MINIMUM INTERNAL CONTROLS STANDARDS

THE CASINO GAMING COMMISSION

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DEFINITIONS

The following definitions apply:

“advertising” means any promotional activity relating to a particular casino or activities therein in Jamaica, or casino gaming in Jamaica generally.

“bankroll” means the amount of cash or cash equivalent that a casino operator has available on the casino premises, or within reach of the casino premises for immediate use when required, to pay any gaming debts owed by the casino operator to its patrons.

“bankroll formula” means a method for calculating the minimum amount for a bankroll that a casino operator should maintain.

"breach” refers to actions or omissions on the part of the casino operator deemed to be a violation of terms and conditions set forth by regulatory authorities or the casino’s own policies. For example, engaging in fraudulent activities, or manipulating games.

“canister” means a lockable container housed in a slot machine, electronic table game or electronic table game betting station machine which stores paper-based currency or any other representation of value accepted by such machine.

“cashless funds transfer system” means the collective hardware, software, communications technology and other ancillary equipment used to facilitate the electronic transfer of cashable or non-cashable credits to a patron at a gaming machine.

“chip purchase voucher” means a voucher drawn on a patron’s account to be exchanged for gaming chips.

“chip runner” means a casino staff member who supplies gaming chips, or gaming tokens to table games in progress.

"complimentary services” means any services or goods provided by a casino operator directly or indirectly to an individual in respect of the anticipated or actual gaming activities of that individual at no cost or at reduced cost where the provision of such services or goods is not generally available to the public and includes cash or non-cash gifts, the awarding of reward or other loyalty points otherwise than in accordance with any stated reward scheme.

“controlled contracts” has the meaning assigned to it in Part VI of the Casino Gaming Act.

“count room staff” means the employees responsible for handling the counting, sorting, and verification of the money collected from the casino's gaming operations.

“data controller” has the meaning assigned to it in section 2 of the Data Protection Act.

“data subject” has the meaning assigned to it in section 2 of the Data Protection Act.

“duty to maintain due diligence reports of all business associate relationships” in the casino industry refers a comprehensive approach to risk management, compliance, and oversight to protect the integrity of the operation, prevent regulatory violations and mitigate risk. This framework includes: background checks, compliance monitoring, contractual agreements, risk assessments, ongoing oversight, staff training and eduction, and documentation and record-keeping.

“General Advertising Guidelines” means the guidelines of the Comission designed to ensure that marketing communications in relation to casino gaming are socially responsible.

“house betting rules” refers to general guidelines setting out how bets are placed, accepted and settled within the casinos.

“house rules” refers to general guidelines set by the casino operator governing the conduct of players and the operation of games.

“introducer” means a person or entity (including a third-party marketing agent and/or junket) that brings in new players to a casino.

“mantrap” means an arrangement of doors with a passageway between them, with the defining characteristic that only one door can be opened at a time, with the intention to only allow a single person to pass through.

“marketing junket” refers to a promotional event or trip, organized by a casino or a gambling establishment to attract high-rolling players, commonly referred to as VIP players or high rollers

"parlay wagering” means a type of bet in which bettors combine two or more individual bets into a single wager, with the key characteristic that all of the individual bets must win for the overall parlay to be successful.

“pit supervisor” means key employee in a casino responsible for overseeing a specific section of the gaming floor.

"pit supervisor plan” means a set of guidelines or strategies devised by the Pit Supervisor to manage and optimize the operation of the gaming pit. This may involve managing staffing, ensuring compliance with gaming regulations, and implementing procedures for handling customer issues.

“redemption kiosk” means a self-service machine or terminal that allows patrons to perform various transactions related to their gaming activities. These kiosks are typically located throughout the gaming floor and provide a convenient way for players to access their funds, redeem vouchers, or perform other transactions without the need to visit the main cashier cage.

“responsible gaming framework” means guidelines issued by the Commission intended to provide an overall orientation to responsible gaming practice and policy, for adoption by casino gaming operators in Jamaica to minimize gambling-related harm.

“restricted gaming area” means a gaming area operated as if the casino operator limits patron access to it.

“slug” includes counterfeit currency, dye-stained notes, counterfeit chips, counterfeit tokens and coins, foreign coins and all tokens and coins and denominations of tokens and coins not programmed to be accepted by a particular slot machine or found in the table game drop box or table game float.

"table game pit” refers to an area in a casino where various table games are situated.

“third-party systems” means a hardware system or process performed by someone who is not part of the casino operator or Technology Platform Provider.

“wire transfer” means an electronic transfer of funds to or from a patron.

GENERAL

Casino operators shall operate according to robust, well-documented and auditable internal controls. The Casino Gaming Commission (the Commission) will undertake regular on-site inspections and off-site supervision of the casino's operations to assess whether it is conducting its business in a controlled manner, in conformity with law and regulations, and to assess the correct application of the procedures documented in the approved documented internal controls (ICs), and whether the licensee's current approved ICs remain relevant and appropriate to the business. The licensee shall therefore ensure all operational changes are addressed in the internal control standards and secure the Commission's formal approval before implementing any such change in accordance with the Casino Gaming Act (the Act), the attendant Regulations, Minimum Internal Controls (MICs) and other directives.

A. ORGANIZATIONAL STRUCTURE AND SUCCESSION PLAN

i. The casino operator shall establish and maintain a detailed organizational chart depicting appropriate segregation of performance of functions and responsibilities. Key employees who are involved in the day-to-day operations and management shall be identified, including any executive, employee, or agent of the licensee, having the power to exercise a significant influence over decisions concerning any part of the casino's operations. The chart should include:
   a. the key employee positions;
   b. other supervisory employee positions;
   c. other positions of casino staff;
   d. the functions for each position or group of positions; and
   e. the supervisory relationships between them.

ii. Description of each position shown on the organizational chart, shall include duties, responsibilities, authority, supervisory capacity, signatory authority, and access to restricted areas.

iii. The casino operator shall maintain a register of the current occupants of each position in the organizational chart, including temporary or acting appointments, and ensure that the chart is kept up-to-date.

iv. If there is a change to the organizational chart, after submission to the Commission, the updated organizational chart should be submitted within five (5) days of the change and a log of the effective date of the previous chart and updated chart shall be indicated.

v. A Succession Plan shall be established, depicting contingencies for the loss of key employees or supervisory employees, including any changes that may need to be made to the organizational structure to maintain the lines of authority and separation of roles and responsibilities appropriate to ensure compliance. The organizational chart shall be reviewed annually by the Compliance Committee to confirm segregation of duties and updated within five (5) days of any change.

vi. The internal control document shall specify the circumstances in which one (1) casino employee may perform the duties of another.

vii. In the event of a vacancy in any licensed position, the casino operator shall, within five (5) days after it becomes aware of the vacancy, inform the Commission of:
   a. the vacant position;
   b. the date on which the position will become or became vacant;
   c. the measures to be taken by the internal control document of the casino operator if no replacement is found prior to the date of termination; and
   d. requirement for a provisional personal licence under the Act, where necessary, in accordance with section 33 of the Act.

B. TRAINING, SUPERVISION, MOVEMENT & EMPLOYEE HIRING

For a casino operator to be confident that its employees have sufficient probity and competence to be trusted to safely and securely work in the licensed casino operation, with access to secure and confidential assets and information, including customer identity and funds, the following shall be implemented by the casino operator:

Training, Supervision and Movement

i. The casino operator shall implement detailed internal controls to ensure that persons who are required to obtain personal licences under section 31 of Act are suitably qualified, and trained, initially and on an ongoing basis, and shall be experienced in operational training of approved gaming equipment, and gaming machines, where necessary.
ii. Employees shall be exposed and experienced to the monitoring mechanisms for problem gambling and player protection, fraud and security.
iii. Training systems shall be developed, maintained and amended at least once per year, to ensure competencies for all key employees based on the casino operator's assessment and/or directive from the Commission.
iv. Training shall be in tandem with the changes to the documented training systems.
v. In support of the regulations, credit policy training shall be issued once per year by a designated officer identified on the organizational chart displaying adequate qualifications and expertise to facilitate such training.
vi. The casino operator shall implement a system to enable the work undertaken by each employee to be fully documented, recorded by video surveillance and monitored by the designated supervisor regarding any work for gaming machines, equipment relating to gaming, cashier's cage, and casino floor and any other area, as necessary.
vii. A casino operator shall ensure that key personal licensees or provisional personal licensees, together with any other applicable employees are suitable for their level of responsibility, control and influence of the casino's operations and are suitable for movement within the organizational chart, based on expertise and qualifications in support. All licensed employees shall undergo annual refresher training. Compliance staff shall receive a minimum of eight (8) hours of AML/CFT training per annum. Competency assessments shall be documented and filed annually with the Human Resources department

Employee Hiring

i. The casino operator shall identify and record the knowledge, skills, qualifications, and experience required for each position, and ensure satisfaction of same through:
    a. confirmation of references, information on past regulated industry experience and related discipline;
    b. verification of criminal records, and
    c. certified proof of qualifications and maintenance of internal records in support.
ii. The supervisor of a casino employee shall be capable of performing the functions of said casino employee under his or her supervision. The supervisor's competencies should be recorded in his or her personnel file and reviewed at least once per year.

