



Regulations for Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT)

Applicable for the Curaçao jurisdiction

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General Statements.

1. The Regulations for Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT) are an integral part of the casino license requirements for the Curaçao jurisdiction.
2. These Regulations are issued in implementation of article 3, par. 1, of the NOCCS, article 11, par. 3, of the NOIS and art. 22mm, par. 3, of the NORUT.
3. The licensee has a legal obligation to comply with the NOIS and the NORUT. Therefore, it is the licensee's **own responsibility** to keep up-to-date with any amendments of:
 - a. the NOIS and the NORUT,
 - b. their implementation regulations,
 - c. the implementation regulation of the Sanctions National Ordinance (in compliance with art. 10 of the NORUT and the Ministerial Regulation Indicators Unusual Transactions - N.G. 2015, no. 73), and
 - d. the FATF- and CFATF-notifications regarding higher-risk countries (in compliance with art. 5i of the NOIS).

As a service to the casinos, the GCB website provides links to information such as the FATF- and CFATF notifications, Sanction Decrees and Sanction Ministerial Regulations.

Every effort is made to provide accurate and current information. However, due to updating cycles and resources, outdated information may occur.

The GCB DISCLAIMS any responsibility or liability for errors, omissions, and delay in updating of any information or links, or for claims regarding the accuracy, currency and completeness of the information.

1. Definitions.

In these regulations the following definitions are used:

- a. *Compliance Officer* : The officer referred to in Rule 9;
- b. *FATF* : *Financial Action Task Force*. An independent intergovernmental body, established in 1989 and mandated by its Member Jurisdictions to develop and promote policies to protect the global financial system against money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction;
- c. *FATF Recommendations* : A framework of recommendations on policies and measures, issued by the FATF, to combat money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction;
- d. *FIU* : The Financial Intelligence Unit Curaçao, referred to in art. 2 of the NORUT¹;
- e. *money laundering* : The process used to conceal or disguise the nature, location, source, ownership or control of money or assets, obtained through criminal activity;
- f. *NOIS* : National Ordinance on Identification when rendering Services (Landsverordening identificatie bij dienstverlening, N.G. 2010, no. 40 as last amended by N.G. 2015, no. 69).
- g. *NORUT* : National Ordinance on the Reporting of Unusual Transactions (Landsverordening Melding Ongebruikelijke Transacties, N.G. 2010, no. 41 as last amended by N.G. 2015, no. 68).
- h. *reporting code* : A unique code, assigned by the FIU to each reporting entity/casino, for the purpose of reporting unusual transactions;
- i. *Reporting Form* : The standard form, issued by the FIU for the purpose of recording the information regarding an unusual transaction;
- j. *Sanctions National Ordinance* : The National Ordinance also known as the "Sanctielandsverordening", published under N.G. 1997, 336 as last amended.

¹ Previously this entity was called 'Meldpunt Ongebruikelijke Transacties' (MOT) or "Unusual Transactions Reporting Center" (or the Reporting Center). The name was changed on December 5, 2015, by an amendment of the National Ordinance on the Reporting of Unusual Transactions (PB 2015, no. 68).



- k. *terrorist financing* : Providing or collecting funds with the knowledge that they will be used in the commission of terrorist acts;
- l. *transaction* : an action or combination of actions by or on behalf of the client as referred to in art. 1, par. 1, sub o, of the NOIS or art. 1, par. 1, sub c, of the NORUT.

2. Abbreviations.

In these regulations the following abbreviations are used:

- a. *AML* : Anti-Money Laundering
- b. *CDD* : Customer Due Diligence
- c. *CFT* : Combating the Financing of Terrorism
- d. *CFATF* : Caribbean Financial Action Task Force

3. General rules.

- 3.1 The licensee is responsible for the compliance with:
 - a. these regulations,
 - b. the NOIS,
 - c. the NORUT, and
 - d. the Sanctions National Ordinance.
- 3.2 All records and documents, referred to in the MICS, shall be made available to the GCB upon request.

4. Policy statement.

- 4.1 Each casino's senior management must issue a policy statement that clearly expresses the casino's commitment to combat the abuse of its facilities, products and services for the purpose of money laundering and terrorist financing.
- 4.2 The policy shall state the casino's intention to comply with current anti-money laundering and terrorist financing legislation as well as provisions and guidelines, in particular the laws and guidelines regarding customer due diligence and the reporting of unusual transactions, i.e. the NOIS and the NORUT.

