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# Revised Terror Financing Assessment of the Inherent Money Laundering and Terrorist Financing Risks **GAMBLING SECTOR**

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# Contents

1.	INTRODUCTION.....	3
2.	SCOPE, LIMITATIONS AND METHODOLOGY OF THE RISK ASSESSMENT.....	4
3.	OVERVIEW OF THE GAMBLING SECTOR .....	4
3.1	Nature of the sector .....	4
3.2	Regulation of the sector .....	5
4.	THE INTERNATIONAL MONEY LAUNDERING RISKS ASSOCIATED WITH THE GAMBLING SECTOR.....	8
4.1	General money laundering vulnerabilities in gambling institutions.....	8
4.1.1	Casino value instruments.....	8
4.1.2	Exchanging low denomination currency for high denomination currency.....	8
4.1.3	Casino accounts and facilities.....	9
4.1.4	Winnings .....	9
4.1.5	Movement of people and money to casinos .....	9
4.1.6	Employee complicity.....	9
4.1.7	False documents.....	10
5	REPORTING BY THE SECTOR.....	10
5.1	The volume of reports received from the gambling sector .....	10
5.2	Types of reports filed.....	11
6	RISKS BASED ON THE SECTOR SURVEY AND RESEARCH .....	11
6.1	Products and services risks.....	11
6.2	Client risks.....	13
6.3	Transaction risks.....	13
6.4	Risks associated with delivery channels .....	14
6.5	Geographical location risks .....	14
6.6	Terrorist financing risks .....	14
7.	INDICATORS OF MONEY LAUNDERING ACTIVITIES .....	15
8.	CONCLUSIONS.....	16
	Overall money laundering risk of gambling institutions – Rating heatmap .....	17

## 1. INTRODUCTION

Money laundering (ML) can be described as the process whereby criminals attempt to conceal the proceeds of their criminal activities from the actual crimes, thereby giving the funds derived from criminal activities an appearance of legitimacy. The gambling sector has been identified by the anti-money laundering community internationally as being potentially vulnerable to being abused for money laundering purposes. Terrorist financing (TF) is the process by which individual terrorists and terrorist organisations obtain funds through legitimate, illicit or criminal activities to commit acts of terrorism.

In 2019, the Financial Intelligence Centre (FIC) conducted a preliminary risk assessment of the inherent money laundering and terrorist financing (ML and TF) risks affecting the gambling sector, including casinos, in South Africa. On 31 March 2022, the FIC issued the sector risk assessment (SRA) for the gambling sector, with a statement that the consideration of the TF rating was under further consideration. During 2023, the document and risk rating of casinos was reviewed by the FIC, assisted by consultations with the State Security Agency and the United Kingdom HM Treasury Technical Assistance Unit. In December 2023, following these consultations, the FIC re-rated the TF risks for casinos as “Low” TF Risk. This revised SRA for the gambling sector with the revised TF risk rating of low, is now duly recorded and published.

Gambling institutions were surveyed when the initial risk assessment was conducted in 2019 to ascertain their views on the sector’s vulnerability to ML and TF. This report captures the feedback provided to the questionnaire used in the initial risk assessment as well as open-source information on national and international money laundering risks in the gambling sector, and was updated with later statistics and updated information on terrorist financing risks. In addition, the FIC’s regulatory knowledge of the sector and the analysis of the regulatory reports submitted by the gambling sector to the FIC have also been considered.

The survey that was conducted offered valuable insights for the gambling sector, the relevant supervisors and the FIC. While it was understood that the ML and TF environment may change from time to time, the risks identified from this survey feedback and from other sources are significant observations and still provide valuable information to the sector on the ML and TF risks that it is exposed to.

## 2. SCOPE, LIMITATIONS AND METHODOLOGY OF THE RISK ASSESSMENT

2.1 This sector risk assessment report addresses the inherent money laundering and terrorist financing risks that face the gambling sector pertaining to products, clients, transactions, delivery channels and geographical location. Although it is recognised that these risks could be mitigated by introducing processes and procedures in accordance with the requirements of the Financial Intelligence Centre Act, 2001 (Act 38 of 2001) (FIC Act), such mitigation factors were not included in this report.

