

Responsible Gambling Code of Conduct

Clever Contacts PTY LTD ATK The Kidd Family Trust

(ACN 612 853 728)

The Code is available on the Clever Contacts website at clevercontacts.com.au or by request to

Vicki Love, Compliance Office on 07 3188 7653

Responsible Gambling Message

Clever Contacts is committed to selling raffle tickets responsibly to support community and charitable organisations.

Availability of Responsible Gambling Code of Conduct

This message will be displayed on Clever Contacts website and on material developed by Clever Contacts for the promotion and conduct of raffles on behalf of community and charitable organisations.

Responsible Gambling Information

A responsible gambling message is available to any customers placed on hold prior to or during a telephone contact.

Information about the following is available on the Clever Contacts website at clevercontacts.com.au or by request to Vicki Love, Compliance Office on 07 3188 7653

- how to gamble responsibly, e.g. decide before you buy how much you want to spend
- the availability of gambling support services
- restrictions that apply to the provision of credit or the lending of money by Clever Contacts for the purposes of purchasing raffle tickets.

The terms and conditions for the conduct of a raffle will be printed on the ticket and/or information material designed to promote the raffle, and the Clever Contacts website at clevercontacts.com.au or by request to Vicki Love, Compliance Office on 07 3188 7653

This information will include how to enter and the odds of winning the stated prizes based on the total possible ticket sales.

Interaction with Staff

Staff are permitted to purchase raffle tickets being sold by Clever Contacts.

A nominated manager/supervisor of Clever Contacts will assist a staff member who requests it, with information about help with a gambling problem. This information will include referral details to a Gambler's Help telephone service and/or information materials prepared by Gambler's Help services. This will be done away from the general work area and in such a way as to protect the staff member's privacy.

Staff members who are displaying indicators of distress that may be related to problem gambling (not confined to raffle purchases) will be offered the above information and assistance.

Interaction with Problem Gambling Support Services

The Manager or a senior staff member of Clever Contacts will contact Gambler's Help services twice a year to obtain updated publications and any changes to contact details or available services. This information will be communicated to staff, and made available for use with customers, as soon as practicable after it is received.

Gambling Help Online

1800 858 858

Lifeline Australia

P O Box 173

Deakin West ACT 2600

Phone 02 6215 9400

Fax 02 6215 9401

24 Hour Telephone crisis support – 131114

Clever Contacts telephone staff will assist customers who request it with information about help with a gambling problem. This information will include referral details to a Gambler's Help telephone service and/or information materials prepared by Gambler's Help services. In addition, for customers who have indicated that they have a gambling problem or where a canvasser forms the view from the caller that a caller may be overextending themselves financially:

- Telephone canvassers will offer to end the call/call back later if the customer wishes to continue with their ticket purchase (cooling off period)
- Provide a telephone number whereby credit card purchasers could amend or cancel their order (cooling off period)
- Where tickets sold by mail an upper limit of books will be issued to a customer to purchase/sell at any one time.

Customer Complaints

If a customer wishes to lodge a complaint relating to Clever Contacts responsible gambling code of conduct, they should do so in writing, addressed to:

Clever Contacts Attention: CEO, 25/27 South Pine Road, BRENDALE QLD 4500

The CEO will investigate the complaint as soon as possible, and will take the following steps to resolve a complaint:

- Will acknowledge the complaint within 24 hours of receipt;

- Will assess whether the complaint is relevant to the Gambling Code of Conduct and advise through written notification;
- Where further investigation is needed, information and feedback will be gathered from all relevant parties;
- Will assess whether all parties have been treated fairly and reasonably in accordance with Clever Contacts Responsible Gambling Code of Conduct;
- Will ensure Parties are notified on the progression of the complaint and be informed of the outcome through written notification. The outcome will detail the action and how the complaint has been resolved;
- Complaints will be provided to the Victorian Commission for Gambling Regulation (VCGR) upon request.

Calls are recorded for Quality Assurance at Clever Contacts – all agents across all campaigns are included. In the instance Clever Contacts could not resolve customer complaint we would liaise with Charity Partner for clarification and resolution.

Commitment to discourage gambling by minors

Clever Contacts does not encourage early gambling habits in children. Clever Contacts will not target a promotion or sales campaign at minors and will not knowingly sell raffle tickets to minors. Tickets are not sold to persons under the age of 18. All persons buying tickets over the phone are asked if they are over the age of 18. The Charity partners of Clever Contacts do not offer prizes that include alcohol.

Clever Contacts Pty Ltd will not supply a prize of a raffle which includes liquor (or any other product that cannot be legally purchased by a minor) to a minor.

The Gambling Environment

Clever Contacts will discourage repeatedly excessive purchase of tickets by customers. To achieve this Clever Contacts will:

- Set a limit on the quantum or value of tickets to be sold to an individual
- Check data base of regular ticket purchasers to detect a pattern of excessive purchase
- Not engage in hard/pressure sales techniques.

Tickets sales will be capped at \$200 value or 10 books

Financial Transactions

Clever Contacts will not be processing customer payments. Clever Contacts is a partner of the Charity whom the raffle raises funds for. All transaction information is passed through to the Charity for processing.

Prizes of cash are not permitted in Victoria by law except that cash may form up to 10 percent of a travel prize.

Responsible Advertising Promotions

Any advertising and promotions undertaken by Clever Contacts in relation to a raffle will:

- Comply with the advertising code of ethics adopted by the Australian Association of National Advertisers
- Not be false or misleading or deceptive about odds, prizes or the chances of winning
- Have the consent of any person identified as winning a prize prior to publication
- Not be offensive or indecent in nature
- Not create an impression that entering a raffle is a reasonable strategy for financial betterment
- Not promote the consumption of alcohol while buying raffle tickets.

Clever Contacts will incorporate the above standards into its advertising checklist and will assess all proposed advertising against these standards.

Processes and Structures to Support the Ongoing Implementation of the Code.

1. Responsible Gambling matters will be a standing item for Board and staff meetings.
2. A Responsible Gambling Officer will be identified from among senior staff to:
 - a. Handle more difficult customer contacts
 - b. Liaise with Gambler's Help services to obtain relevant information, advice and training and make this available to staff and customers
 - c. Induct new staff members to ensure they are informed about responsible gambling issues and the Code
 - d. Handle responsible gambling issues raised by staff
 - e. Identify staff worthy of reward and recognition for their responsible gambling efforts

Code Review Process

Clever Contacts Code will be reviewed each year on the anniversary of its commencement.