

# Alderney eCasinos and NRA2

Industry update on the National Strategy  
and National Risk Assessment  
23<sup>rd</sup> January 2024

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# A not so 'high-risk' sector

- 25 'eCasino' CAT1 licensees
- Intensive scrutiny of ownership and investment
- High ratio of supervisors to licensees
  - Onsite and remote inspections
  - Access to all CAT 1 financials monthly



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# eCasino SARS are a majority of Bailiwick SARS

- 75 percent of all SARS
- 60 percent of all consent requests
  - One operator dominates with 3.5m UK players
  - Low average stake value
  - FIU and AGCC have risk-based strategy in place.

Year	SARs	% of all SARS
2018	1,103	52%
2019	1,517	62%
2020	2,270	74%
2021	2,832	79%
2022	2,031	76%



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# External triggers for re-rating

- European Commission 2022 report on AML and TF risk in the internal market.
- UK Gambling Commission November 2023 re-rating
- Common concerns:
  - Prepaid cards
  - Smurfing
  - Fake identification/ identity theft.
  - Use of mules



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# Not news to the gambling sector

- Greatly reduced instance of payment and card fraud
- Already accustomed to preventing:
  - Bonus abuse
  - Linked accounts
- eCasinos ensure:
  - No unverified customer withdrawals are possible
  - Enhanced transaction monitoring / enhanced customer DD
  - Automated sanctions screening including PF screening



# Thank you

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