**OMAZE AUSTRALIA PTY LTD (ACN 672 745 238)**

**Responsible Gambling Code of Conduct**

1. **Availability of the Responsible Gambling Code of Conduct**

The Code of Conduct is available:

* + on the Omaze Australia website at: https://[www.omaze.com.au](http://www.omaze.com.au/) (**Website**); or
	+ by request to support@omaze.com.au or by telephone at: +61 483 933 383.

# Responsible Gambling Message

Omaze Australia is a service provider contracted by community or charitable organisations to assist with the conduct of raffle programs. In providing its services, Omaze Australia is committed to responsible gambling and to selling raffle tickets responsibly to support community and charitable organisations. We are also committed to providing an environment where customers can make an informed decision about their ticket purchases. This Code of Conduct forms part of that commitment and will be available on our Website and we will refer to this Code of Conduct where possible on material developed by Omaze Australia for the promotion and conduct of raffles on behalf of community and charitable organisations.

Omaze Australia acknowledges its responsibility in the shared nature of responsible gambling.

This responsible gambling message will be displayed on the Website and at all places where raffle tickets are sold. The tagline “Play responsibly, have fun and know your limits” will also be read out electronically when a person is placed on hold prior to or during a telephone contact.

We believe in the importance of generating awareness of the risks associated with gambling and creating and promoting environments that prevent or reduce the potential harm of gambling.

# Responsible Gambling Information

Information about responsible gambling is available:

* + on the Omaze Australia website at: https://omaze.com.au (**Website**); or
	+ by request to support@omaze.com.au or by telephone at: +61 483 933 383.

The responsible gambling information which will be available on the Website is as follows:

* + how to gamble responsibly, including options available to “take a break”, permanently self- exclude and set a spending limit, including the processes for this;
	+ contact details of Gambler’s Help Services; and
	+ restrictions that apply to cheque cashing and the availability of credit to customers. These are set out further below.

Omaze Australia believes that it is important for customers to know their budget for purchasing tickets and to make an informed decision on how much they wish to spend.

Omaze Australia provides links and resources to available gambling support services and information on the Website. The resources include:

* + https://[www.gamblinghelponline.org.au](http://www.gamblinghelponline.org.au/);
	+ https://gamblershelp.com.au/get-help/under-25s or by phone 1800 262 376;
	+ https://gamblershelp.com.au or by phone 1800 858 858; and
	+ https://[www.gambleaware.com.au](http://www.gambleaware.com.au/).

A “take a break” request or permanent self-exclusion from Omaze Australia is available to customers. Customers are able to make a request through an online form available on our website [www.omaze.com.au](http://www.omaze.com.au/), or via email to: support@omaze.com.au or by telephone at: +61 483 933 383 to restrict themselves from buying raffle tickets for a period of time or permanently if gambling has become an issue, or is causing others around them harm.

Customers can make a request to set a spend limit via email at: support@omaze.com.au or by telephone at: +61 483 933 383.

Omaze Australia may retain personal information, for as long as required, to effectively implement the above self-exclusion facilities. The following minimum personal information will be retained by Omaze Australia where a customer closes their account:

* + customer name;
	+ customer address; and
	+ customer payment details.

For more information on self-exclusion, contact Gambler's Help on 1800 858 858 or visit <https://www.gamblinghelponline.org.au/vic/local-support-services>.

# Gambling Product Information

The terms and conditions for the conduct of a raffle will be included on the electronic ticket/receipt and referred to on any material designed to promote the raffle, as well as in detail on the Website or by request to Omaze Australia customer support:

* + via email at: support@omaze.com.au; or
	+ via telephone at: +61 483 933 383.

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

# Customer Loyalty Scheme Information

Omaze Australia will not be offering any ‘customer loyalty scheme’, as defined in the Ministerial Direction.

# Interaction with Customers

Omaze Australia’s staff will assist customers who request assistance including by providing information about reducing gambling harm and gambling support services. This information will include referral details to a Gambler’s Help telephone service and/or information materials prepared by Gambler’s Help services. For example, referral details of:

* + [https://www.gamblinghelponline.org.au](https://www.gamblinghelponline.org.au/);
	+ <https://gamblershelp.com.au/get-help/under-25s> or by phone 1800 262 376; and
	+ https://gamblershelp.com.au or by phone 1800 858 858.

