



KENO
let's play!

Keno Responsible Gambling Code of Conduct Victoria

TABLE OF CONTENTS

KENO (VIC)'s Responsible Gambling Mission Statement	5
KENO (VIC) Responsible Gambling Code of Conduct	6
1. Our commitment to Responsible Gambling	6
2. Objective of the Code	6
3. Scope of the Code	7
4. Application of the Code	7
5. Compliance with laws and other industry regulations	7
6. Conflict with legislation and the Code	7
OUR COMMITMENTS	
7. Communication of the Code	8
8. Review of the Code	8
9. Annual review of Responsible Gambling practices	9
10. KENO (VIC) Policies and Procedures	9
11. Responsible Gambling Training	9
12. Staff Gambling Policy	10
13. Advertising, marketing and promotions	10
PROVIDING OUR CUSTOMERS WITH INFORMATION AND SUPPORT	
14. Product Information	11
15. Identifying gambling harm	12
16. Responsible Gambling Information	12
17. Gambling Environment	13
18. Interaction with customers	13
19. Responsible Gambling Register	14
20. Transactions	15
21. Keno self-exclusion program	15
ONLINE ACCOUNT MANAGEMENT	
22. Online Account Management Features	15
23. Deposit Limits	16
24. Unsubscribe from Marketing Material	16
25. Take A Break	16
26. Transaction History and Online Statements	17
27. Closing an Online Account	17
28. Proactive monitoring program	17

SUPPORTING RESPONSIBLE GAMBLING.....	
29. Minors	17
30. Pre-commitment	18
31. Signage.....	19
32. Working with the community	19
33. Problem Gambling Support Services.....	19
34. Implementation of the Code	20
35. Customer Complaints	20
36. Definitions	21

KENO (VIC)'s Responsible Gambling Mission Statement

Keno (Vic) Pty Ltd (KENO (VIC) believes industry, government and the community have a shared responsibility to help prevent the development of gambling related problems, and to ensure that problem gambling support services are available for individuals who may require assistance.

KENO (VIC) has been issued a licence to conduct its Approved Keno Games (**Keno**) in the State of Victoria. KENO (VIC) along with its authorised Keno agents, accredited in accordance with section 6A.2.4 of the Gambling Regulation Act Vic (2003) (each, an **Agent**), is subject to this Responsible Gambling Code of Practice (the **Code**).

Keno is generally viewed as a fun, social game. For most people, gambling is a pleasurable leisure activity and an enjoyable form of entertainment. However, KENO (VIC) is conscious at all times of ensuring that Keno is conducted consistently with our commitment to responsible gambling.

As a result, KENO (VIC) has developed this Code which outlines practices adopted by us and acts as a guide for the responsible service delivery and our commitment that the community can expect from us and our retail network of Venues. KENO (VIC)'s Responsible Gambling message, containing information regarding accessibility of the Code, will be displayed where it is clearly visible to customers.

The Code reflects KENO (VIC)'s commitment to our customers. We welcome feedback on our ongoing commitment to our responsible gambling initiatives.

KENO (VIC) Responsible Gambling Code of Conduct

1. Our commitment to Responsible Gambling

Keno is offered at the premises of KENO (VIC) agents being a network of agencies, licensed hotels, and clubs (each a **Venue**) as well as via the internet.

The Code reflects KENO (VIC)'s commitment to delivering Keno with the highest levels of integrity and corporate and social responsibility and in accordance with Victorian legislation.

KENO (VIC) is committed to providing the highest standards of customer care and responsible gambling. The Code illustrates how we demonstrate this commitment.

The Code is designed to:

- ensure that playing Keno remains a socially responsible, fun and entertaining experience, minimising the potential for negative impacts of gambling on customers, their families and the wider community;
- set standards and requirements to assist in the responsible delivery of Keno across our operations, our retail network and our digital channels;
- reflect our underlying values, and our commitment to responsible business practices, community support and minimising potential harm associated with playing Keno;
- align with the Victorian Responsible Gambling Ministerial directions;
- provide information to our customers that enables them to make informed decisions about their gambling;
- provide our customers who have an acknowledged gambling problem with access to voluntary self-exclusion from Keno online and facilitate their access to appropriate support agencies and information; and
- promote a shared understanding between individuals, communities, the gambling industry, regulators and government, of responsible gambling practices and the rights and responsibilities of all stakeholders in accordance with those practices.

A copy of the Code must be provided to the Victorian, Gambling and Casino Control Commission (**VGCCC**).

2. Objective of the Code

KENO (VIC) respects the rights of our customers to enjoy our products and services. Customers must take responsibility for their own conduct, but KENO (VIC) also acknowledges our own responsibility to our customers to provide them with appropriate information that may assist them to manage their gambling, if they require this support.

