reviewed monthly in order to ensure that any patterns emerging are noticed and dealt with if appropriate. This review must be conducted by senior management.

Should the customer refuse to provide the requested documents the business relationship with the customer will be terminated.

6. MONITORING THIS POLICY

To ensure that the policy continues to be fit for purpose:

Chongie Entertainment Limited are committed to carrying out an ongoing risk assessment of its Customer Due Diligence and "Know Your Customer" procedure, tailoring this procedure and training around new products and newly identified risks as appropriate.

In the course of day to day activities and in reaction to any POC or ML cases, Chongie Entertainment Limited will continue to seek best practices and new techniques to improve the processes and procedures in place.

This policy is subject to review following any new guidance published by the Gambling Commission.