Omaze Australia will be regularly monitoring customer account activity in an effort to ascertain if any customers may be suffering from any harm caused by purchasing tickets. As part of this, Omaze Australia will undertake a “health check” of customers from time to time which it suspects are suffering from gambling related harm due to the perceived display of indicators of distress. These indicators of distress may include, for example, if a customer:

* is exhibiting signs of distress such as crying or swearing;
* is abusing or threatening staff;
* expresses guilt or remorse for gambling or purchasing tickets in a raffle;
* purchases 3 or more separate tickets (or bundles of tickets) within a 24 hour period;
* makes multiple purchases of tickets for a particular raffle using multiple changing payment methods;
* thinks they can control the outcome of a raffle or believes in myths; and
* is making remarks that they have seriously overspent on gambling activities.

Omaze Australia’s staff will also be interacting with customers who have requested information about, or assistance with, gambling harm, reducing their gambling activity, or self-exclusion by placing a block on the customer’s account, or closing it where required.

Omaze Australia will provide customers with resources that provide accurate information and encourage them to think about their choices. Omaze Australia will also set a fixed maximum spend amount applicable to each customer account.

In addition, for customers who have indicated that they have a gambling problem or would like assistance in reducing their gambling activity, or where a canvasser forms the view from the caller that a caller may be overextending themselves financially, canvassers will:

* offer to end the call/call back later if the customer wishes to continue with their ticket purchase;
* provide a telephone number whereby credit card purchasers could amend or cancel their order; and
* where tickets are sold in person suggest that the purchaser take a moment to reflect on whether they wish to purchase tickets/ as many tickets.

We understand that gambling related harm is difficult and often complex to detect. All customers seeking information from our staff about help with a gambling-related problem or reducing their gambling activity will be dealt with in a respectful manner. Omaze Australia will also respect the customer’s right to privacy.

# Interaction with Staff

Staff at Omaze Australia are not permitted to purchase raffle tickets being sold by Omaze Australia. Omaze Australia will support our staff in a confidential and appropriate manner.

Omaze Australia will be regularly monitoring the health and welfare of all staff in an effort to ascertain if any may be suffering from any harm caused by selling tickets. Where one of our staff members is exhibiting observable signs of distress, or behaviour indicating difficulties managing their gambling, we will provide information on:

* + Responsible Gambling tools and services; and
	+ how to access gambling support services and facilitate access to such services if required.

Omaze Australia will also be interacting with staff who have requested information about, or assistance with, a gambling problem or reducing their gambling activity.

Omaze Australia will interact with all staff in a manner that respects the staff member’s right to privacy, for example taking steps to make sure any conversations are sensitively handled.

# Interaction with Gambling Harm Support Services

The Manager or a senior staff member of Omaze Australia will contact Gambler’s Help services via email or phone at least twice per year (or more frequently as required) to ask for information in relation to any relevant updates or future updates to 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.

# Customer Complaints

If a customer wishes to lodge a complaint relating to Omaze Australia, they should do so in writing either via an online form available on [www.omaze.com.au](http://www.omaze.com.au/) or via email to: support@omaze.com.au or through a phone call to: +61 483 933 383. Details of the complaint should be provided in respect of each complaint lodged.

Omaze Australia will acknowledge the lodged complaint as soon as reasonably practicable following receipt.

The complaints officer of Omaze Australia will investigate the complaint as soon as reasonably possible and in any event within 21 days, and will take the following steps to resolve the complaint:

* + Omaze Australia will assess whether the complaint is a genuine complaint. Omaze Australia will ensure parties are notified of the progression of the complaint and, following a determination by the complaints officer, are informed of the outcome through written notification. The outcome will detail the action and how the complaint is being treated and has been resolved.
	+ If the complaint is resolved by the complaints officer, no further action will be taken.
	+ Omaze Australia will keep all records of complaints and will document the following information:
		- when and how the complaint was made;
		- the complainant's personal details;
		- what the complaint was about;
		- how the complaint was resolved; and
		- all actions, decisions and interactions.
	+ Omaze Australia will assess whether all parties have been treated fairly and reasonably in accordance with the Code of Conduct.
	+ If the review into the complaint is not resolved and further investigation is needed, information and feedback will be gathered from all relevant parties.