The primary objective of the Code is to ensure a standard framework is in place across the KENO (VIC) network that ensures:

- customers make informed decisions about gambling;
- where customers require assistance, that KENO (VIC) may facilitate their access to gambling help services;
- the maintenance of meaningful relationships with our stakeholders in order to enhance our understanding of problem gambling with community groups, governments, problem gambling counsellors, our employees and industry groups; and
- customer care principles are in place to empower customers to make informed, self-aware decisions to minimise gambling-related harm.

3. Scope of the Code

The Code includes:

- our commitments to our customers in relation to responsible gambling;
- an overview of the information and resources (as amended from time to time) we make available to inform our customers about our products, responsible gambling and problem gambling counselling services;
- what we do to implement the responsible delivery of gambling across our retail network and through our interactive channel, in accordance with our commitment to the highest standards of customer care;
- how we support our customers in seeking assistance for a gambling-related problem; and
- how the Code is administered.

4. Application of the Code

The Code applies to:

- KENO (VIC) and our employees;
- our retail network and all people employed by Agents in that network, including in Venues; and
- Keno gambling services or products that we provide, including those provided through electronic facilities, within Victoria.

From time to time, we may revise the Code. A copy of the updated version of the Code is provided to the VGCCC before its release. Following provision, the updated version of the Code will be available in our retail network, on our website (keno.com.au) (our **Website**), on our Keno App (our **App**) and on the VGCCC website (vgccc.vic.gov.au). We will inform our customers when we update the Code via our Website.

This Code is not relevant to the provision of keno by any other suppliers in Victoria.

5. Compliance with laws and other industry regulations

KENO (VIC) will comply with all relevant laws within Victoria relating to the provision of our Keno products and services, including those relating to:

- industry responsible gambling codes of conduct and/or practices;
- anyone under the age of 18 years (**Minors**);
- the provision of credit for the purpose of gambling;
- the KENO (VIC) Keno Rules;
- requirements of Venues;
- the service of alcohol in conjunction with gambling;
- advertising and promotions; and
- privacy.

6. Conflict with legislation and the Code

Where there is any conflict between the Code and any Commonwealth or State legislation or regulation, the higher standard will apply.

Furthermore, the Code is to be applied in conjunction with, and as deemed necessary, will be in addition to any other applicable industry responsible gambling codes of conduct and/or practices we adopt within Victoria.

Throughout the Code, we make commitments to our customers. The nature of our business means that we rely on people employed in our retail network at Venues to fulfil such

commitments. Venues in our retail network are owned and operated independently of KENO (VIC), and this includes Keno facilities located within hotels, licensed clubs and other facilities. However, KENO (VIC) remains responsible for providing our retail network with the tools and training to maximise compliance by Venues with the Code. Venues are able to access responsible gambling resources, including training materials, via the Keno Connect online platform.

We will use our best endeavours and take all responsible steps to ensure there is a commitment to the requirements of the Code from our Venues and all staff employed at those Venues. Each Venue, by virtue of their Agency Agreement with KENO (VIC), is required to ensure that its employees assist with the conduct of Keno, and all associated activities, in accordance with the Code.

OUR COMMITMENTS

7. Communication of the Code

We will communicate and promote the Code online and across our retail network. The Code is available throughout the Keno retail network in Venues, via our Website, and via our Apps. Hard copies of the Code can be provided to any customer who telephones our Customer Support Team on 1800 056 066 and requests to be sent a copy.

We will provide regular reminders of the existence of the Code in contact we have with our customers via collateral in Venues, emails, Website notices or any other means by which we may regularly contact our customers. KENO (VIC) has prominent messages on our Website and our Apps, detailing that our operations are governed by the Code and a Responsible Gambling message.

The Code is available to our customers in English in Venues and on the Responsible Gambling section of our Website, and on our App. The Code (or a summary of it) is also available translated into major community languages via our Website, our App or upon request by telephoning our Customer Support Team. These major community languages are Italian, Arabic, Chinese, Turkish, Greek, Italian, Vietnamese and Spanish. Telephone translation and interpretation services are also available to customers and Venue operators via our Customer Support team in conjunction with Translating and Interpreting Service National.

8. Review of the Code

KENO (VIC) will use its best endeavours to ensure that the Code complies with all legislative and regulatory requirements, including any Ministerial directions. A review of compliance with the Code (including compliance within our retail network) will be conducted on a regular basis. As part of an ongoing compliance management framework, KENO (VIC) will seek and consider feedback from key stakeholders, including Venue staff, Venue Duty Managers, Agents, customers and Keno employees.

We may also conduct a further assessment of the Code on an as needs basis where there are significant changes in the responsible gambling environment. We will consult with our customers, employees, representatives from the various sectors of our operations, and representatives from gambling industry groups, problem gambling counselling services and community groups where applicable/appropriate, when making changes to the Code for this purpose.

Any update to the Code will be provided to the VGCCC before its release. Following provision, the updated Code will be available in Venues, on our Website and on the VGCCC website.