5. Customer identification and due diligence.

- 5.1 **Objective of CDD measures:** The CDD measures must enable the casino²:
 - a. to identify the customer and verify that customer's identity using reliable, independent source documents, data or information;
 - b. to identify the beneficial owner, and take reasonable measures to verify the identity of the beneficial owner. For legal persons and arrangements this should include understanding the ownership and control structure of the customer;
 - c. to understand and, as appropriate, to obtain information on the purpose and intended nature of the business relationship;
 - d. to conduct ongoing due diligence on the business relationship and scrutiny of transactions undertaken throughout the course of that relationship to ensure that the transactions being conducted are consistent with the casino's knowledge of the customer, their business and risk profile, including, where necessary, the source of funds.
- 5.2 **When to conduct CDD measures**³: Casinos have the obligation to undertake Customer Due Diligence (CDD) measures when:
 - a. establishing business relations;
 - b. carrying out occasional transactions above the monetary equivalent of US\$ 3,000;

² Art. 2, par. 2, of the NOIS and FATF Recommendation 10.

³ Art. 2, par. 3, of the NOIS.



Note: a transaction may be a single transaction, but may also be a series, combination or pattern of transactions involving a total amount in excess of the monetary equivalent of US\$ 3,000.

- c. there is a suspicion of money laundering or terrorist financing; or
 - d. the casino has doubts about the veracity or adequacy of previously obtained customer identification data.
- 5.3 **Documents required** to establish the identity:
- a. The identity of a natural person shall be established through one of the documents, valid in the country of issue, listed in art. 3, par. 1, of the NOIS.

Note: Under the conditions, mentioned in art. 3, par. 1, second section, and par. 7, of the NOIS it is allowed to establish the identity of the natural person by other means.

- b. The identity of a legal person shall be established through one of the documents, valid in the country of issue, referred to in art. 3, par. 2 and 3, of the NOIS.
 - c. The identity of the ultimate beneficial owner shall be established through the documents stipulated under a and b.
- 5.4 **Verification of identity:** The casino shall verify the identity of the customer and the ultimate beneficial owner, using reliable, independent source documents, data or information in compliance with art. 2, par. 5, of the NOIS.
- 5.5 **Ongoing due diligence:**
- a. The casino shall conduct ongoing due diligence on the business relationship and scrutinize transactions undertaken throughout the course of that relationship to ensure that the transactions being conducted are consistent with the casino's knowledge of the customer, their risk profile, including where necessary the source of funds⁴.
 - b. Casinos shall ensure that documents, data, and information collected through the CDD measures are kept up-to-date and relevant by undertaking reviews of existing records, particularly for higher risk categories of customers.
- 5.6 **Risk profiles:** The casino shall develop risk profiles to determine the customer categories which expose the casino to higher risk⁵.

Note: Examples of high risk customers include: non-resident customers, customers from countries identified as not having adequate AML/CFT systems, customers from countries subject to sanctions, embargos or similar measures issued by, for example, the United Nations, customers from countries identified as having significant levels of corruption or other criminal activity, customers from countries or geographic areas identified as providing funding or support for terrorist activities, or that have designated terrorist organizations operating within their country.

- 5.7 **Enhanced Due Diligence:** Casinos shall conduct enhanced due diligence for high risk customers, consistent with the risks identified.

Note: Examples of enhanced CDD measures include:

- a. Obtaining additional information on the customer (e.g. occupation, volume and assets, information available through public databases, internet etc.) and updating more regularly the identification data of customer;
- b. Obtaining information on the source of funds or source of wealth of the customer;
- c. Obtaining the approval of senior management to commence or continue the business relationship;

⁴ Implementation of FATF Recommendation 10(d).

⁵ Art. 2, par. 4, of the NOIS.



