



Keno

Responsible Gambling

Code of Conduct

Victoria

Approved 3 April 2014

Version 2.0



Keno Responsible Gambling Code of Conduct Victoria

1. Definitions

Accredited agent means the person or persons who have been accredited by the Keno Licensee under section 6A.2.4(3) of the *Gambling Regulation Act 2003* to sell tickets in Keno games

Outlet or **Keno outlet** means the place of business of the accredited agent

Tabcorp means the Keno licensee, which is Tabcorp Investments No. 5 Pty. Ltd. ABN 72 105 341 366 of 5 Bowen Crescent, Melbourne, Victoria

2. Our commitment to Responsible Gambling

Keno is committed to providing the highest standards of customer care and Responsible Gambling. Keno's Responsible Gambling Code of Conduct illustrates how we demonstrate this commitment.

Responsible Gambling occurs when customers can make informed choices about gambling and make rational and sensible choices based on their individual circumstances.

3. Availability of the Code of Conduct

This Code is available in English and major community languages in Keno outlets, and in the Responsible Gambling section of Tabcorp's website at www.tabcorp.com.au.

Major community languages are:

- Italian
- Greek
- Vietnamese
- Chinese
- Arabic
- Turkish
- Spanish

Upon request copies of the Code in all the above languages will be provided to customers.

4. Product Information

Keno Rules must be on display where Keno is sold including Keno self-service terminals.

Brochures containing information on how to play Keno are provided to accredited agents for display at each Keno outlet.

5. Responsible Gambling Information

Keno works with Victorian accredited agents and outlets to provide responsible gambling information in a range of forms, including brochures, stickers and posters. This includes but is not limited to information in relation to:

- how to gamble responsibly
- making a pre-commitment decision
- the availability of gambling support services
- information on our products enabling customers to make informed decisions
- the prohibition on the provision of credit for gambling
- restrictions that apply to the payment of winnings by cheque

Contact information for support services and Responsible gambling tips are also displayed by various means, including screen displays, within Keno outlets.

The following responsible gambling message will be displayed on all relevant material.

Think! About your choices
Call Gambler's Help
1800 858 858
www.gamblinghelponline.org.au

6. Interaction with customers

Keno does not have direct contact with customers who play Keno. However, Tabcorp encourages accredited agents, outlets and their staff to engage with customers and provide information (supplied by Tabcorp) on Keno to customers upon request.

In a venue, a person who approaches a staff member for information about, or assistance with, a gambling problem or who is displaying behaviours that may be related to problem gambling will be directed to the Venue's Responsible Gambling Officer/Gaming Duty Manager or a senior employee (preferably the Agent) for help.

A customer displaying signs of distress or unacceptable behaviour will be approached by a staff member who will offer assistance. These signs may include, but are not be limited to:

- a person either gambling every day or finding it difficult to stop gambling at closing time
- gambling for extended periods. That is, gambling for three hours or more without a break
- avoiding contact while gambling, communicating very little with anyone else, barely reacting to events going on around them, making requests to borrow money from staff or other customers or continuing to gamble with the proceeds of large wins
- displaying aggressive, anti-social or emotional behaviour while gambling

This assistance may take the form of:

- staff interacting with the customer and encouraging them to take a break from their gambling
- staff offering the customer some refreshments (eg. cup of tea or coffee) in a quieter, more private part of the gaming venue.

If the behaviour could be due to problem gambling, the customer will be referred to the Responsible Gambling Officer/ Venue Manager Duty Manager or Gaming Manager.

Keno respects and protects the privacy of our customers. Our Privacy Policy is available on our website www.tabcorp.com.au.

All incidents will be recorded in the outlets Responsible Gambling Registers.

7. Pre-commitment

Tabcorp encourages, and supports all accredited agents to encourage, all customers who play Keno to set a time and money limit according to their circumstances.

Keno outlets/venues display signs that recommend customers "set a limit and stick to it", where Keno terminals are located. In addition the Keno Game Guide has information on circumstances that can lead to overspending. These include:

- gambling every day or finding it hard to stop at closing time
- gambling for long periods, that is, for three hours or more without a break
- avoiding contact while gambling, communicating very little, barely reacting to events going on around the player
- trying to borrow money from staff or other customers or continuing to gamble with the proceeds of large wins
- aggressive, anti-social or emotional behaviour while gambling
- trying to win back gambling losses
- when feeling stressed or unhappy
- losing control because of excessive consumption of alcohol

Accredited agents and outlet staff will support customers who inform them of a pre-commitment decision, by encouraging them to keep their pre- commitment decision.

8. Staff Gambling Policy

All employees of Tabcorp are required to comply with the Tabcorp Gambling Employee Policy. Adherence to this policy is a strict requirement of employment or contract with Tabcorp. Non-compliance is treated as a serious breach of a key policy.

The policy places a range of restrictions on the ability of our employees to participate or otherwise engage in Keno activities operated by us whether on or off duty. This includes not permitting our employees to take part in Keno whilst on-duty unless this is part of an employees' official duties

Keno outlet staff are not permitted to play Keno while on duty (including rostered breaks) unless required to do so in order to perform their normal work duties. Licensed venues owned and operated independently of Tabcorp have policies that strictly prohibit gambling by employees whilst on duty (including rostered breaks). We encourage these venues to also have in place policies relating to the participation of employees in gambling products at their venue during off-duty periods.

