

In de loop van het onderzoek heeft Zembla de onafhankelijke aanbieders van geldautomaten benaderd met algemene vragen over hun antiwitwas-beleid. Dit zijn de vragen met de antwoorden van Yourcash die Zembla ontving op 2 april 2024. Deze vragen en antwoorden hebben geen betrekking op de uitzending en het daarin getoonde verborgen cameramateriaal. De reactie daarop is verwerkt in de uitzending en tevens opgenomen in het document 'Statement YourCash'

We can confirm that both the Euronet ATM network and YourCash ATM network in the Netherlands are owned by the Euronet Worldwide, Inc., group ("Group"). For more information on the Group, please see: [Payments and financial technology solutions provider \(euronetworldwide.com\)](https://www.euronetworldwide.com).

It should be noted that whilst the Group operates its ATM networks around the world (including in the Netherlands) under various operating models, it is not a "white label" ATM provider in the Netherlands. The Group typically deploys an independent ATM model (where it takes responsibility for the operation of the ATMs) working with one or more principal members of the main card associations (such as Visa/Mastercard) or operates as an outsourced service provider to credit/banking institutions who have their own networks of ATMs.

In the Netherlands as you have correctly identified, the fleet of ATMs branded Euronet is filled by duly supervised cash-in-transit companies with banknotes sourced from the various retail banks. The fleet of ATMs branded YourCash are, in contrast, mainly filled by merchants with banknotes sourced from their retail operations (although there are some cash-in-transit filled machines in the fleet). In both cases the circulation of Euro banknotes must be handled in accordance with the applicable European Central Bank regulations together with those put in place by domestic member state competent authorities such as the Dutch National Bank ("DnB"). The regulations mentioned in the previous sentence put a series of obligations on "cash handlers" i.e. those participants in the cash cycle who are involved in the recirculation of Euro banknotes through automated machines.

**1. What permits and licenses does Euronet/Yourcash have to operate ATMs?**

*"The ownership and/or operation of an ATM is not a regulated service. The provision of cash withdrawal services may be a regulated payment service in certain circumstances but in any event an independent operator of ATMs must partner with one or more principal members of the main card associations (including Visa, Mastercard, AMEX, Diners, China Union Pay, JCB etc) in order to accept their branded cards at its ATMs. Each of those card associations sets strict membership criteria including obligations relating to the prevention of money laundering and terrorist financing. The Group has several members of the card associations and also partners with at least one external third party member of such as it relates to the ATM networks in the Netherlands. In addition, for some locations or sites where ATMs are installed by the Group in the Netherlands construction and/or operating permits from local authorities and municipalities may be required depending on the city or municipality bylaws. The Group has a very strong track record in working with local authorities and municipalities in this regard."*

**2. How do you assess the money laundering and terrorism financing risks associated with the use of white label ATMs?**

*“Given the Group is not a white label ATM deployer we cannot comment in that regard. As it relates to the operating models deployed by the Group in the Netherlands, we believe the risks of money laundering are low given the very nature of the four-party card scheme operating model. In addition, as a matter of prudence, for the merchant fill ATMs operated under the YourCash brand, the Group has designed a series of “KYC/KYB” type checks as it relates to merchants and their associated financial status together with on-going monitoring of a merchant’s activity.”*

**3. Is it possible to use your ATMs to launder criminal money? If so, how?**

*“As stated in our response to question #2, we believe the risk of money laundering and/or terrorist financing relating to the Group’s ATM business in the Netherlands is low especially given the existing procedures that we deploy in each operating model. In addition and not specific to the Netherlands, the Group deploys a series of transaction monitoring rules covering its ATM operations and also deploys an array of training for staff members to keep them apprised of the latest money laundering and/or terrorist financing risks.”*

**4. White label ATMs are often located in business premises. What is your KYC procedure regarding such ATM locations?**

*“As previously stated, the Group does not provide white label ATMs. Where the Group deploys merchant fill ATMs, mainly in supermarkets and merchants of that type, a KYC/KYB procedure is deployed in order to identify and verify the applicant merchant (and certain associated individuals) together with the financial reliability of the merchant. As a result of the initial checks conducted by Group employees, merchants are subject to periodic load limits and the activity is monitored per site, per merchant with any anomalies triggering internal investigations. It should also be noted that for the merchant fill ATMs, each merchant is provided with a European Central Bank (and DnB) approved note checking device and is contractually obliged to check any and all notes through such device before those notes are loaded in the ATM”.*