Where differing levels or classifications of employees undergo differing degrees of vetting, such procedures should be recorded, maintained, and monitored by the casino operator. These procedures shall be audited internally and externally, once per year, or shorter as necessary. Criminal record checks shall be conducted at least once every three (3) years for all licensed employees. Reference checks shall be mandatory for all new hires.

C. EMPLOYEE SIGNATURES

i. The casino operator shall maintain a secured database of signature specimens for all casino

employees and be displayed alongside each signatory's first and last name and assigned employee number. This information should be accessible by the accounts department to facilitate cross-referencing and authenticity against day-to-day activities related to the casino's operations, including gaming floor payout approvals and disbursements.

D. ACCOUNTS

i. The casino operator shall implement effective control of the casino's financial affairs via specified authorization policies, discrepancy assessment protocols and any other appropriate mechanisms.

ii. The casino operator shall implement and follow proper accountability for assets, including mechanisms to ensure that recorded assets are compared with actual assets at sufficient intervals determined by the casino operator to minimize the risk of misappropriation. The Commission is at liberty to provide directives for specified intervals of accountability exercise based on an assessment of the casino operator's internal controls. Assets shall be reconciled against records on a quarterly basis. The casino operator shall submit unaudited interim financial statements quarterly and audited financial statements annually.

iii. As a part of the responsible accounting procedure, authorization of financial transactions shall be performed in accordance with specified authorization policies as set out in the internal control document of the casino operator.

E. FINANCIAL STATEMENTS AND ANNUAL REPORT PRESENTATION

i. The casino operator shall ensure that policies in relation to the creation of financial statements and annual reports are developed, maintained and monitored on an annual basis by the Chief Financial Officer or other designated officer with accounting expertise identified on the organizational chart.

ii. Unaudited financial statements are to be submitted to the Commission on a quarterly basis, no later than the 15th day following the end of each financial quarter.

Year-to-date unaudited financial statements reflecting the period since the last audited financial statements were submitted to the Commission shall also be submitted to the Commission within sixty (60) days of the date on which any of the following events occur:

a. license termination;
b. change in the business entity; or
c. change in control or ownership.

If any of the above events at paragraph (ii) occur, the casino operator shall contact the Commission prior to submitting the unaudited financial statements.

iii. In the event that the independent auditor's engagement is terminated either when the independent auditor resigns or is dismissed by the casino operator, the casino operator shall provide the Commission with a signed statement from its Compliance Committee within twenty-one (21) days of termination setting out the details of the termination and confirming whether or not there have been any disagreements between the parties and if so the details of any such disagreements.

F. THE CONDUCT OF FINANCIAL TRANSACTIONS

Maintenance of bankroll – formula and worksheet:

i. The casino operator shall implement the minimum bankroll requirements below:
   a. Implement robust mechanisms based on the best industry practices for the formula to be used to determine the appropriate size of a bankroll for casino gaming.
   b. Submit a minimum bankroll analysis worksheet to the Commission, prepared on a basis as frequently as necessary by the casino operator to determine whether a cash deficiency exists.
   c. After initial submission at paragraph (a), the worksheet shall be submitted to the Commission each month for the first three (3) months after the casino's opening, and if released from the monthly requirement by the Commission, submissions by the casino operator shall be quarterly after that until the first anniversary of the casino's opening.
   d. Maintain records reflecting accurate monthly computations of the minimum bankroll requirement and actual bankroll available.
   e. The Commission, through written direction, may require a casino operator to provide computations more frequently than set out above, to undertake additional record keeping, and/or maintain a bankroll higher than the minimum set by the casino's bankroll formula.
   f. Maintain bankroll at no less than the minimum amount.
   g. The liability of outstanding chips and tokens, as calculated during the quarterly inventory, shall be included on the minimum bankroll analysis worksheet.
   h. The bankroll worksheet shall be submitted when the casino operator's cash position materially changes and/or when there is a cash deficiency.
      - The casino operator shall indicate to the Commission the general process conducted to determine a material change in the bankroll, including findings from regular monitoring, comparing actual versus expected bankroll, analysis of trends, and assessing impact.
   i. If at any time the licensee's available cash or cash equivalents are less than the minimum bankroll amount required, the licensee shall immediately notify the Commission and may require an adjustment to the cash requirement.
   j. The casino operator shall immediately notify the Commission in writing of the shortfall of cash and how the casino operator proposes to remedy it in accordance with its established internal controls.

Handling Cash and Wire Transfers:

i. Through the internal control document, the casino operator shall set out how a casino employee shall deal with cash received from a patron and in each case shall be designed to ensure that the integrity of the casino operations is maintained:
   a. for gaming;
   b. by way of tips or gratuities; or
   c. for other purposes.

ii. The casino operator shall ensure the following for wire transfers:
   a. robust and standardized log of all wire transfers, using a sequential numbering system;
   b. obtain and record all information relating to a wire transfer, including required signatures and documents necessary for reconciliation;

c. identification of the patron and the source or destination of the transfer;
d. reconciliation of accounts relating to wire transfers; and appropriate reporting of identified discrepancies.

Tips And Gratuities:
The casino operator shall submit to the Commission for approval a description of their comprehensive and robust internal controls for acceptance of tips and gratuities by casino employees that will adequately mitigate risks to the integrity of the casino gaming industry with regards to anti-money laundering, counter-finance terrorism and counter-proliferation financing (AML/CFT/CPF) including bribery, fraud, and regulatory non-compliance. At a minimum, the tips and gratuities policy shall provide for:

i. the posting by the casino operator of its house rules regarding tips and/or restrictions on dealer tips, if applicable;
ii. how the acceptance and redemption of tips or gratuities by each type of permitted employee at each type of game will be monitored and controlled;
iii. monitoring any casino employees who are prohibited from accepting or soliciting tips or gratuities;
iv. how tips and gratuities are to be identified by the surveillance operators;
v. how tips and gratuities are to be identified and reported to the Commission during identification in the financial statements and annual reports.

Use of Drop Boxes

i. The internal controls shall specify the time or times when drop boxes will be removed and the contents counted.
ii. With respect to table game drop boxes, the casino operator's policy shall include mechanisms for the following:
    a. each container to be permanently marked with the game type, shift, and a number corresponding to a permanent number on the table used;
    b. all markings on the container to be clearly visible from a distance of at least twenty (20) feet;
    c. the container is to be locked to the table and separately keyed from the container itself;
    d. only one (1) drop box is to be allowed for each table per shift, except for poker tables offering jackpots, which will have a poker drop box and a jackpot award drop box;
    e. a log for authorized personnel of the casino to sign upon receiving, retaining, and returning restricted gaming keys to sensitive areas, including drop boxes and count room(s);
    f. procedure for verifying the exchange of full drop boxes with empty drop boxes after table inventory procedures are completed.

G. MAINTENANCE AND RETENTION OF RECORDS

i. The casino operator shall establish the procedures for record-keeping having regard to the Data Protection Act of Jamaica (and attendant regulations) and the Anti-Money Laundering and Combating the Financing of Terrorism and Proliferation Financing Guidelines for

Casinos, 2024.

ii. The internal controls of the casino operator shall include:
    a. electronic storage of documents, papers and information relating to the casino's operations, including password protection mechanisms, system storage mechanisms and authorized access register; and
    b. physical storage of documents, papers and information relating to the casino's operations, including a register of employees with hierarchical access (where necessary), and a log sheet monitoring the custody of documents handled at the designated storage location.

iii. The policy for record-keeping should be reviewed and updated annually or at such other frequency as the Commission may direct by a designated officer identified on the organizational chart. Electronic records shall be retained for a minimum of seven (7) years. Access logs shall be reviewed quarterly. Compliance with record-keeping requirements shall be audited annually.

iv. The register of all gaming machines and gaming equipment is to be reviewed and report provided to the Commission annually by a designated officer, identified on the organizational chart.

H. CASINO LAYOUT

Restricted Gaming Area:

i. If the casino operator proposes to operate any gaming area as a restricted gaming area, whether at all times or from time to time, the procedures shall specify:
    a. the nature of the restrictions; and
    b. when they will be applicable;

i. The casino operator shall indicate how the operation of a restricted gaming area does not compromise:
    a. the integrity of the conduct of gaming in the gaming area;
    b. the effectiveness of the surveillance system; or
    c. the safety of patrons and employees.

