



KENOGO

RESPONSIBLE GAMBLING CODE OF CONDUCT

VERSION 4.0



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1 FOREWORD

KenoGO gives millions of Australians the chance to participate in and enjoy online gaming. At the heart of KenoGO is the customer, and we are committed to providing gaming services for our customers in a responsible and informed manner. This Responsible Gambling Code of Conduct (**Code**) is an important reflection of our commitment to our customers and employees regarding harm minimisation and safer gambling.

We are committed to ensuring that our customers enjoy our gaming experiences and recognise that some customers have difficulties with gaming responsibly. Although the decision to gamble is an individual choice, we are dedicated to ensuring that our customers and employees are informed about our gaming products, and the gambling help services and support available to them. gambling can not only cause personal financial difficulty, mental and emotional harm, but can also impact family, friends and the wider community.

This Code has been specifically tailored to our provision of online games, however, we recognise that in the future we may look to provide our gaming services in a retail environment. We are committed to continually reviewing and updating our Code, and appropriate responses to gambling harm over time.

2 DEFINITIONS

BetStop means www.betstop.gov.au the National Self-Exclusion Register.

Code means this Responsible Gambling Code of Conduct.

KenoGO App means KenoGO mobile application.

KenoGO Website means the KenoGO website at www.kenogo.com.au.

VGCCC means the Victorian Gambling and Casino Control Commission.

VRGF means the Victorian Responsible Gambling Foundation.

We, our or KenoGo means and refers to Lottoland Australia Pty Ltd ACN 602 590 429 whose registered office is situated at Level 7, 151 Clarence Street, Sydney, NSW 2000.



3 RESPONSIBLE GAMBLING INFORMATION

We are committed to providing the highest standards of customer care and Responsible Gambling. Our Responsible Gambling Code of Conduct illustrates how we demonstrate this commitment.

We provide a range of safer gambling information to our customers which is available on our [KenoGO Website](#) or KenoGO App. This includes, but is not limited to the following:

1. how to gamble responsibly;
2. how to make and keep a pre-commitment decision;
3. the availability of gambling support services;
4. restrictions that apply to the payment of winnings by cheque or the lending of money for the purposes of gambling;
5. self-exclusion programs;
6. providing the option of a deposit limit for customers to help assist with spending on their account;
7. providing the option for customers to voluntarily self-exclude either on a temporary or permanent basis;
8. providing information on BetStop – the National Self-Exclusion Register;
9. making safer gambling information available to all customers either through our [KenoGO Website](#) or KenoGO App, or at their request;
10. ensuring our staff, both current and new are up to date with safer gambling procedures and measures;
11. providing the correct information to our customers who may need any gambling-related support;
12. making sure that customers are aware that winnings are only paid into the customer's account and distributed by bank transfer only; and
13. making it clear that we don't lend money for the purpose of gambling.

We are available to answer all customer questions either via:

- the phone (1800 574 859);
- live chat service; or
- by emailing (support@kenogo.com.au).

“Gambling help services” logos and links, as well as the “18+” symbol, is displayed on our [KenoGO Website](#) or KenoGO App. There will also be a specific section within the [KenoGO Website](#) and KenoGO App entitled “Responsible Gambling”, where customers will be able to find all information related to this topic.

We will display the following safer gambling messaging on all relevant pages in a clear and visible manner:

- Information on BetStop;



- Persons under 18 years of age are not permitted to gamble; Links to gambling support services such as Gambler's Help and Reset.

4 COMMITMENT TO RESPONSIBLE GAMBLING

We are committed to ensuring safer gambling measures are in place to assist you with any potential risks. Moderate betting is the key to maximising one's enjoyment from gambling.

We take our responsibilities seriously and make every effort to prevent the risks of gambling harm and make gambling safer for you.

We promise to do all we reasonably can to provide you with a fair and safe gambling experience that helps you to understand every aspect of safer gambling, allowing you to remain in control and showing you how to get help if you feel you need it.

We want you to enjoy your gaming experience in a responsible manner, and encourage you to gamble within your means and budget.

