

Perth Casino Royal Commission

AMENDED WITNESS STATEMENT OF DANIELLE SLATTERY~~20~~ 25 October 2021

1. I, Danielle Patricia Slattery, care of Crown Perth, 201 Great Eastern Highway, Burswood WA 6100, make this statement in response to a summons to give evidence dated 8 October 2021.
2. I was issued with a list of topics on 12 October 2021, and was invited to address those topics in a written witness statement by 19 October 2021. I have done my best to address those topics in the time available and alongside other commitments.
3. This witness statement contains my personal knowledge and recollection. Where there are documents relevant to a particular topic, I have done my best to identify that document. For convenience, a list of the documents referred to in my statement is attached and marked "**DS-1**".
4. This statement is true and correct to the best of my knowledge and belief.

QUALIFICATIONS AND EXPERIENCE

(Question 1)

Professional background

5. I worked for the Australian Criminal Intelligence Commission (**ACIC**) from 2006 until joining Crown Perth in January 2021. I was based in Melbourne before moving to Perth in 2018.
6. The ACIC's operations are confidential and there are restrictions on what I am permitted to disclose about my work there. I have ongoing obligations under section 51 of the *Australian Crime Commission Act 2002* (Cth) not to disclose information that I acquired by reason of, or in the course of, the performance of my duties at the ACIC. I understand that my lawyers have provided the PCRC with a copy of a letter from the ACIC about my summons.
7. Bearing those restrictions in mind, I can say the following.

8. The ACIC is Australia's national criminal intelligence agency. It was formed in 2016 following the merger of the former Australian Crime Commission and CrimTrac. I was employed by the Australian Crime Commission before the merger.
9. The ACIC works with partner law enforcement agencies at the federal and state levels, as well as international agencies, to target serious and organised crime. This includes work alongside AUSTRAC and the WA Police Force (**WAPF**), among others.
10. I worked in various roles at the ACIC, starting in an entry-level position and working my way up to a senior position. Through the course of my work, I became a subject-matter expert on issues relating to the contemporary money laundering environment and AML tradecraft. I have a good understanding of money laundering typologies and predicate offending, as well as the ML/TF vulnerabilities and risks faced by cash intensive businesses and of reporting entities such as banks, casinos and money remitters.
11. My work required me to have a general understanding of the AML/CTF legislation. The ACIC, like many law enforcement agencies, is a user of the information provided by reporting entities under the legislation.
12. In terms of experience with the gaming sector specifically, I regularly reviewed and analysed the data provided by casinos under the AML/CTF legislation. This gave me some familiarity with casino operations and the information being reported out of those operations including junkets. And as a user of the data, I understood what reporting requirements casinos had as well as restrictions such as tipping off.
13. Risk management was another important part of my work at the ACIC. The ACIC operates in a heavily regulated environment, and deals with classified information. I conducted risk assessments to identify, manage and mitigate risks relating both to investigators investigations and to the use of the ACIC's coercive powers.

Qualifications

14. I hold a Certificate III Government (Security) - Personnel Security Course from the Attorney General's Department, Protective Security Training Centre and a Graduate Certificate in Criminal Intelligence from Charles Sturt University.
15. Before joining the ACIC, I completed the majority of a Bachelor of Arts – Recreational Leadership at Victoria University, which is currently deferred.

16. While I was with the ACIC, I completed the majority of a Graduate Diploma in Criminal Intelligence from Charles Sturt University. I have approximately one unit left to complete this diploma, which is currently deferred.

MY ROLE AT CROWN PERTH

17. I joined Crown Perth in January 2021 as the AML Compliance Manager for the Perth Casino, reporting to Adam Sutherland.
18. Steven Blackburn is leading a reform of Crown's financial crime resources and capabilities called the Financial Crime & Compliance (**FC&C**) Change Program. As part of this program, my title will be (subject to regulatory approval) Manager – FC Advisory, Perth. I report to the Group GM – FC Advisory, Shannon Lindner.
19. My role sits within "FC Advisory", which is part of the "Financial Crime Risk" division, shown on slides 13 and 32 of Mr Blackburn's 24 May 2021 presentation (CRW.512.081.1750). My position is relatively junior. I am not part of the senior management team, and I am not a delivery lead on any of the initiatives of the change program.
20. In broad terms, the role of FC Advisory is to advise all of the business units about financial crime, including AML/CTF risks and controls. This is part of the risk-based approach to the management and mitigation of financial crime risk. Our objective is to help the business units operate as an effective 'line 1' defence by giving them the tools and knowledge to make informed decisions about financial crime. This is part of the three lines of defence model.
21. In practical terms, and by way of example, my day-to-day work has involved things such as the following.
 - (a) Running both formal and informal training sessions for business units on financial crime. This covers induction training for new employees, targeted and specialised training for particular business units, and various ad hoc training and briefing sessions on financial crime risks.
 - (b) Reviewing AML/CTF-related standard operating procedures (**SOPs**) for business units, to make sure that they are aligned with relevant policies and procedures.
 - (c) Fielding and responding to queries from business units about their AML/CTF obligations and general financial crime risk management.

