



Responsible Gambling Code of Conduct

Version 5 October 2016



RESPONSIBLE GAMING
STAY IN CONTROL

Crown Responsible Gaming Support Centre: 1800 801 098
Gambler's Help: 1800 858 858

Responsible Gambling Code of Conduct - Overview

This section provides an overview of the Crown Melbourne Limited (**Crown**) Responsible Gambling Code of Conduct (**Code**).

The full version of the Code follows and is available at various locations throughout the Casino and on the Crown Melbourne website www.crownmelbourne.com.au

Chinese (Simplified and Traditional), Vietnamese, Arabic, Greek, Italian, Cambodian and Hindi versions are also available online or on request at any Crown Rewards desk.

For further information, please contact any member of staff or phone the Responsible Gaming Support Centre on 1800 801 098.



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Crown's Commitment to Responsible Gambling

Crown is committed to providing responsible gaming services by making available information, assistance and resources regarding responsible gaming matters. Crown's responsible gaming message is 'STAY IN CONTROL'.

Gambling Product Information

The rules of all Table Games and Electronic Gaming Machines (**EGMs**) offered at Crown are available upon request or by visiting the Crown website. Player Information Displays on all EGMs and Fully Automated Table Games (**FATGs**) can provide further information including the odds of winning.

Crown Rewards (Customer Loyalty Program) Information

The Crown Rewards terms and conditions (including information about how to join, resign, account balances and the accrual and redemption of benefits) are provided to all new members. Further information is available at any Crown Rewards desk or by calling the Crown Rewards Information Hotline on 1300 8 CROWN (1300 827 696).

Pre-commitment - Voluntary Money and/or Time Limits

The Victorian State Government has introduced a state-wide voluntary money and/or time limit setting and tracking scheme called YourPlay. This is available for EGM customers. Crown encourages and supports customers who play EGMs to set money and/or time limits. EGM customers can select to use a casual card, where limits can be set and changed at the Voucher Issuance Kiosk (**VIK**), or a registered card, where limits can be set and changed on-line at yourplay.com.au or at the Crown Rewards desk or the VIK. YourPlay brochures are available throughout the Casino and on request.

Play Safe Limits is a separate and Crown operated money and/or time limit setting program available only for FATGs. Play Safe Limits allows Crown Rewards members to set voluntary money and/or time limits when playing FATGs and does NOT integrate with the EGM money and/or time limit setting scheme, YourPlay. Crown encourages and supports customers who play FATGs to set money and/or time limits. Play Safe Limits Brochures are available throughout the Casino and on request.

Interaction with Customers

All relevant Crown staff complete the approved Responsible Service of Gaming training. Training is regularly reviewed to ensure that customers can be provided with the most appropriate service(s) for their individual circumstances.

Responsible Gaming services available to customers include (but are not limited to):

- Responsible Gaming Support Centre;
- Responsible Gaming Liaison Officers;
- Self-Exclusion;
- Information about YourPlay for EGMs;
- Information about Play Safe Limits for FATGs;
- Information and assistance (including in Languages other than English);
- Referral to other support providers;
- Responsible Gaming Psychologists;
- Chaplaincy Support Service; and
- Brochures (including Languages other than English).

All services are provided confidentially and free of charge, 24 hours a day, seven days a week.

Interaction with Staff

Crown employees are not permitted to gamble at the Casino at any time. A free, confidential Employee Assistance Program is available to any staff member requiring assistance.

Problem Gambling Support Services

Crown maintains regular contact with the principal problem gambling support services through attendance at meetings, professional development sessions, seminars and conferences.

Customer Complaints

Crown has a comprehensive complaint handling process. Complaints may be made in person, via telephone, fax, email, or by letter. All complaints will be acknowledged and responded to promptly. Complaints about the Code can be raised with a Responsible Gaming Liaison Officer on tel: 1800 801 098.

Prohibition on Gambling by Minors/Persons under 18 Years

The Casino is an adult environment and as such, no person under the age of 18 is permitted entry to the Casino. If any doubt exists, appropriate identification will be requested. If appropriate identification cannot be provided, entry is refused.

Any parent or guardian bringing a child to any part of the Complex must ensure that the child is not left unattended. If a child is unattended, the parent or guardian may be banned from entering the Complex and the matter may be referred to the police.

The Gambling Environment

A number of features exist within the Casino which are aimed to encourage responsible gaming.

These include (but are not limited to):

- Responsible gaming information (brochures, posters etc.)
- Clocks
- Adequate lighting
- Responsible Service of Alcohol
- Locating Automatic Teller Machines (**ATMs**) away from the Casino in accordance with relevant legislation

Financial Transactions

A number of restrictions apply to financial transactions. These restrictions include matters such as cheque cashing, payment of winnings and identification requirements. Full details are available by contacting staff at any Cashier's location.

Responsible Advertising and Promotions

Advertising and/or promotions will comply with all requirements described in the 'Responsible Advertising and Promotions' section in this Code, including the Australian Association of National Advertisers Code of Ethics and applicable laws.