Cage:

i. The casino operator shall ensure that:
    a. the casino premises has at least one (1) fully enclosed area designed to house cashiers and to store any cash, chips, chip purchase vouchers, markers, and documents to be provided to patrons for the purpose of gaming cage; and
    b. all such items are stored in a cage.

ii. A cage shall be constructed and configured in accordance with the casino operator's documented industry best practices.

iii. The main cage of the casino shall include a mantrap.

Count room:

i. The casino operator shall ensure that:
    a. the casino premises have a count room, with an enclosed area designed to perform the following functions:

- accommodate the receipt of cash, drop boxes and storage boxes, and
- the counting of those items and their contents.

b. only counting room staff are present during a count, and conduct a count.

ii. The count room shall be constructed and configured in accordance with the casino operator's documented international best practices.

iii. The internal control document shall specify the procedures and controls for the counting of items in the count room including:
   a. the mechanism by which a count will be undertaken;
   b. the procedures for recording and verifying a count;
   c. the procedures for dealing with emergency drops to the count room;
   d. the procedures for dealing with corrections or errors; and other personnel (excluding counting room staff) permitted or required to be present during each count.

iv. For the purposes of the count room at paragraph (i), the internal document shall:
   a. specify appropriate positions in the organizational structure as being "counting room staff".

v. Maintain lists for the counting room staff with the name, address, employee number and job description of each person.

vi. The casino operator shall review counting room staff annually and provide a copy of the list to the Commission within thirty (30) days of the end of the calendar year.

Multi-functional use of gaming areas

The casino operator shall ensure the following mechanisms are in place:

i. Ensure that any activities conducted in a gaming area do not compromise the integrity of the conduct of gaming in the gaming area.

ii. Set out times or circumstances in which a gaming area may be used for a purpose other than gaming.

iii. Include any procedures that are necessary to ensure the integrity of the gaming equipment and surveillance equipment in instances where the gaming area is used for other purposes than gaming, measures shall include:
   a. removing or safeguarding gaming equipment in the gaming area; or
   b. removing or safeguarding related surveillance equipment.

I. GAMING MACHINE & GAMING EQUIPMENT

GSA GAT Certification:

i. All platforms intended to be certified for use in the casino must support the GSA GAT protocol, specifically version 3.50 or higher. Should a gaming device not be able to support the GAT 3.5 protocol, the operator must arrange for manufacturers/suppliers to contact the Commission directly to obtain a waiver for the respective platform.

ii. Electronic Gaming Devices (EGDs) intended to be approved for use at a casino shall employ a verification mechanism which allows remote validation of all critical program storage media (PSM) and which incorporates the following specifications:

   a. The mechanism shall be readily accessible via a communication port and utilize GAT

3.5 protocol or later as approved by the Commission.

b. The communication port shall be located within the locked EGD cabinet area and allow connectivity without requiring access to the locked logic compartment. If the port is located on the backplane of the cabinet, an extension cable shall be permanently mounted to allow connection of the required cable towards the front interior of the EGD cabinet.

c. The mechanism must provide on-demand authentication of each EGD PSM. This function should not require the EGD power to be cycled and the execution time should not exceed twenty (20) minutes.

d. The mechanism must generate a unique signature for each PSM component utilizing Secure Hashing Algorithm-1(SHA-1) as defined by the National Institute of Standards and Technology (NIST). Hashing methodologies will be continually reevaluated by the Commission to ensure industry best security practices are maintained.

e. The mechanism must provide support for escrowing verification results. Verification results shall be preserved and retrievable pending a subsequent verification request or a loss of power.

List of games to be offered:

The internal control document shall set out a list of the games that the casino operator will conduct at any time of its operation.

i. The list shall be updated every four (4) months, indicating any games removed or added to the list of games offered for each period reported.

ii. An annual report shall be provided to the Commission within thirty (30) days after the end of each calendar year, outlining (i and ii) above.

Movement of approved gaming equipment and gaming machines:

i. The Commission shall be notified by the casino operator within twenty-four (24) hours or as soon as practicable upon the determination by the casino operator that a gaming machine or gaming equipment on the casino floor is to be removed or relocated.

ii. The casino operator shall notify the Commission in writing within twenty-four (24) hours or as soon as practicable, after becoming aware that any approved gaming machine or gaming equipment in its possession no longer complies with the Act, the Regulations, or any other provision of law or directions.

iii. To ensure compliance and safety protocols, the movement of gaming equipment and gaming machines shall be coordinated with the Commission, and relevant internal departments of the casino, including facilities management, the accounts division, and the security division.

iv. To minimize disruption to casino operations and casino patrons' experience, the scheduled movement of gaming machines and gaming equipment shall occur during off-peak hours.

v. Implementation of signage or barriers by the casino operator to alert casino patrons to the removal of gaming machines and gaming equipment.

vi. The operator shall provide appropriate training to casino employees involved in the moving process, emphasizing proper inspection of gaming machines and gaming equipment to

ensure powering down and disconnection from any network or peripheral devices of equipment, and protocols for clear pathways for movement of gaming machines and gaming equipment.

vii. The movement of gaming equipment and gaming machines shall be executed in accordance with the casino operator's documented international best practices.

J. HANDLING OF GAMING EQUIPMENT

i. An up-to-date register of approved gaming equipment and machines shall be present in the casino, and accessible to the "Pit Supervisor" at all times.

ii. The casino operator shall ensure that international best practices are used during the handling of gaming equipment including:

   a. using the approved gaming equipment according to manufacturer guidelines to prevent unnecessary strain and wear during state of play, storage, relocation or testing;
   b. ensuring the accuracy of records for gaming equipment by the verification of serial numbers for each approved gaming equipment during state of play;
   c. approved gaming equipment shall be used and controlled at all times by an authorized employee of the casino operator during the state of play, movement, deactivation or testing.

Repair and maintenance of gaming equipment

i. The casino operator shall ensure that approved gaming equipment is maintained in good working order.

Use of Gaming Chips, Gaming Tokens and Chip Purchase Vouchers (CPVs)

i. Gaming Chips, Gaming Tokens and CPVs shall be issued only:

   a. by a cashier at a cage, or by the dealer at a table game to a patron at the game; or
   b. by a chip runner to a patron at a table game, if the casino operator's internal document provides for the use of chip runners.

Handling of Gaming Chips, Gaming Tokens and CPVs

The casino operator shall ensure that the internal control document sets out the procedure for:

i. the receipt of gaming chips, gaming tokens and CPVs from the manufacturer;
ii. the inspection of gaming chips, gaming tokens and CPVs;
iii. the storage of gaming chips, gaming tokens and CPVs;
iv. the distribution and collection of gaming chips, gaming tokens, and CPVs to and from table games and table game pits;
v. the destruction of gaming chips, gaming tokens and CPVs;
vi. the immediate removal of any gaming chips, gaming tokens and CPVs suspected of, or showing signs, of being tampered with or being otherwise non-compliant with any approval granted, and the secure storage of these gaming chips, gaming tokens and CPVs not to be used again for gaming pending any subsequent investigation.
vii. the immediate reporting of the incident to the Compliance Committee or other designated sub-committee and reporting to the Commission as soon as practicable.

Issue and Use of Gaming Chips, Gaming Tokens and CPVs

i. The casino operator shall not issue gaming chips, gaming tokens or CPVs unless the internal control document has set out:
   a. the circumstances in which they may be issued; and
   b. the procedures for their issue and use.

Redemption of Gaming Chips and Gaming Tokens

The internal control document shall indicate:

i. Redemption of:
   a. gaming chips and gaming tokens only at a cage; and
   b. CPV only at a cage or redemption kiosk.

ii. All reasonable steps to be taken by the casino operator to prevent the redemption of gaming chips, gaming tokens or CPVs in the following circumstances:
   a. the encashment of it by non-patrons of the casino;
   b. suspected counterfeit;
   c. the casino operator suspects that it was obtained or is being used unlawfully;
   d. the redemption does not comply with the conditions in the house rules;
   e. a gaming chip, gaming token or CPV was issued by another casino;
   f. the approval of the gaming chips, gaming tokens and CPVs has terminated or been withdrawn by the Commission; or
   g. the gaming law or a written direction by the Commission prohibits redemption in the circumstances.

Dice and Playing cards:

i. The casino operator shall ensure that the internal control document sets out the procedure for**:**
   a. the receipt of dice and playing cards from the manufacturer;
   b. the inspection of dice and playing cards;
   c. the storage of dice and playing cards;
   d. the distribution and collection of dice and playing cards to and from table games and table game pits;
   e. the destruction of dice and playing cards;
   f. the immediate removal of any dice or playing cards suspected of, or showing signs, of being tampered with or being otherwise non-compliant with any approval granted, and the secure storage of dice or playing cards not be used again for gaming pending any subsequent investigation.
   g. the immediate reporting of the incident to the Compliance Committee or other designated sub-committee and reporting to the Commission as soon as practicable.