- (d) Reviewing samples of Unusual Activity Reports (**UARs**) on a periodic basis for quality assurance, and providing guidance to and supervision over Perth based Analysts who submit suspicious matter reports (**SMRs**) and conduct Customer Due Diligence.
 - (e) Working with the Cage and Premium Gaming on a review of Crown's existing DAB accounts, including the risk assessment of patrons and the process of returning funds to patrons with whom Crown has ceased business with, including Junket and International Programs.
 - (f) Liaising with law enforcement agencies including the ACIC, AFP and WAPF and assisting with requests from law enforcement. I have regular meetings with WAPF with a plan to have more thematic discussions about trends in financial crime, and to engage with law enforcement at the intelligence level.
 - (g) Assisting with aspects of the implementation of AML/CTF-related recommendations and remediation changes coming out of the inquiries and external reviews of Crown's operations. This includes assisting with the Remediation Project for Crown Perth, which involves weekly meetings with various action items.
22. Delivering training and providing education across Crown Perth has been a big part of my role to date. I have given a lot of formal and informal training to the first line business units about financial crime. For example, Crown rolled out a new online portal for the submission of UARs earlier this year, and I was responsible for delivering training to business units on how to submit UARs through the new portal. This included a discussion of red flag indicators and what constitutes unusual activity. The training was given by reference to an instructions and FAQ sheet (CRW.510.043.0650) and a list of red flag indicator examples (CRW.701.009.4983), and there is also a step-by-step instructional video. All of these materials are available on the AML Portal on the intranet.
23. Another example of training and education is my involvement in developing an internal Responsible Practices and Ethical Decision-Making workshop. This arose ~~out-of~~ in conjunction with a patron-facing Responsible Practices program, which was a joint effort across business units to develop patron communications regarding the changes Crown was making, particularly in relation to its treatment of funds deposited by patrons. This joint effort was primarily led by the FC&C team.

24. Following this, we delivered a pilot workshop to the Cage and Table Games Managers in October and we are planning to roll it out to other teams later in the year. The workshop involves a mix of awareness, instruction and group activities, with an assessment component. It focused on playing out particular scenarios that front-line employees may encounter in their jobs which raise financial crime, risk and ethical issues. The purpose of this is to empower the participants to make good decisions as part of the first line of defence.
25. As part of the workshop, we engaged a detective inspector from WAPF to attend and present to the personnel on a particular operation that was initiated from a Crown Perth referral. The example highlighted the impact of financial crime on the broader community and how the Casino industry plays an intelligence role in the detection and disruption of criminal activity. I have been working with WAPF more broadly to increase the flow of information on financial crime matters.
26. In addition to these sorts of matters, I am a member of two committees at Crown Perth.
 - (a) *The Legal Compliance Committee.* The Legal Compliance Committee has representatives from all of Crown Perth's business units. The committee meets monthly, and its purpose is primarily to provide for communication between the business units (at an operational level) and senior management in relation to potential or actual compliance breaches and how they are addressed. I represent the FC&C team and I contribute a monthly compliance certificate listing any specific compliance incidents relating to the FC&C business unit at Crown Perth. The results of the monthly compliance certificates are discussed at the committee meetings (along with general compliance issues, developments and policy changes) and items requiring further attention are noted as an action item. I understand that the outcome of the committee meetings fed into reporting to the Crown Perth Executive Risk and Compliance Committee, but I am not directly involved in this.
 - (b) *The POI (Persons of Interest) Subcommittee.* The subcommittee is made up of representatives of the Security, Surveillance, and FC&C teams at Crown Perth. The function of the subcommittee is to provide for the efficient dissemination of information between the Security, Surveillance and Financial Crime departments of Crown Perth as it relates to Persons of Interest (POIs) to Crown Perth, monitor and review the status and activities of POIs, triage of information to and from law enforcement agencies. This is separate to the Group POI Committee – the

subcommittee is Perth-specific and is about managing Crown Perth's relationship with local law enforcement and the sharing of relevant patron information to manage the risk of money laundering and any other criminal behaviour. This subcommittee does not make decisions on notices to revoke patron licences (**NRLs**), but discussion in the subcommittee may prompt escalation as necessary, which may ultimately result in a NRL.

