



## **INSTRUCTION (No.6 ) TO LICENSEES AND CERTIFICATE HOLDERS**

### **SUSPICIOUS TRANSACTION REPORTING**

Instruction made under Section 22(3)(b) of the Alderney eGambling Ordinance, 2009.

#### **1. Background**

The Alderney Gambling Control Commission (“AGCC”) is committed to meeting established international standards on Anti Money Laundering and Counter Terrorist Financing (“AML/CFT”).

#### **2. Suspicious Transaction Reporting**

The Guernsey Financial Intelligence Service (“GFIS”) has noted that, in line with their licence obligations in both Alderney and the United Kingdom, eCasinos, eGambling licensees and certificate holders are filing both Suspicious Transaction Reports via THEMIS and Suspicious Activity Reports to the National Crime Agency in the United Kingdom.

The GFIS has requested that, where reports are filed in both jurisdictions in respect of a person or persons located in the United Kingdom or where the activity has taken place in the United Kingdom, the report is first filed with the National Crime Agency in the United Kingdom.

By filing with the National Crime Agency first the reference number generated by the National Crime Agency report can then be added to the THEMIS report. Doing this will ensure that the GFIS and National Crime Agency can liaise effectively without duplication of work.

#### **3. Action to be taken**

MLROs and Nominated Officers should, where practicable, when dealing with persons located in or activity taking place in the United Kingdom necessitating the submission of a Suspicious Activity Report to the National Crime Agency and a Suspicious Transaction Report to the GFIS, file the Suspicious Activity Report with the National Crime Agency first and provide the reference number of that report in the Suspicious Transaction Report made to the GFIS using THEMIS.

The action taken by each eCasino or eGambling operator under this Instruction will be reviewed during on-site inspections and by other means as necessary.

25<sup>th</sup> August 2016