5 AVAILABILITY OF THE CODE OF CONDUCT

This Code will be available, in English, on our [KenoGO Website](#) and KenoGO App. Upon request, copies of this Code will be made available in the following languages:

- Arabic;
- Chinese;
- Greek;
- Italian;
- Spanish;
- Turkish; and
- Vietnamese

6 PRODUCT INFORMATION

KenoGO Rules and the Terms & Conditions for use of the [KenoGo Website](#) can be found on the [KenoGO Website](#) and KenoGO App.



7 INTERACTION WITH CUSTOMERS AND INDICATORS OF STRESS

We only market directly to you where you have explicitly opted in to receiving marketing material. You are able to change your preferences on your KenoGO account at any time by following these step-by-step instructions:

- click on your avatar on the top right-hand side of the screen;
- click on 'My Account';
- scroll down to 'Contact preferences';
- click 'Edit' to change your contact preferences;
- tick or untick selection based on your contact preferences; and
- click 'Submit'

Knowing the warning signs of gambling harm can assist our staff and our customers, as well as help assist others such as friends or family. Some examples of gambling harm red flags are identified below:

- struggling to pay bills or credit cards;
- becoming worried, angry or upset for no reason;
- feeling depressed or not sleeping or eating;
- spending too much time on gambling sites and apps;
- gambling larger amounts to get the same feeling of excitement;
- friends or family being withdrawn, spending more time by themselves, or regretting the amount of time lost when gambling;
- friends or family constantly asking to borrow money even though they are earning a wage;
- friends or family acting differently with anger, frustration or short tempered.

If you demonstrate any of these signs during communications with our staff, then we will consider appropriate intervention. If we consider that the behaviour is indicative of gambling harm, we will seek to refer you to our Responsible Gambling Manager to take further action.

If you have requested information about, or assistance with, harm associated with gambling or self-exclusion via the phone (1800 574 859), live chat service or by emailing (support@kenogo.com.au), we will provide (or provide information on how they can access) this Code.

We will also supply you with any additional material or links our trained staff consider appropriate to provide (such as information on responsible gambling, [information on where you can obtain free information on household budgeting](#), or instructions on how to self-exclude from our services). You may also be directed to our Responsible Gambling Manager for help.

Interactions with you will be conducted in a manner that respects your right to privacy. Our privacy policy is available on the [KenoGO Website](#) and KenoGO App.



In addition to monitoring and addressing warning signs through direct interaction with you, we will also monitor your transactions for any indicators of harm. Such indicators shall serve as triggers for us to review your account and take any appropriate measures to protect you. Some examples of indicators of stress are set out below:

- Declining of deposits
- Substantial losses
- Unsociable hours or extended play triggers
- Substantial number of time outs registered for one player
- Substantial deposits made
- Request for reopening an account following self-exclusion
- Frequent additions of registered payment methods
- Frequent changes to deposit limits
- Changes in gambling patterns

8 GAMBLING SUPPORT SERVICES

8.1 HOW WE INTERACT WITH THE SERVICES

We liaise with a range of gambling related support services and stakeholders on a periodic basis to enhance our understanding of gambling harm and continuously improve our safer gambling procedures.

If a customer seeks support from us, they can do so by using:

- the phone (1800 574 859);
- live chat service; or
- by emailing (support@kenogo.com.au).

Our staff are trained in Responsible Gambling and are able to offer links and contact details for gambling support services such as Gambling Help Online.

Information about gambling support services is included in our proactive interaction with customers who may be displaying at-risk behaviours.

We are committed to ensuring there are strong links between our services and staff and local responsible gambling organisations and gambling support services. These links are strengthened by in-person meetings with the VRGF, as representatives of gambling harm support services. These meetings include:

- semi-regular meetings between our Responsible Gambling Manager and our other key staff and representatives from the VRGF;



- regular contact with the VRGF to discuss *inter alia* safer gambling initiatives being undertaken by us, to the extent it is required
- attendance at the annual National Association for Gambling Studies Conference.

Any incidents raised by customers will be logged in the Responsible Gambling Register, which is available for review by the VGCCC upon request.

