

Tatts Lotteries Responsible Gambling Code of Conduct

Introduction

Tattersall's Sweeps Pty Ltd (**Tatts**) and Golden Casket Lottery Corporation Limited (**Golden Casket**) (collectively referred to as **Tatts Lotteries**) run world class lottery operations across multiple jurisdictions within Australia under the Tatts, Tatts Quick and Golden Casket brands and are committed to Responsible Play throughout the states and territories in which we operate. Tatts Lotteries' games are available through an extensive network of over 2,000 retailers, who are committed to providing games in a safe, secure and friendly environment.

For most people, playing lottery games is fun and entertaining. Lottery play is rarely associated with causing problem gambling. Notwithstanding this, Tatts Lotteries has developed this Responsible Gambling Code of Conduct as a cornerstone to our Responsible Play Program.

The Responsible Gambling Code of Conduct acts as a guide for the responsible service delivery and unfaltering commitment that the community can expect from Tatts Lotteries and its retailer network.

Objectives

- To ensure that lotteries remain a socially responsible, fun and entertaining experience.
- To provide a framework for Tatts Lotteries and its retailer network for the continued responsible delivery, marketing and sale of its lottery products.
- To continue to demonstrate Tatts Lotteries' unwavering commitment to responsible business practices and community support.

1. Definitions

Tatts Lotteries means Tattersall's Sweeps Pty Ltd, ABN 99 081 925 662 of 615 St. Kilda Road, Melbourne and Golden Casket Lottery Corporation Limited, ABN 27 078 785 449 of 87 Ipswich Road, Woollongabba Queensland.

Tatts means Tattersall's Sweeps Pty Ltd.

Golden Casket means Golden Casket Lottery Corporation Limited.

Retailer means the person(s) who has been granted a Tatts and/or Golden Casket Franchise and for the purpose of this Code includes the websites **www.tattersalls.com.au** and **www.goldencasket.com**.

Outlet means the place of business of a Retailer.

2. Commitment to Responsible Gambling

Tatts Lotteries and its Retailers are committed to providing the highest standards of customer care and responsible gambling. We support and encourage the responsible play of our lottery games and are committed to the Tatts Lotteries Responsible Play Program. The Tatts Lotteries Responsible Gambling Code of Conduct forms part of this program. In general, Tatts Lotteries does not offer games that would:

- (a) create any continuous forms of play;
- (b) have a strong appeal to minors; or
- (c) be offensive or contrary to the public interest.

This Responsible Gambling Code of Conduct (**Code**) describes how we demonstrate this commitment.

3. Availability of the Code

A sign indicating the availability of the Code, is on display in all Outlets.

A responsible gambling brochure, "*Have Fun & Play Responsibly*", indicating the availability of the Code and providing a summary of the Code in major community languages, is available for all customers in the Outlets.

A full copy of the Code is available for inspection in all Outlets upon request and also on the Tatts website at **www.tattersalls.com.au** and the Golden Casket website at **www.goldencasket.com**.

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4. Responsible Gambling Message

Tatts Lotteries has a responsible gambling message, “**HAVE FUN & PLAY RESPONSIBLY**”, which is displayed on all responsible gambling materials.

5. Responsible Gambling Information

Tatts Lotteries’ Responsible Gambling Materials

All Outlets and www.tattersalls.com.au and www.goldencasket.com have responsible gambling information on display in a range of forms, including brochures and posters.

