

STAR CITY

**RESPONSIBLE
GAMBLING
CODE**



INTRODUCTION

Star City seeks to achieve excellence in all aspects of its services and operations. As a leading provider of entertainment facilities in NSW, Star City is committed to providing gaming services for customers in a responsible manner. This Responsible Gambling Code of Practice is an important reflection of that commitment.

The vast majority of Star City Casino customers enjoy their gaming experience. However, a small minority may have difficulty in controlling their gambling behaviour and may encounter serious personal and financial difficulties.

Whilst it is acknowledged that problem gambling may never be completely avoidable, Star City is committed to providing programs and initiatives to minimise problem gambling behaviours and the provision of timely and effective assistance for customers who seek help.

The Code of Practice will be updated, when appropriate, as the industry and community gain a greater understanding of the causes of problem gambling.



Larry Mullin

Chief Executive, Casinos

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1.1 What is the Code?

This Code is an initiative of Star City. It sets the common standards and requirements for us to follow in the responsible delivery of gambling products and services across our operations.

The Code reflects our underlying values, and our commitment to minimising the potential harm associated with gambling.

A key aim is to provide a single point of reference for the care and expectations of our customers whom we serve and the community in which we operate.

1.2 Objective of the Code

The primary objective of this Code is to:

- provide information on our gambling products and services – so our customers are able to make informed decisions about their gambling practices;
- underpin the responsible delivery of our gambling products and services to facilitate the highest standards and consistency of customer care;
- provide information on help available from support services, and access to the self exclusion program so individuals can seek assistance where they demonstrate a problem with gambling;
- support and monitor developments both locally and overseas in responsible and problem gambling research, programs and initiatives; and
- maintain a meaningful relationship with our stakeholders in order to enhance our understanding of problem gambling – through ongoing consultation with community groups, governments, problem gambling counsellors, expert researchers, our employees and industry groups.

1.3 What this Code includes

This Code covers:

- our commitments in relation to responsible gambling;
- the information we will make available to inform our customers about our gambling products, responsible gambling and problem gambling counselling services;
- what we do to implement the responsible delivery of gambling within Star City 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 this Code is administered.

1.4 Application of the Code

On and after the commencement date this Code applies to Star City and its employees.

From the commencement date, this Code replaces the Tabcorp Responsible Gambling Code issued in October 2001, and re-issued in November 2005.

From time to time we may revise this Code. The updated version of the Code will be available on our website at www.starcity.com.au

1.5 Conflict with legislation and codes of practice

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

We commit to making available appropriate information so that our customers are able to make an informed decision.

2.1 Awareness, education and player information

- The decision to gamble lies with the individual and represents a choice. However, to make that choice responsibly our customers need the opportunity to be informed about our gambling products.
- We will make available appropriate information so that our customers are able to make informed decisions and choose whether to gamble or not, consistent with their personal preferences and individual circumstances.

2.2 Compliance with laws and other industry regulations

We will comply with all relevant laws applicable in New South Wales, Australia relating to the provision of our gambling products and services including those relating to:

- minors;
- the provision of credit;
- player information;
- the responsible service of alcohol;
- advertising and promotions; and
- privacy.

2.3 Training

We require appropriate responsible gambling training programs and refresher training to be in place so that relevant employees:

- understand the commitments and provisions of this Code and applicable regulations;
- are equipped to deliver our gambling products and services to our customers in accordance with this Code;
- understand the possible behavioural indicators of problem gambling;
- understand the support and counselling services available, including relevant contact details;
- are aware when a customer is displaying behaviours potentially consistent with problem gambling, or displaying observable signs of distress or seeking assistance, and understand what action should be instigated in such circumstances;
- have the ability to respond appropriately to customer requests by offering the opportunity to contact available support services;

- are equipped to maintain appropriate records of incidents; and
- have the skills to deal with customers sensitively.

We will review and assess relevant responsible gambling training programs when appropriate to ensure they remain effective in supporting provision of the highest standards of customer care.

2.4 Inappropriate practices

Individuals demonstrating characteristics commonly associated with gambling related problems should not be exploited. Consistent with this principle, we will not encourage our customers to:

- Chase their losses; and
- Continue playing after they have indicated a desire to stop.