8.2 AVAILABLE GAMBLING SUPPORT SERVICES

We display responsible gambling messages on our [KenoGO Website](#) and KenoGO App. We provide customers identified as requiring support with information about the below gambling support services.

Customers, their families, their community, or any other person can reach out to these services.

- National Gambling Helpline 1800 858 858 (available 24 hours a day, 7 days a week)
- Gambler's Help 1800 858 858 <https://www.gamblinghelponline.org.au/>
- Gambler's Help Youth Hotline for under 25s 1800 262 376
- Gambling Helpline Interpreter Service 131 450
- Victorian Responsible Gambling Foundation <https://responsiblegambling.vic.gov.au/>
- Gambler's Anonymous <https://gaaustralia.org.au/>
- Relationships Australia 1300 364 277 <https://relationships.org.au/>
- Lifeline 13 11 14 <https://www.lifeline.org.au/>

If you contact one of these services, they can provide you with free information, advice, and support. They can also direct you to the best service provider for your specific circumstances.

9 PRE-COMMITMENT

9.1 WHAT IS PRE-COMMITMENT?

Pre-commitment is a tool that you can use to manage your gambling and prevent gambling harm. It involves you setting a deposit limit before you start gambling. This deposit limit is a predetermined threshold i.e. 'pre-committing' how much time and money you are prepared to spend before you start gambling.

Pre-commitment decisions are individual to each customer and you should set deposit limits in accordance with your personal circumstances.



9.2 HOW TO MAKE A PRE-COMMITMENT DECISION?

At KenoGO, you are always able to keep an eye on your spending. Deposit limits help you to stay in control of your money and, thus, your spending. On registration, you are encouraged to use the deposit limit tool to set a binding limit on how much you can deposit into your account each week. The amount set should be affordable in the context of your income and other living expenses. You can also activate a 'deposit limit' at any time, adjusting your account settings via the [KenoGO Website](#) or the KenoGO App.

You can choose to set a maximum deposit limit over the following specified periods:

- a day (24 hours);
- a week (7 days); or
- a month (30 days).

We will assist you to make a pre-commitment decision by:

- requiring you to set a deposit limit or specifically opt out of setting a deposit limit when opening an account with us;
- actively promoting setting a deposit limit on our [KenoGO Website](#) and KenoGO App as well as in emails to you;
- offering you the ability to set up a deposit limit at any time by logging into your account online or by contacting us via the phone (1800 574 859), live chat service or by emailing (support@kenogo.com.au);
- advising you to set a deposit limit in line with your personal circumstances and what you can afford to lose - our Customer Service Centre and Safer Gambling teams are available to assist you in setting a deposit limit;
- when we identify at-risk behavioural, financial or account indicators, our Safer Gambling team will encourage you to set a deposit limit or provide advice on an appropriate deposit limit to set;
- when your deposit limits are excessively high, our Safer Gambling team will contact you to encourage you to reduce your deposit limit in accordance with your personal circumstances; or
- providing you with a prompt annually when you log into your account to set a deposit limit or update your deposit limit if you have already set one.

If you have made a pre-commitment decision, we will help you stick to it by doing the following:

- we will prevent you from depositing into your account when you reach your deposit limit;
- we allow you to change your deposit limit at any time by logging into your account. Any decrease to the limit is effective immediately. If you wish to increase your limits, you can also do this at any time. Nevertheless, the change will take 7 days to take effect on your account; and
- we will notify you annually within our [KenoGO Website](#) and KenoGO App reminding and prompting you to review your deposit limit.



10 RESPONSIBLE GAMBLING TOOLS

In addition to pre-commitment deposit limits, there are other responsible gambling tools that empower and support you to manage your gambling and to gamble safely and responsibly. We actively promote the following tools on our [KenoGO Website](#) and KenoGO App.

10.1 TIME-OUT:

We offer you the option of taking a time-out, which allows you to suspend your account for 24 hours, a week, or a month. During the time-out, you will not be able to access your account or receive marketing or promotional material.

We will do what we reasonably can to prevent you from operating new accounts, but you should not open any further KenoGO accounts during the time-out.

A time-out cannot be cancelled once activated. Once the duration selected has expired, your account will automatically be reactivated.