K. PROGRESSIVE JACKPOT

i. The casino operator shall not offer a payment that has not been approved by a designated officer identified on the organizational chart and certified by the Compliance Committee as being fair in the context of the relevant games. Jackpot liability shall be reconciled quarterly and verified annually by an independent auditor approved by the Commission.

ii. The casino operator shall identify whether jackpot payout is to be offered in one or a mixture of the following ways:
    a. in cash, including as an annuity;
    b. in the form of goods or services;
    c. or as a mixture of these.

iii. The casino operator shall not offer a payout that includes an annuity, or goods or services, except by the documented internal controls that permit such payouts.

iv. If the internal control document provides for an annuity payout:
    a. it shall set out how the casino operator is to ensure the future payments of the annuity,
    b. it may also provide for a single cash payout in place of the annuity, adhering to compliance with the threshold transaction limits and reporting requirements, and if it does so:
        - it shall set out the calculations for the amount of the cash payment, showing any discount; and
        - the casino operator shall ensure that any advertisement includes the calculations.

v. If the internal control document provides for a payout in the form of goods or services, it may also provide for a single cash payout in place of the goods or services.

vi. If the casino operator offers a payout consisting of goods or services, the casino operator shall:
    a. set out clearly in any advertisement:
        - the value of the goods or services available as a payout;
        - the dates the goods or services are available as a payout;
        - an accurate description of the goods or services, which shall not be misleading as to value; any restrictions on the goods or services including any dates by which the goods or services shall be collected or utilised; and
        - if a cash prize is offered as an alternative, the amount of the cash prize; and ensure that any goods or services provided by third parties are provided to the patron.

L. CONDUCT OF GAMING AND WAGERING

The casino operator shall ensure that the internal control document sets out the house rules based on international best practices for casino gambling to facilitate fair play and maintain order and security:

House Rules shall include:

a. a list of the games offered to a patron by the casino;
b. the mode of play and the rules for each game;
c. any limitations and conditions on the offering or playing of each game;
d. minimum and maximum wagers displayed clearly at each gaming machine and gaming table, which is not in a restricted area;
e. clear and concise explanation of all fees to be charged in relation to individual games and generally;

f. all other terms and conditions related to the games.

i. The casino operator shall maintain a record of the games actually offered at the casino at any time in the previous six (6) years.

ii. The casino operator shall ensure that:
   a. an electronic copy of the mode of play and rules of play are made available by a clear and conspicuous link to any patron accessing a patron account; and
   b. a paper version of the house rules is made available to a patron on request; and/or
   c. may be displayed for patrons in the casino relating to a particular game or games.

iii. Distribution and removal of gaming chips at a gaming table:
   a. when chips are distributed to and removed from a gaming table on which gaming is in progress, an accurate electronic record shall be made that contains sufficient information for the reconciliation of all distributions and removals including:
      - date and time of distribution and removal;
      - total amount and denomination of chips distributed and removed;
      - the table and employees involved in the distribution and receipt of chips, as well as the removal of chips; and
      - access to completed records for the distribution and removal of gaming chips shall be restricted to specified employees who have no involvement in the distribution or removal process.

House Betting Rules

If house betting for sports games and other events is permitted by the casino operator, the internal control document shall be robust, standardized and based on international best practices to include the following:

i. the forms of betting offered to a patron by the casino;
ii. the rules for each form;
iii. a clear and concise explanation of all fees;
iv. any applicable betting limits, including the minimum and maximum bets applicable in particular circumstances; and all other terms and conditions relating to betting;
v. mandatory access to the electronic copy of the house betting rules is made available to any patron accessing a patron account by clear and conspicuous link;
vi. a paper version of the house betting rules is made available to a patron on request;
vii. modified extract from the house betting rules may be made available to a patron, or displayed for patrons in the casino, provided that:
   a. it relates to a particular form of betting; and
   b. includes a summary of the following:
      - the rules that form part of betting; and
      - other information in the house betting rules that are relevant, that includes all essential information and is not misleading in any way; and
   c. clearly states that it is only a summary of the rules that relate to the form of betting, and that the complete house betting rules are available on request.

M. ANTI-MONEY LAUNDERING, COUNTER FINANCING OF TERRORISM AND COUNTER-PROLIFERATION FINANCING (AML/CFT/CPF) CONTROLS:

The internal control document for casino operators shall take into account the Commission's Anti-Money Laundering, Combating the Financing of Terrorism and Proliferation Financing Guidelines for Casinos, 2024 (the Guidelines). The objectives of these Guidelines are to inform casino operators of their responsibilities under the applicable legislation, as well as to identify best practices in Anti-Money Laundering (AML), Counter Financing of Terrorism (CFT) and Counter-Proliferation Financing (CPF) procedures and systems. In addition to the above-mentioned controls, a casino operator shall integrate the following requirements into its internal control document:

i. Every casino employment contract shall incorporate a term mandating compliance with the casino's AML/CFT/CPF policy, the Commission's Guidelines and any other provisions of law relating to AML/CFT/CPF.

ii. The casino operator shall ensure that an independent third-party review of the casino operator's AML/CFT/CPF policy is conducted and the below-mentioned are adhered:

    a. The independent third-party shall prepare and submit to the Commission a written opinion of the AML/CFT/CPF policy by the casino operator before the casino's opening.

    b. The independent thirty-party shall have experience in the auditing of AML/CFT/CPF policies.

    c. The independent third-party review shall state whether the proposed internal control document by the casino operator conforms to the requirements of the Commission's Guidelines, MICs and any other provisions of law relating to AML/CFT/CPF.

Casino operators shall undergo an annual AML/CFT/CPF compliance audit.

Suspicious transaction reports shall be filed with the Commission within twenty-four (24) hours of identification.

For the avoidance of doubt, the report by a registered public accountant in accordance with regulation 8(2)(c) of the Casino Gaming (General) Regulations, 2024 must specifically confirm that the submitted internal control document meets the internal control standards in relation to AML/CFT/CPF.

N. MINORS

The casino operator shall establish a policy in adherence to the responsibilities for dealing with minors in accordance with section 43 of the Casino Gaming Act which requires mandatory identity verification be conducted for all patrons prior to entry.

O. EXCLUSION AND EXPULSION

The casino shall ensure that the internal document defines the basis on which a person is excluded and expellable from the casino. The casino operator shall implement the following policies and procedures:

i. the casino operator shall determine how a patron is identified as excludable and expellable from the casino;

ii. signage shall be posted across the casino advising patrons of the bases on which they may be excluded and expelled from or refused access to the casino;

iii. annual training shall be issued to all casino employees involved in the exclusion and expulsion of patrons of the casino based upon international best practices.

The self-exclusion program shall be reviewed quarterly, with reports submitted to the Commission detailing enrolments, breaches, and remedial actions.

P. COMPLIANCE OFFICER

i. Each casino operator shall designate, in writing to the Commission, an employee to serve as its internal compliance officer within ninety (90) days before opening the casino and within thirty (30) days of any change of the designated Compliance Officer once operations has commenced.

ii. The casino operator's letter to the Commission shall include the following information in respect of the Compliance Officer:
    a. description of the designee's primary job responsibilities;
    b. line or staff authority;
    c. who the Compliance Officer reports to on the organizational chart;
    d. previous related gaming-industry experience of the Compliance Officer,
    e. company-issued employee number, email address and contact number/s.

iii. The Compliance Officer shall maintain sufficient independence from the day-to-day management and control of operations of the casino to enable the effective review of the business and to promote a compliant operational environment.

iv. The casino operator shall ensure that the remit of the Compliance Officer includes:
    a. Evaluation of internal control systems and operating processes.
    b. Reporting material changes in the fitness and propriety to the Compliance Committee as soon as practicable regarding the casino operator, associates and employees of the casino operator.
    c. Notification to the Compliance Committee of any major or minor changes to the structure of the casino's operations.
    d. Maintain due diligence reports of all business associate relationships with the casino operator and notify the Compliance Committee of any material changes regarding those relationships as soon as practicable.
    e. Notify the Compliance Committee of any compliance failures as per the Act, regulations, MICs or other directions or laws, by preparing a report summarizing each non-compliance issue upon the completion of the inspection.