**5. Can you detail how the background of location owners and operators is checked?**

*“For clarity, the relevant Group entities are the operators of the ATMs in each model working with the respective members of the card associations as mentioned above.*

*The level of KYC/KYB checks varies between the Euronet ATM fleet where there is no involvement of a third-party merchant and the YourCash branded fleet as mentioned in the previous answers.*

*In order to identify an applicant for the merchant fill fleet, we obtain from each applicant merchant (through our designated on-the-ground employees at face-to-face meetings) a series of documents covering the applicant merchant’s identity (together with those of associated individuals if, for example, the applicant is a company). Such documentation*

together with the wider application is then cross-checked with publicly available information and reviewed by at least three separate teams prior to the application being accepted or rejected.”

6. **With respect to the above questions, are there any differences between merchant fill machines and devices filled by CTTs? If so, what differences**

*“Please see the previous answers together with the introductory paragraph.”*

7. **Can you detail how the origin of the money with which merchant fill machines are filled is checked? How often do such checks take place?**

*“As it relates to the merchant fill ATMs, an applicant merchant must provide a series of related documents at the start of the relationship e.g. bank statements, accounts etc in order that Group employees may ascertain the financial reliability of the merchant. Based on that assessment, the merchant is provided with a load limit. Loads of the ATMs are monitored on a periodic basis together with cash withdrawal activity also being monitored as mentioned previously. In addition to the on-going monitoring of a merchant’s activity, there is an annual audit/review meeting with the merchant in order to refresh and ensure it operates in accordance with the contractual operating procedures.*

*It must also be restated that each merchant (operating in the merchant fill model) is contractually obliged to check all Euro banknotes in the provided European Central Bank (and DnB) approved note checker. Compliance with this process is checked and audited from time-to-time by both YourCash and/or the DnB who we have been liaising with for several years on this operating model.”*

8. **If you do not conduct such checks, which agencies do?**

*“Not applicable, please see the answer to question #7”.*

9. **Has Euronet/Yourcash had to deal with situations where a company ATM was filled with money from tax fraud or other criminal activities? If so, how has Euronet/Yourcash responded?**

*“Neither Euronet/YourCash are aware of such situations occurring and we reasonably believe the chances of such instances occurring are low for the reasons as set out in the previous answers”.*

10. **Has Euronet/Yourcash encountered suspicions of money laundering or attempts to launder money through an ATM of your company? If so, how has Euronet/Yourcash responded?**

*“For the Euronet branded ATM network we are not aware of such situations occurring given the operating model and we reasonably believe the chances of such instances occurring are low for the reasons as set out in the previous answers. As it relates to the merchant fill machines, we have in a very limited number of cases proactively chosen to deactivate and remove ATMs due to concerns with partner merchants.*

- 11. Are there any business sectors with an increased risk of tax fraud and criminal activity where your company does not place ATMs for that reason?**

*“As you may appreciate, retailers with certain industry activity codes (also known as “merchant category codes”) are generally recognised to represent a significantly higher risk to business compared to others. The Group is proud of the reputation it has built around the world in the last thirty years of operating and where decisions may impact that reputation they are not taken lightly. In order to protect its reputation, the Group has identified a list of merchant categories that it is not willing to cooperate with as it relates to the ATM businesses in the Netherlands and that list is also influenced by the relevant third parties that it works with such as the card schemes, principal members of the card schemes, cash-in-transit companies and its third-party banking providers. As a result, the Group does not deploy ATMs in locations in the Netherlands such as adult entertainment establishments, coffee-shops and similar types of establishments even if, they may represent legal business establishments.”*

- 12. White label ATMs are sometimes located in coffee shops, casinos and brothels/strip clubs. Locations that investigative experts say carry an increased risk of tax fraud and criminal activity. Does Euronet/Yourcash have policies in place to prevent cash from ATMs from being used for this purpose? If yes, what policy? If no, why not?**

*“Please see the previous answer. Where ATMs are deployed in casinos in the Netherlands they are filled by our contracted cash-in-transit company and not under a merchant fill model.”*