10.2 CUSTOMER ACTIVITY HISTORY

You can monitor your activity history. This will ensure that you can keep a full track of your stakes, wins, and losses. Viewing your transaction history will allow you to review all transactions, including deposits and withdrawals.

You will also receive a monthly activity statement sent to the email linked to your account. This is in accordance with the Federal government's National Consumer Protection Framework (**NCPF**) guidelines which aim to minimise harm caused from online wagering.

Although, it is not a mandatory requirement under our Keno licence, we have proactively adopted the NCPF guidelines to send this statement, as we believe monthly activity statements are a powerful tool for our customers to easily track and monitor their stakes, wins, and losses.

These features mean you can see all of your returns at a quick glance.

10.3 BETSTOP

In line with the NCPF framework for online wagering providers, we have opted to implement BetStop, the National Self-Exclusion Register. Although, it is not a mandatory requirement under our Keno licence, we have proactively implemented BetStop to ensure players suffering gambling harm do not participate in playing Keno with us.

If you want to self-exclude from all Australian online wagering services, you can register on the National Self-Exclusion Register at www.Betstop.gov.au or by calling 1800 238 786.

10.4 CREDIT/DEBIT CARD LIMITS

You may be able to limit the daily amount you can deposit into your account via your card and/or banking provider.



10.5 UNSUBSCRIBE FROM MARKETING

You can opt-out of receiving marketing and promotional emails and messages by editing 'contact preferences' under the 'My Account' section on our [KenoGO Website](#) and KenoGO App.

10.6 ACCOUNT CLOSURE

You can easily close your account online via our KenoGO Website, KenoGO App or by contacting us via the phone (1800 574 859), live chat service or by emailing (support@kenogo.com.au).

You can close your KenoGO account by following these step-by-step instructions:

- click on your avatar on the top right-hand side of the screen;
- click on 'My Account';
- scroll down to 'Account Status';
- click 'Edit' to change your account status;
- select 'Close account'; and
- click 'Submit'

11 SELF-EXCLUSION PROGRAM

Self-exclusion is a feature where you can ask us to prevent you from accessing KenoGO for a specified period.

You can choose a self-exclusion period that can last up to:

- 6 months;
- 9 months;
- 1 year;
- 2 years;
- 5 years; or
- permanently.

We implement self-exclusion provisions:

- at your request if you request help to control your gambling habits;
- when we have reasonable grounds to suspect that you might be experiencing gambling harm, i.e. gambling beyond your means, reporting feeling hopeless, depressed, frustrated or suicidal, seeming worried, agitated or upset, etc.

In addition, you can self-exclude by



- contacting our customer services team to request self-exclusion via the phone (1800 574 859), live chat service or by emailing (support@kenogo.com.au); or
- an automated service on our [KenoGO Website](#) and KenoGO App.

You can self-exclude from KenoGO by following these step-by-step instructions:

- click on your avatar on the top right-hand side of the screen;
- click on 'My Account';
- scroll down to 'Responsible Gaming Status';
- click 'Edit' to change your account status;
- select 'Self-exclusion' and the period you would like the account suspended for; and
- click 'Save'

We will provide a list of gambling help support services to all customers who request self-exclusion as well as encouraging them to exclude themselves from other gambling operators by registering with BetStop.

Self-excluded customers will have their accounts closed and their remaining balances returned to them. You will be removed from our marketing distribution lists.

Self-exclusion will allow you to close your account for a specified period between 6 months to permanently. You can also request to be excluded for an indefinite period by contacting our Customer Service. You are also allowed to increase the period of self-exclusion at any time during the exclusion or once this has elapsed.

This will prevent you from gambling with KenoGo for your selected period of time and you will not be able to re-open your account for any reason during the self-exclusion period. Any attempt by you to open a new account during the self-exclusion period will prompt us to take all reasonable measures to identify and close any related accounts.

Following the expiry of your self-exclusion period, you will be allowed to use our services following the below procedures:

- a self-excluded account will not automatically reopen, and you must proactively request reopening your account;
- we check if the self-exclusion timeframe has expired;
- a 24 hour cooling-off period needs to be completed;
- we request you to answer a series of questions to ensure you are comfortable with your decision to return back to playing KenoGo;
- we provide you with information on the range of responsible gambling tools available for you and encourage you to set a deposit limit on your account; and
- we will re-verify your identity.