Q. THE COMPLIANCE COMMITTEE AND REPORTING OF NON-COMPLIANCE:

i. The casino operator shall ensure that the internal control document for the Compliance Committee specifies the descriptor for the proposed membership of the Committee.

ii. The Compliance Committee shall implement and follow the Terms of Reference outlining the Compliance Committee's objectives, and responsibilities and detailing its retained and delegated authority to any sub-committee/s.

iii. At the end of each calendar year, or after the change of committee membership, the casino operator shall submit to the Commission a register of the Compliance Committee members to include:
    a. current list of the Committee's membership;

b. changes to the committee's membership during the calendar year being reported;
c. reason for the membership change; and
d. current identification details of each member,

iv. The Compliance Committee of the casino operator shall maintain and monitor a register of its past and present committee members, including:
a. qualifications;
b. vetting exercises conducted;
c. expertise;
d. employment history; and
e. details of appointment and resignation from the Committee.

v. The Compliance Committee shall report to the Commission all instances of non-compliance within three (3) days of a breach of the Act, regulations, MICs or other legislation. A breach shall not include patron disputes or complaints. The information to be submitted to the Commission includes:
a. details of the breach, including date, time, parties involved and ensuring the breach was brought to the attention of the Compliance Committee by the Compliance Officer due to stimulated internal procedure.

vi. The Compliance Officer shall submit an annual compliance report to the Commission. The Compliance Committee shall convene at least once every four months and maintain minutes of all meetings.

R. Contracts Oversight

vii. Control Integration
All contracts shall be captured within the operator's MIC framework, including procurement, vendor due diligence, and payment controls, including procedures for treating with anomalies and preventing breaches of transfer pricing rules and safeguarding the integrity of invoicing processes.
Material anomalies (including over invoicing or non-arm's-length terms) must be escalated internally.

viii. AML/CFT/CPF Alignment
Contracts shall be risk-assessed within the operator's AML/CFT/CPF program Suspicious transactions must be reported in accordance with statutory obligations under the Proceeds of Crime Act and the CGC's AML Anti-Money Laundering and Combating the Financing of Terrorism Guidelines for Casinos.

ix. Related-Party Disclosure
Operators shall maintain a current register of related-party transactions. Any connection to ownership, directors, or key employees shall trigger enhanced internal review and shall be appropriately disclosed and interrogated in the external audit process.

x. Supervisory Access
The Commission may, on a risk-sensitive basis, review or sample contracts to assess the effectiveness of the operator's internal controls and any relevant external audit findings. Operators shall maintain sufficient records to demonstrate compliance and audit defensibility.

xi. Financial Monitoring
Operators shall provide targeted reporting of non-gaming expenditure categories upon request, or where material variances or vendor concentration thresholds are triggered. Such reporting shall be proportionate and limited to information necessary to support supervisory assessment.

S. HANDLING OF PATRON DISPUTES AND COMPLAINTS:

The internal control document shall distinguish between patron disputes and complaints. Operators shall direct patrons to the Commission's online complaints portal to submit their complaints. .

Patron Disputes

i. The casino operator shall ensure signage is posted, via physical placement throughout the casino floor and electronic placement on the game-related website of the casino indicating a patron's right to report a patron dispute to the casino operator.
    a. The physical signage placement shall be at designated locations throughout the casino floor including:
        - cashier's cage;
        - information desk;
        - gaming areas for each type of game offered by the casino operator; and
        - restricted gaming area, if applicable.
    b. Signage on the gaming-related website of the casino shall be visible and accessible upon entry to the website.

ii. Description of the patron dispute resolution process shall include:
    a. mechanisms for how a patron should report patron disputes to the casino operator;
    b. establishing the dispute's severity, as determined by the casino operator;
    c. mechanisms for how the casino operator should resolve patron disputes; and
    d. mechanisms for how patron disputes will be reported and reviewed by the Compliance Committee.

iii. The casino operator shall seek to resolve all patron disputes in good faith.

iv. Timelines for review, and investigation by the casino operator and notification process to the patron regarding the casino operator's final decision regarding the dispute.

v. Detailed notification process by the casino operator to the patron regarding his or her rights to contact the Commission for intervention, where both parties are unable to resolve the patron dispute, and in support, the casino operator shall provide the contact details of the Commission to facilitate further action by the patron.

Complaints

To assist with the Commission's resolution of any reported complaint, the casino operator shall submit all resources of information at its disposal. The resources shall include:

a. any person, any documentation or information necessary or desirable for the Commission's investigation; and
b. any report by the Compliance Officer to the Compliance Committee indicating the investigation findings of the patron dispute, which was later referred to the Commission as a complaint.

T. CASINO MARKETING ARRANGEMENTS

Contracts related to casino marketing arrangements shall be deemed controlled contracts, in accordance with Part VI of the Casino Gaming Act. All advertising in casino marketing arrangements shall be in accordance with the General Advertising Guidelines issued by the Commission. Operators shall submit an annual certification of compliance with advertising standards.

i. The internal control document shall set out:
    a. The circumstances and terms on which a casino operator may enter into a casino marketing arrangement, including a marketing junket arrangement, with a person or entity;
    b. how the casino operator will satisfy itself that a person is suitable to enter into such an arrangement, including as an introducer. The minimum informational requirements of this third party shall include KYC and source of funds information to facilitate compliance with AML, CFT and CPF requirements; and
    c. the process by which the Compliance Committee or designated subcommittee will:
        - approve any casino marketing arrangement before it is entered into: and
        - supervise the operation of any casino marketing arrangement.

ii. The services offered by the marketing junket or introducer on behalf of the casino operator shall not go beyond the scope of the terms of the casino marketing arrangement approved by the Compliance Committee and the Commission.

iii. The casino operator shall notify the Commission at least ninety (90) days before entering into a casino marketing arrangement with any person, and provide details of the proposed arrangement.

iv. The casino operator shall not directly or indirectly reward any person for the introduction of a patron or patrons to the casino, otherwise than in accordance with the terms of a casino marketing arrangement made before the introduction.

v. The casino operator shall not directly or indirectly reward any person for the introduction of a patron or patrons to the casino unless it is satisfied that:
    a. none of the introduced patrons were subject to any form of duress; and
    b. all resources available to patrons relating to problem gaming are available to the patron being introduced.

vi. If the casino operator becomes aware of evidence that any introduced patron was subject to any form of duress before or after becoming a patron, the casino operator shall immediately inform the Commission.

vii. The casino operator shall maintain a register of all casino marketing arrangements entered into and shall maintain, in a form easily accessible from the register, details of:
    a. all payments made to the introducer or any other person in direct consequence of the casino marketing arrangement;
    b. any non-monetary compensation granted to the introducer, the patron, or any other person as a consequence of each casino marketing arrangement;
    c. a description of the patrons, or classes of patrons, in relation to whom payment was made or compensation granted, including, where known, the countries of their residence;
    d. any credit granted to any such patron;
    e. all transactions relating to a patron account of such a patron;
    f. a record of the investigations undertaken by the casino operator to satisfy itself as to the matters in paragraph (i)(b).

U. WHISTLEBLOWING:

i. The casino operator shall develop procedures by which employees can anonymously report breaches of gaming law or any other provision of law without fear of retaliation, retribution

or detrimental treatment, in compliance with the Protected Disclosures Act, 2010. An annual report of whistleblowing cases and remedial actions shall be submitted to the Commission.

ii. The procedure shall set the mechanism by which employees can anonymously inform the Compliance Committee or any designated subcommittee of any breaches by fellow employees, patrons, associates of the casino operator or any other parties.

V. COMPLIMENTARY SERVICES AND GOODS

The casino operator shall ensure that the procedures for complimentary services and goods are sufficiently robust to mitigate the occurrence of theft, collusion, and other illegal activities by employees and patrons.

i. The casino operator shall establish controls relating to the authorization and issuance of any complimentary services, including without limitation:
    a. the procedures by which employees are authorized to issue complimentary services, including signatory authority;
    b. the procedures by which the casino operator establishes, modifies or limits that authority; and
    c. a list of the employees able to authorize complimentary services, and the maximum dollar value or other limit on each employee's authority.

ii. At least monthly, accounting, IT, or audit personnel who cannot grant or receive complimentary privileges shall prepare reports for all complimentary items and services equal to or exceeding tiered amounts established by the casino operator. The casino operator shall ensure that the following details of the complimentary service are recorded in standardized forms and electronic database at the time of issuance or shortly thereafter:
    a. description of the complimentary service or goods;
    b. the date it was provided;
    c. the name and position of the employee who authorized it;
    d. the name of the person receiving it;
    e. its dollar value;
    f. the reason for providing it.

iii. Within fourteen (14) days after the end of each calendar quarter, the casino operator shall provide the Commission with a copy of the report.

iv. If the casino operator gives patron coupons, vouchers or other documents that will entitle them to a complimentary service, the casino operator shall implement procedures to ensure that:
    a. they are given in a manner that is clearly visible by the surveillance system; and
    b. the nature of the coupon, voucher or other document is easily identifiable by the surveillance system.

iv. Any complimentary service provided directly or indirectly by a third party not an affiliate of the casino operator shall be deemed to have been provided by the casino operator where such service or item:
    a. is directly or indirectly related to gaming; or
    b. is provided at no cost or at a reduced cost, compared to the cost at which it is available to members of the public generally.

