

Safer Gambling Policy



Revision History

Version	Revision Date	Revised by	Section Revised
1.0	29/12/2023	Gill Clulow – Safer Gambling Compliance Manager	New Document
1.1	01/05/2024	Amanda Kiernan – Head of Compliance	1.5 The Compliance Team

Version	Section	Reason	Sign-off
1.0	All	New Document	Amanda Kiernan – Head of Compliance
1.1	1.5 The Compliance Team	New Safer Gambling Compliance Manager appointed	Amanda Kiernan – Head of Compliance

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1. INTRODUCTION

MERKUR Bingo is fully committed to delivering the highest standards in relation to Safer Gambling (SG). This policy outlines robust and effective procedures which have been implemented to ensure compliance with the current regulations and standards.

This policy provides guidance and a systematic approach for the Company's employees to follow, to ensure that they fully understand both their own and the Companies responsibilities under the Gambling Commission's Licence Conditions and Codes of Practice (LCCP), Gambling Commission/Wider Industry guidance/learning and the Company's own procedures. This policy is presented in an easy to read and understandable format which contains information on all relevant procedures and guidance relating to Safer Gambling (SG).

The latest version of this policy is available as a reference document and is available to all employees on MyMERKUR.

This policy extends to all employees, defined as: permanent, fixed term, temporary, third-party representatives, sub-contractors, agency workers, volunteers, interns, and agents engaged with the Company in the United Kingdom or Overseas.

It is the responsibility of all employees to ensure that they read and understand this policy and that they are familiar with its contents. Employees with personal licences (PML) are reminded that it is their responsibility to keep themselves updated with any changes in Gambling Legislation/Guidance or the LCCP. To keep up to date with Gambling Commission communications employees are recommended to subscribe for the fortnightly Gambling Commission e-bulletin/newsletter.

This policy does not form part of any employee's contract of employment and the Company can amend it at any time. Any employee who breaches this policy may face disciplinary action in accordance with the Company's disciplinary policy, which could result in dismissal for misconduct or gross misconduct. The disciplinary policy is available to view in the Employee Handbook

1.1 Responsibility for the document

The Head of Compliance has overall responsibility for the Company Safer Gambling Policy. This includes operational management of this policy and responsibility for Company Safer Gambling issues including reviewing, updating and the maintenance of Company Safer Gambling policies, procedures, and controls.

Any changes to this document will be devised and written by the Head of Compliance and/or the Safer Gambling Compliance Manager with approval from the Board. Changes and approval are to be recorded in the Revision History at the front of this document.

It is the responsibility of all Senior Employees and Managers to ensure that any changes to the Safer Gambling Policy are communicated and trained to all relevant employees at their site with training records updated accordingly.

The board will be advised of changes to the Safer Gambling Policy through the minutes of the Compliance Risk Monitoring Meetings and policy changes will be forwarded for review by Board Members with any comments documented in Compliance Risk Committee Meetings minutes.

1.2 Gambling Commission

The Gambling Commission was created under the provisions of the Gambling Act 2005 and is responsible for regulating the Gambling Industry within the United Kingdom. Three key regulatory goals underpin the Gambling Commission's activity, these regulatory goals are defined by the Gambling Act 2005 and are known as the Licensing Objectives. These Licensing Objectives are mandatory and are detailed below.

- Preventing gambling from being a source of crime and disorder, being associated with crime and disorder or being used to support crime.
- Ensuring the gambling is conducted in a fair and open manner.
- Protecting children and other vulnerable people from being harmed or exploited by gambling.

Where the Company or a licensed employee fail to uphold the licensing objectives, for example ignoring their Safer Gambling responsibilities or failing to comply with the Licensing Conditions and Codes of Practice (LCCP), the Gambling Commission will consider reviewing the company operator's licence and/or the individual employee's personal licence (PML) under Section 116 of the Gambling Act. Where failings are identified sanctions can result in penalties from a warning up to revocation under Sections 118 and 119 of the Gambling Act 2005 (the Company can also be subject to financial penalties under Section 121 of the Gambling Act).

1.3 Licence Conditions and Codes of Practice (LCCP)

The LCCP sets out the mandatory conditions (issued under Section 24 of the Gambling Act 2005) which the Company must meet to hold its operating licence. The latest LCCP revision is dated 12 September 2022; <https://www.gamblingcommission.gov.uk/licensees-and-businesses/lccp>

The LCCP is broken down into three parts; Operating Licence Conditions attached to operating licences (mandatory), the Code of Practice Provisions (social responsibility and ordinary provisions) and Personal Licence Conditions attached to personal licences.

The principal codes of practice are divided into Social Responsibility Code Provisions (SRCP) which are mandatory and Ordinary Code Provisions (OCP) which are considered best practice. The key Operating Licence Conditions (both AML and Safer Gambling/Social Responsibility) relating to MERKUR Bingo are.

- Qualified persons and personal licences (1.1.1, 1.2.1 and 1.2.2).
- General Fair and Open Provisions (7.1.1).
- Prevention of money laundering and terrorist financing (12.1.1).
- Access to Premises (14.1.1).
- Reporting suspicion of offences (15.1.1, 15.1.3).
- Reporting key events (15.2.1, 15.2.2, 15.2.3)
- General and regulatory returns (15.3.1).
- Responsible placement of digital adverts (16.1.1).

The key Code of Practice Provisions (Ordinary and Safer Gambling) relating to MERKUR Bingo are.

- General (OCP 1.1.1) and (SRCP 1.1.2).
- Protection of Children and Other Vulnerable Persons (SRCP 3.2.3, 3.2.5, 3.3.1, 3.4.1, 3.5.6) and (OCP 3.2.4, 3.2.6, 3.5.2, 3.5.7, 3.6.2, 3.6.5, 3.6.6, 3.8.2).
- Fair and Open Provisions (SRCP 4.1.1, 4.2.2).
- Marketing (SRCP 5.1.1, 5.1.6, 5.1.9, 5.1.11) and (OCP 5.1.8, 5.1.10).
- Complaints and Disputes (SRCP 6.1.1).
- Gambling Licensees' Staff (SRCP 7.1.2).
- Information Requirements (OCP 8.1.1).
- Gaming Machines in Gambling Premises (SRCP 9.1.2).
- Assessing Local Risk (SRCP 10.1.1) and (OCP 10.1.2).