27. The FC&C team is a group-wide team with personnel based across all of Crown's properties. At the moment, I am the only Perth-based member of the FC Advisory sub-division. Perth currently has four FC&C team members, comprising myself, two FC Analysts – Investigation and a Senior Manager in the Financial Crime Intelligence Unit.
28. More people are being recruited to join the FC&C team, including in Perth. This is being overseen by Mr Blackburn. We are building a broad array of experience covering the banking sector, gaming, Surveillance, Security, law enforcement and federal government intelligence.

THE AML/CTF PROGRAM

(Questions 2 and 3)

29. The current AML/CTF Program applicable to Crown Perth is the Joint AML/CTF Program approved and adopted on 2 November 2020, which is made up of:
 - (a) Crown Resorts Limited Joint Anti-Money Laundering and Counter-Terrorism Financing Program Part A, version 2.0 (CRW.514.002.0110).
 - (b) Crown Resorts Limited Joint Anti-Money Laundering and Counter-Terrorism Financing Program Part B, version 2.1 (CRW.700.102.5742); and
 - (c) Crown Resorts Limited Joint Anti-Money Laundering and Counter-Terrorism Financing Program Policy and Procedures, version 2.0 (CRW.700.103.5736) (**Policy and Procedures**).
30. The AML/CTF Program is implemented by business units through incorporating the relevant detail in the SOPs which guide their core functions. Financial Crime also has guidelines for investigations such as the Crown Financial Crime Team – Guidelines for Completing AML Investigations (CRW.700.102.5716), AML CURA Guidelines (CRW.708.018.0951), Customer Screening Guidelines (CRW.701.009.4859) and other

relevant instruments such as the SMR Decisioning Delegation Instrument (CRW.701.009.3873).

31. There are various policy documents that are relevant from a financial crime perspective in reducing exposure to ML/TF risk, though these are not elements of the AML/CTF Program specifically. These include, for example, the Third Party Transfers and Return of Funds Policy (CRW.700.100.1321), the Significant Cash Transactions (Source of Funds) Policy (CRW.512.102.0003), and the AML/CTF Policy Statement - Escalation of Critical Risk Customers (CRW.510.004.0703).
32. Question 3 asks me about various aspects of the AML/CTF Program. The detail is found in the above documents, but I can provide the following as a high-level summary.

Transaction Monitoring: Questions 3(a) and 3(b)

33. Transaction monitoring is not part of my role in FC Advisory. It is the responsibility of the Operations division and management. As such, I only have a general understanding of the transaction monitoring system.
34. Crown operates manual and automated rules to monitor for unusual or potentially suspicious transactions. Broadly speaking, the rules monitor a range of patron gaming and related activity which include transactions on certain Crown bank accounts. Monitoring of both manual and automated rules is carried out by Analysts, sitting in the Operations division of the FC&C team.
35. Crown's automated transaction monitoring system is called Sentinel. It runs a consistent set of rules across Crown Perth and Crown Melbourne to identify potentially suspicious gaming transactions. It was introduced into a live monitoring environment in Perth on 3 February 2021, and underwent modification in April 2021. Since then, there have been a range of new rules introduced and existing rules refined.
36. The detail of the transaction monitoring program is reflected in the AML/CTF Program, and the original transaction monitoring rules are listed in a memorandum from Jon Yeats (Senior Manager – AML Customer Investigations) to Nick Stokes (Crown AML/CTF Compliance Officer and Group General Manager, Anti-Money Laundering) titled Sentinel Transaction Monitoring, 28 February 2021 (CRW.510.043.0662) and the Crown AML/CTF – Risk Based Alert Monitoring – Risk Incubation Alerts (CRW.510.043.0545). The manual review process undertaken by the Analysts is outlined in the Manual Bank Statement Review Guidelines (CRW.701.009.4973). I

understand that the transaction monitoring rules are constantly evolving. The manual and automated rules (and rationales for them) as at 7 and 13 October 2021 are detailed in the summaries at CRW.701.009.2505 and CRW.532.078.0001 respectively. Again, I only have a high-level understanding of the transaction monitoring procedures as a member of FC Advisory.