## 3. OVERVIEW OF THE GAMBLING SECTOR

### 3.1 Nature of the sector

3.1.1 The FIC Act identifies business sectors vulnerable to being abused for purposes of ML and TF. The gambling sector, falling under Schedule 1, Item 9 of the FIC Act, includes: *A person who carries on the business of making available a gambling activity as contemplated in section 3 of the National Gambling Act, 2004 (Act 7 of 2004) (NGA) in respect of which a license is required to be issued by the National Gambling Board or a Provincial Licensing Authority.*

3.1.2 Since the publication of the initial sector risk assessment for the gambling sector in 2022, betting has surpassed casinos as the leading gambling activity, based on Gross Gambling Revenue. Illegal gambling remains a major concern for the health and future of the sector. Although illegal, and therefore, not part of the formal gambling sector, it must be noted that online gambling and illegal land-based casinos have an impact on the ultimate risks associated with the sector.

According to the 2022/23 Annual Report of the National Gambling Board, betting contributes the highest share in Gross Gambling Revenue with 50.3%, followed by casinos with 36.8%. Following the betting and casino sectors, are the limited pay-out machines sector at 9 percent of revenue collected and the bingo market at 4.9 percent of revenue collected.

3.1.2 The South African gambling industry, which was risk assessed in its entirety and not only limited to licenced casinos, comprises the following activities:

- Casino gambling, both tables and slots as well as gambling machines, which offer unlimited bets and pay-outs.
- Limited pay-out machines, which operate as a secondary business in non-casino venues such as pubs, clubs, and restaurants. Limited pay-out machines operators place caps on the value of bets and pay-outs. There are four main categories of players in the limited pay-out machines industry, namely route operators, site operators, independent site operators and the operator of the national central electronic monitoring system. Route operators are companies that are licensed to own, manage and operate limited pay-out machines in conjunction with a site operator except independent site operators. Licenses are typically given to operate a maximum number of limited pay-out machines in a province. Regulations further exist to control the number of limited pay-out machines licensed per site.
- Horse racing and sports betting offered by several bookmakers on a fixed-odds or pari-mutual basis. Sports betting is the only segment of the industry in which online betting is legal, provided it is offered by a licensed South African bookmaker. This gambling activity is currently the largest contributor to total turnover in the gambling sector.
- Bingo, which has traditionally been in seated venues and is increasingly being offered via electronic bingo terminals.

3.1.3 In addition to the activities referred to in paragraph 3.1.3 above that are registered and regulated by the appropriate gambling authorities in South Africa, illegal gambling such as the playing of *fhafee*, dice, cards, bingo and table games at non-licensed venues are also taking place. These must be mentioned as they can potentially contribute to the ML and TF risks posed by gambling in South Africa. However, illegal gambling is increasingly internet based with individuals playing casino games and betting on sport and other activities through non-licensed entities, including unregulated international websites, bookmakers, and “casinos”.

## 3.2 Regulation of the sector

3.2.1 The National Gambling Board (NGB), an agency of the Department of Trade, Industry and Competition, was established in terms of the National Gambling Act, 1996 (Act 33 of 1996). This Act was replaced on 1 November 2004 by the National Gambling Act, 2004 (Act 7 of 2004) (NGA). The NGA makes provision for the oversight of matters relating to casinos,

gambling, betting and wagering and promotes uniform norms and standards in relation to gambling throughout South Africa.

3.2.2 The gambling sector is also regulated on a provincial level by nine provincial licensing and regulatory authorities, which are:

3.2.2.1 Eastern Cape Gambling Board (ECGB) – The ECGB oversees all gambling activities in the Eastern Cape, in line with the prescripts of the Eastern Cape Gambling and Betting Act, 1997 (Act 5 of 1997).