1.4 Trade Association – Bingo Association

As a responsible operator the Company are members of The Bingo Association and as such are obliged to be committed to providing Safer Gambling and to provide confidence to the public, the Government, and the Gambling Commission, in the way the industry conducts its business. The trade association has created industry wide codes with the aim of understanding the importance of Safer Gambling. The key actions are outlined <https://www.bingo-association.co.uk>

1.5 The Compliance Team

The Company has a Compliance Team who can be contacted by any employee by email – Compliance_UK@merkur-casino.com

Head of Compliance/MLRO Nominated Manager
Name: Amanda Kiernan - Email: akiernan@merkur-casino.com

Safer Gambling Compliance Manager
Name: Stacey Irvine - Email: sirvine@merkur-casino.com

Deputy MLRO
Name: Merk Wells - Email: mwells@merkur-casino.com

2. REGULATORY FRAMEWORK

2.1 Legal Background

The Company Safer Gambling Policy is based on the following.

- The Gambling Act 2005 ('the Act') – The principal legislation that is used to regulate the United Kingdom Gambling Sector,
- <https://www.legislation.gov.uk/ukpga/2005/19/contents>
- The Gambling Commission Licence Conditions and Codes of Practice ('LCCP') – The Code of practice provisions provide.

- mandatory obligations under the Social Responsibility Code Provisions (SRCP),
- <https://www.gamblingcommission.gov.uk/licensees-and-businesses/lccp>

The Company has further considered numerous sources when identifying and assessing the key risks to its licensed activities such as.

- Gambling Commission Safer Gambling Hub, <https://www.gamblingcommission.gov.uk/public-and-players/safer-gambling>
- Gambling Commission Compliance Hub, <https://www.gamblingcommission.gov.uk/licensees-and-businesses/compliance>
- Advisory Board for Safer Gambling <https://www.gamblingcommission.gov.uk/absg>
- Wider industry learning including Gambling Commission guidance and enforcement actions, <https://www.gamblingcommission.gov.uk/news>
- GamCare <https://www.gamcare.org.uk/>

2.2 Information Requirements and Access to Premises

The Company conducts its gambling operation in accordance with both the licensing objectives and LCCP and works with the Gambling Commission in an open and co-operative way. Information is submitted to the Gambling Commission as required through Key Events.

Employees will cooperate with Gambling Commission officials and are made aware of entry requirements for Gambling Commission Enforcement Managers under Part 15 of the Gambling Act 2005.

3. FINANCIAL REQUIREMENTS

3.1 Anti-Money Laundering

The Company has in place its Anti-Money Laundering and Prevention of Terrorist Financing Policy and a Money Laundering and Terrorist Financing Risk Assessment. The Company considers the Gambling Commission guidance.

The latest version of Company AML Policy & Procedure document is available as a reference document and is available to Company employees on MyMerkur.

4. THE RISK BASED APPROACH

4.1 Risk Based Approach for Safer Gambling

The Company has in place its Safer Gambling Policy to comply with the LCCP and has in place proportionate policies, procedures, and controls to mitigate and manage effectively the Safer Gambling risks identified.

The LCCP imposes compulsory requirements and a breach can constitute a failure to apply the Licencing Objectives. However, within this regulatory framework of requirements, the Company has flexibility to devise policies, procedures and controls which best suit its assessment of the possible safer gambling risks faced by its customers. The LCCP require the establishment and maintenance of proportionate policies, procedures, and controls to mitigate and manage effectively the risks identified.

The required risk-based approach involves a number of discrete steps in assessing the most proportionate way to manage and mitigate the safer gambling risks faced by its customers. These steps require the Company to:

- Identify the Safer Gambling risks that are relevant.
- Design and implement appropriate policies, procedures, and controls to manage and mitigate these assessed risks.
- Monitor and improve the effective operation of these controls.
- Record what has been done and why.

The Company uses an amended three lines of defence model to ensure that Safer Gambling policies, procedures and controls are effectively communicated to its Employees, to provide oversight from the Manager, the Safer Gambling Compliance Manager and Senior Management to identify weaknesses and provide improvements and/or remedial actions/training where necessary.

Company Employees (including Duty Managers) make up the first line of defence and are responsible for the following.

- Implementing Safer Gambling policies, procedures, and controls in Bingo Clubs.
- The conducting and recording of age verification checks aligned to the company Think 25 policy.
- To ensure that all employees are aware of their responsibility in the conducting and recording of customer Interactions/Conversations.
- Any subsequent reporting following a request from the Compliance Department or the Manager.
- The monitoring of customers for signs of behavioral changes that may indicate they are beginning to show signs of gambling harm
- Carrying out Interaction/Conversations with any customers identified as spending at an above average level, in line with the Interaction and Evaluation process.
- Processing and guiding persons wishing to self-exclude through the exclusion scheme.
- Conducting effective re-instatement interviews with people wishing to return to gambling after a period of self-exclusion has expired and ensuring ongoing monitoring upon.

The Manager and Area Manager make up the second line of defence and are responsible for the following.

- Ensuring that Safer Gambling policies, procedures and controls are implemented and followed at each bingo club.

Safer Gambling Policy



- Reviewing breaches of Safer Gambling policies, procedures, and controls (including such breaches as identified by the Safer Gambling Compliance Manager).
- Provide oversight and guidance/advice to employees in the first line of defence.
- Ensuring that any policy, procedure, or control updates have been communicated, trained (where required) and implemented in relation to Company Employees.
- The identification of any training needs or remedial actions in relation to employees (including conducting additional training for employees identified by the Safer Gambling Compliance Manager as having a specific need).
- Reviewing and evaluating Safer Gambling Interaction/Conversations completed to determine if the correct outcome was delivered.
- Processing and guiding persons wishing to self-exclude through the exclusion scheme.
- Conducting effective re-instatement interviews with people wishing to return to gambling after a period of self-exclusion has expired.