UARs: Question 3(c)

37. Any Crown employee can submit a UAR by logging into the AML online portal on the Crown intranet and filling out an online form. The form has pre-set questions to be completed. The person submitting the UAR has an option to include reference to additional relevant documents, and note if any other business units such as Surveillance have been notified of the incident.
38. As I mentioned earlier, I have been involved in giving training to Crown Perth personnel on the UAR process using the new AML Portal, and I have been conducting sample reviews of Crown Perth UARs on a periodic basis. I understand from feedback I have received that employees find the online portal more user-friendly than the previous paper form.
39. Once a UAR is submitted, it goes into an online portal which the Analysts in the FC&C Operations team access on a daily basis. The FC&C Operations team have recently also made access to this portal available more broadly, to avoid the need for the Analyst to forward UARs on to other business units when seeking relevant information, and for relevant managers to be able to access their staff's reporting.
40. Analysts in the FC&C Operations team undertake a three-phase process in reviewing each UAR in the online portal, as follows.
41. Phase 1: The receipt, review, and triage of a UAR for Crown Perth is generally undertaken by Perth-based Analysts. From time to time, support will be provided by other Analysts in Melbourne or Sydney. This phase determines the priority level attached to the UAR and a review as to whether a more detailed investigation should occur.
42. Phase 2: Where a more in depth investigation is required, the content of the UAR will be the basis for additional enquiries. This will generally involve the analysis of information held by Crown (such as CCTV footage) or third-parties relevant to the reported activity. This phase of the investigation will ordinarily culminate in sufficient information for a

decision to be made as to whether to submit an SMR and/or undertake any other relevant workflow.

43. Phase 3: The finalisation of the investigation typically involves a decision to submit an SMR or undertake another relevant workflow such as escalating the customer to senior management. This phase also includes an assessment as to whether the customer/s risk rating should be adjusted.
44. The UAR process is recorded in the Crown Financial Crime Team – Guidelines for Completing AML Investigations (CRW.700.102.5716).

SMRs: Question 3(d)

45. The authority for making a decision to submit an SMR is set out in Crown's SMR Decisioning Delegation Instrument dated 10 September 2021 (CRW.701.009.3873). The following people have authority (subject to various state based licencing):
 - (a) Group Executive General Manager Financial Crime and Compliance Operations;
 - (b) Group Senior Manager Financial Crime Investigations and Screening;
 - (c) Group Senior Manager Customer Intelligence and Due Diligence;
 - (d) Manager Financial Crime Investigations and Screening;
 - (e) Manager Customer Due Diligence and Enhanced Customer Due Diligence; and
 - (f) Financial Crime Manager.
46. As a Financial Crime Manager in FC Advisory, I have the authority to form a reportable suspicion and lodge an SMR with AUSTRAC. But in practice, SMRs are typically lodged by members of the Investigations and Screening division of the Operations team within FC&C in line with the process I described earlier. I have only made a handful of SMR decisions since joining Crown Perth.

Patron risk: Questions 3(e) and 3(f)

47. The system for the identification and assessment of patron-specific risks is set out in Chapter 3 of the Policy and Procedures. This Chapter sets out general rules from which a member of the FC&C team can determine a customer's risk rating. The Chapter also sets out a range of customer risk workflows that the FC&C team will undertake depending on the customer risk.

48. A member of the FC&C team may change a customer's risk rating in accordance with Chapter 3 of the Policy and Procedures. They must undertake the relevant customer risk workflow as detailed in that Chapter.
49. If a decision is required to issue a revocation of licence to a customer in respect of a critical financial crime risk, then this decision is made by the Property CEO or the Group Person of Interest Committee. In certain other circumstances the General Manager Security & Surveillance may also issue a notice of revocation.
50. Chapter 3 of the Policy and Procedures was updated recently to remove the requirement under s 3.1.3 that all new high risk customers be escalated to the Group General Manager – AML each month (as this role no longer exists).
51. Other relevant documents on this subject are the AML/CTF Policy Statement – Escalation of Critical Risk Customers dated 12 November 2020 (CRW.510.004.0703); and the Memorandum on Critical Risk Customer Escalations and Deconflicting WOLs dated 30 August 2021 (CRW.701.009.3871).