- d. Conducting enhanced monitoring of the business relationship, by increasing the number and timing of controls applied, and selecting patterns of transactions that need further examination.
- 5.8 **Politically Exposed Persons c.s.:** For Politically Exposed Persons⁶ (PEPs), their families and their associates, casinos must conduct enhanced due diligence, including measures *a* to *d* mentioned in the note to Rule 5.7.
- 5.9 **FATF- and CFATF-notifications:**
- a. Casinos shall apply enhanced due diligence measures to business relationships and transactions with persons from countries for which this is called for by the FATF and the CFATF⁷. The type of enhanced due diligence measures applied shall be effective and proportionate to the risks.
- b. Casinos are required to check for updates of the FATF- and CFATF notifications on a regular basis and update their Customer Due Diligence policies and –procedures accordingly to reflect these notifications.
The notifications consist of:
- the FATF Public Statement,
 - the FATF Statement “Improving Global AML/CFT Compliance: On-going process”, and
 - the CFATF Public Statement.
- Note: The links to the FATF- and CFATF-notifications are published on the GCB website. The FATF-notifications are usually issued in February, June and October, and the CFATF-notifications are usually issued in May/June and November/December.
- 5.10 **Simplified CDD:** Where the risks of money laundering or terrorist financing are lower, casinos are allowed to conduct simplified CDD measures, which should take into account the nature of the lower risk.
- Note: Examples of simplifying CDD measures are:
- a. Reducing the frequency of customer identification updates;
- b. Reducing the degree of on-going monitoring and scrutinizing transactions, based on a reasonable monetary threshold.
- Simplified CDD measures shall not be applied whenever there is a suspicion of money laundering or terrorist financing, or where specific higher-risk scenarios apply.
- 5.11 Casinos shall not render services to a customer:
- a. when it is known or should be assumed that the funds involved derive from corruption or misuse of public assets, without prejudice to any obligation the casino has under criminal law or other laws or regulations; or
- b. when the objective, referred to in Rule 5.1, was not met⁸.
- 5.12 **Information program:** Casinos shall sustain an information program to inform their customers of the objectives of the relevant AML/CFT-legislation and inherent requirements for casinos.
- 5.13 **Internal CDD procedures:** Casinos’ internal procedures shall clearly indicate the circumstances that require customer due diligence and the required identification documents.
- 5.14 **Record keeping requirements:** The casino shall maintain records, containing the information and documentation necessary to decide whether the objective of the CDD measures referred to in Rule 5.1 was met, and to establish the background and purpose of transactions, for at least

⁶ The U.S Central Intelligence Agency publishes lists of Heads of State and Cabinet Members of Foreign Governments. See <https://www.cia.gov/library/publications/world-leaders-1/>.

⁷ Art. 5i of the NOIS.

⁸ Art. 2a, par. 2, of the NOIS.

five years after the business relationship is ended, or after the date of the occasional transaction⁹.

Such records must be sufficient to permit reconstruction of individual transactions (including the amounts and types of currency involved, if any) so as to provide, if necessary, evidence for prosecution of criminal activity.

Such records shall be made readily available at the request of the Gaming Control Board.

Note: Such records may have been obtained through e.g. CDD measures (copy of identification documents, name, address and place of residence of the client, the nature, number and date and place of issue of the identification document, the nature of the service, the nature, origin, destination, the size and other unique features of the values involved) individual transactions, member account files and business correspondence, including the results of any analysis undertaken.

5.15 **Provision of information:** The casino shall comply promptly with information requests from the GCB¹⁰.

5.16 If doubts arise relating to the identity of the client after the casino has accepted the client as a member and member accounts have been opened, the relationship with the client must be re-examined to determine whether it should be terminated and whether the incident must be reported to the FIU in accordance with art. 2d of the NOIS.

5.17 No casino shall open or maintain an anonymous account or an account in a fictitious name. Casinos are required to maintain numbered accounts in such a way that full compliance can be achieved with the FATF Recommendations.

Note: For example, the casino should properly identify the customer in accordance with these criteria and the customer identification records should be available to the AML/CFT Compliance Officer, other appropriate staff, and competent authorities.

6. Terrorist financing.

6.1 **Monitoring transactions:** Casinos shall continuously monitor transactions, taking into account the characteristics including types of transactions listed in annex 1 to the FATF document entitled Guidance for Financial Institutions in Detecting Terrorist Financing¹¹. If such characteristics are identified, this could indicate funds involved in terrorist financing, so additional scrutiny is required.