3.2.2.2 Western Cape Gambling and Racing Board (WCGRB) – The strategic intent of the Western Cape Eighteenth Gambling and Racing Amendment Act, 2013 (Act 8 of 2013) is to ensure that the board, in pursuit of its mandate, in respect of gambling industry regulation, designs and uses its structure, resources and processes for effective, efficient and optimal performance of its duties.

3.2.2.3 Gauteng Gambling Board (GGB) – The GGB's main functions are to oversee and control gambling activities in Gauteng, including: licensing of individuals and entities to conduct gambling and related activities; registering of persons engaged in such activities; approval and registering of all gaming devices; collecting prescribed taxes and levies for the Gauteng Province and other specified beneficiaries; manage and administer the Sports Development Fund; and advise the MEC on matters relating to gambling. The GGB is a regulatory authority in terms of the Gauteng Gambling Act, 1995 (Act 4 of 1995)

3.2.2.4 Mpumalanga Economic Regulator (MER) – The MER has been charged with the responsibility to perform all functions assigned to it in terms of the Mpumalanga Gambling Act, 1995 (Act 5 of 1995,) as amended, and the Mpumalanga Liquor Licensing Act, 2006 (Act 5 of 2006) or any other legislation by advising, reporting or making recommendations to the responsible member on any matter relating to the regulation of the gambling and liquor industries in the Mpumalanga Province.

3.2.2.5 Limpopo Gambling Board (LGB) – The LGB's philosophy is to operate in accordance with the highest moral and ethical standards, to accept responsibility towards and to strive for a healthy relationship with its stakeholders. The LGB was established in terms of section 2 of the Limpopo Gambling Act, 1996 (Act 4 of 1996), as amended.

- 3.2.2.6 Northern Cape Gambling Board (NCGB) – The NCGB is a public entity which falls under Schedule 3C of the Public Finance Management Act, 1999 (Act 1 of 1999) and performs the functions prescribed in the Northern Cape Gambling Act, 2008 (Act 3 of 2008), as amended, and the NGA to oversee gambling activities in the province.
- 3.2.2.7 KwaZulu-Natal Gambling and Betting Board (KZNGBB) – The regulatory role of the KZNGBB is prescribed and defined by provisions of sections 146 of the South African Constitution, the NGA, including the national regulations, the KZN Gaming and Betting Act, the Public Finance Management Act, 1999 (Act 1 of 1999), as well as Treasury regulations.
- 3.2.2.8 Free State Gambling and Liquor Authority (FSGLA) – FSGLA was established through the merger of the former Free State Gambling and Racing Board and the Free State Liquor Authority. The merger necessitated the review of both the Free State Gambling and Liquor Acts. This review brought about the Free State Gambling and Liquor Act, 2010 (Act 6 of 2010) which commenced on 11 June 2010.
- 3.2.2.9 North-West Gambling Board (NWGB) – The North-West Gambling Board is a statutory body established in terms of section 3 of the North-West Gambling Act, 2001 (Act 2 of 2001), as amended and classified as a Schedule 3C Public Entity in terms of the Public Finance Management Act, 1999 (Act 1 of 1999), to regulate the gambling sector in the North-West province of South Africa.

3.2.3 The gambling sector in South Africa, just as in many parts of the world is not free from illegal gambling elements. The magnitude of illegal gambling is not known but it is estimated to be costing the economy over R10 million per year. The NGA and the provincial acts make gambling, or the provision of gambling without authorisation or a license, a criminal activity. Upon conviction, a person may be liable to a fine, imprisonment or both. The regulators in South Africa do not carry any investigative powers, and as a result, a large portion of the responsibility for enforcement on illegal gambling lies with the South African Police Service.

## **4. INTERNATIONAL MONEY LAUNDERING RISKS ASSOCIATED WITH THE GAMBLING SECTOR**

The variety, frequency and volume of transactions make the gambling sector particularly vulnerable to money laundering. Casinos and other gambling institutions are by nature cash intensive businesses and most transactions are cash-based. During a single visit to a casino a customer may undertake one or many cash or electronic transactions, at either the “buy in” stage, during play, or at the “cash out” stage.