9. Annual review of Responsible Gambling practices

Each year, we conduct surveys of Agents and customers to better understand how our commitment to the Code is delivered to customers and supported by Venues.

This tracking method is used to ensure we maintain high levels of awareness of the Code and provides insight in a number of areas. These include, identifying key information sources for customers to access responsible gambling content, understanding how our customers perceive our protection activities, and customer awareness of responsible gambling messaging.

10. KENO (VIC) Policies and Procedures

KENO (VIC) uses best endeavours to ensure that all KENO (VIC) employees, Agents and their employees (including those at Venues), are provided with compliance tools, information and training that supports the Code, and the responsible delivery of our products and services. These resources are available online via Keno Connect, our Venue intranet portal, and support may be sought from a Venue's appointed Keno Sales Executive as required.

These tools and resources include operational policies and processes, clear lines of accountability for compliance with the Code, reporting mechanisms to report breaches of the Code and follow-up procedures for dealing with responsible gambling issues. We will also monitor the implementation and ongoing management of the Code online and throughout the retail network.

KENO (VIC) monitors Agent's compliance with components of the Code through regular site testing. Site testing is conducted by the Keno Retail Testing team on a sample basis moving through Venues making up the retail network. The site testing results are recorded in a report, which is considered as part of KENO (VIC)'s ongoing commitment to best practice with respect to responsible gambling.

In addition to the site testing, as part of the normal call activities, a check is undertaken of Venue compliance with a range of responsible gambling measures (including display of all required signs and information). Venues are able to download Keno responsible gambling signage, and access the Keno signage advice sheet, via the Keno Connect online platform.

11. Responsible Gambling Training

KENO (VIC) requires all KENO (VIC) employees, Agents and their employees, to understand the commitments and provisions of the Code and applicable regulations.

Agents and their employees are required to attend KENO (VIC) training, prior to being provided with a Keno Operator ID.

The purpose of this training is to provide Venue staff with operational knowledge in all facets of Keno. All KENO (VIC) training courses include modules on responsible gambling matters, the Self Exclusion Program, Keno products, KENO (VIC) Rules and the Code. Venue staff can request training through the Keno Connect web portal under the 'venue profile' section as required. We aim to ensure that all KENO (VIC) employees, Agents and their employees:

- are equipped to deliver our products and services to customers in accordance with the Code;
- understand the possible behavioural indicators of problem gambling;
- are equipped to maintain appropriate records of incidents occurring within their outlet; and
- have the skills to deal with customers sensitively.

KENO (VIC) and Venues will operate under the following guidelines in accordance with responsible gambling requirements:

- Display brochures that contain information about problem gambling at Keno point of sale locations. Such brochures are made available in community languages upon request to KENO (VIC).
- Not allow Minors to use Self-Service Terminals.
- All KENO (VIC) entry forms and tickets will contain warnings regarding problem gambling and provide counselling information.
- How to play information will be available through brochures in Venues and our Website, and these resources will contain information in relation to problem gambling and the chances of winning.
- Will not offer or supply any free or discounted liquor as an inducement to participate in a game of Keno.

KENO (VIC) provides refresher training to its staff at least once every 12 months, includes responsible gambling material in employee newsletters and communications, and displays responsible gambling material in the workplace to remind staff of responsible gambling policies and their responsibilities. Agents and their employees may access responsible gambling training and resources via the Keno Connect platform.

12. Staff Gambling Policy

All KENO (VIC) employees are required to comply with the Employee Gambling Policy. Adherence to this policy is a strict requirement of employment or contract. Non-compliance is treated as a serious breach of a key policy.

The policy places a range of restrictions on the ability of our employees to participate or otherwise engage in Keno activities operated by us whether on or off duty. This includes not permitting our employees to take part in playing Keno whilst on-duty unless this is part of an employees' official duties.

Agent employees/Venue staff are not permitted to play Keno while on duty (including rostered breaks) unless required to do so in order to perform their normal work duties. Venues owned and operated independently have policies that strictly prohibit gambling by employees whilst on duty (including rostered breaks). We encourage these Venues to also have in place policies relating to the participation of employees in gambling products at their Venue during off-duty periods.

Agent employees are given responsible gambling training as part of their employment induction, prior to being issued with a Keno Operator ID. Any Venue staff member who indicates that they have a gambling problem will be directed to the Venue's Duty Manager.

Any contact with such a staff member will occur in a manner that respects the staff member's right to privacy.