6.2 **Updating policies and procedures:** Casinos are required to check for amendments on Sanctions Decrees and Regulations on a regular basis and update their CDD- and AML/CFT-policies and –procedures accordingly to reflect such amendments. Such information contains lists of suspected terrorists, terrorist groups, and associated individuals and entities as mentioned in (in any case):

- a. the Consolidated United Nations Security Council Sanctions List¹²;
- b. the Sanction Decree “Al-Qaida c.s., the Taliban of Afghanistan c.s., ISIL c.s., ANF c.s.” (N.G. 2015, no. 29);
- c. the Ministerial Regulation “Libya” (N.G. 2015, 28);
- d. the Sanction Decree “Islamic Republic Iran 2015” (N.G. 2015, 27);
- e. the Sanction Decree “Democratic People’s Republic of Korea 2015” (N.G. 2015, 30); and
- f. the Ministerial Regulation “Yemen” (N.G. 2015, 65).

⁹ Implementation of art. 7, paragraphs 1 and 3, of the NOIS and FATF Recommendation 11.

¹⁰ Art. 7, par. 1, of the NOIS and art. 11a, par. 1, of the NORUT.

¹¹ The full document can be consulted at <http://www.fatf-gafi.org/media/fatf/documents/Guidance%20for%20financial%20institutions%20in%20detecting%20terrorist%20financing.pdf>.

¹² The list can be consulted at: <https://www.un.org/sc/suborg/sites/www.un.org.sc.suborg/files/consolidated.htm>.



Note: Other suggested sources:

- the sources mentioned in annex 2 to the FATF document Guidance for Financial Institutions in Detecting Terrorist Financing; and
- the listing¹³ of the Office Of Foreign Assets Control (OFAC).

6.3 **Reporting of suspicions:** If a casino suspects or has reasonable grounds to suspect that funds are linked or related to, or are to be used for terrorism, terrorist acts, or terrorist organizations, it shall promptly report its suspicion to the FIU in accordance with art. 11 of the NORUT.

7. Policies and procedures regarding unusual transactions.

- 7.1 The casino shall establish and maintain an AML compliance program and shall have clear policies and procedures regarding unusual transactions.
- 7.2 The casino must provide its staff with specific guidelines and training in recognizing and adequately documenting unusual transactions, as referred to in Rule 11.
- 7.3 To guard against money laundering and terrorist financing, casinos must provide an audit trail for unusual transactions.
- 7.4 **Record keeping requirements**¹⁴: The casino shall maintain the records - containing the information and documentation necessary to decide whether a transaction is deemed unusual as referred to in Rule 8 – that are related to an internal or external unusual transaction report, for at least five years after the business relationship is ended, or after the date of the occasional transaction.
Such records must be sufficient to permit reconstruction of individual transactions (including the amounts and types of currency involved, if any) so as to provide, if necessary, evidence for prosecution of criminal activity.
Such records shall be made readily available at the request of the Gaming Control Board.

8. Reporting of unusual transactions.

- 8.1 **Reporting obligation:** By virtue of article 11 of the NORUT, the casino must report any unusual transaction or any intended unusual transaction to the FIU without delay. Unusual transactions shall be reported in compliance with the NORUT.
- 8.2 Casinos shall convey their policies and procedures for the reporting of unusual transactions, both internally and externally, to their personnel in an understandable way.
- 8.3 Each casino shall be responsible for the identification and reporting to the FIU of transactions that can be qualified as unusual transactions.
- 8.4 Identification of unusual transaction is the responsibility of all employees rendering services. It is the responsibility of the Compliance Officer that all employees rendering services are trained in the identification of unusual transactions and the procedures for reporting them, as referred to in Rule 11.
- 8.5 Every transaction or transaction pattern that in accordance with the NORUT is deemed unusual, shall be reported to the FIU¹⁵.

The following transactions or *intended* transactions are deemed unusual¹⁶:

- a. Transactions which in connection with money laundering or terrorism financing are reported to the Police or to the Department of Justice;
- b. Transactions by or on behalf of a natural or legal person, a group or an entity, who is named on a list, adopted by virtue of the Sanctions National Ordinance (“Sanctielandsverordening”, N.G. 1997, 336 as last amended).

¹³ The list can be consulted at FINCEN's website: <http://www.treas.gov/offices/enforcement/ofac/sanctions/terrorism.html>.