Implementation and Review of the Code

The Code is reviewed regularly. All customers and staff are welcome to provide feedback at any time by writing to:

General Manager
Responsible Gaming
Crown Melbourne Limited
8 Whiteman Street
SOUTHBANK, VIC 3006

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RESPONSIBLE GAMBLING CODE OF CONDUCT

FOREWORD

Crown Melbourne Limited (**Crown**) is the operator of the Crown Melbourne Integrated Resort including the Casino at the Complex and Crown is the appointed Victorian Casino Licence holder. The Complex is one of the world's largest and most diverse integrated resorts and entertainment destinations. Crown is renowned for excellence in all aspects of its services and facilities. Our commitment to providing gaming services for our customers in a responsible manner is no exception. This Responsible Gambling Code of Conduct (**Code**) is an important reflection of that commitment.

Our entertainment and gaming experiences are enjoyed by the vast majority of our customers. However, we recognise that some of our customers have difficulties with gaming responsibly and this may cause them personal and financial difficulties, and potentially their family, friends and the wider community may also be impacted.

While the decision to gamble lies with the individual and represents a choice based on an individual's circumstances, we recognise that to make that choice responsibly, our customers need to be informed about our gaming products and information regarding the services and support available to them should they need or seek help with their gaming behaviours.

As the industry's and community's understanding of the causes of problem gambling and the appropriate responses further develop, our Code will be reviewed and updated over time. It is our goal to work with all interested sections of the community including Government, counsellors and gaming customers themselves to ensure that there is appropriate input into such developments.

This Code represents our commitment to our customers and employees regarding responsible gaming. We want you to enjoy your experiences with us.

As always, we welcome your feedback on any issue at any time and particularly with respect to our continued efforts to ensure that our gaming services are enjoyed by all who choose to participate.

Barry Felstead
Chief Executive Officer
Australian Resorts

CROWN'S COMMITMENT TO RESPONSIBLE GAMBLING

Responsible Gaming

Responsible gaming occurs in a regulated environment where the potential for harm associated with gaming is minimised and customers can make informed decisions when they participate in gaming, based on their individual circumstances.

Responsible gaming is the shared responsibility and actions of individuals, communities, the gaming industry and the Government, working in partnership to achieve socially responsible outcomes which are responsive to community concerns.

Crown's responsible gaming initiatives are focused on minimising the potential for risks for the small number of customers who may develop difficulties associated with their gaming behaviours.

Crown's Responsible Gaming Commitment

Crown is committed to providing responsible gaming services by making available information, assistance and resources regarding responsible gaming matters.

Crown's Code describes and demonstrates how we execute this commitment. It is our objective to ensure that Crown remains a world leader in responsible gaming practices and, at a minimum, that we comply with the legal requirements regarding responsible gaming as contained in the *Casino Control Act 1991 (Vic)* and the *Gambling Regulation Act 2003 (Vic)*.

Crown's commitment to the responsible service of gaming includes the Responsible Gaming Support Centre (**RGSC**), a purpose built facility where responsible gaming programs, services and resources are available, including a dedicated and specially trained team of staff, managers and professionals. They deliver Crown's responsible service of gaming initiatives and provide a focal point for interacting with customers who may need support.

Crown's Responsible Gaming Message

Crown's responsible gaming message is simple yet meaningful – 'STAY IN CONTROL'. The accompanying 'traffic lights' logo reinforces this message. Our message is found clearly visible throughout the Casino, including being placed on Electronic Gaming Machines (**EGMs**), table games and near Automatic Teller Machines (**ATMs**) throughout the Complex.

Crown's responsible gaming message is printed on all gaming related advertising.



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AVAILABILITY OF THE CODE

The Code is available to customers, in written form and on request. Copies are available at Crown Rewards desks, brochure stands near Cashier locations and the RGSC or by contacting a Responsible Gaming Liaison Officer (**RGLO**) on 1800 801 098. The Code is also available on Crown's website at www.crownmelbourne.com.au

Customers are notified about the Code and its availability via signage placed at the RGSC and Crown Rewards desks. An example of that signage follows:

The Crown Responsible Gambling Code of Conduct is available at the Crown Responsible Gaming Support Centre, at Crown Rewards desks, upon request and via the Crown Melbourne website at www.crownmelbourne.com.au



Our Code is also made available on our website (and in written form on request) in the following languages:

- Chinese (*Traditional and Simplified*)
- Vietnamese
- Arabic
- Greek
- Italian
- Cambodian
- Hindi

Crown employs staff from linguistically diverse backgrounds capable of interpreting this Code to assist customers. We encourage our customers to ask for this assistance if they require it.

