

Responsible Gambling Code of Conduct

4Mile Pty Ltd ('The Company')

This Code of Conduct will apply to The Company, its contractors and any employees of contractors that The Company may engage to provide Services. This code of conduct ensures that each person or entity associated with the conduct of raffles on behalf of Not for Profit organisations is committed to the responsible service of gambling.

1. RESPONSIBLE GAMBLING MESSAGE

The Company is committed to the responsible service of gambling.

We foster a commitment to provide a responsible gambling framework and endeavour to provide services in a responsible manner. An integral part of this commitment is the Code of Conduct that has been adopted, designed to assist The Company to provide gambling in an enjoyable and responsible manner to support charitable organisations.

2. AVAILABILITY OF THE CODE OF CONDUCT

A copy of The Company's Code of Conduct will be made readily available upon request to the nominated person, Peter Thomson, Director of The Company who is responsible for the operation of the code of conduct. The code will be sent to the customer in an agreed format, either via mail, email or fax.

The Company does not have a website.

3. RESPONSIBLE GAMBLING INFORMATION

The Company will ensure that its major sub-contractor(s) engaged to perform services relating to the conduct of a raffle will comply with regulatory requirements regarding the display of responsible gambling information for all customers.

The following information about responsible gambling will be made available to customers or employees of sub-contractor(s):

- a) How to gamble responsibly; www.betsafe.com.au;
- b) How to make and keep pre-commitment decisions;
- c) Access to the Commonwealth Government's website, Understanding Money; www.understandingmoney.gov.au
- d) Access to gambling support services;
- e) Access to the state government's problem gambling support website www.problemgambling.vic.gov.au; and
- f) Restrictions on the provision of credit for gambling

At the conclusion of every telephone conversation where a customer has bought tickets in a raffle draw, the customer is supplied with a telephone number where they can:

- a) Request more information about the Raffle;
- b) Cancel or amend a ticket order (until the day on or before the draw of the raffle); or
- c) Change their entries in a raffle to a donation.

The Company will also ensure that an internal opt-in do not call register is maintained for customers. Once a customer has elected to not be contacted for participation in a raffle, all future contact will cease unless otherwise specified by the customer.

4. GAMBLING PRODUCT INFORMATION

Information relating to the odds of winning the stated prizes will be made available to customers upon request. Customers are able to request for this information at the time of their call, or alternatively call the Raffle Enquiry Line.

Information relating to raffle entry terms and conditions will be made available to customers by call centre agents. Call centre agents are trained to disclose terms and conditions of entry during at the time of the call. It is at this point where customers are able to accept or refuse the offer to participate in any raffle.

Terms and Conditions are also printed clearly on the front or reverse of tickets or by free call to 1800 377 000.

5. INTERACTION WITH CUSTOMERS

The Company will ensure that sub-contractor's employees focus on adequately training staff to ensure the best quality of interaction with donors. Call centre staff will be trained to assist those who display any indicators of distress which may be related to a gambling problem. Calls of this nature will be escalated to the nominated person, who will assess the situation and make arrangements as appropriate. In any situation the following may occur:

- a) Provide information relating to access to help services, including self-exclusion and financial advice; or
- b) Provide referral details to Gamblers' Help services.

In addition to those who indicate a gambling problem, call centre staff will be trained to observe those who seem to overextend themselves financially. In accordance with providing a responsible service of gambling, call centre staff will be trained to do either of the following:

- a) Offer a call back date if the customer wishes to purchase raffle entries;
- b) Provide the Raffle Enquiry Line number whereby purchasers are able to amend or cancel their pledge;
- c) Not engage in pressure techniques; or

- d) Encourage pre-commitment decisions.

The nominated person will in any event, ensure that interaction with customers occurs in a manner that respects the customer's right to privacy.

The Quality Assurance (QA) department work with call centre supervisors and team leaders to ensure that call centre operators conduct calls in accordance with strict rules and guidelines imposed.

6. INTERACTION WITH STAFF

The Company value their sub-contractor's employees and are concerned with the service of responsible gambling. Company policy prohibits employees to participate in raffles conducted by The Company.

Anyone who requests information or help with a gambling problem, or who may show any indicators of a gambling problem, not confined to raffle purchases, will be assisted by the nominated person. The nominated person will provide the employee with referral details to a Gambler's Help Service and/or Gambler's Help Service material. If further assistance is deemed necessary, the nominated person will ensure that reasonable steps are taken to address the situation appropriately. Any process relating to gambling help will be conducted in a confidential manner in a way to protect staff privacy but will be recorded in employee files.

Supervisors and Quality Assurance of sub-contractors who monitor employees on a daily basis will also be trained to observe any indicators of stress that may be related to a gambling problem and will escalate these situations to the nominated person for review.

