

ANNEXURE A

BitWinning's RG Code of Conduct

BitWinning's Responsible Gambling message is: BitWinning is committed to responsible gambling and ensuring that a range of tools are available to our customers to manage their gambling. The RG message and this Code are available on the BitWinning website (bitwinning.com) and app.

For most people, gambling is a form of entertainment and is not a problem. But for some people, gambling is or can become a problem.

Gambling inherently involves the risk of losing funds that are bet. Customers acknowledge and accept this risk by opening a betting account and betting.

To gamble responsibly, customers should only gamble funds that they can afford to lose. Customers should also not spend excessive time gambling, especially if gambling causes distress or interferes with other activities such as family or work commitments.

Problem gambling support services can be accessed by calling 1800 858 858 or at gamblinghelponline.org.au or responsiblegambling.vic.gov.au.

Deposit limits

Customers can choose to set a deposit limit that limits the amount of funds that can be deposited to their BitWinning betting account in a particular period of time. Deposit limits are available under the MyAccount section of the app or website, and by Live Chat or email.

A request to set a deposit limit is effective only once the customer has completed the online or other form (and received confirmation), or otherwise been advised by BitWinning that the deposit limit is effective. If a customer withdraws their request for a deposit limit before it has become effective, the deposit limit is not effective.

If a customer sets a deposit limit, they must not establish or operate another betting account with BitWinning or do anything else to circumvent the deposit limit.

A customer can decrease their deposit limit at any time and the new limit becomes effective immediately. If a customer requests to increase their deposit limit, that increase will only become effective after 7 days. If the customer does not advise BitWinning within 7 days that they no longer wish to increase their deposit limit, the deposit limit will be increased as per the request.

BitWinning does not provide credit or lend money for the purposes of gambling.

Self-exclusion

BitWinning provides customers with the option to request to self-exclude either temporarily or permanently from betting with BitWinning. A request to self-exclude can be made in the MyAccount section of the app or website, and by Live Chat or email.

A temporary or permanent self-exclusion is effective only once the customer has completed the online or other self-exclusion form (and received confirmation), or otherwise been advised by BitWinning that the temporary or permanent self-exclusion is effective. If a customer withdraws their request for self-exclusion before it has become effective, the customer is not considered to be self-excluded. A request for account closure, permanent account closure or similar type request is not a request for temporary or permanent self-exclusion. For a self-exclusion to be effective, the customer must complete the self-exclusion process.

If a customer self-excludes with BitWinning, they must not establish or operate another betting account with BitWinning or do anything else to circumvent the self-exclusion.

Once a temporary or permanent self-exclusion is effective, it can only be revoked if the customer completes a self-exclusion revocation form declaring they wish to revoke their self-exclusion, that they

are aware of the responsible gambling tools and problem gambling support services that are available, and that they do not have a gambling problem.

Once a temporary self-exclusion has expired, the customer is no longer excluded and can commence to bet with their BitWinning betting account. If the customer wishes to request to extend their temporary self-exclusion or request to permanently self-exclude, they must make a new request to self-exclude in the MyAccount section of the app or website, or by Live Chat or email.

A temporary or permanent self-exclusion with BitWinning is with BitWinning (Victorian licensee) only. If a customer wishes to self-exclude with other bookmakers or licensees, they must do so with those operators.

Other

The BitWinning rules, terms and conditions are available on the BitWinning website and in the app.

Where a customer has requested information about or assistance with a gambling problem, they will be directed to the Responsible Gambling Policy or this RG Code or to problem gambling support services.

Where a customer has requested information about or assistance with self-exclusion, they will be directed to the Responsible Gambling Policy or this RG Code or otherwise directed to the tools that BitWinning makes available for a person to self-exclude from BitWinning.

Where a customer is displaying indicators of distress that may be related to problem gambling, they will be provided with information for problem gambling support services, directed to the Responsible Gambling Policy or this RG Code, or be asked by BitWinning if they have a gambling problem.

Indicators of distress that may be related to problem gambling exist when the customer states that they do or may have a gambling problem or that their gambling is causing them distress. Interactions with customers will occur in a manner that respects the customer's right to privacy.

Staff members are not permitted to gamble with BitWinning. Where a staff member indicates that he or she may have a gambling problem, the staff member will be provided with information for problem gambling support services or directed to the Responsible Gambling Policy or this RG Code. Interactions with staff will occur in a manner that respects the staff member's right to privacy.

A director of BitWinning will procure the review of publicly available information from a problem gambling support service every two years.

Complaints under this RG Code can be made to BitWinning by email to admin@bitwinning.com or Live Chat. BitWinning will endeavour to respond to complaints within 14 days where possible. If a customer is unsatisfied with the BitWinning response, they can make a complaint to:

- the Victorian Bookmakers Association; and/or
- the relevant Controlling Body (should the nature of the complaint also be relevant to the Rules under which BitWinning conducts its bookmaking operations);

who may undertake an independent review where a complaint falls within the jurisdiction and matters that can be considered by that body.

A customer will also be informed of their right to make a complaint to the Victorian Gambling and Casino Control Commission.

Records of complaints and decisions of any review process made in relation to the operation of this Code will be held for a period of seven years and will be made available for inspection by the Victorian Gambling and Casino Control Commission on request. Information about complaints will be collected and retained in accordance with the BitWinning Privacy Policy.

Minors are not permitted to open a betting account or place a bet with BitWinning. There is a system control that prevents minors from opening a BitWinning betting account. Date of birth is verified during the account opening process.

BitWinning encourages customers to avoid engaging in extended and intensive gambling that may constitute problem gambling. A session timer is visible on the website that allows customers to monitor the duration of their betting session.

Winnings are paid into the customer's BitWinning betting account, and cannot be paid by cheque. Withdrawals from a BitWinning betting account can be made into a nominated Australian bank account.

Any advertising and promotions by BitWinning will: (a) comply with the advertising code of ethics adopted by the Australian Association of National Advertisers; (b) not be false, misleading or deceptive about odds, prizes or the chances of winning; (c) have the consent of any person identified as winning a prize prior to publication; (d) not be offensive or indecent in nature; (e) not create an impression that gambling is a reasonable strategy for financial betterment; and (f) not promote the consumption of alcohol while purchasing gambling products.

Advertising and promotions by BitWinning will be reviewed by a senior manager to ensure compliance with these requirements