If you request to revoke your self-exclusion, you must provide us with a letter of assessment from a state based gambling counselling service provider showing that you have sought assistance for your gambling problem.



12 INTERACTION WITH EMPLOYEES

12.1 EMPLOYEE GAMBLING POLICY

Our employees are not permitted to engage in KenoGO except for testing and research purposes as a requirement of their contract of employment. Non-compliance is treated as a serious breach which may result in termination of their employment.

All new employees are provided with safer gambling training as part of their employment induction. Existing employees undertake safer gambling refresher training annually. Training includes being provided with a copy of or access to this Code.

12.2 PROVIDING INFORMATION AND ASSISTANCE TO EMPLOYEES

We recognise that some employees, like other members of the community, may develop difficulties associated with their gaming behaviour outside of their employment with KenoGO. If an employee indicates that they have a gambling problem or is displaying signs of gambling harm, then they will be directed to our Responsible Gambling Manager who is trained to handle this situation. Where appropriate, employees are also encouraged to seek professional support from external support services, and our Responsible Gambling Manager can provide assistance and relevant information to an affected employee.

Any contact with a staff member who may have a gambling problem or is displaying signs of gambling harm will always be handled in a sensitive and confidential manner that is respectful of that staff member's right to privacy.

13 CUSTOMER COMPLAINTS

If you have a complaint relating to this Code, you should email support@kenogo.com.au or write to:

Responsible Gambling Manager
Lottoland Australia Pty Ltd
Level 7
151 Clarence Street
Sydney
NSW 2000

Complaints will be investigated promptly by the Responsible Gambling Manager and checked to ensure that they are relevant to the operation of this Code. Where complaints are not investigated because it is not relevant to the operation of this Code, the complainant will be informed of the reasons.



If a complaint is substantiated, you will be informed of the outcome. Information will be provided to the VGCCC upon its request.

Every effort will be made to resolve a complaint, however if a complaint cannot be resolved by the Responsible Gambling Manager or otherwise at KenoGO it will be referred to the Institute of Arbitrators and Mediators Australia (**IAMA**) for resolution.

Either party involved in the complaint may contact the IAMA. To initiate a complaint either party can go to IAMA's website (www.iama.org.au), download a Dispute Resolver form, then submit the completed form with the relevant fee to the IAMA.

The mediator/arbitrator will contact both parties to facilitate a resolution.

Each party shall pay its own costs of or incidental to the mediation as per the Resolution Institute Rules.

Documentation regarding all complaints will be maintained in the Responsible Gambling Register for access by the VGCCC as required.

14 MINORS

It is an offence for anyone under the age of 18 to gamble and we take our responsibility to prevent underage gambling very seriously. In line with legal, licensing and regulatory obligations to ensure all our players are 18 and over, we operate a strict policy on underage gambling and we carefully verify every new player at registration. We may ask for further documentary proof of age where necessary.

If a customer is under the age of 18 and found to be gambling with us, we will close their account immediately and any winnings will be forfeited. You should never allow a minor to gamble via your account or disclose your account login credentials to a minor.

For further queries about our protection of minors or if there is a suspicion that a minor has access to KenoGo, contact can be made with our Responsible Gambling Manager at support@kenogo.com.au.

Gambling is a pastime reserved for adults. We make use of multi-level verification systems during the registration process to verify the age of our players. If minors have access to a computer/smart phone/tablet that is used to access KenoGo, we encourage you to download and install one of the popular child protection packages, such as Net Nanny, CyberSitter or Cyber Patrol. This software offers the option to install Parental Controls, allowing restriction of access to both gambling and other adult content whilst children are using a device.



15 THE GAMBLING ENVIRONMENT

You will be encouraged to take regular breaks from gambling and not to partake in sustained or intensive gambling. This is done by:

- having a clock visible at all times on our [KenoGO Website](#) and KenoGO App so you are aware of the passage of time; and
- notification popups at regular intervals alerting you that an hour has passed and that you should consider taking a break. You can choose to log-out directly through this notification.