### **4.1 General money laundering vulnerabilities in gambling institutions**

#### **4.1.1 Casino value instruments**

Casinos use various value instruments to facilitate their customers’ gambling. Casino value instruments are most often used for money laundering when illicit funds are converted from one form to another. These include:

- Buying casino chips for cash or on account, then redeeming value by way of a casino cheque, bank draft or money transfer
- Purchase of chips from ‘clean’ players at a higher price
- Casino cheques payable to cash
- Use of chips as currency in illegal transactions
- Purchase of large numbers of ‘casino gift certificates’
- Purchase of casino reward cards
- Wire transfers to casinos.

#### **4.1.2 Exchanging low denomination currency for high denomination currency**

Individual launderers or organised groups use casino services to refine large amounts of low denomination bank notes into more manageable high denomination notes. Sometimes groups holding illicit funds will divide money between members of their group before entering a casino. Methods used for exchange of low to high denomination currencies include:

- Refining using the cashier’s desk;
- Refining using ‘note acceptors’ or gaming machines that accept cash;
- Use of casino account for refining.



### 4.1.3 Casino accounts and facilities

Casino accounts provide criminals further opportunities for laundering criminal proceeds. Many casinos offer deposit accounts and lines of credit with less scrutiny and customer due diligence requirements than financial institutions. The frequent movement of funds between financial institutions and casinos, or between casino accounts held in different casinos may expand the risks of money laundering. This includes:

- Cashing cheques into casino accounts
- Deposits into casino accounts by wire transfers or bank cashier's cheque
- Foreign holding accounts
- Safety deposit boxes.

### 4.1.4 Winnings

The intention of buying winning tickets from legitimate winners for more than they are worth seeks to create the impression that the funds were derived from a legitimate source.

### 4.1.5 Movement of people and money to casinos

- An inherent vulnerability of junket programmes is that they involve the movement of large amounts of money across borders and through multiple casinos by third parties. Junket participants generally rely on the junket operators to move their funds to and from the casino. This has the potential for creating layers of obscurity around the source and ownership of the money and identities of the players. This is made more difficult if the junket operator is complicit in any money laundering activity by the players or is solicited by criminals to blend illicit funds with the pool of legitimate funds.
- Where applicable, foreign marketing offices/branches of casinos may accept deposits into a patron's casino account before they travel to the casino. The study of casino vulnerabilities could not identify cases where the foreign marketing offices of a casino were subject to local controls for combating money laundering and the financing of terrorism, despite their role in taking deposits to player accounts. In such instances, in effect, there is no cross-border wire transfer to move the funds to the casino.

### 4.1.6 Employee complicity

Employee complicity is another method in which third parties are used to facilitate money laundering. Individual employees or organised groups comprising staff from different

departments in a casino could conspire with customers to enable money laundering transactions to go undetected. Methods include:

- Failing to file suspicious and unusual transaction reports or cash threshold transaction reports
- Destroying documents or transactions reports related to due diligence or reporting processes
- Falsifying player ratings and other gambling records to justify the accumulation of casino chips or gaming machine credits.

#### 4.1.7 False documents

Money launderers use false documentation to disguise the origin of criminal proceeds and to protect the identity of those laundering the proceeds in financial institutions and in non-financial institutions such as casinos.

## 5 REPORTING BY THE SECTOR

### 5.1 The volume of reports received from the gambling sector.

Between April 2018 and March 2023, the gambling sector filed a total of 1 992 014 cash threshold reports (CTRs<sup>1</sup>) at an average of 308 403 per year. During the same period, the sector filed a total of 20 043 suspicious and unusual transaction reports (STRs<sup>2</sup>) at an average of 4 009 per year. The gambling sector only submitted one terrorist property report (TPRs<sup>3</sup>) to the FIC during this time.