Materials are subject to change but current examples of responsible gambling materials include:

- (a) The “*Have Fun & Play Responsibly*” brochure is available for customers at all Outlets and online at www.tattersalls.com.au and www.goldencasket.com. This brochure provides information on:
 - how to gamble responsibly;
 - how to make and keep a pre-commitment decision; and
 - the availability of gambling support services.
- (b) The ‘*Have Fun & Play Responsibly*’ sign is on display in all Outlets and online at www.tattersalls.com.au and www.goldencasket.com. This sign includes information on:
 - the prohibition of the sale of lottery products to minors and how to lodge a complaint for a suspected sale of lottery products to minors;
 - the availability of gambling support services; and
 - Tatts Lotteries financial transaction policy including the restrictions that apply to the payment of winnings by cheque and the provision of credit or the lending of money for the purposes of gambling.
- (c) The Public Lottery Rules for Tatt’s games are available for inspection at all Tatts Outlets and Tatts Quick stores and online at www.tattersalls.com.au. The Public Lottery Rules provide information on the games and the odds of winning.
- (d) The Lotteries Rule 1998 (**Lotteries Rule**) for Golden Casket games is available for inspection at all Golden Casket Outlets via the Agents internet browser and online at www.goldencasket.com. The Lotteries Rule provides information on the games and the percentage return to players.
- (e) The ‘How to Play’ brochures are available to customers at all Outlets (excluding Tatts 7 Eleven Outlets) and online at www.tattersalls.com.au and www.goldencasket.com. The “How to Play” brochure provides information on the games and the odds of winning. This information is also contained in the Public Lottery Rules Folder for Tatts 7 Eleven Outlets.
- (f) The ‘Customer Complaint Handling Charter’ which is available online at www.tattersalls.com.au and www.goldencasket.com.
- (g) Responsible Gambling banner text containing a responsible gambling message and contact information details for problem gambling support services will be electronically displayed on screens in most Outlets at least four times per annum.
- (h) A copy of the ACT Gambling and Racing Control (Code of Practice) Regulation 2002 is provided to all ACT Outlets and is kept in the Public Lottery Rules folder (Tatts Outlets) or the Agent’s Manual (Golden Casket outlets) for customer inspection on request. Customers can get their own copy from the ACT government website: www.legislation.act.gov.au.

6. Gambling Product Information

Information on all gambling products is available and accessible for customers on request in all Outlets. This information concerns the odds of winning and player information for each game.

The Public Lottery Rules for each Tatts lottery game are available and accessible for customers on request in all Tatts Outlets and Tatts Quick stores or online at www.tattersalls.com.au. They include the odds of winning a first and subsequent division prize and the percentage return to players.

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The Lotteries Rule is available for inspection by customers in all Golden Casket Outlets via Agents internet browser or online at www.goldencasket.com. The Lotteries Rule provides information on the games and the percentage return to players.

Outlets also have 'How to Play' brochures available for customers which include information on how to play the games, and the odds of winning a first division prize or the odds of winning a prize.

7. Customer Loyalty Scheme

The Tatts Card (Tatts) and Winner's Circle Card (Golden Casket) are membership schemes which add security to members' lotto purchases and where customers can choose to store their favourite numbers. Tatts Lotteries tickets purchased by the cardholder are registered to their Tatts or Winner's Circle Card respectively. Tatts Lotteries stores the customer's contact information against the Tatts or Winner's Circle Card and pays their prizes if not claimed within a defined period.

Tatts Lotteries does not actively have a schedule of defined rewards which are linked to expenditure; however the database system storing customer information has the ability to extend to these methods. Occasionally, Tatts Lotteries will communicate about upcoming events or offer members the ability to enter a second chance draw by using their Tatts or Winner's Circle Card to purchase particular lottery products. The winners of any promotions conducted for Tatts or Winner's Circle Card members are contacted by Tatts Lotteries.

Should Tatts Lotteries decide to operate a customer loyalty scheme by offering a scheme of defined rewards based on purchases; all information regarding this customer loyalty scheme will be made available online at www.tattersalls.com.au and www.goldencasket.com.

Tatts conducts local area marketing which includes offering Retailers from a particular geographical area, the ability to operate a Customer Appreciation Scheme where each purchase provides the customer with a stamp. A certain amount of stamps provides the customer with a lottery product reward. Details on any such scheme are provided on the Customer Appreciation card.