RESPONSIBLE GAMBLING INFORMATION

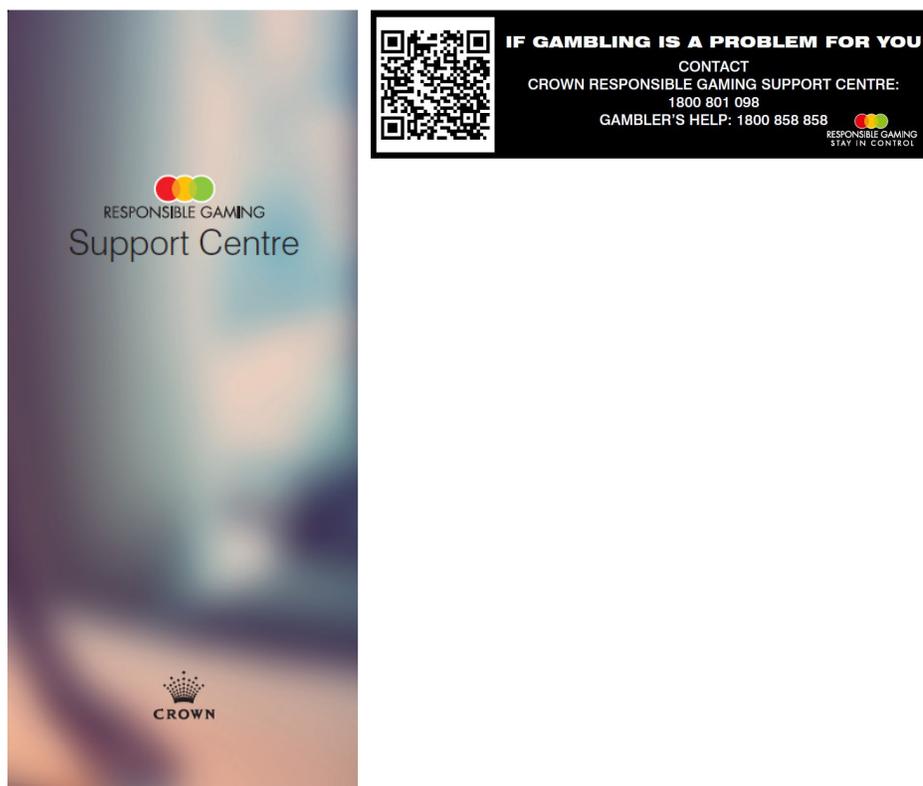
In addition to our own responsible gaming message, Crown displays responsible gaming information throughout the Casino in a variety of forms including brochures, posters, in-house TV and on screen Player Information Displays (**PIDs**) on EGMs and Fully Automated Table Games (**FATGs**).

Crown complies with current and future signage requirements.

For further information or assistance, customers are encouraged to contact the RGSC or a RGLO on 1800 801 098.

Information and some examples of key Crown responsible gaming messages found at the Casino follow.

a) Availability of gaming support services and Crown's RGSC



b) Payment of winnings, credit and lending

Except for lawful exceptions, EGM winnings or accumulated credits above \$2,000 must be paid by cheque and not made out to cash. Crown will not provide credit or lend money to Australian customers for the purpose of gaming.

Crown may provide chips on credit to non-Australian residents in circumstances prescribed by legislation and in accordance with controls and procedures approved by the Victorian Commission for Gambling and Liquor Regulation (**VCGLR**).

Customers have the opportunity to take large winnings payments in part or full by cheque.

More detailed information is available on request.

c) Crown's Self-Exclusion Program

In addition to observing its existing legislative requirements regarding Exclusion orders, Crown has a Self-Exclusion Program. Self-Exclusion is a process available to customers to voluntarily ban themselves from the Casino. This may be an option useful to those customers who may be experiencing difficulties as a result of their gaming behaviours.

Self-Exclusions are:

- facilitated by trained staff in the RGSC;
- available 24 hours a day, seven days per week; and
- provided free of charge.

Crown will not disclose information gathered during the facilitation of a Self-Exclusion to any third party unless legally obliged to do so or with the customer's consent.

Crown will not knowingly send any advertising or other promotional material relating to gaming to Self-Excluded or excluded customers.

Brochures containing information about Self-Exclusion are provided to customers on request, and made available at various locations throughout the Complex and at the RGSC.

Additional Information

Crown's responsible gaming programs include:

- The establishment of the Crown RGSC as a world first responsible gaming initiative, which operates 24 hours a day, seven days a week;
- A Self-Exclusion Program available for customers to ban themselves from the Casino, that informs and encourages applicants to seek counselling and assistance;
- Information about YourPlay. The Victorian State Government has introduced a state-wide voluntary money and/or time limit setting and tracking scheme called YourPlay. This is available for EGM customers. Crown encourages and supports customers who play EGMs to set money and/or time limits. EGM customers can select to use a casual card, where limits can be set and changed at the Voucher Issuance Kiosk (**VIK**) or a registered card, where limits can be set and changed on-line at **yourplay.com.au** or at the Crown Rewards desks or the VIK. YourPlay brochures are available throughout the Casino and on request;
- Information about Crown's Play Safe Limits. Play Safe Limits is a separate and Crown operated money and/or time limit setting program available only for FATGs. Play Safe Limits allows Crown Rewards members to set voluntary money and/or time limits when playing FATGs and does NOT integrate with the EGM money and/or time limit setting scheme, YourPlay. Crown encourages and supports customers who play FATGs to set money and/or time limits. Play Safe Limits Brochures are available throughout the Casino and on request;

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- The provision of Player Activity Statements for EGM play or FATG play (see 'Customer Loyalty Program' information in this Code);
 - The availability of Psychologists experienced in the field of problem gambling to assist customers and family members;
 - A robust process that applies to the application by a customer for the revocation of their Self-Exclusion. This process includes satisfying criteria whereby the applicant demonstrates the ways in which they have addressed their gaming behaviours (such that they are back 'in control');
 - A Gaming Resumption Information Program (**GRIP**), designed for customers who are successful in satisfying the criteria for revoking their Self-Exclusion, to assist them in developing strategies when resuming gaming at Crown; and
 - A Chaplaincy Support Service.