The number of regulatory reports filed by the gambling sector with the FIC in each financial year from 2019 to 2023 is depicted in the table below:

Reports filed by gambling industry	2018/19	2019/20	2020/21	2021/22	2022/23	Average number of reports
CTRs	439 022	481 429	271 820	418 704	381 039	398 403
STRs	2 064	3 741	3 050	5 639	5 549	4 009

<sup>1</sup> Reports on cash transactions exceeding R24 999.99 until November 2022; thereafter R49 999.99

<sup>2</sup> Reports on transactions that are regarded as unusual and suspicious, as explained in section 29(1) of the FIC Act

<sup>3</sup> Terrorist property reports refer to reports on property associated with terrorist and related activities, as explained in section 28A of the FIC Act

<b>TPRs</b>	0	0	0	1	0	0
<b>Total reports</b>	441 086	485 170	274 870	424 343	386 588	402 412
<b>Registered number of gambling institutions</b>	3 590	3 705	3 727	4 097	4 196	3 863
<b>Average number of reports per gambling institution per year</b>	441 086/ 3 590 = 122.9	485 170/ 3 705 = 131	274 870/ 3 727 = 73.8	424 343/ 4 097 = 103.6	386 588/ 4 1 96 =196.9	402 412/3 863 = 104,2

## 5.2 Types of reports filed

The majority of reports filed with the FIC by the gambling sector are CTRs, which indicate that, to a large extent, cash is still used in the industry. This considerably increases the risk for abuse by money launderers.

## 6 RISKS BASED ON THE SECTOR SURVEY AND RESEARCH

The risk factors used in this report align with those used in Guidance Note 7, issued by the FIC which is available [www.fic.gov.za](http://www.fic.gov.za), and also includes a short reference to risks of terrorist financing.

The risk factors below were taken into consideration when the inputs on the survey were analysed. The gambling sector needs to consider these factors when conducting their daily business.

### 6.1 Products and services risks

6.1.1. As gambling offers several diverse products, each uniquely licensed product carries the following potential risks:

6.1.2. Casinos – Most casino operators more commonly offer loyalty cards to their customers rather than day cards. Day cards require customer verification measures to mitigate the anonymous loading and withdrawal of money on the cards. Most of the operators use gambling chips in their casinos and do not require patrons to cash out their chips when leaving the casino. Where a casino is part of a group, it is allowed for patrons to use gambling chips at different

branches within a group. Casinos are legally obliged to have online monitoring systems in place. These monitoring systems are used to a large extent to track cash movement between the players and the casino. The players and the source of cash are, at the minimum, at this point identifiable or identified.

- 6.1.3. Route operators – The majority of route operators are relatively large role players, having more than 100 gambling machines licensed to them. Clients are only identified and verified when the pay-out exceeds a predetermined amount.
- 6.1.4. Site operators – The extensive use of cash by site operators is evident considering that these operators pay out their clients in cash as well as via EFT. In some instances, clients are only identified and verified when the pay-out exceeds a predetermined amount or the cash threshold of R49 999.99.
- 6.1.5. Bingo – The practice of only identifying and verifying clients when the pay-out exceeds the reportable cash threshold or another predetermined amount, is also followed by bingo operators.
- 6.1.6. Betting through bookmakers – Some operators use a combination of on-site, online and telephonic bet placement. Online betting makes it more difficult to correctly establish and verify the identity of the client and in instances where a client has already been identified, to verify the actual account holder. This may potentially increase the money laundering risks associated with the sector. Bookmakers who receive deposits via EFT, do not always conduct customer identification and verification prior to providing such customers with their bank details. This may complicate linking the deposits to a specific client or the bookmakers being guilty, knowingly or unknowingly, of assisting a money launderer when funds are repaid to the depositor. This also goes against the FIC's interpretation of customer due diligence and the timing of the receipt of funds as expressed in public compliance communication 31 (PCC 31) which deals with the acceptance of funds by an accountable institution prior to the completion of the prescribed client identification and verification requirements. It has been noted that client identification and verification often take place only when payments exceed the CTR threshold.
- 6.1.7. Betting through totalisators – Totalisators pay their clients in the form of a combination of cash and EFT payments. Clients are identified and verified prior to the placing of bets at the pay-out stage.
- 6.1.8. There is scope for anonymous transactions to occur and the identification and verification of clients is not consistent in the different gambling institutions. The value of winnings as well as

the fact that clients can place bets non-face-to-face, makes the money laundering risks associated with the products and services high.

