



Appendix 5

Betsafe and Anti-Money Laundering and Counter Terrorism Finance Policy



Responsible Conduct of Gaming

Wentworthville Leagues Club is a founding member of Betsafe. To promote the Responsible Service of Gaming the Club has a policy which complies with the various acts of Parliament that apply to the Registered Clubs Industry. This policy will be implemented for the benefit of our members, their guests and the community in general.

The Club encourages responsible practices in advertising and promotions to ensure that the Club is not providing inducements to gamble. Signage to promote Responsible Gaming and where to seek help are posted in the gaming area and also throughout the Club. Wentworthville Leagues Club will not under any circumstances provide cash on credit cards or the cashing of cheques.

Members and/or visitors to Wentworthville Leagues Club have the right to exclude themselves from the Club. In order to provide support and advice, the Club's Managers are trained to be a confidential point of contact for the club's patrons, or the families of patrons, who believe they may have a problem with gambling. Wentworthville Leagues Club encourages those patrons who self-exclude to keep in contact with the Club so that the club can assist wherever possible.

Providing information and training to Club staff on problem gambling is essential. The concept of patron and employee care can help reduce problem gambling in the Club. Staff are trained to ensure discretion in matters involving problem gamblers.



ANTI-MONEY LAUNDERING AND COUNTER-TERRORISM FINANCING (AML/CTF) POLICY

Policy

To ensure that the club addresses its legal obligations to have an Anti Money Laundering and Counter Terrorism Financing program.

Scope

This policy covers all employees of the club and is ongoing.

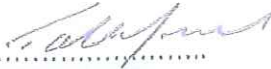
Guidelines

The club is committed to compliance with the requirements of the Anti-Money Laundering and Counter Terrorism Financing Act and Regulation so far as they apply to the activities of the club. The club will provide the resources to develop and maintain the necessary procedures for the making of reports of threshold transactions and suspicious activities to the Australian Transaction Reports and Analysis Centre (AUSTRAC).

Implementation

1. The Club Board and senior management commit themselves to oversight of the program.
2. The club will conduct an analysis of its AML/CTF risk.
3. A threshold transaction reporting program is established and maintained.
4. A suspicious activity reporting program is established and maintained.
5. Necessary records are to be generated and maintained and where appropriate, submitted to AUSTRAC.
6. Staff are trained about their responsibilities under the program.
7. Due diligence is conducted in the employment and promotion of staff
8. The program is to be subjected to regular review
9. Periodic reports are provided to the Board and senior management
10. Confidentiality and privacy are maintained

Approved by the Board of Directors on 25th of September 2008


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T. Oldfield AM
Chairman