W. ADVERTISING

The casino operator shall establish robust controls relating to advertisements and promotional activities for casino gaming in accordance with the General Advertising Guidelines issued by the Commission. In conjunction with the aforementioned guidelines, the casino operator shall integrate the following into the internal control document:

i. Mandatory and adequate annual training for all employees and agents responsible for advertising the casino's games and promotional offerings:
    a. Employees and agents conducting advertising or promotional activities for the casino operator shall be informed of the obligations associated with the casino's advertising, including:
        - ensuring compliance with directives from the Commission for advertising or promotional approval;
        - ensuring that advertising regardless of medium of communication (including but not limited to print, video, direct mail, social media advertising, or pre-recorded or live broadcast) is conducted with international best practices for the casino industry.

ii. The training of employees and agents as described in subparagraph (i) shall be conducted by a designated officer identified in the organizational chart or a competent and qualified third party.
    a. The casino operator shall maintain a register of compliant and non-compliant employees, a list of sanctions, and instances where sanctions are applied for non-compliance.

X. RESPONSIBLE GAMING

The casino operator shall document protocols demonstrating a sufficient level of protection for patrons, employees and vulnerable members of society in accordance with the Responsible Gaming Framework for Casinos in Jamaica issued by the Commission. In conjunction with the aforementioned guidelines, the casino operator shall integrate the following into the internal control documents:

i. Policies and procedures for interaction with patrons for the purposes of mitigation of problem gaming to include:
    a. annual training for casino employees who are authorized to initiate an interaction with a patron exhibiting the behaviours of a problem gambler;
    b. procedures for such an interaction;
    c. the types of behaviour that will trigger such an interaction;
    d. the circumstances that may give rise to refusing service to a patron exhibiting behaviours of a problem gambler;
    e. how to interact with patrons demonstrating signs of agitation, distress, intimidation, aggression or other behaviours that may inhibit patron interaction; and
    f. the creation and retention of records relating to interactions with patrons not exhibiting responsible gaming behaviour.

ii. Implement clearly delineated employee gaming policy to address whether or not gaming is strictly prohibited for casino gaming employees. If employees are permitted to gamble, the

policy shall specify under what conditions are they permitted, for example: designated limits as to the amount to be spent on a given gaming occasion.

iii. The casino operator shall monitor and evaluate its responsible gaming programme to periodically track effectiveness and make adjustments as necessary based upon its patrons exhibiting gambling behaviours on the casino premises, leading to expulsion or exclusion.

Y. CASHLESS WAGERING SYSTEMS (CWS) AND CASHLESS FUNDS TRANSFER SYSTEMS

In order to facilitate data analysis and risk assessment by the Commission, a casino operator shall include robust procedures for the following:

i. Internal investigations shall be conducted:
Due to the failure or compromise of the CWS, there shall be the immediate reporting of the investigation's findings to the Compliance Committee, and within two (2) days thereafter, there shall be notification to the Commission with provision of a copy of the report.

ii. Adjustment of credit:
On or before the date of adjustment, a casino operator shall provide notice to the Commission, in writing, of any adjustment to the amount of credit transferred to a gaming machine by means of a cashless funds transfer system.

Annual Audit Requirement:

iii. Cashless wagering systems shall undergo an independent audit annually. Patron accounts shall be reconciled quarterly, with discrepancies reported to the Commission.

Z. PATRON ACCOUNTS, PATRON CHEQUES, CREDIT CARDS AND DEBIT CARDS, AND PATRON ACCOUNT CREDIT

For the purposes of Know-Your-Customer (KYC) protocols, and patron convenience, the casino operator shall ensure the following internal controls be implemented:

i. each patron partaking in gambling within a casino in Jamaica shall have a patron account;
ii. ensure the maintenance and monitoring of patron accounts, including patron accounts connected to the CWS;
iii. the monitoring and maintenance of patron accounts shall apply to both active and dormant accounts and include:
    a. identification data, and
    b. financial transaction history on the accounts, including source of funds.
iv. outline the operation of patron accounts, including:
    a. restrictions to hold an account;
    a. access mechanisms shall be a one-to-one player system;
    b. opening and closing of patron account;
    c. suspension mechanisms;
    d. types of authorized and unauthorized transactions,

Use of credit or debit card

The casino operator shall document protocol facilitating the international best practices for

submission by the patron and acceptance by the casino operator of credit and/or debit cards:

i. The credit or debit card shall be valid and provided by a recognized financial institution.
ii. The casino operator shall establish procedures for standardized documentation and authorization of each credit or debit card transaction within the casino gaming floor related to casino gaming.

Granting Patron Account Credit

The following procedures shall be incorporated into the internal controls of the casino operator:

i. Instances for the prohibition of the grant of credit to a patron.
ii. If applicable, procedures and criteria for waiving the requirements of assessment by the casino operator prior to the issuance of credit on a patron account.

Credit Agreement

i. The internal control document shall detail procedures for partial payment, consolidation or redemption of credit agreements, and for the issuing of new credit instruments in substitution for those partially paid or consolidated.
ii. The casino operator shall ensure that a decision on behalf of a casino operator to grant credit to a patron shall be made only by an employee holding a senior managerial position identified on the organization chart.
    a. The casino operator shall ensure that this designated officer has been provided with such training in dealing with casino credit and problem gaming.
iii. Training for the designated officer identified at (ii) is to be conducted once per year.

Cheque Cashing Facility

i. The casino operator's internal control document shall include the procedure for verifying the patron's identity before issuing the cheque cashing facility.
ii. The casino operator is prohibited from accepting third-party cheques in the following circumstances:
    a. as a condition for offering credit to a patron;
    b. as security for any credit instrument; or
    c. for the satisfaction in part or in full of any credit instrument.

Creditworthiness

i A casino operator shall be satisfied that patrons identified will be able to pay the debt when it is due.
ii The internal control document shall detail the methods to be used to assess the patron's creditworthiness, which shall include at least one (1) of the following:
    a. obtaining the patron's credit history from a bona fide credit-reporting agency;
    b. assessing the casino operator's own previous credit transactions with the patron in any jurisdiction;
    c. obtaining information about the patron's credit history from:
        - a legal business that has granted credit to the patron;
        - a financial institution at which the patron maintains an account; or
        - another casino operator; and

- where no credit information is available from any of the sources listed above, obtaining information in writing from any agent or employee of the casino operator who has personal knowledge of the patron's credit reputation or financial resources.

d. The casino operator shall not assess a person who has derogatory elements in his credit history as being creditworthy unless the person's subsequent credit history has demonstrated that those elements are no longer relevant.

Increase in credit

i During the assessment to determine whether to increase the amount of credit available to a patron who has been granted credit based on creditworthiness, a casino operator may choose not to require a new application for credit, provided that:
   a. no new information that calls the creditworthiness of the patron into question has come to the attention of the casino operator; and
   b. on the basis of the assessment, the casino operator is satisfied that:
      - the patron will be able to pay the increased debt when it is due; and
      - there is no reason to think that payment of the increased amount of debt will cause the patron hardship.

ii The same employee shall not conduct the initial assessment of creditworthiness and the assessment regarding the increase of credit for the same patron.

Debt recovery

i. The internal control document shall set out timelines for the collection of payment from the patron and the process for the establishment of good faith efforts to collect the full amount of the debt due, including:
   a. documenting attempts to collect payment:
      - in letters sent to the patron's last-known address;
      - electronic mail;
      - in-person or telephone conversations with the patron.
   b. such other collection methods as the Compliance Committee or other designated sub-committee may authorize in accordance with the policy and conditions of the credit agreement.

ii. Any agreement between the casino operator and the patron to amend the date that the debt becomes due and payable shall be set out in writing and signed by both parties.

iii. The casino operator shall document its attempts to collect payment from the patron.

iv. Where the casino operator enters into a settlement agreement with a patron, it shall inform the Compliance Committee immediately and inform the Commission within fifteen (15) days of its execution and, if the Commission requires, the casino operator shall provide copies of the credit agreement and the settlement agreement.

v. The casino operator shall retain all documents showing detailed records of compliance with this minimum control standard, and furnish those documents and records to the Commission upon request.

vi. No person may collect payment of a debt relating to a credit agreement on the casino operator's behalf other than:
   a. a debt collection agency (an "agency") approved by the Compliance Committee or delegated sub-committee;

b. the casino operator's designated employees or attorneys; or
c. an affiliate of the casino operator.

vii. The Compliance Committee:
   a. may approve an agency in any jurisdiction for the purposes of debt collection, provided that the Compliance Committee is satisfied that:
      - the individuals at the agency are suitable persons; and
      - the methods of collection are lawful in the country of residence of the debtor and would, if undertaken in Jamaica, be lawful in Jamaica; and
   b. may withdraw such an approval at any time.

viii. The Compliance Committee shall maintain a list of current and previously approved agencies, together with the reasons for the withdrawal of approval of any previously approved agency.

ix. The Compliance Committee shall inform the Commission within five (5) days whenever it approves or withdraws the approval of an agency, and in the case of a withdrawal of approval, the reasons for the withdrawal.