Senior Management (including the COO, CFO, Head of IT & Head of Marketing, Head of Compliance, Operations Director, and the Safer Gambling Compliance Manager) make up the third line of defence as members of the Compliance Risk Committee and are responsible for the following.

- Setting of the Company's Safer Gambling strategy, framework, and risk appetite.
- Ensuring that there is the correct balance between the Company's compliance obligations and commercial activity.
- Ensuring that the Company is compliant under the LCCP.
- Reviewing breaches of Safer Gambling policies, procedures, and controls.
- Reviewing any weaknesses in the Company's Safer Gambling policies, procedures and controls and the recommendations of any improvements or remedial action made by the Safer Gambling Compliance Manager.
- Providing oversight of Employees in the first and second lines of defence.
- Ensuring that any policy, procedure, or control updates have been communicated, trained (where required) and implemented in relation to Company Employees, Senior Management, and the Board by the Safer Gambling Manager.
- The review of any minutes of meetings and reports to the Compliance Risk Committee in relation to Safer Gambling compiled by the Safer Gambling Compliance Manager.
- The completion and submission of any minutes of meetings and reports to the Board in relation to Safer Gambling.

The Safer Gambling Compliance Manager is integral to each line of defence under the Company Safer Gambling framework. Outside of the specified role of the Safer Gambling Compliance Manager (detailed in Section 6 of the Company Safer Gambling Policy), the Safer Gambling Manager is responsible for the following as part of the three lines of defence.

- Ensuring that Safer Gambling policies, procedures and controls are implemented and followed by all Company Employees.
- Reviewing breaches of Safer Gambling policies, procedures, and controls (including those escalated at site level by the Manager).
- Provide oversight and guidance/advice to all Company Employees within each line of defence.
- The identification of any training needs or remedial actions in relation to Company Employees.
- The review of age verification and customer interaction records.

5. PROTECTION OF CHILDREN AND OTHER VULNERABLE PERSONS

5.1 Combatting Problem Gambling

The Company makes annual financial contributions to organisations approved by the Gambling Commission which between them deliver or support research into the prevention and treatment of gambling related harms, harm prevention approaches and treatment for those harmed by gambling (the full list of Gambling Commission approved organisations can be found at.

<https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/list-of-organisations-for-operator-contributions>

5.2 Access to Gambling by Children and Young Persons

It is an offence under Section 47(1) of the Gambling Act 2005 to permit a child (those under the age of 16) or a young person (those aged 16 – 17) to enter a gambling premise.

The Company will therefore maintain a strict approach of challenging any person who appears to be under the age of 25 (which is a legal requirement in Scotland and considered best practice in England/Wales). Employees are required to either challenge a person who appears to be or who they believe under the age of 25 who is on Company premises or refer any such concerns/observations to a Duty Manager.

Any approved visitor or contractor employed by the Company to conduct works within the Company's licensed premises must be informed that they and, or their employees must be aged over 18 years and that they may be asked to provide verifiable age-related identification before entry is permitted.

If there is any doubt as to a person's age the person will not be permitted entry unless verifiable age-related identification is provided.

If a child or young person is accompanied by an adult, service is to be refused and both persons are to be denied entry or asked to leave. The incident is to be recorded on the IHL Smart Tablet.

If a child or young person gains access to Company premises and gambles, it is a legal requirement that only stakes (initial buy-in) are to be returned and under no circumstances are winnings or prizes to be paid. Any identified winnings will be considered forfeit and will be donated to a gambling charity. The incident is to be recorded on the IHL Smart Tablet.

The Company does not use any signage, promotions, or marketing materials for the purposes of gambling that would appeal to children or young people.

It is a mandatory licence requirement that the Company displays signage at each entrance stating that entry by a person aged under 18 is not permitted. Marketing materials, other information, equipment, or other decorative items must not obstruct the signage. The Manager has a responsibility to replace any signage that is worn or defaced without delay.

5.3 Gambling Management Tools and Responsible Gambling Management Information

The Company displays information both within its premises and on its website that help customers to gamble responsibly and where to seek further help and advice should they experience problem gambling or gambling related harms.

The Company displays responsible gambling information on all marketing information and notices within its premises.

Staying in Control leaflets are available for customers to take away which provide information on help and advice for problem gambling. These leaflets are available at the following locations within the premises.

- Service Desk
- Reception (Bingo Clubs)
- Customer Toilets
- Employee Rest Area

The Manager is responsible for ensuring that leaflets are available in the above locations and that enough stock is available for replenishment.

GamCare Helpline numbers and QR Code are also displayed on gaming machines, tablets, GeWeTe and ATM's. The Manager has a responsibility to ensure that any stickers that are worn or defaced are replaced without delay.

The Company has 'Set Your Limit' Features enabled on all its B3 category slot machines which allows customers to set time and deposit limits.

5.4 Customer Interaction

The Company aims for its employees to have Interaction/Conversations with customers as part of the Customer Journey to ensure employees 'know their customers' and minimises the risk of them experiencing harms associated with gambling and takes into account the Gambling Commissions guidance.

Bingo Club Employees attend Interaction and Evaluation Training workshops where, in addition to reviewing the language used in an Interaction/Conversation the evaluation of such conversations is considered. Employees are trained in.

- Observing any changes in customer behaviour which may indicate signs of them suffering from gambling harm.
- Identifying Customers who may be at risk of, or experiencing harms associated with gambling.
- Interacting with Customers who may be at risk of, or experiencing harms associated with gambling.

- Understanding the impact of the interaction on the Customer and Evaluating the interaction/conversation and the impact of the licensee's actions and approach.

The Company has set in place a number of intervention points where a customer may be at risk of or experiencing harms associated with gambling.

