

► POLICY | Responsible Conduct of Gambling (RCG)

1.0 OBJECTIVE

As a not-for-profit, member-based organisation, we fully support the principles of providing a safe gambling offering for our members. We hold this moral position because it is the right thing to do, and we do not wish to benefit from any individual's inability to self-manage their gambling habits.

Mingara Leisure Group (MLG) acknowledges that, while most people participate in gambling activities in a socially enjoyable and harmless manner, gambling can create problems for some individuals. The extent of these problems can range from occasional overspending to the development of serious gambling practices.

The club has accepted its social and legal obligations as a provider of gambling services to create a responsible gambling environment and a commitment to implement and adhere to Responsible Gambling legislation - Registered Clubs Amendment (Responsible Gambling) Regulation 2002 - and best practice for the benefit of customers and team members.

The objective of this policy is to ensure team members are aware of the behaviours that are above the line (acceptable) and those behaviours that are below the line (unacceptable) with respect to Responsible Conduct of Gambling.

our values team. safe. reliable. progressive. memorable.	
living our values above the line	These actions are only some of the ways to live our values above the line. ▪ I provide assistance to anyone who asks for help with a gambling issue and involve my supervisor to help as soon as possible. ▪ I know and understand what the signage around the venue means, and where customers can get help. ▪ I inform my supervisor if a customer seems distressed in the gaming room. ▪ I have the knowledge to assist a customer to set Voluntary Pre-Commitment (VPC) on the member kiosks if asked. ▪ I assist customers to use the ATM or EFTPOS when there is a legitimate need, and ensure another team member is present. ▪ I assist family members with information about third party exclusions and involve my supervisor to help immediately.
not living our values below the line	These actions are not the only ways that behavior can fall below the line. ▪ I do nothing when I recognise someone who is self-excluded playing the gaming machines. ▪ I do nothing when I see a customer in distress. ▪ I am not interested in helping a customer set their Voluntary Pre-Commitment (VPC) when asked. ▪ I discuss how much players have spent or won with others. ▪ I lend money and allow IOU's for customers to gamble with. ▪ I do not know or have any information when I am asked for third party exclusion. It's not my problem.

Below the line behaviour could be subject to counselling or disciplinary action, which may include termination of employment.

2.0 SCOPE

Our Commitment is to deliver, advertise and promote gambling services in a lawful and socially responsible manner, having regard to the potential for harm that may be caused by gambling and community concerns about the responsible conduct of gambling.

We aim to achieve this through a variety of measures and strategies, which include the following:

- Our policies and procedures will outline the provision and use of gambling products occur in a safe and enjoyable manner.
- We will provide support to assist with the handling of any gambling-related incidences, which may occur at the club and refer to our RCG policies and procedures.
- We will provide mandatory RCG training for team members and management with refresher training when required.
- We will conduct community awareness campaigns and promote responsible gambling practices amongst club customers and the local community.
- We have adopted responsible gambling and harm minimisation measures in accordance with the Code of Practice from Club's NSW.

Duty of Care and Negligence

We have a duty to take reasonable care for the safety and welfare of our customers.

The following are our actions to ensure our duty of care to our customers:

- We always provide and support self-exclusion to a self-disclosed problem gambler.
- We always refer a third-party's self-exclusion request to the Adjudication Panel.
- We always enforce a self-exclusion that has been initiated.
- We train and implement RSA in all areas of the club including all gaming areas.
- We care and check in with our customers and record all our communications when conducting a welfare check.
- We keep our records up-to-date to ensure we do not send any gambling advertising or promotional material to a person that has been excluded from the club.

3.0 PROCEDURES

Some of the more common conditions that MLG complies with are:

- The club does not provide credit that could reasonably be used for the purpose of gambling including providing cash advances from credit cards.
- Loans are not made to customers or team members, which could be used for gambling.
- We ensure a reality check for customers, i.e., clocks are in place and monitored. These clocks include the LED display of times on each of the gaming machines in the gaming areas. All timepieces are set to the correct time and monitored.
- Minors are prohibited from Gaming areas; we monitor this continually and address issues if they arise.
- We have a player reward scheme that can only be used to buy goods and services and cannot be used for credit card payments or cash.
- We ensure that participants in our player reward scheme have access to their Player Activity Statements.

Activity Statement provides the following information in relation to gaming machine activity.

- The total amount of turnover, total wins, and net expenditure for the player.
- The total points earned and redeemed as the result of playing gaming machines.
- The total length of time during which a customer's card was inserted in the gaming machines during each 24-hour period in the month, and the total length of time during the whole month.
- A note advising that the statement only relates to the gaming machine play whilst the player's card was inserted into the machine and that it may not include information about wins on gaming machines that are part of an inter-club linked system.
- We maintain a **Gambling Incident Register (GIR)** and review it every month.

- GIR records the following;
 - Player welfare checks and outcomes.
 - Requests for self-exclusions and outcomes.
 - Third-party exclusion requests and outcomes.
 - Breaches or attempted breaches of an exclusion
 - Complaints in relation to the club's compliance with its responsible gambling practices.

Self-exclusion

- We have a Multi-Venue Exclusion Scheme.
- We conduct self-exclusions in accordance with the provision of the Gaming Machines Act 2001 (NSW)

Club-Initiated exclusion

- We exclude any person, including a Club member, on personal welfare grounds; and
- Automatically accept a request from any other gaming venue in NSW to exclude a person on personal welfare grounds.
- We will initiate an exclusion if a person displays any of the following problem gambling behaviours;
 - Seeking credit for gambling
 - Seeking to borrow money for gambling.
 - Admitting to borrowing or stealing money to gamble
 - Leaving a minor unattended while playing gaming machines.

Family-initiated exclusion

- Our Multi-venue Exclusion Scheme allows a Family member of the person to make an application to the Code Adjudication Panel to have that person excluded from the gaming machine areas at multiple venues.
- We will ensure the correct information is provided to us in accordance with the Clubs NSW Gaming Code of Practice.

Exclusion Revocation Process

- We will provide the information for the excluded person on how to apply to the Code Administrator to have their exclusion revoked.

4.0 BREACH

Mingara Leisure Group has an obligation to consistently apply and enforce this policy. Likewise, team members must comply with this policy.

Any Team member who breaches this policy shall be subject to counselling and/or disciplinary action, which may include termination of employment.

Questions on the interpretation and application of this policy can be directed to your General Manager or site Human Resources contact.

CONTROL INFORMATION	Subject	Responsible Conduct of Gambling	
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