## **6.2 Client risks**

- 6.2.1 Patrons are mainly natural persons so it is highly unlikely that a legal entity can participate in gambling activities because of the nature of the product and service offering of operators.
- 6.2.2 Conducting business with Foreign Politically Exposed Persons (FPEPs) and Domestic Politically Exposed Persons (DPEPs) is limited and where the client base includes such persons, their business, is limited. The percentage of business conducted with private individuals from foreign countries, is relatively high.
- 6.2.3 A large number of respondents do not risk rate their clients. This is part of the FIC Act requirements and non-compliance is in contravention of the Act. As a result, inherent money laundering risks are not sufficiently mitigated through compliance.
- 6.2.4 A small percentage of respondents have indicated that clients have placed bets or gambled with amounts inconsistent with their occupation and/or income, which contributes to the higher risks associated with clients in the sector.
- 6.2.5 The majority of gambling activities are conducted by South African citizens. This, together with the fact that a high percentage of gambling institutions do not risk rate their clients or enquire about the source of funds, results in the money laundering risks associated with clients being high.

## **6.3 Transaction risks**

- 6.3.1 Cash is still widely used to conduct transactions in the gambling sector. A large majority of casino operators allow clients to play with cash at gaming tables or gaming machines. Further, most winnings are paid in cash or via EFT.
- 6.3.2 The majority of limited pay-out machine site operators pay their clients with cash, while the remainder in this sector use a combination of cash and EFTs.
- 6.3.3 Payments in the bingo sector are also in the form of either cash, or a combination of cash and EFT payments.
- 6.3.4 The majority of bookmakers pay their clients through a combination of cash and EFT, while the remainder receive EFT payments from clients.
- 6.3.5 Totalisators accept cash on their premises. In addition, the amount of cash that a client may use to place bets during the day is generally not limited.

## **6.4 Risks associated with delivery channels.**

- 6.4.1 Gambling institutions must be aware of the delivery channels they use to attract and deal with clients. The use of alternative types of delivery channels by gambling institutions is becoming more prominent with technological developments such as smartphones and internet platforms. The onboarding of clients using such new technologies may obscure or conceal the true identity of the client. Alternatively, it may result in clients not being onboarded on a face-to-face basis, which in turn may increase the risk of the gambling institution being abused by criminals to launder the proceeds of crime. In instances where a service provider is used to provide any onboarding technology, such a service provider, and the technology, processes and procedures they use must be properly scrutinised to ensure all required information on clients is obtained and verified.
- 6.4.2 In the bookmakers' section, more than half of bets are placed through a combination of the bookmakers' premises, telephonically and using an internet portal. This makes it difficult to identify and verify the clients and increases the risk of money laundering.

## **6.5 Geographical location risks**

- 6.5.1 Business conducted with clients from countries that are tax havens, high secrecy areas and subject to those that have United Nations travel bans and sanctions were limited. This risk is often not addressed by sector participants as it is presumed as a low ML or TF risk.
- 6.5.2 The responses to the questionnaire indicate that conducting business with clients outside the respondents' geographical location is a moderate practice. The money laundering risks associated with conducting business with clients from high-risk countries are low. In general, the inherent geographic location risks associated with money laundering in this sector could be regarded as medium due to the possibility of conducting business with clients from other jurisdictions or areas outside of the institution's geographic area.