7. INTERACTION WITH PROBLEM GAMBLING SUPPORT SERVICES

The nominated person of The Company will maintain regular contact Gambler's Help services to remain updated with publications and to ensure contact details are updated on a regular basis. The nominated person will also enquire about any specific training programs available. The relevant information will be communicated to staff and customers immediately. All relevant material will be filed in the Responsible Gambling Folder.

8. CUSTOMER COMPLAINTS

Complaints received regarding this Responsible Gambling Code of Conduct will be recorded and complainants may be asked to record their complaint in written form, directed to the Nominated Person.

The Nominated Person will investigate the complaint in a confidential manner within a reasonable time frame, at least 2 weeks after receipt of the complaint and will implement a reasonable resolution and log the action taken. If the matter is resolved, no further action will be taken. A letter of acknowledgement will be sent to the complainant expressing appreciation for their interests and will be informed of the appropriate action taken.

For complainants who request for an independent review of a complaint, the matter will be referred to independent mediators (www.iama.org.au), and costs will be shared equally between both parties.

Information that is received will be collected and recorded in the Complaints Register and retained in the Responsible Gambling Folder. Records of complaints and decisions will be filed and will be made available upon request of VCGLR. Complaint and feedback forms are annexed to the Code of Conduct.

10. COMPLIANCE WITH THE PROHIBITION ON GAMBLING BY MINORS

Selling raffle entries to minors is prohibited at all times. The Company and its sub-contractors do not engage in any sales campaigns specifically targeted to minors, or knowingly sell raffle entries to minors. Call centre operators are adequately trained in this field to ensure this does not occur. The Quality Assurance department coupled with team leaders and supervisors are able to monitor and verify that all sales are executed in accordance with any guidelines relevant to any raffle campaign.

11. THE GAMBLING ENVIRONMENT

To ensure a responsible gambling environment, The Company and its sub-contractors do not engage in any forms of lotteries which encourage continuous play, or are targeted for minors. The Company also discourage excessive raffle ticket purchases by customers.

The Company regularly check customer database for history of excessive purchases. In circumstances where a gambling problem is made known by the customer, please refer to section 6. It is common practice for The Company to verify all transactions made over \$100. A maximum limit of tickets purchased in one transaction is imposed, in any case it is \$500.

Reasonable sales techniques are used by call centre operators to ensure no pressure sales techniques are employed. The Quality Assurance Department coupled with supervisors also ensure that call centre operators adhere to strict guidelines imposed.

12. FINANCIAL TRANSACTIONS

The Company do not engage in extending credit or cashing cheques for the purpose of purchasing raffle tickets at any time. Customers who request such a service will be notified of the policy and procedures relating to financial transactions and therefore are not able to acquire credit.

Customers who request such services will be made known to the nominated person, who will assess the situation and take the appropriate steps to ensure the particular customer is assisted in such a way to ensure engagement in responsible gambling.

Prizes awarded at the conclusion of each raffle are strictly non cash prizes. The only exception is where a holiday prize is offered, in such a case where the raffle winner elects the choice of a holiday, 10% of the retail value of the prize is cash.

13. RESPONSIBLE ADVERTISING AND PROMOTIONS

Responsible Advertising

To ensure engagement in responsible advertising of information relating to gambling undertaken, The Company will:

- a) Comply with advertising code of ethics adopted by the Australian Association of National Advertisers;
- b) Not engage in false, misleading or deceptive advertising;
- c) Ensure advertisements are not to be offensive or indecent in nature;
- d) Not create an impression that entering a raffle is a reasonable strategy for financial betterment;
- e) Not include false, misleading, or deceptive advertising about odds or prizes or chances of winning; and
- f) Not publish any form of advertisement which identifies customers who have won a prize without prior consent.

Prior to publishing, all advertising material is checked and signed off by the relevant department, in particular the nominated person. Future publications will be assessed against the abovementioned standards will be added into the current advertising checklist. If any employee of a relevant department believes that any advertisement may be in contravention of the responsible advertising checklist, all queries are forwarded to the nominated person, Peter Thomson. In such a case, reasonable steps are taken to assess and resolve the issue accordingly.

14. REVIEW PROCESS

Employee Feedback

The focal point at which the code of conduct is introduced to new staff is at induction. The code of conduct will be made available in the induction manual distributed to each new staff member to ensure they are informed about the responsible gambling measures employed by The Company.

Any feedback or issues raised by staff at weekly meetings is addressed by senior management to ensure the implementation of the code of conduct in all relevant departments and operations.

15. REVIEW OF THE CODE

Annual Review of the code will occur on the anniversary of its commencement. The Company also encourages any input or feedback from relevant staff, management or customers to ensure that the code of conduct remains operational and effective in achieving its purpose.

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