13. Advertising, marketing and promotions

KENO (VIC) will ensure that any advertising, Keno-related marketing or promotions:

- comply with all applicable Commonwealth and State laws, regulations and codes relating to the advertising or promotion of Keno products, including the advertising code of ethics adopted by the Australian Association of National Advertisers;
- are in good taste (given prevailing community standards) and are not offensive or indecent;
- are factually correct, accurate and truthful;
- are not false, misleading or deceptive, and do not misrepresent the probability of winning or financial gain;
- are not intentionally directed, expressly or indirectly, to vulnerable or disadvantaged

- groups and/or Minors;
- will not be aimed at or designed to appeal to Minors and do not appear in conjunction with an offer, event or facility advertisement that pertains to Minors;
- do not promote the consumption of alcohol while gambling and do not associate gambling with alcohol;
- do not offer any credit, rewards or vouchers to a person as an inducement to open a Keno Account or refer another person to open a Keno Account;
- do not provide any credit, voucher or reward or other benefit to encourage a person to consent or continue to consent to receive direct marketing;
- do not encourage or offer any credit, voucher or reward or other benefit to induce a Keno Account holder to keep their Keno Account open after a request has been submitted to close it;
- have the consent of any person identified as winning a prize prior to publication;
- are socially responsible;
- do not promote gambling as a means of funding routine household purchases or costs of living or for relieving financial or personal difficulties;
- do not create an impression that gambling is a reasonable strategy for financial betterment;
- do not promote gambling as a means of enhancing social standing or employment, social or sexual prospects;
- do not make claims related to winning or prizes that can be won that are not based on fact, are unable to be proven or are exaggerated;
- do not state or imply that a player's skill can influence the outcome of a gambling; and
- do not exaggerate the connection between the gambling activity and the use to which the gambler's profits may be put.

Venues may from time to time, run Keno promotional activities. The Keno Agency Agreement provides that Venues will conduct promotional activities relating to Keno only in accordance with the prior approval of KENO (VIC). If a Venue elects to participate in a Keno promotional activity run by KENO (VIC) it may only use official services and materials provided by and/or approval by KENO (VIC), in relation to that activity.

KENO (VIC) ensures that we comply with our obligations for responsible advertising and promotions through the following internal actions:

- We communicate information to KENO (VIC) employees regarding our responsible advertising and promotions obligations.
- We train all KENO (VIC) employees in our responsible advertising and promotions obligations through both our induction training and ongoing Marketing training.
- We use all best endeavours to ensure that our self-excluded customers do not receive direct marketing.
- All advertising and marketing must be signed off by a Senior Marketing Manager, following review and feedback by the Responsible Gambling Operations Team and Legal Team before it is released to market.

PROVIDING OUR CUSTOMERS WITH INFORMATION AND SUPPORT

14. Product Information

Agents must ensure that:

- copies of the KENO (VIC) Rules are made available for inspection upon request;
- copies of the Code (or a summary of it) are available for inspection on request in major community languages (Italian, Arabic, Chinese, Turkish, Greek, Italian, Vietnamese and Spanish);
- copies of the Code are made available for inspection on request; and
- Venue staff print a copy of the Keno Rules or the Code for the customer immediately upon request or ask for the customer's email or home address and send it to them promptly.

Copies of the Code are available for Venue staff on the Keno Toolkit available via the Keno Connect online portal.

15. Identifying gambling harm

KENO (VIC) provides access in its retail network, on our Website and via our Customer Support Team to information that assists customers to identify the triggers that can lead to overspending on gambling. These include:

- Gambling to avoid dealing with problems or disappointments.
- Skipping work or study to gamble.
- Spending more time gambling than with family and friends.
- Thinking about gambling every day.
- Gambling to win money, not just for fun.
- Gambling to win back money lost by gambling.
- Feeling depressed because of gambling.
- Lying or keeping secrets about gambling.
- Borrowing money to gamble.
- Arguing with family and friends about gambling.
- Gambling for longer periods of time than originally planned.
- Gambling until every dollar is gone.
- Losing sleep due to thinking about gambling.
- Not paying bills and using the money for gambling instead.
- Trying to stop gambling but can't.
- Becoming moody when trying to stop or cut down on gambling.
- Trying to increase the excitement of gambling by placing bigger bets.
- Breaking the law to get money to gamble.

KENO (VIC) encourages any customer displaying any of these signs to contact Gambler's Help 1800 858 858 (Free Call) or take steps to utilise a self-exclusion program. The "Tools and Strategies" section of our Website provides customers with tools to assist customers in managing their gambling. These tools include setting deposit limits, taking a break and closing their account.

In supporting KENO (VIC)'s commitment to responsible gambling and our desire to assist customers to make a pre-commitment decision, Venues have dedicated Responsible Gambling Officers who:

- are present during Keno operating times at the Venue;
- can assist customers to manage their gambling spend;
- facilitate customers to access gambling support services (through KENO (VIC) and Gambler's Help); and/or
- help access voluntary self-exclusion programs.