Third-party transfers: Questions 3(g) and 3(h)

52. Since November 2020, Crown's policy has been not to accept payments from third parties, including money remitters, into its accounts for the benefit of a Crown customer. Crown will also not make payments to third parties, including money remitters, on behalf of a Crown customer. There were exceptions allowed for in the policy, however in February 2021 the WA Regulator requested the exception process to cease and the Casino Manual was updated to reflect this, as was the Return of Funds Policy.
53. These matters are recorded in the Crown Resorts – Third Party Transfers and Return of funds Policy (CRW.700.100.1321); and Section 29 – Lodged funds and TTs – Casino Manual (CRW.700.001.1182).
54. Third-party transfers are not prohibited by the AML/CTF legislation, but Crown has prohibited these transfers as an aspect of its risk management. As such, I see this as being both an AML/CTF matter and a broader risk management matter.
55. I do not have knowledge of any approvals of third-party or money-remitter transfers at Crown Perth during my employment. This is not something that would involve me in my role in FC Advisory. I understand that Nick Stokes' statement to the Victorian Royal Commission (25 April 2021) (CRW.998.001.0084) addressed this question.

Monitoring of patron balances: Question 3(i)

56. As I said earlier, transaction monitoring is not something that I am responsible for in my role in FC Advisory so I can only comment generally on Question 3(i).
57. The money laundering risk of using the DAB as a holding account is considered at the time of any assessment of a customer, through the UAR process. There is currently a Perth working group to conduct a risk assessment on previous Junket and International Program Customers with DAB balances. As I have mentioned, I have been involved in advising on the process of returning funds to customers from DAB accounts when Crown has decided to cease business with those customers.

MY ASSESSMENT OF THE AML/CTF PROGRAM

(Questions 4 and 5)

58. Question 4 asks me to compare Crown's AML/CTF Program with the AML/CTF Programs of other organisations of which I have experience. I cannot assist with this question because I have not had any experience with the AML/CTF Programs at other organisations. That is not something that I dealt with at the ACIC.
59. Question 5 asks me to provide my view on any deficiencies in Crown's AML/CTF Program, and to provide reasons for my answer. Given my background and the nature of my role at Crown, I am not in a position to assist the PCRC with an assessment of Crown's Joint AML/CTF Program.
60. I can say that the Joint AML/CTF Program has been scrutinised by Crown and external consultants as part of the various reviews. Additionally, I understand that Crown is commissioning an independent review of the Joint AML/CTF Program by another external expert. These matters have been overseen by Mr Blackburn and the senior management team. Being a relatively junior member of the team, I have not had any direct involvement.

IMPLEMENTATION OF THE AML/CTF PROGRAM

(Question 6)

61. Question 6 asks me for my view on whether the AML/CTF Program is properly implemented in practice at the Perth Casino, with reference to several sub-topics.
62. I have not investigated this in a direct and comprehensive way, though I understand that this may be covered by some of the expert consultants engaged through the remediation

process and inquiries. As mentioned, this is something handled by senior management and does not involve me.

63. Crown's systems, policies, and procedures have been in a near constant state of change as the business has responded to the recommendations coming out of the expert reports and inquiries, and Mr Blackburn's FC&C Change Program.
64. With that in mind, I can make the following observations about the sub-topics in Question 6.

Policies and Standard Operating Procedures: Question 6(a)

65. My understanding is that the SOPs were reviewed from an AML/CTF perspective to ensure that they reflect the Joint AML/CTF Program approved in November 2020, though I was not involved in that review. I believe it happened before I joined.
66. I have recently reviewed a set of SOPs from the business units to check that they align with the subsequent changes to the way Crown conducts its business, including things like the treatment of cash deposits and third-party transfers, junkets, and the UAR process. Examples of these SOPs are identified at Items 10, 11, 14, 15 and 17 of DS-1. My job was to check that these were properly implemented in the business unit SOPs. As part of that review, I had in mind the broader requirements of the Joint AML/CTF Program.
67. Based on this work, my view is that the SOPs properly implement the Joint AML/CTF Program.

Casino Manual: Question 6(b)

68. My role has not required me to review the Casino Manual in detail because I have focused on the business units' SOPs governing their day-to-day jobs.