Additionally, customers may attend the RGSC in person or free call 1800 801 098 to speak to our experienced staff or obtain more information about any of the services or information contained in this Code.

Crown complies with all relevant government legislation pertaining to the Responsible Service of Gaming.

Crown wants its customers to enjoy their gaming in a responsible manner and encourages customers to gamble within their means and budget.

Customers can obtain free information on household budgeting from websites such as the Commonwealth Government's website 'Understanding Money' www.moneysmart.gov.au

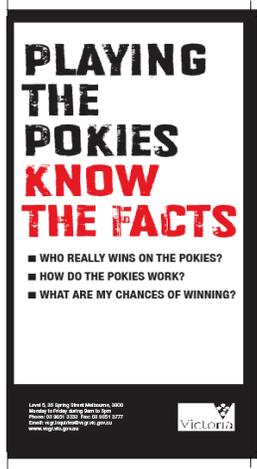
The State Government's problem gambling support website can be found at www.problemgambling.vic.gov.au

GAMBLING PRODUCT INFORMATION

Signs are displayed in the Casino at Crown Rewards desks advising customers that, upon request, Crown will provide information on the Rules of all Table Games and EGMs offered for play at the Casino.

Those Rules are also available on Crown's website at www.crownmelbourne.com.au

The following Brochure explains the chances of winning on EGMs and is available at the Casino.



EGM and FATG game information, including the chances of winning, is accessible via PID screens on each EGM and FATG, which allows players to keep informed about their EGM and FATG play. Information on how to access and view the PID screens is available from a member of staff or PID brochures (for EGMs), at Crown Rewards desks and the RGSC. Below is an example of the kind of brochure that is available.



CUSTOMER LOYALTY PROGRAM INFORMATION

Crown operates a Complex wide Loyalty Program called Crown Rewards that entitles its members to certain benefits and privileges. The EGM Loyalty Scheme that forms part of the Crown Rewards program is provided to customers in accordance with relevant legislation.

Customers can obtain information on how to join or resign from the Crown Rewards program, benefits they may accrue, account balances and the manner in which points may be redeemed for rewards:

- at any Crown Rewards desk;
- by contacting the Crown Rewards Information Hotline on 1300 8 CROWN (1300 827 696); and
- in the terms and conditions available on application for membership (or on request).

When joining Crown Rewards, EGM customers are supplied with the required information and are given the opportunity to set YourPlay Limits, relevant to EGMs and separately, Crown's Play Safe Limits, relevant to FATG play.

The Victorian State Government has introduced a state-wide voluntary money and/or time limit setting and tracking scheme called YourPlay. This is available for EGM customers. Crown encourages and supports customers who play EGMs to set money and/or time limits. EGM customers can select to use a casual card, where limits can be set and changed at the VIK, or a registered card, where limits can be set and changed on-line at yourplay.com.au or at the Crown Rewards desk or the VIK. YourPlay brochures are available throughout the Casino and on request.

Play Safe Limits is a separate and Crown operated money and/or time limit setting program available only for FATGs. Play Safe Limits allows Crown Rewards members to set voluntary money and/or time limits when playing FATGs and does NOT integrate with the EGM money and/or time limit setting scheme, YourPlay. Crown encourages and supports customers who play FATGs to set money and/or time limits. Play Safe Limits Brochures are available throughout the Casino and on request.

Further information regarding YourPlay and Play Safe Limits is provided in this Code under 'Pre-commitment – Voluntary Money and/or Time Limits.

Crown will not knowingly send or direct any advertising or other promotional material relating to gaming to any person who is excluded or Self-Excluded from the Casino.

Player Activity Statements provide information on each member's EGM or FATG play, including all wins and losses for the period of the statement and are available for EGM play and/or FATG play, these are separate statements. Crown's responsible gaming message 'Stay in Control', as well as information regarding the availability of the Code, is incorporated in and forms part of Player Activity Statements.

At least once a year, Player Activity Statements are made available to EGM Crown Rewards members.

Members who play FATGs are able to collect their Player Activity Statement on request, at any Crown Rewards desk.

PRE-COMMITMENT - VOLUNTARY MONEY AND/OR TIME LIMITS

The Victorian State Government has introduced a state-wide voluntary money and/or time limit setting and tracking scheme called YourPlay. This is available for EGM customers. Crown encourages and supports customers who play EGMs to set money and/or time limits.

