**TMS GLOBAL SERVICES PTY LTD GAMBLING CODE OF CONDUCT**

Introduction:

TMS is a wholly owned subsidiary of Jumbo Interactive Limited ACN 009 189 128.

TMS owns and operates the OzLotteries business which is the medium through which a range of lottery products are available for consumers to purchase, under licence from permitted charity and government lottery operators.

TMS is committed to responsible gambling and support and encourage responsible play.

This Gambling Code of Conduct commences on **1 June 2020**.

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

The Code is available by request to the Legal Counsel or by calling 1300 188 911.

1. **Responsible Gambling Message**

TMS is committed to supporting community and charitable organisations through the sale of lottery tickets.

This message will be displayed on material developed by TMS for the promotion and conduct of raffles on behalf of community and charitable organisations.

1. **Responsible Gambling Information**

Information about the following is available by request to TMS Legal Counsel:

* 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 by TMS for the purposes of purchasing raffle tickets.

1. **Self Exclusion**

If a customer wish to exclude themselves from using our services, they are encouraged to contact us and request self-exclusion. Self-exclusion will apply for a minimum 12 month period, however other options are available for discussion with TMS.

A customer may revoke the decision to self-exclude after certain requirements are met. Any request in this regard, must be in writing.

1. **Gambling Product Information**

The terms and conditions for the conduct of a raffle will be printed on any tickets and/or information material designed to promote a raffle run by TMS by request to: Legal Counsel or by calling 1300 188 911.

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

1. **Interaction with Customers**

By calling 1300 188 911 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 Gambler’s Help services.

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:

* 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 upper limits of books will be issued to a customer to purchase/sell at any one time.

1. **Interaction with Staff**

Staff are not permitted to purchase raffle tickets being sold by TMS.

However, a nominated manager/supervisor of TMS staff 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.

1. **Interaction with Problem Gambling Support Services**

Legal Counsel will contact Gambler’s Help services periodically to obtain updated

publications and any changes to contact details or available services.

1. **Customer Complaints**

TMS will undertake usual complaints handling processes for use for complaints against the Code.

If the complainant requests a review of the internal decision, the matter will be referred by to a member of a panel of independent mediators, for either a determination based on submitted paperwork, or to arrange mediation if necessary.

To initiate an external review, the complainant must provide the request in writing.

1. **Commitment to discourage gambling by minors**

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

TMS 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.

1. **The Gambling Environment**

TMS will discourage repeatedly excessive purchase of tickets by customers. To achieve this TMS will:

• Set a limit on the quantum or value of tickets to be sold by TMS to an individual

• Check data base of regular ticket purchasers to detect a pattern of excessive purchase

• Not engage in hard/pressure sales techniques.

1. **Financial Transactions**

TMS 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.

1. **Responsible Advertising Promotions**

Any advertising and promotions undertaken by TMS 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.

TMS will incorporate the above standards into its advertising checklist and will assess all proposed advertising against

these standards.

1. **Processes and Structures to Support the Ongoing Implementation of the Code.**

1. Responsible Gambling matters will be with on an as needed basis.

2. A Responsible Gambling Officer will be identified from among senior staff to:

1. Handle more difficult customer contacts
2. Liaise with Gambler’s Help services to obtain relevant information, advice and training and make this available to staff and customers
3. Induct new staff members to ensure they are informed about responsible gambling issues and the Code
4. Handle responsible gambling issues raised by staff
5. Identify staff worthy of reward and recognition for their responsible gambling efforts
6. **Code Review Process**

1. TMS’s Code will be reviewed annually.

2. Input will be obtained from management and staff about the operation and effectiveness of the Code.

A report of the review will be provided on request.