16. Responsible Gambling Information

KENO (VIC) works with Agents and Venue staff to provide responsible gambling information in a range of forms, including brochures, stickers and posters. This includes but is not limited to information in relation to:

- how customers can gamble responsibly;
- making a pre-commitment decision;
- the availability of gambling support services;
- information on our products, enabling customers to make informed decisions, including the odds of winning;
- the prohibition of the sale of our products to Minors and to intoxicated people;
- the prohibition on the provision of credit for gambling;
- how prizes of certain values may be paid, for example paying high value prizes by cheque;

- availability of the KENO (VIC) Rules for inspection;
- information on how to self-exclude; and
- information about the Code.

Contact information for gambling support services and responsible gambling tips are also displayed by various means, including screen displays within Venues (including Self-Service Terminals), on our Website, and via the Keno App.

The following responsible gambling message will be displayed on all relevant material:

Think! About your choices.
 Call Gambler's Help 1800 858 858
www.gamblinghelponline.org.au

17. Gambling Environment

Agents and their employees are provided with quarterly reminders of their obligations to ensure that they manage and monitor their environment for customers who have been in their outlet for lengthy periods of time. Agents and their employees are encouraged to speak directly with such customers to ensure they are aware of the passage of time.

KENO (VIC) customers will also be encouraged to take breaks from gambling and not to engage in extended or intensive gambling. This encouragement may take the form of an announcement regarding a staged event, or through direct customer interaction. Types of staged events may include;

- Announcing that a morning tea is now available
- Announcing a member's draw
- The commencement of activities such as morning melodies

In addition, clocks are placed in all major areas of the venue so customers are made aware of the passage of time. Venue staff will mention the time when making announcements about venue activities. All Keno tickets have the time of purchase printed on them.

18. Interaction with customers

KENO (VIC) employees, and Agents and their employees (including Venue staff), are trained in identifying behaviours that may indicate a customer has a problem with their gambling.

A customer, KENO (VIC) employee, or employee of an Agent, who approaches a Venue staff member for information about, or assistance with a gambling problem, or who is observed exhibiting or displaying signs of distress or behaviour that may indicate a problem with their gambling, will be approached by the Venue's Duty Manager or a senior employee (preferably the Agent) for help and will be:

- approached in a supportive, sensitive and appropriate manner;
- encouraged to take a break from their gambling;
- ordered some refreshments (eg cup of tea or coffee) in a quieter, more private part of the venue;
- provided with information on access to support services which can help manage play, such as setting pre-commitment limits if the customer uses online gambling services, or seeking further help by contacting KENO (VIC)'s Customer Support Team and/or Gambler's Help services;
- offered support on how to self-exclude ; and
- in the case of KENO (VIC) employees, and Agents and their employees, provided with access to our Employee Assistance Line, managed by an external and independent professional counselling service.

Signs that a customer requires assistance may include:

- either gambling every day or finding it difficult to stop gambling at closing time;
- displaying aggressive, anti-social or emotional behaviour while gambling;
- gambling for extended periods (i.e. gambling for three hours or more without a break);
- avoiding contact while gambling, communicating very little with anyone else, barely reacting to events going on around them, making requests to borrow money from staff or other customers or continuing to gamble with the proceeds of large wins;
- requesting self-exclusion, and/or disclosing a gambling related problem.

KENO (VIC) employees, and Agents and their employees (including Venue staff), are not trained to make assessments as to whether an individual is or is not a problem gambler but must be aware of and respond to such indicators of distress in a sensitive manner.

KENO (VIC) requires that action taken in such circumstances be recorded by Venue staff in the retail network in an appropriately maintained Responsible Gambling Register via KENO (VIC)'s Service Support Centre.

KENO (VIC) also has designated Customer Support Team members who are available during business hours. The Customer Support Team can be contacted on the Responsible Play phone number 1800 056 066. On request, the Customer Support Team can:

- assist customers with locating tools and resources;
- provide further information and contact details for gambling-related support services;
- with respect to players who are noticeably distressed from gambling, provide them with information detailing gambling support services for customers, including transferring the customer directly to Gamblers Help; and
- assist customers to self-exclude from our products.

We respect and protect the privacy of our customers. Our privacy policy is available on our website at keno.com.au.

19. Responsible Gambling Register

Agents must have established processes in place in their Venues to ensure that all responsible gambling related matters are recorded in a Responsible Gambling Register. All relevant Venue staff should be informed of the register, where it is located in the Venue and how to use it.

The Responsible Gambling Register should have the provision to record all of the following information:

- (a) the date and time of the occurrence;
- (b) the names of Agent's employees who observed or dealt with the matter;
- (c) the name of the customer involved (if available);
- (d) a description of what occurred;
- (e) the details of any documentation completed or received by Venue staff that relate to the matter;
- (f) the action taken, comments made by any relevant party or details of any follow-up action required or agreed to.

The customer's right to privacy and confidentiality should always be respected in relation to a responsible gambling matter. KENO (VIC) respects and protects the privacy of our customers. Our Privacy Policy is available on our Website.