¹⁴ Implementation of art. 11a, par. 1, of the NORUT.

¹⁵ Implementation of art. 11, par. 1, of the NORUT.

¹⁶ Ministerial Regulation Indicators Unusual Transactions (N.G. 2015, no. 73).



Note: Casinos are required to check for amendments on Sanctions Decrees and Regulations on a regular basis and update their CDD- and AML/CFT-policies and – procedures accordingly to reflect such amendments. Sanction Decrees and Regulations and amendments are published on the GCB website.

- c. Transactions in the amount of NAf 5000,= or more, regardless whether the transaction is made in cash, by check or other form of payment, or through electronic or other non-physical means. This includes but is not limited to:
 1. A cashless transaction in the amount of NAf 5,000 or more.
A cashless transaction is a transfer from a bank account of the casino to a local or international bank account, at the request of the client.
 2. Accepting or releasing a deposit in the amount of NAf 5,000 or more at the request of the client;
 3. Sale to a client of chips in the amount of NAf 5,000 or more.
“Chips” includes but is not limited to tokens and credits.
 4. Pay-out of prize money in the amount of NAf 5,000 or more.

Note: A transaction may be a single transaction, but may also be a series, combination or pattern of transactions involving a total amount in excess of the monetary equivalent of NAf 5,000.

- d. Presumed money laundering transactions or terrorist financing:
Transactions where there is cause to presume that they can be related to money laundering or terrorist financing.
- 8.6 In the event multiple casino patrons appear to be acting in unison, the amounts of their individual transactions shall be added together to evaluate whether the transactions need to be reported according to the NORUT.
- 8.7 By virtue of art. 11, third paragraph, of the NORUT, the casino shall examine, as far as reasonably possible, the background and purpose of all complex, unusual large transactions, and all unusual patterns of transactions, which have no apparent economic or lawful purpose, in order to decide whether or not to report the transactions as unusual transaction to the FIU¹⁷.

The casino shall maintain records, containing the information and documentation necessary to decide whether or not to report the transaction or pattern of transactions to the FIU, for at least five years after the business relationship is ended, or after the date of the occasional transaction or transaction pattern).

Such records must be sufficient to permit reconstruction of individual transactions (including the amounts and types of currency involved, if any) so as to provide, if necessary, evidence for prosecution of criminal activity.

Such records shall be made readily available at the request of the Gaming Control Board.

- 8.8 The casino shall record each unusual transaction individually on a Reporting Form. Individual Reporting Forms are numbered sequentially. Any Reporting Form that is voided shall be retained by the casino.
- 8.9 Each report about an unusual transaction will include at least the following information:
- a. the identity of the client;
 - b. nature and number of the identification document of the client;
 - c. the nature, date, time and place of transaction;
 - d. the amount, destination and origin of the funds, securities, precious metals, or other values involved in the transaction;
 - e. the circumstances that identified the transaction as unusual.

¹⁷ Implementation of art. 11, par. 3, of the NORUT.



- 8.10 In case of manual reporting to the FIU¹⁸, the following items must be added:
- Casino reporting code;
 - Date and time of the report;
 - Amount of the transaction, including the currency in which it is to be executed;
 - In case of non-cash transactions, the bank(s) and account number(s) the client wishes to use in the transaction;
 - Whether or not the casino executed the transaction;
 - Any other relevant facts or circumstances pertaining to the client or the proposed transaction.
- 8.11 The Compliance Officer signs the Reporting Form if it is submitted manually.
- 8.12 The casino will not conclude the unusual transaction if the information, necessary for the report, cannot be obtained or if the objective of the CDD measures, referred to in Rule 5.1, was not met.
- 8.13 The casino shall report to the FIU within 48 hours the details of the transaction as recorded on the Reporting Form. The casino can use an electronic system approved by the FIU for this purpose, or submit a paper copy of the Reporting Form. Submission of paper forms shall not be done by fax for the purpose of data security. In either case, the casino will retain a copy of the Reporting Form for its own records, which are available to GCB Agents upon request.
- 8.14 Submission of Reporting Forms will be confirmed in a confirmation letter from the casino to the FIU, which references only the transaction numbers of the submitted Reporting Forms.
- 8.15 The FIU shall confirm receipt of confirmation letters by means of a stamped, signed and dated return of the confirmation letter. This letter confirms receipt of the corresponding Reporting Forms and serves as indemnification in a civil or criminal procedure. The casino shall file such letter with the copy of the original Reporting Form.