Behaviour signs or triggers can be displayed but are not limited to the following.

- Changes to appearance, demeanour and wellbeing brought about through non-gambling related negative events.
- Remaining on the premises for an extended period.
- Patterns of frequent leaving and returning to the premise.
- Repeated evidence of a customer being tired and/or sleep deprived.
- Mentioned self-exclusion or taking a break.
- Seeking to borrow money from associates or unknowns.
- Changes in the nature, patterns, or levels of play.
- A person affected by a health condition which may impair their judgement.
- Frequent use of ATMs on the premises.
- Family/partner/close friend visiting the premise to find Customer or receipt of information with respect to a concern about a customer.
- Mentions frequently about losses or hints that they have been treated unfairly, irrespective of whether they wish to make a complaint.
- Repeated aggressive behaviour, agitation, distress, or changes which would be an indication that gambling is having a negative impact on a customer's wellbeing.
- Admission of a gambling problem or direct request for help in respect of gambling problems.
- Intoxication/substance abuse or other suspected/known addictions.

Behaviour/Problem Gambling Signs – in all cases where a customer's behaviour has changed and it is believed they are showing signs of problem gambling or gambling related harm, this must be immediately brought to the attention of the Duty Manager. A Safer Gambling interaction/conversation must be conducted and recorded on Maxim. Should the Interaction/Conversation give the employee any cause for concern the Customer should be offered advice on where to seek further help, and on self-exclusion (as with all interventions with people who may be in distress, the Duty Manager is required to consider the health and safety of themselves, the customer and other employees/customers within the premises). The Duty Manager must record details of the interaction, what behaviour triggers were observed and the outcome (ranging from customer self-exclusion to an enforced suspension with details of advice offered). The interaction/conversation is to be recorded on Maxim.

Long Periods of Play – While it is recognised that some Customers may only visit the premise with the sole aim of participating in gambling, employees should be vigilant to ensure that unusually prolonged periods of play are monitored and where appropriate measures taken to ensure that the Customer is to take rest breaks.

The Duty Manager or Authorised Person must record details of any Interaction/Conversation, the length of time observed etc. and the outcome (ranging from continuation of gambling to suspension) and why they made this decision. The interaction is to be recorded on Maxim.

Visitation – Consideration should be given to the fact that the Customer may just be a regular visitor and the frequency of their visit may not be a concern. In these cases, an interaction/Conversation may not always be required.

The Duty Manager or Authorised Person must record details of the interaction, the number of visits recorded etc. and the outcome (ranging from continuation of gambling to suspension) and why they made this decision. The interaction is to be recorded on Maxim.

The Manager and the Safer Gambling Compliance Manager are to be informed and the Customer prevented from further gambling and/or entry at that time in cases where the Duty Manager/Authorised Person has concerns that the Customer may be at risk of gambling harm.

Significant Win – As with all types of play, it does not necessarily follow that because a customer has won an interaction must take place. However, there is a risk that high staking following a win could hide or lead to harmful behaviours and attention must be paid to this.

- As a guide, normal practice ticket wins of £1,000 will require intervention from an employee to approve pay-out.
- Or where the win is significant in relation to the Customers normal play history and information we hold on the Customer, upon their next visit a safer gambling interaction/welfare check may be undertaken before any gambling takes place.

The interaction is to be recorded on Maxim.

Consecutive Losses – As with all types of play, it does not necessarily follow that because a customer has lost an interaction must take place. However, there is a risk that consecutive losses could hide or lead to harmful behaviours and attention must be paid to this.

- As a guide, normal practice where 3 or more consecutive losses are understood to have occurred, the customers play will be reviewed and depending on information known regarding the customer an Interaction/Conversation will be undertaken and recorded on Maxim.
- Or where the loss is significant in relation to the Customers normal play history and information we hold on the Customer, upon their next visit a safer gambling interaction/welfare check may be undertaken before any gambling takes place

The interaction is to be recorded on Maxim.

Return from a Period of Self-Exclusion – Customers who self-exclude do so for many reasons ranging from a short-term control mechanism to instances of potential or actual gambling related harms. Customers returning from periods of self-exclusion must be given options to regulate their gambling behaviours and an increased level of protection against gambling harm.

- A customer returning from a period of self-exclusion will be subject to a re-instatement interview and they will not be permitted entry until after a minimum 24 hrs cooling off period.

- The reinstatement is to be recorded on the Smart Tablet and further safer gambling interactions/welfare checks will be scheduled with the Customer, where deemed appropriate following reinstatement.

Intoxication/Substance Abuse - Where a customer is suspected of/or observed to be intoxicated/under the influence of an illegal substance either attempting to enter or on the premises the Duty Manager is to be informed immediately.

- Any Customers who are suspected of/or observed to be intoxicated/under the influence of an illegal substance either attempting to enter or on the premises are required to have a safer gambling interaction/conversation with the Duty Manager and entry may not be permitted. (As with all interventions with people who may be intoxicated, the Duty Manager is required to consider the health and safety of themselves, the Customer, and other employees/Customers within the premises).
- For instances that require police assistance such as refusal to leave, operating a motor vehicle etc. the Duty Manager will be required to record on the Smart Tablet Incident App and as an Interaction/conversation on Maxim.

To evaluate an interaction, it is important to understand the impact on the Customer and the effectiveness of the Companies approach. See Appendix A for the safer gambling interaction process. The Company will consider the interactions with those Customers who may be at a higher risk of suffering gambling related harms or displaying signs of problem gambling by looking at the following.

- The Customer behaviour that led to the interaction.
- How the interaction was undertaken and how this was communicated to the Customer.
- Did the Customer understand the reason for the interaction and the purpose of any advice that may have been offered.
- What action was undertaken upon completion of the interaction.
- Is there a need for any follow up action to the interaction.

Safer Gambling Interactions that relate to Customers who may be at an increased risk of gambling harm will be reviewed by the General Manager and the Safer Gambling Compliance Manager.

