

Lighthouse Group Pty Ltd T/A RaffleLink

Commercial Raffle Organiser (CRO) Responsible Gambling Code of Conduct

1. Availability of the Responsible Gambling Code of Conduct

The Code is available on the RaffleLink website at rafflelink.com.au or by request to Belinda Watson at belinda@rafflelink.com.au. RaffleLink is a registered business of Lighthouse Group Pty Ltd, the holder of the Commercial Raffle Organiser's license.

2. Responsible Gambling Message

Lighthouse Group Pty Ltd as RaffleLink is committed to selling raffle tickets responsibly to support community and charitable organisations. This message will be displayed on the RaffleLink website and on material developed by RaffleLink for the promotion and conduct of raffles on behalf of community and charitable organisations.

3. Responsible Gambling Information

Information about the following is available on the RaffleLink website at rafflelink.com.au or by request to Belinda Watson at belinda@rafflelink.com.au.

- 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 Lighthouse Group Pty Ltd for the purposes of purchasing raffle tickets.

4. Gambling Product Information

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 RaffleLink website at rafflelink.com.au or by request to:

Belinda Watson at

belinda@rafflelink.com.au

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

5. Customer Loyalty Scheme Information

RaffleLink does not make provision for a customer loyalty scheme.

6. Interaction with Customers

As an online selling service, RaffleLink has minimal interaction with ticket buyers however, RaffleLink 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 may be overextending themselves financially:-

* RaffleLink will remind customers at time of ticket purchase how to gamble responsibly and display the Free Gambling Helpline phone number 1800 858 858

* At time of purchase, Raffle will instruct buyers to review the Terms & Conditions of ticket purchase on our RaffleLink website – Terms. These Terms will also display a telephone number and email address whereby credit card purchasers can amend or cancel their order (cooling off period)

* Where the raffle website page for ticket purchases is promoted in person, suggest that the purchaser take a moment to reflect on whether they wish to purchase tickets/as many tickets (cooling off period)

* RaffleLink has access to every raffle sales database and can keep a vigil on customers displaying extreme volume ticket purchases. Our clients are grassroots fundraisers and it is expected that the ticket price will be of low denomination – an average of \$2 and not in excess of \$5 each.

7. Interaction with Staff

Staff are NOT permitted to purchase raffle tickets being sold through RaffleLink.

A nominated manager/supervisor of RaffleLink 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.

8. Interaction with Problem Gambling Support Services

The Manager or a senior staff member of RaffleLink 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.

9. Customer Complaints

A customer may lodge a complaint with RaffleLink regarding the Gambling Code of Conduct by writing to:

RaffleLink, PO Box 6758, Upper Mount Gravatt QLD 4122

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

- will acknowledge the complaint within 48hrs of receipt
- will investigate the complaint by gathering all necessary information and feedback from relevant parties
- will keep the customer informed regarding the progress, outcome and resolution of the complaint enquiry through written notification
- complaint details will be kept on file and can be made available to the relevant governing authority upon request

Should a complaint not be resolved through the regular process mentioned above, then the following independent process will commence:

- the customer will be invited to attend joint meetings with an independent mediator with the cost to be shared equally between both parties

10. Compliance with the prohibition on gambling by minors

RaffleLink does not wish to encourage early gambling habits in children. RaffleLink will not target a promotion or sales campaign at minors and will not knowingly sell raffle tickets to minors.

RaffleLink will display a message on the ticket purchase page stipulating that a person must be over the age of 18 years old to purchase a ticket.

As an online selling environment, customers will require a credit card to purchase tickets, thereby indirectly curtailing ticket purchases by those under 18 years.

11. The Gambling Environment

The RaffleLink online selling facility provides that only friends/family and surrounding community linked to the organisation or club are invited to purchase tickets and are provided with access to the Raffle website to do so. The purchase of tickets is thereby restricted by invitation only.

RaffleLink will discourage repeatedly excessive purchase of tickets by customers by:

- checking the data base for regular ticket purchasers to detect a pattern of excessive purchases
- by not engaging in hard/pressure sales techniques

12. Financial Transactions

RaffleLink does not extend credit to customers to purchase raffle tickets.

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

13. Responsible Advertising Promotions

Any advertising and promotions undertaken by RaffleLink 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.

RaffleLink will incorporate the above standards into its advertising checklist and will assess all proposed advertising against these standards. All client raffle web pages are reviewed by RaffleLink for their appropriateness before activation to selling mode.

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

Code Review Process

- 1) RaffleLink's Code will be reviewed each year on the anniversary of its commencement.
- 2) Input will be obtained from management and staff and a sample of patrons about the operation and effectiveness of the Code.

A report of the review will be provided to the VCGLR at the end of each financial year.