The Responsible Gambling Register must be made available at all times to VGCCC Inspectors upon request.

20. Transactions

Venues do not cash cheques from customers, including the cashing of cheques for the purpose of playing Keno. A sign stating this is displayed in Venues.

In accordance with the Agency Agreement between Agents and KENO (VIC), Agents and their employees must strictly follow the large payout processes by only paying prizes in cash up to their nominated maximum Keno Cash Payout limit. The remaining balance must be paid by cheque issued by KENO (VIC) or by means of electronic funds transfer into an account nominated by the customer. The method of prize payment will be at the election of KENO (VIC). Venues are not permitted to issue prize cheques.

21. Keno self-exclusion program

KENO (VIC) facilitates voluntary self-exclusion by allowing for the self-exclusion of customers from Keno online. It also supports industry operated self-exclusion programs offered by Venues in Victoria.

KENO (VIC) makes available to customers upon request:

- Information on how to self-exclude from Keno online (including what is involved with self-exclusion, how to apply, what procedures are involved, what information and documents customers must provide), and
- contact information for problem gambling support services.

We will enable Keno Account Holders to exclude themselves from Keno online by contacting the Customer Support Team on 1800 056 066, or by visiting the Keno.com.au website (and downloading the Keno self-exclusion form).

KENO (VIC) has policies and procedures in place to keep a record of the number of:

- (a) Keno Account Holders who have self-excluded; and
- (b) self-excluded persons who extend or revoke their self-exclusion.

Where customers are seeking to reactivate play after a self-exclusion period, they may be required to first verify, in a manner determined by KENO (VIC), their capacity to manage spend and participation.

Where gambling has become a problem for a customer, we encourage them to consider seeking self-exclusion from Keno.

ONLINE ACCOUNT MANAGEMENT

22. Online Account Management Features

KENO (VIC) is very conscious of community and government focus on the responsible provision of legal gambling products and accepts that some customers may encounter difficulty in controlling their personal level of expenditure. Responsible gambling is all about being informed, having fun and knowing your limits.

Customers who use our Website and Apps can use their Keno Account to set controls which allow them to keep their Keno play activity in balance. Self-manage tools including setting deposit limits, Take a Break and closing the account are available within the Keno App and on our Website. Customers may explore our range of tools that enable them to take control of their Keno experience via the "Tools and Strategy" section of our Website.

KENO (VIC) can exclude or suspend customers and close customer or employee accounts for responsible gambling purposes and for the protection of players. KENO (VIC), in these circumstances, will directly communicate with impacted customers to assist with connecting them to relevant support services.

23. Deposit Limits

A deposit limit allows customers to manage the maximum amount which can be deposited into their Keno Account within a set time range. Customers are encouraged to set a deposit limit in line with their personal circumstances.

As part of creating a Keno Account, all customers will be invited to set a deposit limit.

Customers may choose to set a deposit limit or change their deposit limit at any time after Keno Account creation by:

- logging into their Keno Account and following the prompts; or
- contacting our Customer Support Team on 1800 056 066; or
- writing to us using the 'Contact Us' page on our Website (<https://www.keno.com.au/contact-us>).

Any decreases to the deposit limit will take effect immediately but increases will take effect after 7 days from request.

The benefits of setting a deposit limit include helping customers to:

- set a budget and control the amount of money deposited from their personal funds that they can afford to bet with; and
- gamble with money set aside only for gambling and not for other bills to help them to continue to gamble responsibly.

24. Unsubscribe from Marketing Material

KENO (VIC) will not provide any direct marketing (including emails and SMS) to a customer without first receiving their consent.

Customers may update their marketing preferences and opt-out of receiving direct marketing (including emails or SMS messages) from KENO (VIC) at any time. Customers can change their marketing preferences:

- by logging into their Keno Account via our Website and Apps; or
- by calling the Customer Support Team on 1800 056 066; or
- by using the unsubscribe provisions in electronic communications.

If a customer:

- submits a request to close their Keno Account; or
- requests to be self excluded from Keno via our Website;

KENO (VIC) will take steps to unsubscribe the customer from direct marketing.

25. Take A Break

From time to time, customers may wish to remove their ability to play Keno for a short period. Take A Break allows customers playing Keno via the Keno Apps or our Website to suspend their account for between 1 and 180 days. During the break, customers will be unable to access their Keno Account or any associated features. After the expiration of the break period, the customer's Keno Account is automatically unlocked at next login.

During the period that a customer is using the Take A Break feature, they will not receive any direct marketing communication from KENO (VIC).

26. Transaction History and Online Statements

Reviewing historical online activity and statements can help customers stay informed and assist customers to gamble responsibly.

Customers can review up to 90 days of transactions made through their Keno Account via the Website or App. For a list of transactions extending beyond 90 days, customers can contact the Customer Support Team on 1800 056 066.