## **6.6 Terrorist financing risks**

A low percentage of respondents indicated that they have done business with a client whose name appears on the United Nations 1267 resolution list. In addition, only one terrorist property reports has been submitted by gambling institutions and none of the respondents to the survey indicated that they were faced with a situation that led them to believe they were facing a terrorist

financing risk. The investigating authorities have also indicated that, at this stage, there are no court cases or investigations relating to terrorist financing that involve casinos. This does not mean, however, that it is not a risk and authorities will continue to monitor the gambling sector for possible involvement in terror financing. Based on these factors and until investigations indicates further concerns in this regard, terrorist financing risks in the gambling sector is regarded as low.

## 7. INDICATORS OF MONEY LAUNDERING ACTIVITIES

The gambling sector in South Africa is continually growing and fast evolving, which brings with it specific challenges due to the introduction of technology in the sector. This is either in terms of how they do business or how they provide services to the market. Internet-based services are becoming a common feature of gambling or providing gambling.

While online gambling is outlawed in South Africa, online betting is not. Online betting takes away the face-to-face interaction which at times compromises the requirements of client identification in so far as the provision of required documentation is concerned.

The following are general indicators that could possibly point to the laundering of illicit funds through gambling activities.

- Patrons who are unable or unwilling to provide identification when purchasing or cashing in their chips;
- Patrons whose chip purchases consistently do not match their gambling activity, i.e. purchases in large quantities, of which the patron then only plays a small proportion, before cashing them all in again;
- Patrons whose appearance and apparent status are inconsistent with the values of their chip purchases (may also indicate that they are acting as an intermediary for an unknown third party);
- Instructions to forward the cash-in value of leftover chips to someone other than the patron (may also indicate that they are acting as an intermediary for an unknown third party);
- Frequent deposits of cash, cheques, bank cheques or wire transfers into casino accounts;

- Casino account transactions conducted by persons other than the account holder;
- Funds transferred from a casino account to a charity fund;
- Use of a casino account as a savings account;
- Use of false and stolen identities to open and operate casino accounts;
- Customer name and name of account do not match;
- U-turn transactions occurring with funds being transferred out of country and then portions of those funds being returned;
- Customer due diligence challenges, e.g. refusal, false documents, once-off gambling, tourist gamblers;
- Requests of casino accounts from foreign politically exposed persons (FEPs) and domestic politically exposed persons (DPEPs).

## 8. CONCLUSIONS

8.1 The money laundering risks, vulnerabilities and indicators associated within the gambling sector and international trends and practices point to inherent risks associated with money laundering as being high. It is, however, acknowledged that in South Africa, casinos have introduced certain measures to comply with anti-money laundering and combating financing of terrorism requirements which have resulted in the residual risks being reduced in these institutions.

8.2 In conclusion, the overall inherent Money Laundering Risks risk for the gambling sector is classified as high, taking all aspects of the sector into account including the casino sector, registered and unregistered (illegal) gambling institutions operating in South Africa, and based on national and international experience. The terrorist financing risk is regarded as low, but monitoring is ongoing and it may change if additional information is received that may impact on the rating.



## Money laundering risk factors for gambling institutions

Money laundering risk factor	Likelihood	Consequence	Overall risk rating	Priority
Compliance: Lack of mitigating circumstances through compliance – e.g. CDD, training, record-keeping	5	4	23	2
Products and services /delivery channels – Use of cash, online platforms, transaction size	4	4	21	1
Risk/threats associated with clients – PEPS, source of funds, complex structures	4	4	21	1
Risk/threat associated with geographical area – sales to clients outside geographic area, sales to clients in restricted area	4	3	17	3

## Overall money laundering risk of gambling institutions – Rating heatmap

<b>LIKELIHOOD SCALE (PROBABILITY)</b>	5 Almost certain likelihood/probability	11	16	20	23 Compliance	25
	4 Highly probable likelihood	7	12	17 Geographic risks	21 Products and services and clients	24
	3 Possible likelihood	4	8	13	18	22
	2 Unlikely probability	3	5	9	14	19
	1 Improbable likelihood	1	2	6	10	15
		1 Low impact	2 Minor impact	3 Moderate impact	4 Major impact significant	5 Severe impact
<b>CONSEQUENCE SCALE (IMPACT)</b>						