EGM customers can select to use a casual card, where limits can be set and changed at the VIK or a registered card, where limits can be set and changed on-line at yourplay.com.au, at the Crown Rewards desk or the VIK. YourPlay brochures are available throughout the Casino and on request.

Additionally, YourPlay is a card-based personal gaming tracker that provides a running total of money and time spent playing EGMs across all gaming venues in Victoria, including the Casino.

Customers can also set personal reminder messages as encouragement to stick to their set limit.

Crown cannot advise customers on the quantum of their personal money and time limits. This is a choice an individual should make according to their own circumstances. Crown does not have access to an individual's YourPlay data.

Play Safe Limits is a separate and Crown operated money and/or time limit setting program available only for FATGs. Play Safe Limits allows Crown Rewards members to set voluntary money and/or time limits when playing FATGs and does NOT integrate with the EGM money and/or time limit setting scheme, YourPlay. Crown encourages and supports customers who play FATGs to set money and/or time limits. Play Safe Limits Brochures are available throughout the Casino and on request.

The YourPlay brochure is provided to all customers joining the Crown Rewards scheme. The Play Safe Limits brochure is provided to customers joining the Crown Rewards program who indicate they will play Table Games. Staff are also available to provide information regarding YourPlay and Play Safe Limits at locations throughout the Casino, including at the Crown Rewards desks and the RGSC.

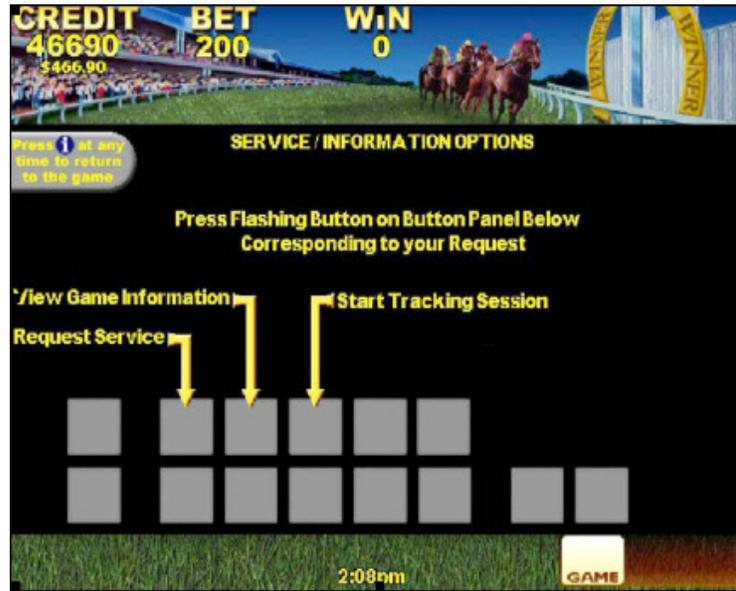
Crown cannot advise customers on the quantum of their personal money and time limits. This is a choice an individual should make according to their own circumstances.



RGLOs are available on request to assist and support a customer with strategies for keeping within their YourPlay and Play Safe Limits or any other pre-commitment strategy.

In addition, all EGMs and FATGs enable a player to use the PID to track the time and the net loss or win during a session of play. Information on how to activate session tracking is available from staff and the PID brochure (for EGMs) is available on request.

Example PID screen information follows:



INTERACTION WITH CUSTOMERS

Crown is committed to providing a world-class entertainment experience for our customers and exceptional levels of customer service in all areas. This includes being aware of our customers and our responsibility to foster responsible gaming. All relevant staff, including Crown management, are trained in the responsible service of gaming when they are inducted into the business and on an ongoing basis. Crown's staff training meets national competency standards and is approved by the VCGLR. Training is subject to ongoing review so that any proven initiatives or programs in the responsible service of gaming are included, ensuring relevant staff, are at the forefront of responsible gaming.

Crown employees are instructed that, when approached by customers who request information or assistance with a gaming problem; request information on Self-Exclusion; or display other observable signs that may be related to their gaming behaviours, to refer them, as soon as practicable, to Crown specialist assistance via their supervisor/manager to the RGSC.

Crown's RGSC, located within the Complex but away from the Casino, provides a range of services to customers and others.

The RGSC is staffed by RGLOs who are specially trained in all aspects of Crown's responsible gaming programs, including recognising observable signs which may be related to potential problem gaming behaviour. The RGLOs are supported by Psychologists and a Chaplain to assist those customers who may be experiencing difficulties with their gaming behaviours.

The RGSC:

- provides strategies to assist customers in managing their gaming behaviours, to foster responsible gaming and prevent difficulties from arising;
- offers professional support, assistance and referral, which is available 24 hours a day, seven days a week, free of charge;
- facilitates referrals to problem gambling and financial counselling support services and welfare organisations and provides contact with and information about these bodies;
- ensures its assistance and referral services are conducted on a strictly confidential basis;
- has available Psychologists experienced in the field of problem gambling to assist customers and family members;
- provides information regarding Self-Exclusion for customers who wish to exclude themselves from the Casino and manages Crown's Self-Exclusion Program;
- provides information about YourPlay for EGMs;
- provides information about Play Safe Limits for FATGs;
- is able to access and provide information in selected community languages; and
- provides a Chaplaincy Support Service for customers and staff.