Partial payments and consolidations

i. If the casino operator has obtained partial payment or consolidation of the debt, it shall issue a new substituted credit agreement in place of the original.

ii. If the casino operator settles a debt on a credit agreement for less than its full amount, the casino operator shall ensure that:
   a. the debt is settled either with the patron to whom the credit was initially granted or with a person authorized by law to act on his behalf (the "representative");
   b. the settlement shall be authorized on behalf of the casino operator by an employee holding a senior managerial identified on the organizational chart; and
   c. the settlement shall be reflected in a single document that is prepared and executed within ten (10) days after the new agreement and includes—
      - the patron's name;
      - valid identification;
      - the name of the representative, if any;
      - the original amount of the credit agreement;
      - the amount of the settlement stated in words and numbers;
      - the date of the agreement;
      - the reason for the settlement;
      - the name and signatures of the designated employee holding a senior managerial identified on the organizational chart who authorized the settlement; and
      - the signature of the patron or the representative.

iii. Verification of the settlement and its terms, and the circumstances of the original grant of credit shall be provided to the Compliance Committee within fifteen (15) days of the execution and submitted to the Commission within thirty (30) days of execution by the casino operator.

Theft or destruction of a credit agreement

i. Where a credit agreement has been stolen, the casino operator shall report the theft in writing to the police in Jamaica within forty-eight (48) hours of the discovery of the theft and shall

provide the police with such information and assistance as it may require.

ii. The casino operator shall inform the Compliance Committee immediately upon discovery of theft and inform the Commission upon the filing of the police report and provide proof that the Compliance Committee was informed and provide proof of that a police report was filed.

iii. If a credit agreement is lost or destroyed, the debt represented by the credit agreement shall not be unenforceable solely on that basis.

AA. SERVICE OF LIQUOR

i. The casino operator may serve intoxicating liquor on casino premises, and permit intoxicating liquor to be consumed on casino premises only:
   a. in accordance with its internal control document; and
   b. subject to any restrictions or conditions under:
      - the Act;
      - the casino gaming licence; and
      - if the casino premises, or part of the casino premises, are also licensed premises for the purposes of the relevant licence granted in accordance with the Spirit Licence Act of Jamaica.

ii. If the casino operator proposes to serve intoxicating liquor, or permit it to be consumed on casino premises, the internal control document shall set out:
   a. Details, including floor plans, of the areas on the casino premises in which intoxicating liquor may be stored, served, consumed and prohibited.
   b. Visible and clear signs shall be displayed at any bar or service point in the casino indicating the following:
      - areas permitted and prohibited for liquor consumption; and
      - the hours during which intoxicating liquor will be available or may be consumed on the casino premises.
   c. Establish the mechanisms of how intoxicating liquor is kept on the casino premises under proper supervision (which may include surveillance) during opening hours and is securely stored outside opening hours.
   d. Establish how intoxicating liquor may be ordered or purchased.
   e. The controls to prevent the consumption of intoxicating liquor by minors and by persons who are demonstrating signs of problem gambling.
   f. Indicate the hours during which intoxicating liquor will be available or may be consumed.
   g. Annual training to be provided to all employees responsible for the sale or service of intoxicating liquor:
      - the training policy should be reviewed annually by the designated officer identified in the organizational chart.
   h. Establish the policy and procedures for drinks promotions.
   i. If the casino operator proposes to permit patrons to consume, on casino premises, intoxicating liquor that was served elsewhere on the IRD in accordance with a licence under the Spirit Licence Act, details of the proposed permission shall be indicated.

j. If the casino operator proposes to permit patrons who have been served intoxicating liquor to consume that liquor in other areas of the IRD, details of the proposed permission shall be indicated.

Responsible service of alcohol

i. The casino operator shall ensure that every casino employee with responsibility for the sale or service of liquor has been certified as having completed a training programme on responsible alcohol sales and service within a casino, and particularly with a view to preventing or managing problem gambling. Compliance checks shall be conducted quarterly.
ii. The casino operator shall ensure that a copy of the certificate is kept at the premises and made available at the request of an inspector.
iii. The casino operator shall ensure that:
    a. casino employees endeavour to identify expellable persons in the casino; and
    a. persons identified as expellable persons are not served intoxicating liquor.

Prohibition of drunkness by casino employees on the casino premises

i. The casino operator shall implement internal controls to ensure the fundamental concepts of responsible employee behaviour by prohibiting the drunkenness of any casino employee while on duty on the casino premises.

BB. BETTING

If the casino operator proposes to offer betting on casino premises for the purpose of placing bets on various sports events, horse race betting or other events, the internal document shall set out the casino's policies and procedures for all aspects of bookmaking:

i. policies and procedures regarding the following:
    a. details, including floor plans, of the areas within the gaming areas of the casino in which betting may be offered;
    b. the forms of betting that may be offered to patrons;
    c. the rules for each form;
    d. a clear and concise explanation of all fees;
    e. any applicable betting limits, including the minimum and maximum bets applicable in particular circumstances;
    f. the presentation time limits for winning betting tickets; and
    g. all other terms and conditions relating to betting.
ii. The casino operator shall identify the designated officer in the organizational chart responsible for booking at all times during the acceptance of wagers.
iii. The casino operator shall ensure that:
    a. the presentation time limits for winning betting tickets are clearly displayed in any betting area; and
    b. the presentation time limit for a particular ticket is printed on the ticket.
iv. Maintain records of wagering limits and temporary changes to such limits.
v. Maintain records of its betting operations that will enable it to report to the Commission, on request, details of bets, or series of bets, accepted from a particular patron or class of patrons or for a particular period or periods.
vi. Establish mechanisms for prohibition against:
    a. lines or odds, offer wagering propositions or otherwise facilitate a bet for the purpose

of ensuring that a patron will win a bet or series of bets.

vii. If a third party manages any part of the betting operations of a casino, there shall be implemented by the casino operator internal controls in accordance with the controlled contract notice of the Commission.

Reserve Requirements

i. The casino operator offering betting on casino premises shall maintain at all times a cash reserve at least equal to the greater of:
    a. during the first week of the operation of the book, the amount that the casino operator projects will be its book liability at the end of the first week of the book's operation; and
    b. establish a mechanism and utilize international best practices to ensure that the reserve is not unencumbered nor commingled with the funds of the book or any other funds.

ii. Identify all reasonable steps to ensure that the reserve is protected from claims by any third parties or creditors other than the patrons for whose benefit and protection the reserve is established, and shall provide that:
    a. the reserve is established and held in trust for the benefit and protection of patrons to the extent the book holds money for their account, has accepted wagers from them on contingencies whose outcomes have not been determined, or owes them on winning wagers;

iii. Establish a log or other recording mechanism as proof that the casino operator calculates its reserve requirement each day and ensures that any payments or arrangements necessary to cover the required reserve are made within twenty- four (24) hours.

iv. To ensure the maintenance of the reserve, the casino operator shall retain an independent certified accountant to conduct the below:
    a. creation and quarterly submission (or shorter as necessary) of a robust and standardized report to the Compliance Committee or any other delegated subcommittee to facilitate review of all transactions relating to reserve on a weekly basis.
    b. The report shall include:
        - the amounts required for the reserve for each day of the previous month; and
        - whether the actual reserve amounts met the required amounts.

If the report indicates that the amount of the reserve is less than the required amount, then the Compliance Committee shall inform the Commission forthwith of that fact and of the steps taken to remedy the deficiency, in adherence to the established policy of the casino operator.

Betting Tickets

i. The casino operator shall establish a standardized betting ticket on which the terms of the bet are written, triggered by the acceptance of a bet.

ii. A casino operator shall determine whether a betting ticket will be provided physically or electronically. If the latter, the casino operator shall establish a format that does not allow for any alteration or amendment of the information contained on the ticket.

iii. A betting ticket shall indicate the following:
    a. the name and address of the casino operator;
    b. the event number and the date and description of the event;

c. a unique number by which the ticket can be identified in the casino operator's records;
d. the location, date and time of issue; the amount of the bet, and;
e. the payout odds.

iv. The casino operator shall develop mechanisms for prohibition of betting by the following individuals:
a. a minor;
b. an excluded person; or
c. a person whom the casino operator reasonably believes is placing a bet on behalf or another person.

v. The casino operator shall develop a robust policy for payment of winning tickets to include payment to:
a. the person who presents the patron's copy of the betting ticket during the presentation time limit printed on the ticket and prohibition thereafter; or
b. acceptance and pay a winning bet where the betting ticket is provided by post.

