

Anti-Money Laundering Policy

The Stroke Association Anti-Money Laundering (AML) Policy describes Stroke Associations' rules for reporting and actual or suspected criminal activities.

It is the policy of Stroke Association, in conjunction with its External Lottery Managers to:

- Ensure no person is enrolled into any of its lottery schemes if that person is suspected of any potential or actual criminal activities
- Freeze any transaction that appears to be suspicious, and any other transaction made by the same supporter
- Conduct and regularly review an assessment of the money laundering risks to its business, both remote and non-remote
- Ensure unusual patterns of transactions, and very high account turnover, will be investigated thoroughly
- Train staff to look out for any suspicious activity relating to purchase of lottery tickets
- Ensure all such activity will be reported to our ELM, Police or National Crime Agency or Serious Organised Crime Agency and the Gambling Commission, where deemed necessary
- Ensure only supporters residing in the UK are permitted to enter lotteries
- Limit the number of raffle tickets sent to 'warm supporters' to a value of £50, per campaign. Any requests for additional raffle tickets in excess of £50 will require a customer interaction and a full record of the outcome will be maintained.
- Limit the number of raffle tickets initially sent to 'cold supporters' to a value of £20, per campaign. Any requests for additional raffle tickets in excess of £20 will require a customer interaction. Should more than £20 worth of tickets be distributed to 'cold supporters', a full record will be maintained of where those tickets have been sent to, their total value and their serial numbers
- Ensure all transactions on a player's account are recorded and securely stored
- Use payment provider(s) that have experienced risk and fraud teams who scan and validate and monitor payment card transactions for potentially suspicious transactions
- All information and records will be retained in-line with Stroke Associations' legal and regulatory requirements.