As part of delivering exceptional customer service, our staff are encouraged to engage with our customers. A customer displaying observable signs that may be related to potential problem gaming behaviours or unacceptable behaviour will be approached by a staff member who will offer assistance and referrals to specialist support as required.

Observable Signs are seen or reported behaviours or patterns of behaviours which are potential indicators that a person may be experiencing problems with their gaming behaviours. These are seen or reported in context and usually more than one is displayed to indicate potential problems with gaming. Observable signs are included in Crown's Responsible Service of Gaming training and may include, but are not limited to*:

- Self-disclosure of a problem with gaming or request to self-exclude
- Requests for assistance from family and/or friends concerned about an individual's gaming behaviour
- Children left unattended whilst parent/guardian gambles
- Gets angry while gaming or shows signs of distress during or after gaming
- Often gambles for long periods without a break
- Witnessed or heard that a customer was trying to borrow money for gaming
- Significant decline in personal grooming or appearance
- Observed conflict over gaming between family members or friends
- Unrealistic remarks about gaming
- Complains to staff about losing or blames the casino or gaming product for losing
- Secretive or embarrassed about being at the casino or stays on to gamble when friends leave the venue
- Gambles without reacting to what is going on around him/her and avoids contact or conversation with others
- Frequent visits to the ATM

The assistance offered by staff may take the form of:

- interaction with the customer and encouraging them to take a break from gaming;
- offering the customer non-alcoholic refreshments such as a cup of tea or coffee in a quieter and more private area such as our lounge areas or the RGSC.

Persons displaying these types of behaviours will be referred to RGLOs or senior management, who have undergone advanced responsible gaming training.

Responsible gaming interactions are recorded in the Responsible Gambling Register. This register and all personal information recorded by Crown is held in accordance with Australian privacy laws.

* These signs are adapted from 'Validation study on in-venue problem gambler indicators', Thomas, A., Delfabbro, P. and Armstrong, A. (2014), Gambling Research Australia; 'Identifying Problem Gamblers in Gambling Venues', Delfabbro et al, 2007 and 'Current Issues related to identifying the problem gambler in the gambling venue' various authors, Australian Gaming Council, 2002.

INTERACTION WITH STAFF

Crown employees are not permitted to gamble at the Casino *at any time*. Crown also has policies in place which restrict certain staff from gaming at affiliated properties.

Crown recognises that some employees (like other members of the community) may develop difficulties associated with their gaming behaviours, outside of their employment at Crown. Crown employees so affected are encouraged to seek professional assistance through Crown's Employee Assistance Program. This is a free service for all employees and their immediate family, which is run by independently employed professional counsellors and details of all discussions are treated confidentially.

Where appropriate, employees are also encouraged to seek professional assistance from external support services and RGSC staff can provide relevant information.

PROBLEM GAMBLING SUPPORT SERVICES

As a major stakeholder in the gaming industry, Crown is a member of and participates in industry peak bodies and consultative groups to enable it to maintain awareness of responsible gaming issues, practices and procedures.

Crown maintains regular contact with principal problem gambling support services. This is achieved through professional development sessions and meetings, in addition to attending seminars and/or conferences with support service staff.

Examples of these may include:

- participation in meetings with Gambler's Help Services occurring when Gambler's Help staff agree and at mutually convenient times;
- various Gambler's Help Services meetings arranged and held as required;
- National Association for Gambling Studies annual conference;
- the Victorian Responsible Gambling Foundation; and
- telephone contact with Gambler's Help and other support agencies as required.

Details of all meetings with problem gambling support services are retained in the Responsible Gambling Register located in the RGSC and attendance details include:

- time and date of the meeting;
- attendees at the meeting;
- topics discussed;
- outcomes/action items from the meeting (where applicable); and
- next meeting/attendance date (where applicable).

The Gambler's Help contact number is 1800 858 858 and online assistance is available at www.gamblinghelponline.org.au



CUSTOMER COMPLAINTS

Crown has comprehensive processes in place for managing and resolving issues relating to customer complaints received by Crown, including complaints related to the provision of gaming and this Code.

All relevant staff are trained to manage and resolve customer complaints.

Complaints from customers may be received by Crown's Customer Relations Department, other Crown Departments directly, or frontline staff.

To register a complaint, customers may:

- contact Crown by telephone;
- send a fax, letter or email; or
- do so in person.

Any complaint received is:

- managed and responded to in a timely and appropriate manner;
- investigated sensitively;
- recorded in the Crown Customer Relations system and the Responsible Gambling Register; and
- managed and resolved in accordance with Australian Standards.

All customer complaints are acknowledged, where possible, within 48 hours of receipt of the complaint and resolution will be attempted at first point of contact or within 10 working days.

During the investigation of a complaint, a Crown manager may seek information from the staff member concerned on the subject matter of the complaint.

The appointed Crown manager will seek to establish whether the customer has been treated reasonably.

