

Thomas Direct Pty Ltd – Responsible Gambling Code of Conduct

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1. Availability of the Responsible Gambling Code of Conduct

The Code is available on request to customers and will be provided in written format via mail or email, our policy may appear on client's web sites, the policy forms part of the employment standards and is available via request to Administration Manager adminmanager@thomasdirect.com.au and (07) 5588 2888

2. Responsible Gambling Message

Thomas Direct Pty Ltd is committed to selling raffle tickets responsibly to support community and charitable organisations. The message will be displayed within the organization prominently and within each department

3. Responsible Gambling Information

Information about the following is available on the Thomas Direct Pty Ltd website at www.thomasdirect.com.au or by request to the Administration Manager adminmanager@thomasdirect.com.au and (07) 5588 2888

- 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 Thomas Direct 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 charities website. This information will include how to enter and the odds of winning the stated prizes based on the total possible tickets sales.

5. Customer Loyalty Scheme Information

Charities have different offers to their individual customer base and from time to time Thomas Direct Pty Ltd will be asked to advise customers of the availability of these offers – should a customer wish they are able to join one of the loyalty clubs – The charity is responsible for ensuring that the program complies with relevant legislation, however at all times the customer is able to cancel at any time.

6. Interaction with Customers

Thomas Direct Pty Ltd 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 the Gambler's Help services.

The services highlighted will be

- Gamblers Help Line 1800 858 858
- problemgambling.vic.gov.au

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:

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- 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).

Thomas Direct Pty Ltd allows a maximum of \$100 per customer transaction

7. Interaction with Staff

Staff are/are not permitted to purchase raffle tickets being managed by Thomas Direct Pty Ltd.

A nominated manager/supervisor of Thomas Direct Pty Ltd 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 or/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 Thomas Direct Pty Ltd 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

If a customer wishes to lodge a complaint relating to Thomas Direct Pty Ltd responsible gambling code of conduct, they should do so in writing, addressed to:

Thomas Direct Pty Ltd Attention: General Manager PO Box 616, Runaway Bay QLD 4216

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

- Will acknowledge the complaint with 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 Thomas Direct Pty Ltd 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.

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10. Commitment to discourage gambling by minors

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

Thomas Direct 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.

11. The Gambling Environment

Thomas Direct Pty Ltd will discourage repeatedly excessive purchase of tickets by customers. To achieve this Thomas Direct Pty Ltd will:

- Allow a maximum of \$100 per transaction per call;
- Check data base of regular ticket purchasers to detect a pattern of excessive purchase;
- Not engage in hard/pressure sales techniques;
- Maintain regular training and call monitoring of all staff.

12. Financial Transactions

Thomas Direct Pty Ltd will not cash customer's cheques or extend credit to customers to purchase raffle tickets. Customers will be advised of this at the time if they required such a service.

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 Thomas Direct Pty Ltd 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 changes 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;

Thomas Direct Pty Ltd will incorporate the above standard 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 Management and staff meetings.
2. A Responsible Gambling Officer will be appointed to:
 - a. Handle more difficult customer contacts;
 - b. Liaise with Gambler's Help services to obtain relevant information, advice and training and make the available to staff and customers;

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- 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

1. Thomas Direct Pty Ltd 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 by 30 June each year.