8. Pre-commitment Strategy

Tatts Lotteries encourages customers to set a limit according to their individual circumstances. Printed information is available at Outlets to assist a customer to make a pre-commitment decision.

9. Interaction with Customers

Tatts Lotteries has designated Responsible Play Liaison Officers (RPLO's) who are available during business hours (approximately 5am until 8pm Monday to Saturday and 5am until 2.30pm on Sunday, but subject to change).

Tatts Lotteries RPLO's can be contacted on 131 868.

Tatts Lotteries customer service representatives (Retail Territory Managers) and Retailers are trained in the service of responsible gambling. Each Retailer receives comprehensive responsible gambling training prior to their commencement at an Outlet. Tatts Lotteries also produces responsible gambling training materials for the Retailer for the purposes of on-training their staff members.

Tatts Lotteries has also trained 7 Eleven RPLO's to handle responsible gambling queries during Tatts Lotteries out of hours (approximately 8pm until 5am Monday to Saturday and 2.30pm to 5am on Sunday but subject to change).

A person who approaches a staff member in an Outlet and asks for information about problem gambling services or indicates a problem with their gambling will be directed to the Retailer or Tatts Lotteries RPLO for assistance.

Players who are noticeably distressed from gambling will be provided with information detailing gambling support services.

Retailers in NT and ACT maintain a Responsible Gambling Incident Register at the Outlet and the Gambling Contact Officer ("GCO") for ACT also maintains one at head office as do the RPLO's of any telephone calls received by customers experiencing a gambling problem. For interpreter services regarding Responsible Play customers will be advised to contact the RPLO's on 131 868 for further information. If required the Retailer will assist the customer by contacting the RPLO's on the customer's behalf.

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Tatts Lotteries and its Retailers value the protection of customers' privacy and all interaction with customers will be done with due respect for their privacy.

Gambling Helpline National Number: 1800 858 858.

10. Staff Gambling Policy

Victoria, Queensland, Northern Territory and Tasmania

Tatts Lotteries has no restrictions on its staff or Retailers participating in the purchase of lottery products.

If a Tatts Lotteries staff member, a Retailer or a member of its staff asks for information about problem gambling services or indicates a problem with their gambling, they will be directed to a Tatts Lotteries RPLO for assistance, with due respect for the privacy of the staff member or Retailer.

Tatts Lotteries provides responsible gambling training and material to all staff members and new Retailers at induction training and provides updates on responsible gambling at regular network meetings.

ACT

In the ACT Gambling and Racing Control (Code of Practice) Regulation 2002 Part 1.2 Clause 1.4 Staff Care and Training, states that the Outlet manager or person in charge:

- must have successfully completed an approved training program within the previous five years;
- does not take part, or allow anyone else to take part on their behalf, in a gambling activity at the Outlet except as part of the person's duty; and
- is made aware of his or her obligations under the ACT Gambling and Racing Control Code of Practice.
- The person in charge must take all reasonable steps to ensure that :
 - a) Each staff member who is directly involved in providing gambling services to patrons and each person who supervises staff members –
 1. Has successfully completed an approved training program within the previous 5 years; and
 2. does not take part, or allow anyone else to take part on their behalf, in a gambling activity at the outlet except as part of the member's duty; and
 - b) each staff member is made aware of his or her obligations under this code of practice; and
 - c) if the person will be absent from the facility for longer than 1 week – the licensee is told who will be in charge of the facility during the person's absence.

11. Problem Gambling Support Services

Tatts Lotteries is committed to maintaining strong linkages with problem gambling support services. Tatts Lotteries Social Responsibility Manager and the Tatts Executive General Manager, Community Relations, with the assistance of the Senior Retail Business Manager, are responsible for maintaining those relationships and meeting with the Gamblers Help support services at least four times per annum.