We actively use a range of proactive measures to monitor and evaluate potential problem gambling or gambling related harms. We have implemented a safer gambling monitoring program in order to identify customers who may be displaying at-risk behaviours. These include the following behavioural, financial and account indicators but are not exclusive to;

- substantial number of time outs registered for one player;
- request for reopening an account following self-exclusion ;
- frequent additions of registered payment methods;
- several payment methods being used on a customer account;
- excessive hours spent playing on the site;
- playing at unsociable hours;
- declined deposits (especially due to insufficient funds);
- adding, removing and changing safer gambling tools;
- speed of spend;
- frequency of play;
- inconsistent deposit value and frequency;
- increasing of stake and play frequency;
- substantial loss following big win.

We will review these indicators for signs of gambling harm and consider if an intervention is required. Should you be identified as displaying signs of gambling harm, we will attempt to interact with you using a range of communication methods, including email and telephone.

Intervention may consists of the following:

- soft interaction – typically sent in email form. This interaction type will alert you to the at-risk behaviour and highlight the relevant tools available alongside any support networks; or
- hard interaction – typically performed via email or telephone calls. This interaction type will engage you to answer set questions around your activity to ensure we gauge an understanding of the risk presented but also encourage your self-awareness. A response



is expected from these interaction types. If we are unable to engage with you, a hard stop or internal deposit limit may be implemented to ensure you are protected.

16 FINANCIAL TRANSACTIONS

You are only able to deposit funds into your player account electronically. You are not able to cash cheques or deposit funds using a cheque.

Your winnings will be transferred electronically to your bank account. If requested by you, KenoGO winnings will be paid partly or wholly by cheque.

We do not provide credit or lend money to customers.

17 ADVERTISING AND PROMOTIONS

All advertising undertaken by KenoGO complies with all applicable Commonwealth and State laws, regulations and codes relating to the advertising or promotion of our products, including the advertising code of ethics adopted by the Australian Association of National Advertisers.

Further, we will ensure that advertising materials will:

- not be false, misleading or deceptive about odds, prizes or the chances of winning;
- not be offensive or indecent in nature;
- not create an impression that gambling is a reasonable strategy for financial betterment;
- be in good taste (given prevailing community standards) and not be offensive or indecent in nature;
- be socially responsible;
- be correct, accurate and truthful;
- not promote gambling as a means of funding routine household purchases, cost of living, nor relieving financial or personal difficulties;
- not be intentionally directed, expressly or indirectly, to vulnerable or disadvantaged groups and minors;
- not promote the consumption of alcohol while purchasing gambling products;
- have the consent of any person identified as winning a prize prior to publication;
- will not be aimed at or designed to appeal to minors and do not appear in conjunction with an offer, event or facility advertisement that pertains to minors.

We will ensure that relevant staff are trained on the advertising and promotional obligations within this Code. Each prospective advertisement and promotion is checked by relevant marketing staff against this Code and other relevant codes and standards, and also checked against relevant legal requirements, including compliance with the Australian Consumer Law. Staff have access to external legal advice where necessary.



18 RESPONSIBLE GAMBLING REGISTER

We will maintain a responsible gambling register, recording all responsible gambling incidents and interventions. This includes:

- date and time the incident occurred;
- details of the incident;
- details of the interventions made in response to the incident;
- details of the customer's response to the intervention, if known;
- date and time the entry was recorded in the responsible gambling register; and
- the name and account details of the individual

Information recorded in the register will be retained for at least six months from the day it was recorded and will be provided to the VGCCC upon request.

19 IMPLEMENTATION OF THE CODE

This Code is included in induction materials given to all new staff upon commencement of employment.

Issues identified by staff or customers relating to this Code will be directed to the Responsible Gambling Manager via email: support@kenogo.com.au.

20 REVIEW

A review of this Code will be conducted on an annual basis along with external stakeholders such as the VRGF, to ensure that it complies with all legislative requirements, including any Ministerial directions.

We may also conduct a further assessment of this Code on an as needs basis where there are significant changes in the safer gambling environment.