2.5 Emerging technology and new products

Prior to the introduction of relevant new gambling products and services, including those which make use of emerging technology, we undertake to assess their likely impact on gambling behaviours in accordance with our commitment to the responsible delivery of gambling in this Code.

2.6 Policies and Procedures

We will ensure that we have appropriate policies and procedures in place to support the implementation of the Code, and the responsible delivery of our gambling products and services.

These include clear lines of accountability, reporting mechanisms and follow-up procedures for dealing with responsible gambling issues.

2.7 Communication of this Code

We will communicate and promote this Code throughout our operations and on our website.

We will make this Code available:

- upon request at our Host Desks;
- on our website www.starcity.com.au;
- upon request in writing; and
- via communications with you as appropriate.

We also undertake to make this Code available in selected community languages other than English on our websites or by visiting a Host Desk at the casino.

3.1 Information we make available to ensure customers understand our products

Upon request, we will make available to our customers information on:

- the nature and operation of table games, including the rules of play;
- information on the chances of winning major prizes; and
- how gaming machines operate.

3.2 Information on problem gambling support services and responsible gambling

We will display responsible gambling messages and information about where to obtain assistance with a gambling problem.

We will make available on our website information on responsible gambling and where and how to seek assistance with a gambling related problem.

We will also ensure information on problem gambling support services is accessible in selected community languages.

The information and messages available will be reviewed and updated regularly.

We will also enable access, upon request, to information on a customer's gaming activity when playing gaming machines using their player rewards card.

4.1 Playing environment

Clocks are to be displayed in the gaming areas to assist customers to be aware of the passage of time.

4.2 Unacceptable behaviour or signs of distress

If an employee believes that a person in the casino is acting in an unacceptable manner, or is visibly affected by alcohol, so as to endanger the safety and enjoyment of others at the casino, the casino will take appropriate action which may include removal from the casino complex.

Where a person in the casino is exhibiting or displaying signs of distress, or behaviours potentially indicating a problem with their gambling, the casino will implement procedures designed to provide an appropriate response to the needs of the customer.

Such signs of distress, behaviour or situations may include:

- requests for self exclusion, or self disclosure of a gambling related problem;
- aggressive and anti-social behaviour, such as physical or verbal abuse;
- requests to casino employees to borrow money for gambling related purposes;
- children left unattended;
- drowsiness whilst participating in gambling activities;
- requests from families or friends to intervene; and
- gambling for excessive periods of time.

We understand that employees should not make assessments as to whether an individual is, or is not, a problem gambler. Rather we require that the employee be aware of and respond to such indicators of distress, behaviour or requests sensitively and within an appropriate timeframe. We also require that action taken in such circumstances be recorded by the casino in an appropriately maintained incident register.

4.3 Minors

It is illegal for minors to gamble. We strictly prohibit minors from entering designated gaming areas within the casino.

We display appropriate signage stating that minors are not allowed to:

- gamble within the casino; and
- enter or remain in designated gaming areas.

We will have processes in place for checking the identification of persons seeking access to designated gaming areas to ensure that only persons 18 years and over are granted access to these areas.

4.4 Unattended children

We will display appropriate signage and ensure that procedures are in place in the event that minors are found unaccompanied within the casino complex.

These procedures may include regular checking of the casino public areas, including the car park for children that may have been left unattended.

Where unattended children are found, employees will take action that may include:

- taking steps to ensure the safety of the child;
- reuniting the child with the parent or guardian;
- directing the parent or guardian to leave the casino complex;
- excluding the parent or guardian from the casino; and
- referring the matter to the police or relevant government department.

4.5 Restrictions on gambling by company directors and employees

We require our employees to comply with the Tabcorp Employee Gambling Policy which, in part, states that Star City employees are not permitted to gamble at Star City at any time.

4.6 Automatic teller machines (ATM) facilities

We require that Star City ATMs:

- are not located within designated gaming areas; and
- have on or near them information on who to contact, should assistance be required for a gambling related problem.

4.7 Payment of winnings and cooling off

All winnings will be paid in accordance with applicable regulations, industry codes or policies. Customers can provide themselves with a cooling off period by taking any large winnings by cheque should they wish. We will provide our customers with this opportunity by making cheques available for such large winnings.