Parlay wagering

i. All parlay wagering forms shall display full, accurate and unambiguous disclosure including:
a. the amounts to be paid for winnings or the method by which such amounts are to be determined and, if payouts are limited to an aggregate amount;
b. the treatment of ties;
c. any minimum and maximum betting limits;
d. the procedure for claiming winnings, including but not limited to the documentation of patrons or persons authorized by patrons to claim winnings, any time limits for claiming winnings, whether winnings may be claimed and paid by mail and, if so, the procedure that applies;
e. the effect on the wager if an event that is bet on is not played on the date specified, or if other events occur that will cause the selections to be invalid;
f. the requirement that a parlay wager shall consist of at least three (3) selections that have not become invalid under applicable house rules or the wager will be void and the money wagered will be refunded;
g. the rights, if any, reserved by the casino operator, including but not limited to reservation of the right to refuse any wager or delete or limit any selection prior to the acceptance of a wager, or to withhold payouts of specified amounts until the outcome of each proposition offered by the parlay wager has been determined;
h. the requirement that the point spreads printed on the parlay wager form when the wager is accepted will be used to determine the outcome of the wagers; and that the house betting rules apply to parlay wagers unless otherwise stated on the parlay wager form.

CC. ARRANGEMENTS WITH RESPECT TO INFORMATION TECHNOLOGY (IT) CONTROL ENVIRONMENT, CYBERSECURITY MANAGEMENT, AND DATA GOVERNANCE

IT Control

IT protocols shall indicate the following:

i. Mechanisms designed to ensure the integrity and confidentiality of all communications and ensure the proper identification of the sender and receiver of all communications. If communications between any system components are performed across internet/public or third-party networks, the system shall either encrypt the data packets or utilize a secure communications protocol to ensure the integrity and confidentiality of the transmission.
ii. All entry and exit points to the network shall be identified, managed, controlled, and monitored on a 24/7 basis.
    a. Robust protocols shall be established to monitor all the casino operator's IT systems in order to prevent, detect, mitigate, and respond to cyberattacks.
iii. Intrusion detection and reporting or an intrusion prevention system shall be in place on the networks and actively configured to notify system administrators.
iv. The internal control document will establish appropriate security measures to protect against the risks of using mobile technology and communication facilities.
v. Telecommuting shall not be permitted except under circumstances where the security of the endpoint can be guaranteed.

Artificial Intelligence (AI) Controls

The casino operator shall disclose, in all relevant operational and governance reporting, the nature, scope, and material impacts of AI use across operations, including specific applications, data sources, and effects on decision-making, efficiency, or risks.

The casino operator shall establish and maintain an AI governance framework, which shall include:

i. Board or senior management oversight mechanisms.

ii. Policies for risk assessment, transparency, accountability, and bias mitigation.

iii. Procedures for ensuring human oversight of AI-enabled processes; and

iv. Documentation evidencing compliance with the Commission's directives and international best practices.

The AI governance framework shall be reviewed annually by the Compliance Committee and updated within five (5) days of any material change to AI use or oversight mechanisms.

Information Security Management System (ISMS)

The casino operator or IT Service Provider shall implement, maintain, regularly review, revise, and comply with a comprehensive Information Security Management System (ISMS) plan. The purpose of the plan shall be to take reasonable steps to protect the confidentiality, integrity, and availability of personally identifiable information (PII) of individuals who place a wager with the casino operator. Additionally, the internal controls document shall contain administrative, technical, and physical safeguards appropriate to the size, complexity, nature, and scope of the operations and the sensitivity of the PII owned, licensed, maintained, handled, or otherwise in the possession of the casino operator.

The ISMS plan shall contain:

i. A commitment by management to actively support security and compliance within the organization through clear direction, demonstrated commitment, explicit assignment, and acknowledgement of cybersecurity, information security and compliance responsibilities.

ii. A description of how cybersecurity and information security roles and responsibilities of casino operator personnel and relevant third-party service providers work in tandem with the operation, service and maintenance of the casino gaming system and/or its components.
iii. A requirement for review at planned intervals and when changes occur to the casino operator's processes which alter the risk profile of the ISMS.
iv. A requirement to communicate cybersecurity and information security policies to all employees and relevant third parties.
v. The protection of PII and other sensitive information from unauthorized access.
vi. The creation of required logs, with controls to prevent unauthorized modification.
vii. The existence of proper controls and documentation for changes, updates and patches to the system.
viii. A security forum or other organizational structure comprised of senior managers, including the Head of Security or equivalent shall be formally established to monitor and review the ISMS to ensure its continuing suitability, adequacy and effectiveness, maintain formal minutes of meetings, and convene at least every six (6) months.
ix. The ISMS shall undergo an annual audit against common cybersecurity and information security principles in relation to confidentiality, integrity and availability.

Cyber Security Management

Encryption and Cryptographic Controls

The internal controls shall describe how and where encryption or cryptography is used in the casino gaming system to protect the confidentiality and integrity of PII and other sensitive information as appropriate. The following shall also be included in the internal controls:

i. The required level of protection of all PII and other sensitive information passed over networks based on a risk assessment and information classification.
ii. The need for encryption of stored PII and other sensitive information on portable computer systems (end user devices e.g. laptops, removable media e.g. USB devices, and similar) and to protect the integrity of sensitive information held at rest on Wagering Equipment.
iii. Secure encryption keys in a way which limits access.
iv. Integrity measures for the storage of winning wager ticket and voucher data and validation information.
v. The roles and responsibilities of IT personnel for key management and the implementation of the cryptography policy.

Firewalls

Protocols shall be equipped with a firewall mechanism to facilitate recording the audit information to preserve and secure the information from loss or alteration.

Third-Party Systems

The casino operator shall document internal controls, the policies and procedures for managing third parties who provide information security services, hardware, and/or software or interact with the casino operator's gaming system, cyber security system, as well as the use of any additional third-party systems/processes that are not managed by the casino operator.

Casino operators shall submit proof of current licensing and support for all cybersecurity tools semi-annually. Operators shall conduct a minimum of two (2) independent penetration tests per annum, with results and

remediation plans submitted to the Commission within thirty (30) days. Patch management schedules should be documented and reviewed quarterly.

Data Governance

All processes of information collection conducted by the casino operator shall operate within the framework of the Jamaican Data Protection Act (DPA) and associated regulations, directives from the Office of the Information Commissioner, and international best practices.

i. The operator's confidentiality processes shall seek to mitigate the inappropriate or unlawful transmission or divulgence of information.
ii. Protocols shall describe training for employees involved in the collection of broad cross section of information for personal data from patrons, self-excluded persons, and contractors.
    a. The policy in support shall be reviewed annually and annual training provided to all applicable employees, along with proof of compliance and corrective measures in instances of non-compliance.
iii. Robust and standardized mechanisms to facilitate compliance with the eight (8) Data Protection Standards from the DPA (below) must be implemented by the casino operator and the exemptions to such obligations as Data Controllers.
    a. Fairness and lawfulness
    b. Purpose limitation
    c. Data minimization
    d. Accuracy
    e. Storage limitation
    f. Rights of data subject
    g. Cross-border transfers

iv. The casino operator shall establish mechanisms for the use of privacy notices in accordance with the DPA to ensure the protection of private and sensitive personal data for patrons and connected matters. The internal controls shall include:
    a. The initial fair processing of privacy notices and extended notices (where applicable) to expressly inform the data subject of the expected period of retention of their personal data.
    b. No processing of personal data for unrelated purposes,as such, personal data shall only be obtained for one or more specified lawful purposes(s).
    c. No data should be further processed in a manner that is incompatible with the initial purposes(s).
    d. Expressly notifying patrons of consumer rights, e.g. rectification including opt-in/opt-out rights e.g., the right to prevent processing of his personal data in specified circumstances, where the data is irrelevant or incomplete, direct marketing/sale purposes.
    e. Expressly notifying customers of request rights of the data subject, and timelines for the Data Controller to respond regarding the personal data being processed.
    f. Expressly notifying the Data Subject of the right to seek redress or guidance from the Office of Information Commissioner regarding unlawful access to information.
    g. Restrictions on processing and sale of personal data of patrons and other individuals.

Third-Party Data Processing

Unauthorized third-party service providers shall be prevented from viewing or altering PII and other sensitive information. Where PII and other sensitive information is shared with third-party service providers, formal data processing agreements shall be in place stating the rights and obligations of each party concerning the protection of the PII and other sensitive information. Each data processing agreement shall set out:

a. the subject matter and duration of the processing;
b. the nature and purpose of the processing;
c. the type of data to be processed;
d. how the data is stored;
e. the detail of the security surrounding the data;
f. the means used to transfer the data from one organization to another;
g. the means used to retrieve data about certain individuals;
h. the method for ensuring a retention schedule is adhered to;
i. the means used to delete or dispose of the data; and
j. the categories of data.

****END OF DOCUMENT****