The Safer Gambling Compliance Manager will report to the Compliance and Risk Committee and will consider the following as part of the evaluation process.

- The outcome and evaluations of the interactions, where Duty Managers have informed the General Manager and the Safer Gambling Compliance Manager that they have concerns that the customer may be at risk of gambling harm.
- Are Company resources being correctly directed towards those customers that may be at risk of gambling harm.
- Any recommendations to strengthen Company safer gambling policy, identify Customers who may be at risk of gambling harm or to improve staff training.

The Safer Gambling Compliance Manager will conduct regular dip samples of the active Customer base with data available on Maxim to ensure that the Customer interaction process is being followed by Club Management and that customers who may be at risk of gambling harm are being identified and interacted with/evaluated where required.

5.5 Self-exclusion

The Company will help those who have identified themselves as having a problem with gambling or who may be suffering gambling harm by, offering enrolment into voluntary self-exclusion schemes.

The Company is part of the National Self- Exclusion schemes managed under The Bingo Association, which covers all United Kingdom land-based premise operators.

Customers who wish to voluntarily enrol into the self-exclusion scheme can do so at the premise.

The Company are unable to accept any applications to enter self-exclusion from third parties, unless in exceptional circumstances. Any applications must be directed to the Head of Compliance.

Any customer that has entered a period of self-exclusion will have their marketing permissions checked. Any customers that have marketing enabled will have the permissions removed by the Head of Marketing before any further promotions are sent.

Any Customer entering a period of self-exclusion will be offered advice on where to seek additional help in relation to problem gambling/gambling harm and will be advised that the following applies.

- Minimum self-exclusion period is six months and not more than 12 months.
- Any self-exclusion period can be extended by the same time period upon request.
- If a self-excluded person manages to enter a premise and gambles any funds gambled or won may be considered forfeit, and the breach recorded.
- Following a self-exclusion period, the Customer may request for their self-exclusion period to be lifted, (the Company will not notify a customer that a self-exclusion period has, or is about to, expire).
- Following a self-exclusion lift request a 24hr cooling off period will apply.

Duty Managers are not trained treatment providers and as such can only offer advice to Customers on where to seek professional help and are not required/trained to offer counselling.

Should a customer who is enrolled on a self-exclusion scheme or who has been excluded on safer gambling grounds attempts entry, the Duty Manager is to be called and no entry is to be permitted.

Where a customer who is enrolled on a self-exclusion scheme or who has been excluded on safer gambling grounds gains entry, they must be told to leave, and the breach is to be recorded on the Smart Tablet Self-Exclusion App and an Interaction/Conversation recorded on Maxim.

Where a customer who is enrolled on a self-exclusion scheme or excluded on safer gambling grounds gains entry and gambles, this must be immediately brought to the attention of the Duty Manager. Any identifiable stakes and or winnings will be considered forfeit, and the Customer may not be permitted to cash out. They must be told to leave, and the breach is to be recorded on the Smart Tablet Self-Exclusion App and an Interaction/Conversation recorded on Maxim.

5.6 Employment of Children and Young Persons

The Company does not employ anyone under the age of 18. All new employees are required to verify their age as part of the application/employment process.

5.7 Money Lending Between Customers

Whilst it is accepted that there are occasions where customers may lend money to each other for the purpose of gambling, the Company is required to monitor and prevent organised or systematic money lending from individuals operating as loan sharks. Where money lending is observed or suspected to be taking place the Duty Manager is to be immediately informed (employees are not to approach customers directly in relation to this matter).

Where the Duty Manager believes that any money lending is non-commercial, a safer gambling interaction/welfare check is to be undertaken. The Duty Manager must record details of the interaction/conversation on Maxim, the reason for non-commercial money lending etc. and the outcome (ranging from continuation of gambling to suspension) and why they made this decision.

Where the Duty Manager believes that any money lending is of a commercial (organised or systematic) nature the Customer must be asked to leave the premises, the Duty Manager is required to consider the health and safety of themselves, the Customer, and other staff/Customers within the premises. The Duty Manager must notify the Nominated Officer to submit a Suspicious Activity Report (SAR).

Where a report is made to the Nominated Officer in relation to systemic or organised money laundering the Nominated Officer will report to the Gambling Commission via a key event and will determine what action to take in relation to any SAR submissions.

Any customers who are believed to be borrowing money from other customers are required to have a safer gambling interaction/welfare check with the Duty Manager. The Duty Manager must record details of the interaction/conversation, reason for Customer borrowing money etc. and the outcome (ranging from continuation of gambling to suspension) and why they made this decision.

The interaction is to be recorded on Maxim.

6. FAIR AND OPEN PROVISIONS

The Company ensures that its terms and conditions are not unfair within the meaning of the Consumer Rights Act 2015.

The Company displays the following information within its premises to assist customers in making an informed choice about which games they may intend to play and/or to provide further assistance if required. Information is available in the following locations.

- Machine information screens
- Book Sales and Charges to Play

The Company ensures that all gaming areas are correctly supervised. Duty Managers, Supervisors and other employees conduct regular checks of both gaming and non-gaming areas to ensure the safety and security of employees and Customers.

7. MARKETING

7.1 Rewards and Bonuses

Any rewards or bonuses that are offered to any existing or potential customers by the Company are subject to the following rules.

- Terms and Conditions are clear and available to all customers who are offered the reward or bonus.
- The reward or bonus is not subject to the customer gambling for a predetermined length of time.
- The reward or bonus is not subject to the customer spend.

From time to time the Company will send promotional offers in the form of free plays and match plays to its customer base. Any promotional offers will not be based on spend.

The Company does not designate any of its customers as VIP and as such does not offer any increased incentive or reward programs.

7.2 Alcoholic Drinks

The Company may from time to time offer complimentary alcoholic drinks to its customers, but the following guidance is applied.

- Complimentary alcoholic drinks must be in no way linked to whether a customer begins or continues to gamble.
- Unsolicited complimentary alcoholic drinks must not be offered for immediate consumption whilst a customer is gambling.