12. Customer Complaints

Tatts Lotteries has a Complaint Handling Charter each for Tatts and Golden Casket dealing with complaints about the operation of this Code and which details the process for customer complaints. These charters are available online at www.tattersalls.com.au and www.goldencasket.com.

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The Responsible Play sign and brochure, which are on display and available at all Outlets, advertises the location of the Complaint Handling Charter on the Tatts and Golden Casket websites.

A member of the public can make a complaint to Tatts or Golden Casket in person, by telephone, letter, fax or email.

CONTACT DETAILS - TATTS

Phone: 1300 556 646
Email: support@tattersalls.com.au
Fax: (07) 3877 1140
Mail: Complaints Coordinator
Tattersall's
Locked Bag 7, COORPAROO DC QLD 4151
Visit in person: Tattersall's House
615 St. Kilda Road
Melbourne VIC 3004

CONTACT DETAILS - GOLDEN CASKET

Phone: 131 868
Email: playersupport@goldencasket.com
Fax: (07) 3877 1140
Mail: Complaints Coordinator
Golden Casket Lottery Corporation Ltd
Locked Bag 7, COORPAROO DC QLD 4151
Visit in person: Golden Casket
87 Ipswich Rd,
Woolloongabba QLD 4102

If a complaint is made in person or by telephone, the complainant may be asked to submit details of the complaint in writing.

The incident or complaint will be investigated within a reasonable timeframe and for written complaints, within 21 days.

The Tatts Lotteries Incidents and Complaints Unit investigates, determines and implements a resolution, informs the complainant and the subject of the complaint (if applicable) of Tatts Lotteries conclusion in relation to the complaint and the reason for that conclusion and also logs the details of the complaint and the outcome. If the matter is resolved, no further action is taken.

If the complainant requests a review of the decision, an internal independent review is conducted, which may include the following measures:

- all material in relation to the complaint is examined; and
- discussions may be held with the complainant, the subject of the complaint, and/or staff involved with the management of the complaint.

If the complainant requests a review of the internal decision, the matter is referred by Tatts Lotteries to a member of a panel of independent mediators, for either a determination based on submitted paperwork or to arrange mediation if necessary. Costs of this process will be shared equally by Tatts Lotteries and the complainant.

If the process finds Tatts Lotteries to be in breach of the Code, Tatts Lotteries will rectify that breach within the terms of the determination or mediation agreement.

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 Minister or the Regulator on request.

13. Minors

Legislation prohibits persons under 18 years of age from purchasing lottery products. Retailers are required to ask for verification of age where they are uncertain whether a customer is at least 18 years of age. If relevant verification cannot be produced, service must be refused. In the Northern Territory, minors are also discouraged from selling lottery products.

14. The Gambling Environment

Victoria, Tasmania, Northern Territory, Queensland & ACT.

Tatts Lotteries and their Retailers provide a safe environment and discourage customers from engaging in extended gambling.

Customers who are unduly intoxicated are not permitted to continue to buy lottery entries.

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Queensland only

Staff working in Golden Casket Outlets, or at Tatts Lotteries Head Office itself, are not to encourage lottery players to provide them with gifts or gratuities.

Northern Territory only

Retailers are prohibited from verbally urging non gambling customers to buy gambling products

15. Financial Transactions

Tatts Lotteries and their retailers do not provide credit or loan money for the purchase of lottery products. The purchase of lottery entries via credit cards and/or EFTPOS is an acceptable retail practice.

Tatts and its Retailers do not accept cheques from customers for the purchase of lottery products, nor do they cash prize cheques.

Golden Casket and its retailers allow the purchase of lottery products by cheque, but do not provide credit or loan money for the purchase of lottery products nor do they cash prize cheques or any other cheques.

Tatts Lotteries and Retailers must pay any prize winnings over \$4,000 by cheque. Under \$4000, options of payment are via cheque, cash and reverse EFTPOS (Golden Casket only) and internet transfer (Golden Casket only).