Where contact details have been provided to Crown, the customer will be informed of the outcome of their complaint.

In the management and resolution of customer complaints, Crown will comply with relevant legal obligations, including our obligations to protect the customer's privacy.

Complainants in all unresolved gaming disputes will be advised of the presence of and their right to consult, a VCGLR Inspector.

Information about complaints will be provided to the VCGLR if requested. Customer complaints relating to gaming matters will also be received and investigated by the VCGLR as an independent body for investigations and resolution.

COMPLIANCE WITH THE PROHIBITION ON GAMBLING BY MINORS/PERSONS UNDER 18 YEARS

Gaming by persons under 18 years is prohibited by law. Signs are located at every entry point to the Casino prohibiting minors from entering. Casino entry point staff are located at all entrances 24 hours a day, seven days a week and are vigilant and responsible for monitoring Casino customers and will request appropriate proof of age documentation if they are uncertain whether a customer is at least 18 years. Entry is refused if appropriate identification is not produced upon request.

In addition, all staff share the responsibility of asking for proof of age when they are uncertain whether a customer is a minor and all staff members are trained to alert a Security Services Representative in these circumstances. If the relevant identification cannot be produced, the customer will be asked to leave the Casino, or removed as the situation requires.

Unattended Children

A parent or guardian who brings a child or young person to the Complex must not leave the child or young person unattended in or around the Complex.

Crown's staff and tenants are instructed to monitor and report the presence of any unaccompanied child or young person in or around the Complex to a Security Services Representative.

Where a parent or guardian leaves a child or young person unattended (particularly in order to participate in gaming activities) Crown may ban the customer from the Complex.

The RGLO with the support of a Security Services Representative will attempt to:

- ascertain the identity of the child or young person;
- establish the whereabouts of the parent or guardian in order to reunite them; and
- require proof that the located adult is the parent/guardian of the child.

The RGLO may also refer the matter to the police.

THE GAMBLING ENVIRONMENT

Breaks in Play

Customers are encouraged to take regular breaks from gaming. This may take various forms including:

- announcing a draw, including those relating to a trade promotion;
- the announcement of any entertainment occurring;
- verbal encouragement by staff for customers to take refreshment breaks;
- 'Have you had a break?' reminders on the displays of EGMs, FATGs and EGM bank end advertising;
- the opportunity to take large winnings payments in part or full by cheque;
- lounge facilities, available throughout the Casino and Complex; and
- the availability of the RGSC located away from the Casino.

Clocks

Clocks are displayed on individual EGMs so that customers can be aware of the passage of time. Staff will mention the time when making announcements about entertainment activities occurring in the Casino.

Lighting

Adequate lighting is provided in the Casino and complies with relevant gambling legislation.

Responsible Service of Alcohol

Crown is committed to the responsible service of alcohol and will not knowingly allow a person who is in a state of intoxication to gamble or bet in the Casino. Under relevant legislation, a person is intoxicated if his or her speech, balance, co-ordination or behaviour is noticeably affected and there are reasonable grounds for believing that this is the result of the consumption of alcohol.

ATMs

ATMs are located away from the Casino and are positioned and/or restricted in accordance with relevant legislation.

Credit

Crown will not provide credit or lend money to Australian resident customers for the purpose of gaming. Non Australian resident customers may be approved to operate a credit facility after the completion of an Application for Credit Facility form and subsequent approval of that facility in accordance with procedures approved by the VCGLR.

Agencies

Crown has a TAB agency (and TAB Electronic Betting Terminals) in the Casino, and the TAB is required to adhere to its own Tabcorp Wagering Responsible Gambling Code of Conduct. Customers can ask the TAB agency about accessing Tabcorp Wagering's Responsible Gambling Code of Conduct.

FINANCIAL TRANSACTIONS

Cheque Cashing Facilities

A Cheque Cashing Facility may be made available to customers who have completed an Application for Cheque Cashing Facility form and are approved to operate such a facility in accordance with Crown's internal processes and the relevant Regulatory Rules.

A summary of the rules that apply to Cheque Cashing Facilities can be found on the relevant Application Form. Customers can enquire about applying for a Cheque Cashing Facility with Crown Staff at any Cashier's location.

Accepting Cheques other than through a Cheque Cashing Facility

Customers of Crown may cash negotiable instruments including, but not limited to, Bank Cheques, Bank Drafts and personal cheques (collectively referred to as **cheques**) under certain circumstances. Customers who wish to cash cheques at Crown may open their own Casino deposit account. The following (for example) can be credited as a deposit to that account:

- cash (or cash equivalent);
- a cheque payable to Crown; or
- Traveller's cheques.

Customers may withdraw from their deposit account by way of Crown issued Chip Purchase Vouchers or withdrawals of cash (or cash equivalent) up to the value of the amount in the customer's deposit account.

Customers can enquire about opening a deposit account and cashing cheques with Crown staff, at the Cashier's location.

Customer cheques are cashed in accordance with Casino legislative requirements. Customers attempting to cash such cheques will be advised of Crown's policy by staff at the Cashier's location, at the time they present the relevant cheque.