All employees that serve alcoholic drinks have received relevant training. Only a Duty Manager may authorise a customer to receive complimentary alcoholic drinks.

7.3 Promotion by Agents

The Company does not use agents for the promotion of any of its gambling activities or to promote its business.

7.4 Compliance with Advertising Codes

The Company undertakes all its marketing in a socially responsible manner and complies with the codes of conduct issued by the Committees of Advertising Practice, non-broadcast (CAP) and the Broadcast (BCAP) which are administered by the Advertising Standards Authority (ASA).

When conforming to the UK Code of Non-broadcast Advertising and Direct and Promotional Marketing (CAP Code, <https://www.asa.org.uk/codes-and-rulings/advertising-codes/non-broadcast-code.html>) particular attention is paid to the following sections;

- Section 3 – Misleading Advertising.
- Section 8 – Promotional Marketing.
- Section 16 – Gambling.

When conforming to the UK Code of Broadcast Advertising (BCAP) Code <https://www.asa.org.uk/codes-and-rulings/advertising-codes/broadcast-code.html> particular attention is paid to the following sections.

- Section 3 – Misleading Advertising.
- Section 17 – Gambling

The Company also complies with the Gamcare Industry Code for the display of Safer Gambling information (Gambling Venues).

<https://www.safergamblingstandard.org.uk/news/new-code-of-conduct-for-land-based-gambling-venues/>

The Company currently has no partnership agreements in place.

7.5 Other Marketing Requirements

The Company ensures that any marketing promotions and new media are within the meaning of the Consumer Protection from Unfair Trading Regulations 2008 <https://www.legislation.gov.uk/ukxi/2008/1277/contents/made>

All marketing material requires approval from the Head of Compliance and where necessary legal advice is sought.

Terms and conditions for all promotions are available to Customers for the duration of said promotion. Terms and conditions can be viewed both on the premises and websites.

The Company ensures that no marketing information or promotions are displayed on materials that are for the purposes of safer gambling.

7.6 Direct Electronic Marketing Consent

Upon initial registration for membership all customers are asked to give their consent to receive marketing and promotions by post, email, text, and social media. The default setting is for no permissions to be set and only customers who give consent (completing a privacy card) will have these permissions enabled on their profile.

All Customers who receive marketing or promotional contact can unsubscribe at any point.

Further information relating to the Privacy and Electronic Communications (PECR) are available on the Information Commissioners Office (ICO) website <https://ico.org.uk>

8. COMPLAINTS AND DISPUTES

8.1 Alternative Dispute Resolution

The Company has a mechanism in place for customers to refer gaming disputes to a recognised Alternative Dispute Resolution (ADR) provider. The Companies approved ADR provider is the Independent Betting Adjudication Service (IBAS www.ibas-uk.com) which is free of charge to customers and approved by the Gambling Commission.

A complaint as determined under the LCCP relates to licensed activities for the outcome of a gambling transaction or a concern over how the Company conducts its gambling business.

Dispute as determined under the LCCP is the non-resolution of a customer complaint which has not been resolved by the Company.

Only disputes of a gambling nature can be referred to IBAS. The Company will address Customer complaints within a maximum of 8 weeks following receipt.

8.2 Non-Gambling Related Customer Complaints

Customers from time to time may wish to complain on issues relating to service (non-gambling) etc. These complaints will not qualify for ADR and will be dealt with internally by the Company via the Customer Care platform:

- Customer Complaint procedures are available for customers in the premise.
- Customer Care details are displayed on the Customer Information Board and via the company website.

9. COMPANY EMPLOYEES

9.1 Responsible Gambling Information for Employees

Employees are encouraged to report any issues they are experiencing in relation to safer gambling as soon as possible to ensure that the Company can provide both the correct and the right level of advice/support that is required.

The company provides a confidential Employee Assistance Programme (EAP), for free information, support, and counselling - available on the Hapi App or on Inform People.

The Company does not permit any of its employees to gamble within any of its premises.

10. SENIOR MANAGEMENT RESPONSIBILITY

10.1 Compliance Risk Committee

For the purpose of the Company Safer Gambling Policies, Senior Management means individuals within the Company with sufficient knowledge of the Company's Safer Gambling risks and with sufficient authority to take decisions that affect the Company's exposure to

Safer Gambling risk. The Company has determined that members of Senior Management will make up the Compliance Risk Committee and will report to the Board.

The Compliance Risk Committee will be chaired by the Head of Compliance and will include the COO, the CFO, Safer Gambling Compliance Manager, Operations Directors. In addition, there is a group Compliance Committee that meet quarterly which is attended by the Chief Executive Manager, Group Compliance Director, and the Company Licensing Advisors, Poppleston Allen. The Compliance Risk Committee makes up the third line of monitoring in the Company's risk-based approach for protecting its customers against the risks of gambling related harms.

The Company has a starting position that most of its customers gamble safely and are not at risk of suffering from gambling related harm and as such present a low risk. All policies, procedures and controls are proportionate to identified Safer Gambling risks.

The Head of Compliance will chair the Compliance Risk Committee meetings and as such they will set agendas and complete minutes.

10.2 Company Safer Gambling Obligations

The Head of Compliance and the Safer Gambling Compliance Manager will provide monthly (calendar), quarterly (calendar) and annual (calendar) reports to the Compliance Risk Committee covering the Company's operation and effectiveness of the systems and controls in place relating to Safer Gambling and will take any action necessary to remedy deficiencies identified by the report in a timely manner. The quarterly and annual reports will set out the following.

- Safer Gambling risks to the Company and/or its customers/employees that are either new/emerging or have changed.
- Remedial action identified through deficiencies or Company Safer Gambling weaknesses.
- Improvements to be made or progress reports on previous measures.
- Internal and independent audit results.
- Interactions with the Gambling Commission or other external bodies.
- Any key notifications (regulatory changes/guidance) from the Gambling Commission or other industry bodies complete with an explanation/interpretation, effects on the company operations/employees/customers and any further recommendations.
- Senior Management and Relevant Employee Safer Gambling training.
- Safer Gambling resource considerations or concerns.
- Any other relevant information at the discretion of the Safer Gambling Compliance Manager.