5.1 Support services

We will make available contact information for support services for individuals and/or their families suffering gambling related problems. We will also provide this information on our website www.starcity.com.au

5.2 Self exclusion program

We have available a self exclusion program and will make available on request:

- access to the self exclusion program where a customer may request to be excluded from our gaming area for a minimum period of twelve months; and
- information about the self exclusion program, including what is involved with self exclusion, how to apply, what procedures are involved, what information a customer must provide and contact information for problem gambling support services.

5.3 Revocation of self exclusion

Customers who wish to re-enter the casino, following the 12 month minimum period for exclusion, are required to provide evidence that they have taken steps to manage their gambling behaviours and to submit a gambling assessment from a Star City approved qualified gambling counsellor.

5.4 Working with the community

In pursuit of the highest standards of customer care, and to strengthen our understanding of problem gambling, we will continue to work and consult with problem gambling related support services, community groups, all relevant tiers of government, industry groups and expert researchers.

We will also continue to contribute towards the cost of undertaking research on issues relating to gambling, problem gambling and the effectiveness of responsible gambling measures through our annual compulsory contribution to the Responsible Gambling Fund.

6.1 Role of Responsible Gambling Committee

To administer the Code, we have established a Responsible Gambling Committee. The Committee is overseen by an appointed senior management representative and is responsible for:

- ensuring that there are policies and procedures in place to achieve compliance with this Code within Star City;
- ensuring that there are appropriate training programs in place for our employees in relation to this Code;
- ensuring ongoing evaluation and improvement of the customer care policies and practices;
- ensuring that there are processes for monitoring compliance with this Code, in line with the requirements of the Australian standard on compliance programs ;
- receiving reports on compliance with this Code;
- investigating any allegation that this Code has been breached, and determining appropriate sanctions for breaches of the Code by employees;
- ensuring that an independent periodic review of compliance with the Code is undertaken;
- receiving reports on, and reviewing findings raised from, reviews of this Code; and
- monitoring developments and research related to responsible and problem gambling.

6.2 Complaints

If you have a complaint relating to the operation of this Code, you should make your complaint in writing marked to the attention of -

Managing Director
Star City
PO Box Q192
QVB Post Office NSW 1230

Alternatively, please send your correspondence via our website at **www.starcity.com.au** in the 'Contact Us' section.

We will deal with any complaints in accordance with our internal dispute handling procedures, ensuring the timely and sensitive follow up of complaints raised.

The scope of complaints should be limited to alleged breaches of this Code.

DEFINITIONS

Code means this Star City Responsible Gambling Code as adopted by us on the commencement date.

Commencement date the date from which we formally announce we have adopted the Code and, in relation to any subsequent amendments made to this Code, means the date from which we announce we have adopted those amendments.

Gambling involves staking money on uncertain events, driven by chance or a combination of chance and skill.

Gambling product or service any gambling activity or scheme authorised under the Casino Control Act 1992.

Gaming all legal forms of gambling, other than wagering and includes electronic gaming machines (commonly known as poker machines), casino table games, lotteries and Keno.

Minor person under the age of 18 years.

Problem gambling exists when gambling activity results in a range of adverse consequences where:

- the safety and wellbeing of gambling customers, or their family and friends, is placed at risk; or
- negative impacts extend to the broader community.

Problem gambling support or treatment service refers to trained professionals, such as psychologists, counsellors and social workers who provide confidential counselling to individuals and/or their families in relation to a gambling related problem. Such services may include Gambling Help, Lifeline and other related agencies.

Responsible gambling occurs in a regulated environment where the potential for harm associated with gambling is minimised and people make informed decisions about their participation in gambling. Responsible gambling occurs as a result of collective actions and shared ownership of individuals, communities, the gambling industry and government to achieve outcomes that are socially responsible and responsive to the concerns of the broader community.

Unattended children where a child:

- is or appears to be without appropriate supervision;
- is or appears to be loitering aimlessly in or about the casino complex, or moving in a slow or idle manner.

Voluntary self exclusion a customer initiated banning from all gaming areas in the casino.

We, us and our refers to Star City Pty Ltd.

Winnings the amount of money won on a gambling product or service.

Think! About your choices.
Call Gambling Help 1800 858 858
www.gamblinghelp.nsw.gov.au

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