Any cheques issued by Crown for a payout won from EGM play will not be cashed by Crown. Any customer attempting to cash EGM payout cheques will be advised of Crown's policy by staff at the Cashier's location at the time they present that cheque.

All cheques cashed by Crown are recorded against the customer's name in Crown's confidential and secure customer database and/or a copy of the cheque is retained by Crown.

Payment of Winnings

Customers who are the recipient of wins may take payment in part or full by:

- cash (or cash equivalent);
- cheque;
- chips; or
- credits.

Staff can provide information on the options for payment of winnings that are available.

By law, all winnings or accumulated credits exceeding \$2,000 from EGMs at Crown must be paid by cheque (unless the relevant EGM is legally operated in an area specified with the consent of the VCGLR).

RESPONSIBLE ADVERTISING AND PROMOTIONS

The advertising or promotion of EGMs to the general public outside the Casino is prohibited by law in Victoria.

All permitted gaming advertising and promotions will:

- Comply with the Advertising Code of Ethics, (as adopted by the Australian Association of National Advertisers (**AANA**)) and all applicable laws;
- Not give unrealistic expectations of the prospects of winning or encourage irresponsible gambling behaviour;
- Not give the impression that gambling is a reasonable strategy for financial betterment;
- Not be false, misleading or deceptive about odds, prizes or the chances of winning;
- Have the consent of any person identified as winning a prize, prior to any publication of the result;
- Not be offensive or indecent in nature;
- Not promote the irresponsible consumption of alcohol while gambling;
- Be in good taste and not offend prevailing community standards and
- Not intentionally be directed at or expressed indirectly at minors or vulnerable or disadvantaged groups.

Advertising or other promotional material relating to gaming will not knowingly be sent to excluded customers or customers suspended or removed from Crown Rewards.

Each prospective advertisement and promotion is checked by relevant marketing staff against a checklist based upon the AANA Advertising Code of Ethics and also checked against relevant legal requirements, including compliance with the Australian Consumer Law by Crown's Legal department.

IMPLEMENTATION AND REVIEW OF THE CODE

The Code is provided to all new gaming staff when they commence employment at Crown.

Staff members who effectively implement and adopt the practices in the Code will be recognised by Crown management as part of our ongoing assessment of our staff in providing excellent customer service in all areas.

The Code will be internally reviewed, at least annually, to ensure that it complies with relevant legislation and any other relevant Ministerial Directions and Guidelines as they exist from time to time.

The content, operation and effectiveness of the Code for the preceding 12 months will also be reviewed at this time.

This review will involve seeking feedback from all relevant stakeholders, including Crown staff, customers and problem gambling support services. The Crown Responsible Gaming Department will obtain that feedback, collate and report on the data collected and where relevant, that report will include recommendations for improvement of the Code and/or its operation.

Within three months of the commencement of the relevant review, a meeting of the Crown Responsible Gambling Management Committee (**RGMC**) will be held to consider and review the report, and where relevant, agree to recommendations for change and/or improvement. The RGMC will also make a plan for actioning accepted recommendations. If the Code is updated it will be provided to the VCGLR.

The report and recommendations and all actions are recorded by the Chair of the RGMC.

Customers and staff are encouraged to provide feedback at any time and for inclusion into this annual review by writing to:

General Manager
Responsible Gaming
Level 6
8 Whiteman Street
Southbank Vic 3006

GLOSSARY

Complex	means the Crown entertainment complex and integrated resort and Casino and all parts of it including gaming and non gaming areas, hotels and retail tenancies, all located at the site known as 8 Whiteman Street, Southbank in the State of Victoria
Casino	means the area in the Complex licensed by the VCGLR to conduct gaming, known as the Casino gaming floor
gaming	means all legal forms of gaming permitted at the Casino and operated by Crown and gambling has the same meaning
Loyalty Program	means Crown Rewards, which is a membership program that entitles members to certain benefits and privileges
Loyalty Scheme	means the Crown operated EGM component of Crown Rewards, operated in accordance with relevant legislation
Problem gambling	exists when a gambling activity results in a range of adverse consequences including, where the safety and well-being of gaming customers, or their friends and families, is placed at risk and/or negative impacts extend to the broader community
Regulatory Rules	means those rules agreed to or imposed by the VCGLR with respect to Casino operations and processes
Responsible Gambling Management Committee	is an internal committee comprising Crown senior management, including the Chief Operating Officer, Executive General Manager Legal and Regulatory Services; Executive General Manager Gaming Machines, Executive General Manager Table Games, General Manager Responsible Gaming, Responsible Gaming Operations Manager and Responsible Gaming Psychologist(s)
RGLOs	Responsible Gaming Liaison Officers are Crown staff members who have undergone specific and advanced responsible gaming training and are experienced in the provision of responsible gaming services and identifying and dealing with observable signs that may be related to potential problem gaming behaviour. RGLOs are directly involved and trained in Crown's Self-Exclusion process
Unacceptable Behaviour	means any customer behaviour that endangers the safety of any customer, themselves or others, or affects the enjoyment of others at Crown