Information on the financial transaction policy is on display at all Outlets on the Have Fun & Play Responsibly sign.

16. Responsible Advertising and Promotions

Tatts Lotteries ensures that its advertising and promotions:

- (a) comply with the advertising code of ethics adopted by the Australian Association of National Advertisers;
- (b) does not represent an irresponsible trading practice;
- (c) does not target people not of Public Lottery playing age and in Tasmania does not show minors in advertising. In the ACT the advertising must not show people gambling who are under 25 years old;
- (d) is not false, misleading or deceptive;
- (e) does not implicitly or explicitly misrepresent the probability of winning a prize;
- (f) does not give the impression that buying Public Lottery tickets is a reasonable strategy for financial attainment;
- (g) does not offend prevailing community standards;
- (h) is not targeted at vulnerable or disadvantaged groups;
- (i) does not include misleading statements about odds or prizes;
- (j) does not publish or cause to be published anything which identifies customers who have won a prize without prior consent (in the Northern Territory notice of individual winnings paid should only be displayed within the gambling provider's premises).
- (k) does not depict or promote the consumption of alcohol while buying a Public Lottery product;
- (l) must not publish advertising that encourages anyone to contravene a gaming law and;
- (m) does not suggest that skill can influence games that are games of chance; and
- (n) in the ACT :
 - a gambling promotion must not encourage people to gamble for a minimum period of time to qualify for promoted rewards;
 - a gambling promotion must not include an offer of free or discounted alcohol; and

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- a gambling promotion must include rules and conditions of the promotion or information stating where such information can be inspected. The rules and conditions must be available for inspection at the outlets.

Tatts Lotteries also incorporates the Responsible Play Program's tagline, "Have Fun & Play Responsibly" into prominent pieces of point-of-sale and other advertising and promotional material where appropriate. Responsible Gambling Checklist is used by Tatts Lotteries in the preparation of marketing material to assist staff compliance for lottery generated promotional material.

The Retailer is obliged to ensure their own advertising and promotional materials, where it relates to Tatts Lotteries gambling products:

- (a) will comply with the advertising code of ethics adopted by the Australian Association of National Advertisers;
- (b) does not represent an irresponsible trading practice;
- (c) does not target people not of Public Lottery playing age and in Tasmania does not show minors in advertising. In the ACT the advertising must not show people gambling who are under 25 years old;
- (d) is not false, misleading or deceptive;
- (e) does not implicitly or explicitly misrepresent the probability of winning a prize;
- (f) does not give the impression that buying Public Lottery tickets is a reasonable strategy for financial attainment;
- (g) does not offend prevailing community standards;
- (h) is not targeted at vulnerable or disadvantaged groups;
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- (k) does not depict or promote the consumption of alcohol while buying a Public Lottery product;
- (l) must not publish advertising that encourages anyone to contravene a gaming law;
- (m) does not suggest that skill can influence games that are games of chance; and
- (n) in the ACT :
 - a gambling promotion must not encourage people to gamble for a minimum period of time to qualify for promoted rewards;
 - a gambling promotion must not include an offer of free or discounted alcohol;
 - a gambling promotion must include rules and conditions of the promotion or information stating where such information can be inspected. The rules and conditions must be available for inspection at the outlets.

The Retailer requirements above are advised to all Retailers in training and via the Tatts Outlet Procedures Manual and the Golden Casket Agent's Manual.

17. Review of the Code

The Code is a dynamic document and will be reviewed annually to ensure it complies with legislation and any ministerial direction.

The Code is monitored for compliance by Retailers through an annual retail outlet audit. The results of the annual retail outlet audit together with feedback from Gamblers Help, Retail Business Managers and Trainers and through information received from telephone interviews with a representative sample of Retailers and Tatts and Winner's Circle card holders (players) will be used to inform the review. Areas needing improvement will be highlighted in a review report and put into an action plan for the following financial year by Tatts Lotteries' Social Responsibility Manager.