27. Closing an Online Account

Customers who no longer wish to use their Keno Account, may close their account by submitting a request:

- through the Keno App or our Website after logging into their Keno Account; or
- through our Customer Support Team on 1800 056 066; or
- by writing to us using the "Contact Us" page on the Website (<https://www.keno.com.au/contact-us>).

KENO (VIC) will process a customer's request to close their account as soon as practicable and after all outstanding entries have completed.

After the Keno Account closure, customers will no longer be able to log in or access any features of their Keno Account.

Any winnings from pending games or other funds that were not withdrawn, are paid to the customer via bank transfer or by cheque to the customer's registered address.

28. Proactive monitoring program

To further protect Keno Account customers, KENO (VIC) monitors spend and activity via analytics and active account monitoring. Where we identify a customer's behaviour has changed materially, we may intervene in the form of communications, messaging, emails or phone calls, to ensure customers are aware of the Keno Account management features and controls which are available to support responsible play.

Customers who are identified through our proactive monitoring program, will be supported through access to our range of tools, information on gambling support services, and information which may help those who feel they may need assistance in managing their gambling or for others who may be adversely affected by gambling.

SUPPORTING RESPONSIBLE GAMBLING

29. Minors

Our services are designed to be used by adults, defined as people aged 18 or over. It is illegal for Minors to gamble with us or hold a Keno Account. We strictly prohibit Minors from gambling.

KENO (VIC) will take all reasonable steps to ensure that Minors cannot use our services. Before opening a Keno Account, customers must provide a date of birth and assert that they are over the age of 18.

In addition, the Keno App will not display or cannot be downloaded from Apple App Store or Google Play Store unless the user account is over 18 in accordance with Apple and Google's policies.

Venues must display signage stating that Minors are not permitted to gamble. We also have appropriate warnings on our Website and the Keno App stating that Minors are not allowed to play online and cannot be registered with us.

Our Keno Account terms and conditions state that Minors cannot bet with us and place obligations on our customers not to allow Minors to bet via their Keno Accounts or disclose their security details.

Venues have processes in place for checking the identification of persons seeking to purchase bets or collect dividends, to ensure that only persons over 18 years participate in Keno.

All Venues carry "Minors" signage at all places where bets are placed and, if applicable, where ATM or EFTPOS machines are situated. These signs are readily available for order by Venue staff via the Keno Connect platform. There is no general prohibition on Minors entering a Venue, however all Venue staff must ask for proof of age if they are uncertain whether a customer is at least 18 years of age. If photo identification cannot be produced, the customer will be asked to vacate the area where Keno is sold (i.e. to leave the Self-Service Terminal or Operator Terminal as the case may be).

If we determine that a customer has opened a Keno Account with KENO (VIC) and they are under the age of 18, or that a person is allowing a Minor to bet using their Keno Account, we will immediately close that Keno Account and report the matter to the Risk and Compliance Committee.

If you have a Keno Account and Minors have access to the device you use to access our Website or the Keno Apps, we encourage customers to download and install child protection software packages. This software may help prevent our Website or the Keno Apps being accessed by Minors.

All customers are required to complete an age and identity check when playing Keno online via our Website or the Keno Apps. This check must be completed within 14 days of joining, or the Keno Account will be suspended. Keno Accounts have reduced functionality until age and identity are verified, including limits on depositing, spending and withdrawing.

30. Pre-commitment

KENO (VIC) encourages and supports Venues to encourage all customers who play Keno to set a time and money limit according to their circumstances. Venues display signs that recommend customers "set a limit and stick to it", where Keno Self-Service Terminals are located.

Our Website and Apps encourage all customers to set a deposit limit. In addition, the Keno Game Guide has information on circumstances that can lead to overspending.

Indicators of problem gambling include:

- gambling every day or finding it hard to stop at closing time;
- gambling for long periods, that is, for three hours or more without a break;
- avoiding contact while gambling, communicating very little, barely reacting to events going on around the player;
- trying to borrow money from staff or other customers or continuing to gamble with the proceeds of large wins;

- aggressive, anti-social or emotional behaviour while gambling; and/or
- trying to win back gambling losses when feeling stressed or unhappy.

Agents and their employees will support customers who inform them of a pre-commitment decision, by encouraging them to keep their pre-commitment decision.

31. Signage

KENO (VIC) requires Venues to display responsible gambling messages and makes available information for gambling support services for individuals and/or their families as to where to obtain assistance to manage a gambling problem. Some of these signs are required by law, and some are created by KENO (VIC) and displayed within the Venue. The information and messages available will be reviewed and if required updated on an annual basis. Signage resources are available for download by Venue staff via the Keno Connect online platform.

Responsible gambling signage is displayed at all points where Keno entries are accepted and, if the Venue has an ATM or EFTPOS facility, responsible gambling signage will be displayed at that point. We make available on our Website information relating to responsible gambling and where and how to seek assistance with a gambling related problem.

