

Community Shares Pty Ltd

Responsible Gambling Code of Conduct

1. Availability of the Responsible Gambling Code of Conduct

The Code is available on the Community Shares Pty Ltd website at [website address to be confirmed] or by request to Director/ Secretary by emailing markrudd@communityshares.com.au.

2. Responsible Gambling Message

Community Shares Pty Ltd is committed to selling Raffle tickets responsibly to support community and charitable organisations. This message will be displayed on Community Shares Pty Ltd website and on material developed by Community Shares Pty Ltd for the promotion and conduct of Raffles on behalf of community and charitable organisations.

3. Responsible Gambling Information

For anyone being affected gambling free help is available 24/7, Australia wide.

Gambling Help - 1800 858 858

Gambling Help Online website at <https://www.gamblinghelponline.org.au/services-in-your-state>

- how to gamble responsibly, e.g. decide before you buy how much you want to spend
- the availability of gambling support services
- Community Shares Pty Ltd does not provide credit or lend money for the purposes of purchasing Raffle tickets.

4. Gambling Product Information

Community Shares Pty Ltd aims to provide a service to Authorised Charities to enable them to undertake a Raffle in accordance with the licence permits issued by one or more State and/ or Territory Regulator.

Services will include the following:

- a) Registration as an Authorised Charity – assisting with the application to be approved to undertake Raffles in one or more Australian State or Territory.
- b) Application for a Raffle Licence Permit - assisting with the application for an Approved Charity to undertake Raffle in one or more Australian State or Territory.
- c) Raffle Ticket Platform – a platform whereby the Authorised Charity can sell tickets to people wanting to buy tickets in a Raffle.
- d) Raffle Management – managing key aspects of the Raffle including acquiring prizes, compliance with Raffle Licence Permits , facilitating Raffle draw and auditing and reporting of the Raffle to the Regulator.
- e) Raffle Promotion – assisting with the promotion of the Raffle to maximise the sale of Raffle tickets.

Community Shares Pty Ltd will enter into a formal agreement with Authorised Charity to undertake one or more of the above services.

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 Community Shares Pty Ltd website at [website address to be confirmed]

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

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5. Interaction with Customers

Interaction with Customers will be undertaken in a respectful and helpful manner and in accordance with Community Shares Pty Ltd policies and procedures. Specific policies relating to this Code of Conduct include Community Shares Pty Ltd's:

- a) Privacy Policy and
- b) Website Terms and Conditions.

These and other applicable policies and documents relating to the conduct of each Raffle will be available on the Community Shares Raffle Ticket Platform.

Community Shares Pty Ltd 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 where a canvasser forms the view that a Customer may be overextending themselves financially:

- 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)
- 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 [cooling off period]
- Where tickets sold by mail an upper limit of 1 book of 10 tickets will be issued to a customer to purchase/sell at any one time.
- Where tickets are sold by the internet Customers will be given a link to access information to assist them if they require assistance with a gambling problem.

6. Interaction with Staff

Staff are not permitted to purchase Raffle tickets being sold by Community Shares Pty Ltd.

A nominated manager/supervisor of Community Shares 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 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.

7. Interaction with Problem Gambling Support Services

The Manager or a senior staff member of Community Shares 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.

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8. Customer Enquiries and Complaints

The Raffle Ticket Platform will provide a telephone number and a Customer Enquiry Form for Customers to be able to make an enquiry or complaint.

A response to all enquiries and complaints will be made within no more than 3 business days from when it has been received by Community Shares Pty Ltd.

In relation to the sale of Raffle tickets generally:

- a) Refunds will be allowed for any request up to the date of closing of the raffle.
- b) Any disputes post the drawing of the raffle will attempted to be resolved between Community Shares Pty Ltd, on behalf of the Authorised Charity conducting the Raffle, and the person making the dispute.
- c) If the matter cannot be resolved between the parties it will be referred to an independent third party mediator agreed between the Authorised Charity and the person making the dispute to adjudicate
- d) If the matter cannot be resolved, after mediation or the parties cannot agree on an independent mediator the matter will be referred to the relevant Regulator in which the person making the dispute resides to adjudicate.
- e) All documentation relating to any complaints and the complaints register will be retained for 7 years or such longer time as required by law and made available to the following people when requested:
 - i. Independent mediator;
 - ii. Regulator; and
 - iii. Any other person as nominated by a Court of Law in Australia.

9. Commitment to discourage gambling by minors

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

Community Shares 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.

10. The Gambling Environment

Community Shares Pty Ltd will discourage repeatedly excessive purchase of tickets by Customers. To achieve this Community Shares Pty Ltd will:

- Directly contact each individual purchasing more than 50 tickets in one transaction and/ or more than 1% of total tickets available for each Raffle.
- Set a limit of 1% of total tickets on the quantum or value of tickets to be sold to an individual
- Check data base of regular ticket purchasers to detect a pattern of excessive purchase.
- Not engage in hard/pressure sales techniques.

11. Financial Transactions

Community Shares 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 request 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.

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12. Responsible Advertising Promotions

Any advertising and promotions undertaken by Community Shares 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 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.

Community Shares Pty Ltd will incorporate the above standards into its advertising checklist and will assess all proposed advertising against these standards.

13. Processes and Structures to Support the Ongoing Implementation of the Code.

- a. Responsible Gambling matters will be a standing item for Board and staff meetings.
- b. A Responsible Gambling Officer will be identified from among senior staff to:
 - i. Handle more difficult customer contacts
 - ii. Liaise with Gambler's Help services to obtain relevant information, advice and training and make this available to staff and Customers
 - iii. Induct new staff members to ensure they are informed about responsible gambling issues and the Code
 - iv. Handle responsible gambling issues raised by staff
 - v. Identify staff worthy of reward and recognition for their responsible gambling efforts

14. Code Review Process

- a) Community Shares Pty Ltd Code will be reviewed each year on the anniversary of its commencement.
- b) Input will be obtained from management and staff and a sample of patrons about the operation and effectiveness of the Code.
- c) A report of the review will be provided to the VCGLR by 30 June each year.

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15. Definitions

Authorised Charity – is an organisation that is licensed by a Regulator and has a permit to undertake a Raffle in one or more States and/ or Territories in Australia.

Customers – people purchasing a ticket in a Raffle and/ or using the Community Shares Pty Ltd Raffle Ticket Platform.

Customer Enquiry Form – information and a form to be available on the Raffle Ticket Platform for Customers to phone or email Community Shares Pty Ltd to lodge an enquiry or complaint.

Raffle – is lottery where people buy tickets for a chance to win prizes offered.

Raffle Licence Permit – is a permit issued by each Regulator which enables the Authorised Charity to undertake a Raffle.

Raffle Ticket Platform – Community Shares Pty Ltd's Raffle Ticket Platform where Customers are able to purchase a ticket and / or find out information in relation to one or more Raffles.

Regulator – is the State or Territory body responsible for regulating Raffles and issuing permits to conduct Raffles and other gaming activities.