They are given responsible gambling training as part of their employment induction. Any staff member who indicates that they have a gambling problem will be directed to the venue's Responsible Gambling Officer/Duty Manager. Any contact with a staff member who indicates that they have a gambling problem will occur in a manner that respects the staff member's right to privacy.

9. Support Services

Keno displays responsible gambling messages and makes available information for gambling support services for individuals and/or their families as to where to obtain assistance to manage a gambling problem. Keno is committed to facilitating strong links between Keno outlets and local problem gambling support services, including encouraging regular meetings with local Gambler's Help services.

Examples of these meetings may include:

- holding annual staff training sessions, run by the local Gambler's Help service
- twice yearly/regular meetings between the Keno outlet/manager and the Gambler's Help service

Details of these meetings should be kept in a Responsible Gambling Folder/Register to be located in the gaming room/ Keno outlet. The meeting details must include:

- time and date of the meeting
- attendees at the meeting
- topics discussed
- outcomes / action items from the meeting
- next meeting date

10. Customer Complaints

Customers who have complaints relating to this Code should write directly to:

Responsible Gambling and Compliance Manager
Tabcorp
GPO Box 1943
Melbourne VIC 3001

E-mail: Kenoregulatory@tabcorp.com.au

A customer with a complaint about an outlet's operation of this Code should write directly to the outlet's management. All complaints will be checked by Tabcorp to ensure that they pertain to the operation of this Code.

Complaints about customer service or Keno operations should go directly to the outlet manager/staff on duty. Complaints will be investigated sensitively and promptly. If it is decided not to investigate the complaint because it does not relate to the operation of this Code, the complainant will be informed of the reasons.

During the investigation of the complaint information may be sought from the staff member concerned. If a complaint is substantiated, the complainant will be informed of the outcome of a complaint. Information will be provided to the VCGLR if requested.

If a complaint cannot be resolved at the outlet level or by Tabcorp it will be referred to the Institute of Arbitrators and Mediators Australia (IAMA) for resolution.

Either party involved in the complaint may contact the IAMA. To initiate a complaint either party can go to IAMA's website (www.iama.org.au), download a Dispute Resolver form then submit the completed form with the relevant fee to the IAMA.

The mediator/arbitrator will contact both parties to facilitate a resolution.

Note: Costs may be associated with complaints sent for resolution to IAMA. All Parties are encouraged to attempt to resolve the matter at the venue level before seeking professional mediation.

Documentation regarding all complaints must be maintained in the Responsible Gambling Folder/Register for access by the VCGLR as required.

11. Minors

It is illegal for minors to gamble. Keno outlets/venues will display signs where Keno is sold advising customers of this prohibition.

All staff must ask for proof of age if they are uncertain whether a customer is at least 18 years of age. If photo identification cannot be produced, the customer will be asked to leave the gaming room/area where Keno is sold.

12. Gambling Environment

Keno customers will be encouraged to take regular breaks from gambling and not to engage in extended or intensive gambling. This encouragement may take the form of an announcement regarding a staged event. Types of staged events may include:

- announcing that morning tea is now available;
- announcing a member's draw;
- the commencement of activities such as morning melodies.

Clocks are in all major areas of the outlet so customers are made aware of the passage of time. Outlet staff will mention the time when making announcements about venue activities.

13. Transactions

Keno outlets do not cash cheques from customers, including the cashing of cheques for the purpose of playing Keno. A sign stating this is displayed at the cashier's station or near the Keno terminal in the Keno outlet/ venue.

If requested by a customer Keno winnings will be paid wholly or partly by cheque.

14. Advertising and promotions

All Keno advertising undertaken by or on behalf of Tabcorp complies with all applicable Commonwealth and State laws, regulations and codes relating to the advertising or promotion of Keno products, including the advertising code of ethics adopted by the Australian Association of National Advertisers.

Further, we will ensure that Keno advertising materials will:

- not be false, misleading or deceptive about odds, prizes or the chances of winning
- not be offensive or indecent in nature
- not create an impression that gambling is a reasonable strategy for financial betterment
- not promote the consumption of alcohol while purchasing gambling products
- Have the consent of any person identified as winning a prize prior to publication
- Will not be aimed at or designed to appeal to minors and do not appear in conjunction with an offer, event or facility advertisement that pertains to minors.

15. Implementation of the Code

Tabcorp's Keno Responsible Gambling Code of Conduct is included in induction materials given to all new staff upon commencement of employment with Tabcorp, and to Keno outlet staff.

Issues identified by staff or customers relating to this Code will be directed to the Responsible Gambling and Compliance Manager, Tabcorp via e-mail: Kenoregulatory@tabcorp.com.au, mail: Responsible Gambling and Compliance Manager GPO Box 1943, Melbourne VIC 3001 or telephone: 02 9218 1441.

16. Review

A review of this Code will be conducted on an annual basis to ensure that it complies with all legislative requirements, including any Ministerial directions. The review seeks feedback from all relevant stakeholders, including Keno outlet staff, Gaming /Keno Managers, Agents, customers and any feedback provided by problem gambling support services.

We may also conduct a further assessment of this Code on an as needs basis where there are significant changes in the Responsible Gambling Environment. Required changes will be implemented where possible.

The updated version of the Code must be approved by the Victorian Commission for Gambling and Liquor Regulation before its release. Following approval, the updated version of the Code will be available in our Keno venues/outlets and on our website www.tabcorp.com.au.