32. Working with the Community

KENO (VIC) is committed to facilitating strong links between Venues and local problem gambling support services, including encouraging regular meetings with local Gambler's Help services.

Examples of these meetings may include:

- holding annual Venue employee training sessions, run by the local Gambler's Help service; and/or
- twice yearly/regular meetings between the Agent or Duty Manager and the Gambler's Help service.

Details of these meetings should be kept in a Responsible Gambling Folder/Register to be located in the gaming room/Venue. The meeting details may include:

- time and date of the meeting;
- attendees at the meeting;
- topics discussed;
- outcomes / action items from the meeting; and
- next meeting date.

Within Venues, we require the Duty Manager to act as a contact point for information on problem gambling support services and matters related to responsible gambling.

Victorian Gambling Harm Awareness week is supported every year to increase awareness of gambling and gambling harm in the Victorian community. It is an opportunity to increase the community's understanding of risky gambling behaviour, encourage people to recognise when their gambling may place them at risk of harm, provide information on practical ways to keep gambling under control and how to get help if they need it. Keno venues are encouraged to share campaign messages and digital content to promote Gambling Harm Awareness Week through their networks and to attend Gambling Harm Awareness week events hosted by the Victorian government and gambling support services.

33. Problem Gambling Support Services

In pursuit of the highest standards of customer care, and to strengthen our understanding of problem gambling, we liaise on a quarterly basis, or more often as required with problem

gambling-related support services, community groups, and all relevant tiers of government and industry groups. These Victorian problem gambling organisations include but are not limited to Gamblers Help, Salvation Army, Victorian Gambling Council and other organisations that may fall under the umbrella of problem gambling counsellors.

We liaise with the problem gambling counsellors through:

- informal and ongoing telephone and e-mail contact to seek their advice and feedback in reference to our self-exclusion program, referral program and the Code;
- formal telephone and email contact to seek advice and feedback regarding the Code (as per our obligation to undertake an Annual Review of the Code); and
- KENO (VIC) is represented, presents and liaises at problem gambling counselling forums across Victoria throughout the year and also attends the National Association for Gambling Studies (NAGS) conference on an annual basis.

34. Implementation of the Code

The Code is included in induction materials given to all new Keno employees and Venue staff upon commencement of employment with KENO (VIC), or an Agent. Issues identified by staff or customers relating to the Code will be directed to KENO (VIC).

35. Customer Complaints

If customers wish to raise a complaint about KENO (VIC)'s Responsible Gambling Code of Conduct, we encourage our customers to tell us. We have a formal complaint management policy in place to ensure that our customer's complaints are considered and addressed appropriately.

In accordance with the following Keno Complaints Handling Charter, complaints should be addressed to:

KENO (VIC) Responsible Gambling Contact Officer
GPO Box 1943, Melbourne VIC 3001
Phone: 1800 056 066

Alternatively, customers may wish to contact us via our website using the "Contact Us" page.

If a complaint is made 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 KENO (VIC) Incident Management Team investigates, determines and implements a resolution, informs the complainant and the subject of the complaint (if applicable) of the 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 review can be conducted, which may include the following measures:

- All material in relation to the complaint is examined.
- A discussion 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 KENO (VIC) 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 KENO (VIC) and the complainant.

Records of complaints and decisions of any review process made in relation to the operation of this Code will be maintained in the Responsible Gambling Register and held for a period of seven years and will be made available for inspection by the Minister for Consumer Affairs, Gaming and Liquor Regulation or the Victorian Gambling and Casino Control Commission on request in accordance with KENO (VIC)'s record keeping obligations.

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

36. Definitions

Active Keno Account means a Keno Account that is not closed which has been used to purchase an entry into a KENO (VIC) product within the preceding 12 months

Agent means the person or persons who have been accredited by KENO (VIC) under section 6A.2.4(3) of the *Gambling Regulation Act 2003 (Vic)* to sell tickets in Keno games.

Agent employee means an employee of the Agent.

Apps means the Internet enabled smartphone, device and/or platform applications made available by KENO (VIC).

Duty Manager means the senior level manager on duty at a specific time of contact at a Venue.

Keno has the meaning provided to it in this Code.

Keno Account means a customer account offered by KENO (VIC) via the internet platform.

Keno Connect means the online platform provided by KENO (VIC) to Agents and Venue staff to, among other things, access Venue sales data, order promotions and stationery and download marketing and responsible gambling assets.

KENO (VIC) means the Keno licensee, which is Keno (Vic) Pty Ltd, of Level 21, Tower 2, 727 Collins Street, Melbourne, Victoria.

Minor means a person under 18 years of age.

Venue has the meaning provided to it in this Code.

Venue staff means an employee of an Agent with respect to a Venue.

Website means the Keno website at www.Keno.com.au.