10.3 Policies, Procedures and Controls

The Company has in place policies, procedures, and controls to mitigate and manage the Safer Gambling risks that have been identified. The Company Safer Gambling policies, procedures and controls are.

- Proportionate to the size and nature of the business using guidance issued by the Gambling Commission (and other relevant bodies such as The Bingo Association)
- Approved by the Head of Compliance and are submitted to both the Compliance Risk Committee, the Board and Group Compliance.

10.4 Safer Gambling Training

The Company provides training to its employees to ensure that they both understand the culture of the company and their personal responsibilities in relation to safer gambling. Safer Gambling training is undertaken upon commencement of employment and then on a six-monthly basis (the Company aims to deliver safer gambling training on a six-monthly basis consisting of a cycle of remote and face to face learning).

All Safer Gambling Training will be devised and supervised by the Safer Gambling Compliance Manager and L&D department and will be reviewed/updated in line with legislation/Gambling Commission guidance. Employees are made aware of.

- The Safer Gambling risks applicable to the Company's customers and how these risks are managed.
- Identifying behavioral changes which may indicate a customer is at risk of Gambling harm.
- Identify Customers at risk of Problem Gambling or Gambling Related Harm.
- Legal requirements of children and young people accessing company premises
- The Customer interaction process.
- Industry Self-Exclusion Scheme.
- Fair and Open provisions.
- The Customer Dispute process.
- The role and responsibilities of the Safer Gambling Manager.

It is the Manager of each venues responsibility to ensure that all employees receive Safer Gambling Training both upon commencement of employment and as a refresher on a minimum six-monthly basis throughout employment with the Company. The Manager will ensure that employee training records are complete and up to date.

Interaction and Evaluation workshops are held on a regular basis to ensure all senior Bingo Club Management are aware of the need to conduct Interaction/Conversations and evaluation of these interactions is conducted.

Interaction and Evaluation workshops review real interactions, give examples of true to life scenarios and encourage open and honest discussions from the attendees.

Internal Compliance Auditors also attend an Interaction and Evaluation workshop to support their Compliance audit assessments.

11. THE SAFER GAMBLING MANAGER

11.1 Role of the Safer Gambling Manager

The Company has appointed a Safer Gambling Compliance Manager who is responsible for:

- Reviewing Safer Gambling documentation that has been collected/completed.
- Reviewing Safer Gambling interactions that have been completed by Duty Managers and approved by the General Manager in line with Company auditing procedures.
- Reviewing transaction data to determine potential Safer Gambling risks or patterns in line with Company audit procedures.
- Being the Company point of contact for all Safer Gambling issues.
- Preparing Safer Gambling training materials for all Company Employees and ensuring face-to-face Safer Gambling training is delivered for Senior Management, Club Managers and Head Office Employees and ensuring that online Safer Gambling training is relevant.
- Collating, preparing, and presenting Safer Gambling reports on a monthly, quarterly, and annual basis to the Compliance Risk Committee (and where required the Board).
- Providing additional support to the Head of Compliance, the Compliance Assistant or other areas of the business as determined by the Head of Compliance or were identified by the Safer Gambling Compliance Manager.

11.2 Standing of the Safer Gambling Manager

The Company has determined that the Safer Gambling Compliance Manager is responsible for the oversight of all the Company's Safer Gambling activities and is the key person relating to Safer Gambling.

The Safer Gambling Compliance Manager has.

- The authority to act independently in carrying out their Safer Gambling responsibilities (relating to the LCCP).
- Has the necessary seniority within the Company and the resources/information to discharge their duties in an objective manner which may conflict with short term operational concerns.

In the temporary absence of the Safer Gambling Compliance Manager Safer Gambling responsibilities will be undertaken by the Head of Compliance.

In the temporary absence of the General Manager (due to holidays/absence etc.) Safer Gambling responsibilities will be undertaken by a Designated Deputy.

12. GAMING MACHINES IN GAMBLING PREMISES

12.1 All non-remote operating licences

The Company makes available Gaming Machines within its licensed premises where there are substantive facilities for non-remote premise games.

All gaming areas are appropriately supervised by staff.

13. ASSESSING LOCAL RISK

13.1 Local Risk Assessment

The Company has in place Local Area Risk Assessments for each of its premises. Each Risk Assessment considers identified risks that are associated with the provision of gambling and the policies/procedures that the Company has in place to mitigate these identified risks.

Each Local Risk Assessment considers matters identified in the relevant licensing authority's statement of licensing policy.

The Safer Gambling Compliance Manager and Internal Compliance Auditors will review the local risk assessments and will update where necessary (at least on a yearly basis or where a notable change has been identified).

The latest version of the Local Area Risk Assessment is available as a reference document in each premise.

14. ONGOING MONITORING AND AUDITING

14.1 Monitoring Techniques

The Company uses various techniques to monitor Customers. The list below is non-exhaustive:

- Monitoring customer play on machines, customer behaviours and ensuring that relevant Safer Gambling interactions are completed and correct. Further to this any Customers of concern are reported to the Duty Manager.
- Monitoring customer behaviours and ensuring that relevant Safer Gambling interactions are completed and correct. Further to this any customers of concern are reported to the Duty Manager.
- Managers to review Safer Gambling Interactions providing rationale for decisions made, ensuring they are recorded correctly. Further to this providing oversight of employees, ensuring training is up to date, reviewing breaches/exceptions to Safer Gambling policy and forwarding information to the Safer Gambling Compliance Manager.
- Area Managers to review Safer Gambling Interactions on a regular basis.
- Safer Gambling Compliance Manager to review Safer Gambling documentation, outcomes and rationale for decisions made and Company documentation.

14.1 Regulatory Compliance Audits

The Company Internal Auditors conduct unannounced Regulatory Compliance audits to ensure both the Company and its employees are compliant with legislation, LCCP and Company policy.