Should a complaint not be resolved through the above process, then the customer will be entitled to participate in an independent mediation with the cost to be shared equally between both parties. The customer will be invited to resolve the issue and entitled to have the complaint heard by an independent authoritative body, such as the Institute of Arbitrators & Mediators Australia (**IAMA**). The IAMA can be contacted by calling 1800 651 650 or email: infoaus@resolution.institute

The Victorian Gambling and Casino Control Commission (**VGCCC**) is entitled to monitor compliance with Omaze Australia’s complaints process. Complaints may also be reported to the VGCCC by calling 1800 182 457 or using the online complaint portal maintained by the VGCCC. The portal can be accessed here: <https://www.vgccc.vic.gov.au/i-want/complaints>.

Records of complaints and decisions of any review process made in relation to the Code of Conduct will be held for a period of seven years and will be made available for inspection by the Minister or the VGCCC on request.

# Commitment to discourage gambling by minors

Omaze Australia will not knowingly sell raffle tickets to minors.

Omaze Australia will take reasonable steps to ensure that raffle tickets are sold to people over the age of 18. This includes requiring all raffle ticket purchasers to first confirm their age is 18+ at the point of sale. Omaze Australia also undertakes a background and identity check of all major prize winners before any prizes are distributed, including verification of the identity and age of prize winners.

Omaze Australia will endeavour to engage a third party service (where possible) to provide external verification that a raffle ticket purchaser is 18+.

The Terms and Conditions for each raffle will also communicate and ensure that only adults 18+ are allowed to enter and win any prizes on offer.

Omaze Australia does not encourage early gambling habits in children.

Omaze Australia will not target a promotion or sales campaign at minors.

Omaze Australia 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.

We demonstrate our commitment to discourage minors from seeking to buy raffle tickets by displaying messages such as “Over 18s only”, “We do not sell raffle tickets to minors”, or equivalent messages on Omaze Australia’s Website, online media, promotions or any sales campaigns.

# The Gambling Environment

Omaze Australia will discourage excessive purchase of tickets by customers. To achieve this Omaze Australia will:

* + set a limit on the quantum or value of tickets to be sold to an individual and will use all reasonable endeavours to contact the customer when they have reached the value of tickets sold by phone or email;
	+ check the database of regular ticket purchasers to detect any pattern of excessive purchase;
	+ not engage in hard/pressure sales techniques;
	+ review customers’ purchase history on a monthly basis to take all reasonable steps to prevent excessive purchase of tickets; and
	+ provide an invoice or statement to the customer that shows the time and date tickets were purchased.

# Financial Transactions

Omaze Australia will not cash customer’s cheques or extend credit to customers to purchase raffle tickets. Customers will be advised of this at the time by phone or email if they request such a service.

Omaze Australia will be offering varying prizes that include houses, cars, gold bullion and gift vouchers.

These will be delivered by Omaze Australia to the winning customers.

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

Cash cannot be offered as an alternative raffle prize.

# Responsible Advertising Promotions

Any advertising and promotions undertaken by Omaze Australia 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 improvement;
	+ not promote the consumption of alcohol while buying raffle tickets;
	+ do not violate the confidentiality of information relating to, or the privacy of customers without the consent of the customer;
	+ not suggest that skill can influence raffle games that are games of chance; and
	+ not encourage excessive or reckless playing.

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

Omaze Australia will provide training to staff and guidance materials to recognise any inappropriate advertising and promotions undertaken by Omaze Australia.

Omaze Australia will remove any advertising that is in contravention of applicable advertising standards including those specified by the Australian Association of National Advertisers.

1. **Processes and Structures to Support the Ongoing Implementation of the Code of Conduct** Responsible Gambling matters will be a standing item for Omaze Australia Board and staff meetings. A Responsible Gambling Officer will be identified from among senior staff to:
	* handle more difficult customer contacts;
	* liaise with Gambler’s Help services to obtain relevant information, advice and training and make this available to staff and customers;
	* induct new staff members to ensure they are informed about responsible gambling issues and the Code of Conduct;
	* handle responsible gambling issues raised by staff; and
	* identify staff worthy of reward and recognition for their responsible gambling efforts

# Code Review Process

Omaze Australia’s Code of Conduct will be reviewed each year on the anniversary of its commencement. Input will be obtained from management and staff and a sample of patrons about the operation and effectiveness of the Code of Conduct.

A report of the review will be provided to the VGCCC by 30 June each year.

**Version: 1.2**

**Date last reviewed: 13th September, 2024**