9. The Compliance Officer: appointment and responsibilities.

- 9.1 Each casino shall assign a Compliance Officer within its organization, who shall monitor compliance with Curaçao AML/CFT laws and regulations as well as with the casino's internal policies and procedures, as referred to in art. 5g of the NOIS.
- 9.2 The Compliance Officer must hold a position within the casino organization at at least middle managerial level. The Compliance Officer may be charged with additional management responsibilities.
- 9.3 The Compliance Officer must be independent of the Casino Games Operations.
- 9.4 The Compliance Officer must be able to carry out his/her function independently and effectively, in accordance with art. 5g of the NOIS.
- 9.5 The Compliance Officer shall have timely access to customer identification data and other CDD information, transaction records, and other relevant information.
- 9.6 The Compliance Officer shall be responsible for the proper execution of the provisions in this regulation and the necessary training of casino personnel to be able to identify and report unusual transactions, which includes the following activities:
- to organize training sessions for the staff on various compliance-related issues;
 - to review compliance with the casino's policy and procedures;
 - to analyze transactions and verify whether any are deemed unusual under the NORUT and hence subject to reporting to the FIU;
 - to review all internally reported unusual transactions for their completeness and accuracy with other sources;
 - to keep records of internally and externally reported unusual transactions;
 - to prepare the external report of unusual transactions;
 - to execute closer investigation of unusual or suspicious transactions;
 - to remain informed of the local and international developments on money laundering and terrorist financing and to make suggestions to management for improvements and;
 - to prepare periodic information on the casino's efforts against money laundering and terrorist financing.

¹⁸ I.e. reporting by non-electronic means.



- 9.7 The above-mentioned responsibilities shall be included in the job description of each Compliance Officer. The job description shall be signed off on and dated by the officer, indicating her/his acceptance of the entrusted responsibilities.
- 9.8 The casino shall inform the Gaming Control Board and the FIU of the identity of the Compliance Officer and of any changes regarding this position.

10. Screening of and appropriate training plans and programs for personnel.

- 10.1 Casinos shall ensure that their business is conducted at a high ethical standard and that the laws and regulations pertaining to financial transactions are followed. Each company shall establish and adhere to proper policies and procedures in screening their employees for criminal records.
- 10.2 Casinos shall develop training programs and provide training to all personnel who perform transactions as referred to in the NOIS and the NORUT.
- 10.3 Training includes setting out rules of conduct governing employees' behavior and their ongoing education to create awareness of the casino's policy against money laundering and terrorist financing.
- 10.4 To demonstrate compliance with the aforementioned training requirements, the casino should at all times maintain records that include:
 - a. details of the content of the training programs provided;
 - b. the names of staff who have received the training;
 - c. the date on which the training was delivered;
 - d. the results of any testing carried out to measure staff understanding of the money laundering and terrorist financing requirements; and
 - e. an ongoing training plan.

11. Examination by the Gaming Control Board.

- 11.1 All casinos shall provide information or documentation on money laundering and terrorist financing policies and deterrence and detection procedures to the examiners of the GCB in preparation of or during an examination and upon GCB request during the year.
- 11.2 The casino shall make the following items readily available:
 - a. its written and approved policy and procedures on money laundering and terrorist financing prevention;
 - b. the name of each Compliance Officer responsible for the casino's overall money laundering and terrorist financing deterrence and detection procedures and her/his designated job description;
 - c. records of reported unusual transactions;
 - d. records on unusual transactions which required closer investigations;
 - e. the completed source of funds declaration;
 - f. schedule of the training provided to the casino's personnel regarding money laundering and terrorist financing;
 - g. the assessment report on the casino's policies and procedures on money laundering and terrorist financing by the internal audit department or the casino's external auditor;
 - h. required copies of identification documents.
- 11.3 The listing above is not limitative and does not exclude the casino from providing additional information and documentation if the GCB so requests.

**End of Regulations for Anti-Money Laundering and
Combating the Financing of Terrorism (AML/CFT)**