15. ANTI-MONEY LAUNDERING AND SAFER GAMBLING

It is important to be aware that while some Customers may display signs that they may be engaged in some form of money laundering activity, the signs may also be an indication of problem gambling.

For instance, a customer whose playing habits increase may be chasing losses, rather than engaging in money laundering activity. Similarly, there may be occasions whereby a customer may be a problem gambler, but in fact, may be spending the proceeds of crime.

Whatever the circumstances, Duty Managers must be prepared to engage with the customer and ask pertinent questions to satisfy themselves, as to whether the Company shall commence or continue with the business relationship with the Customer or terminate it. In summary, it is perfectly plausible that an individual attempting to spend criminal proceeds or launder money could also be a problem gambler, but one does not necessarily follow the other.

The effective identification and management of these risks rests upon the ability to have a comprehensive knowledge of customer relationships and upon Duty Managers having a clear understanding of their responsibilities.

Commercial and business information should be considered for AML as well as safer gambling purposes when transacting with an individual.

If Customers expect that a customer interaction is likely, should they play with large amounts of money, or for lengthy periods and such interaction is consistently applied, there would be less reason for players to question or become suspicious of the motives for these interactions.

APPENDIX A – Safer Gambling Interaction/Conversation Process

Social Responsibility Code Provision 3.4.1 Customer Interaction has been in force since 31st October 2019. A Safer Gambling Interaction is broken down into three parts.

- Identify – What is the behaviour, activity or trigger that has led to the interaction.
- Interact – What has been discussed between the customer and the Duty Manager to find out more information relating to the behaviour, activity, or trigger.
- Evaluate – What was the outcome of the interaction (follow up action where required), did the Customer understand the interaction and why did the Duty Manager make their decision.

Identifying Customers who may be at risk of or are experiencing gambling harm at the earliest opportunity is a key factor in reducing any possible or actual harm. Duty Managers will interact with, observe Customers, and record any such safer gambling interaction.

Before any safer gambling interaction/conversation is undertaken the Duty Manager should where possible review and consider the following.

- Any previous interactions/conversations recorded with the Customer that are relevant and their outcome.
- What information do they know about the Customer.
- Is the reason for the interaction out of character or a cause of concern in relation to the Customer.
- What outcome is expected to be achieved from the interaction.

When conducting the safer gambling interaction/conversation, the Duty Manager is to consider the health and safety of themselves, the Customer, and other employees/customers within the premises as the Customer may be in distress. The Duty Manager is best placed to decide on when, where, and how an interaction will take place.

When interacting with a customer the Duty Manager must remain friendly and supportive. Questions are to be open ended (conversational) to stimulate a response from the Customer and closed questions (yes or no answers) are not recommended.

Examples of open questions are as follows.

- I have noticed that you are not having much fun lately, can you tell me if anything has changed.
- You seem to be spending more time in the premise lately, have things changed at work.

Duty Managers are reminded that the interaction is a conversation relating to customer welfare and is not an interview.

During the interaction/conversation the Duty Manager is to remain vigilant towards signs of gambling harm (agitation, behaviour, language etc). At the same time the Duty Manager is required to assess whether the Customer is showing signs of frustration or is upset for another non-gambling reason. The best outcome for the Customer will only be achieved through an honest and open dialogue.

When evaluating a safer gambling interaction, it is important that the Duty Manager looks at what is in the best interests of the Customer. The evaluation should give an assessment as to whether the Duty Manager feels that the Customer may be at risk of or suffering the effects of gambling harm.

Considerations in the evaluation should include the following.

- Did the Customer understand the reasons for the safer gambling interaction.
- Did the Duty Manager feel that the Customer should be offered further information/advice in relation to problem gambling/Self-exclusion etc.
- Were other gambling management tools discussed such as the Customer reducing their visits, playing at a lower stake, or moderating spend etc.
- Was the Customer considered to be at risk of gambling harm.
- Was it determined that the Customer presents a minimal risk of gambling harm as such no follow up action is required.

The Duty Manager, as part of their evaluation is to give the reasoning for their decision and are to clearly determine what action is to be taken along with any advice that was offered to the Customer.

All Safer Gambling Interactions are to be recorded on Maxim.

The Safer Gambling Compliance Manager will conduct regular reviews of the Safer Gambling Interactions to ensure that the Customer interaction process is being followed by Club staff and that customer who may be at risk of gambling harm, are being identified and interacted with/evaluated where required.

APPENDIX B – Industry Self-Exclusion Scheme (The Bingo Association)

Self-exclusion social responsibility code provision 3.5.1 is a condition of our Operating Licence under the Licence Conditions and Codes of Practice – (LCCP). New regulations were implemented by the Gambling Commission (LCCP Self-exclusion 3.5.1) and as from 6th April 2016, all gaming operators must be part of a multi operator self-exclusion scheme.

The Bingo Association national scheme covers all UK land-based premises. The system aids operators in preventing access to premises by those Customers who have declared themselves as problem gamblers and have expressed a wish to exclude within the scheme rules.

A customer can self-exclude for a minimum 6 months and a maximum 12 months.

Self-exclusion is sector specific:

- BINGO Licensed Premises 'Traditional Bingo Clubs' – National exclusion zone
- BINGO Licensed Premises 'High Street' – 1km exclusion zone

The Company has appointed the Head of Compliance as its Primary Administrator for the Self-exclusion system (SmartHub).

Where a customer has expressed a wish to enrol in self-exclusion the Customer is to cease gambling and will be enrolled via the Smart Tablet Self-Exclusion App after establishing the identity of the Customer and explaining how the scheme works.

Where a customer breaches their self-exclusion, the breach must be recorded on the SmartTablet against the persons exclusion.

As self-exclusion is a voluntary scheme a customer can ask to be reinstated once their minimum period of self-exclusion has elapsed. Following a reinstatement interview, a customer enters a 24 hours cooling off period before they can commence gambling.