Staff and resourcing: Question 6(c)

69. I think that staff and resourcing has been sufficient to implement the Joint AML/CTF Program. With that said, the FC&C Change Program has led to a dramatic change in the structure and resourcing of financial crime personnel at Crown. The uplift is still in the process of being completed and I understand that more people are being recruited. I cannot speak to the situation before I started but my experience has been that the resourcing so far for the proposed structure is of a high calibre and with multiple new sections within Financial Crime to implement the change program. Resourcing will be

enhanced by the uplift program and the recruitment of additional resources to assist with financial crime and compliance. I do note that for the most part of my time at Crown, a significant focus of resourcing has been on the various inquiries, royal commissions, AUSTRAC enforcement, and implementing multiple external recommendations.

Training of staff: Question 6(d)

70. I have been personally involved in the uplift of financial crime training at the Perth Casino, as I mentioned above. I have received positive feedback on the training, and I believe it is continually embedding the Joint AML/CTF Program. The uplift program includes the recruitment of a Manager – FC Training, who will sit in the FC Advisory team and help to further improve the training programs.

Reporting and handling of suspicious matters: Question 6(e)

71. I have explained the UAR and SMR process in response to Question 3 above, and I also mentioned that I have been undertaking sample reviews of UARs for Crown Perth. My view is that the Joint AML/CTF Program is properly implemented.

Risk assessment, control, and management: Question 6(f)

72. I have explained the system for the identification, management, and control of patron risk in response to Question 3 above. My view is that the Joint AML/CTF Program is properly implemented.

Transaction monitoring: Question 6(g)

73. I have explained what I can about transaction monitoring in response to Question 3 above. My view is that the Joint AML/CTF Program is properly implemented.

CHANGES TO THE AML/CTF PROGRAM

(Questions 7 and 8)


74. Questions 7 and 8 ask about changes that have been made during my employment or which are proposed to be made to the Joint AML/CTF Program. The question refers to the Joint AML/CTF Program, but goes on to refer to the SOPs, Casino Manual, and various other aspects.
75. The only changes to the Joint AML/CTF Program during my employment have been an update to Part B, which was approved on 10 August 2021, and a minor update to the Policy and Procedures, which was approved on 29 September 2021. The changes to

the Policy and Procedures are outlined at 50 above. Given the nature of my role described above, I was not involved in these revisions. However, based on my review of version 2.1 of Part B (CRW.700.102.5742), I am able to make the following high-level observations about the changes to Part B:

- (a) the procedures for documentation-based verification and electronic verification of customer information have been updated to reflect the current practice;
- (b) the updated Part B contains more elaborate procedures addressing discrepancies detected in the course of verifying a customer's KYC information or politically exposed person (**PEP**) status, including steps to be undertaken by the Financial Crime Team;
- (c) as Crown has ceased its junket operations and resolved to only deal with individual customers from November 2020, procedures relating to junkets and corporate customers have been removed from the updated Part B; and
- (d) Part B has also removed requirements relating to inactive PEPs. I understand that, previously, inactive PEPs would potentially be risked lower and continued to be monitored through transaction monitoring procedures, and that the new process would be reflected in the minor changes to the Policy and Procedures which are currently underway.

- 76. As mentioned, I understand that the Joint AML/CTF Program has been considered by expert consultants and will be subject to a further independent review. This is something being handled by Mr Blackburn and management so I cannot speak to the details.
- 77. Looking beyond the Joint AML/CTF Program to the various SOPs and implementing documents, it would be impractical for me to catalogue all of the changes that have occurred since I joined. As I said, Crown has been undertaking comprehensive reforms on financial crime and compliance as part of its remediation program and further to the various inquiries and expert reviews. As such, the systems have been in a state of continuous change and uplift. My understanding is that all of the changes would be recorded in documents.
- 78. Question 8 then asks me to consider whether these changes will address any deficiencies in Crown's Joint AML/CTF Program. As I said in response to Question 5, I am not really in a position to assist the PCRC in identifying deficiencies in the Joint AML/CTF Program and there are others who are better placed to do so, such as Mr

Blackburn. Since I am not involved in these higher-level strategic matters, I do not know what the timeframe is but, again, that is something that I expect Mr Blackburn could assist the PCRC with.



DANIELLE SLATTERY

Dated: 20 25 October 2021