

Dalmoon Limited Gambling Policy & Procedures

Dalmoon Limited (*The Operator*)

Combined Operating Licence number: 000-029630-N-310825-004

This document contains The Operator's combined gambling policies. These policies are a requirement for maintaining a Combined Operating Licence from the Gambling Commission. The Operator is licensed by the Gambling Commission to promote its business.

All employees and any contractors or agents associated with The Operator's business will be made aware of the policies and procedures contained in this document. Any contractors and agents will be contractually obliged to operate in accordance with them.

Policy

This policy is compulsory. It sets out The Operator's combined policies, which are based on the Gambling Commission's Licence Conditions and Codes of Practice (LCCP), under the Gambling Act 2005.

Gambling Policy and Procedure

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1. Introduction

1.1. The Operator will alter this policy to reflect any future changes to the Gambling Commission's Licence Conditions and Codes of Practice.

1.2. Policies are provided in relation to:

- (a) general policy statements
- (b) protection of the business from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime
- (c) ensuring that children and other vulnerable persons will be protected from being harmed or exploited by gambling
- (d) the promotion of socially responsible gambling
- (e) ensuring that gambling is conducted in a fair and open way
- (f) access to premises
- (g) information requirements
- (h) marketing
- (i) complaints and disputes.

2. General policy statements

2.1. General

2.1.1. The Operator will operate its business campaigns in accordance with the Gambling Act 2005.

2.1.2. The Operator will run its business in a way that complies with the general licence conditions and associated codes of practice (Licence Conditions and Codes of Practice) attached to The Operator's operating licence, as issued by the Gambling Commission pursuant to Section 75 of the Gambling Act 2005.

2.2. Small-scale operator status

2.2.1. The Operator will operate as a small-scale operator, as defined in the Gambling Act 2005 (Definition of Small-Scale Operator) Regulations 2006.

2.2.2. Any changes required to the list of employees whose details and responsibilities have previously been provided to the Gambling Commission in relation to the operating licence (as in those qualifying persons actually named on The Operator's operating licence) will be provided in writing to the Commission, no later than 28 days after the change has occurred.

2.2.3. Changes to registered address, trading name, equipment type used will be provided in writing to the commission within 28 days.

2.3. Cash handling

2.3.1. The Operator and any contractors will:

(a) ensure that access to any building used for business administration purposes is controlled.

(b) further ensure that access to any area within the building that is used either for business administration purposes or for storage of business-related records is also controlled.

2.3.2. All personnel will, whenever and wherever possible, ensure that customer's personal details are stored as safely and securely as possible.

2.4. General 'fair and open' provisions

2.4.1. The Operator will ensure that:

(a) the terms upon which gambling is offered are not unfair under the Unfair Terms in Consumer Contracts Regulations 1999 and where applicable, meet the reasonableness test under the Unfair Contract Terms Act 1977

(b) the rules for each business are made available to customers and set out in plain and intelligible language see appendix 1: Rules

(c) customers will be notified of changes to the terms before they come into effect.

2.5. Business

The Operator will ensure that its business will be operated specifically in accordance with the Gambling Commission's Licence Conditions and Codes of Practice.

3. Protection of the business from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime

3.1. Business Campaigns

The Operator will refuse to be associated with any proposed business or other gambling activity that may breach the law.

3.2. Contractors/agents

3.2.1. The Operator will refuse to contract with any contractors or agents who The Operator suspects may be associated with any potential or actual criminal activities.

3.2.2. The Operator will only use suppliers who are licensed by the Gambling Commission.

3.3. The Operator employees

3.3.1. The Operator will maintain ongoing monitoring of all personnel, particularly with a view to their direct or indirect association with potential criminal activities.

3.3.2. The Operator will ensure that it reports any actual or suspected criminal activities to the police.

3.3.3. The Operator personnel involved in promoting business will be trained to a satisfactory standard to ensure compliance with The Operator's gambling policy and procedure.

3.4. Prospective customers/actual customers

3.4.1. The Operator will ensure that it reports any actual or suspected criminal activities to the police.

4. Ensuring that children and other vulnerable people will be protected from being harmed or exploited by gambling

4.1. Children

4.1.1. The Operator will ensure that the business rules and any business marketing and promotional literature, adequately and effectively advertise the minimum legal age limit.

4.1.2. The Operator will not accept business entries from children who The Operator knows to be under 18 years old or suspect of being under 18 and cannot prove otherwise by producing acceptable identification documents such as a valid driving licence or passport. The Operator will explain that the operation of the business is covered by the Gambling Act 2005, which prevents any person under that age from taking part in any gambling activities. The Operator will refund in full any business money that may have been received.

4.1.3. If a child under 18 years old is found to have participated in a gambling activity, then a full refund will be made to that person and any prizes that might otherwise have been due to them will not be paid out. If prizes have already been paid out, all reasonable attempts will be made to recover them.

4.2. Suspected problem gamblers

4.2.1. In the event that an attempt to participate in a gambling activity is received from a suspected problem gambler:

(a) The customer must be tactfully referred to GamCare by the manager.

(b) The customer's details must be logged for the purposes of possible exclusion from future participation in future business, should any similar incidents re-occur.

(c) All written and verbal communication between personnel and suspected problem gamblers must be monitored and approved by the manager.

4.2.2. In the event that an existing customer is suspected of becoming a problem gambler:

(a) The customer must be tactfully referred to GamCare, by the manager.

(c) The customer's details must be logged for the purposes of possible exclusion from future gambling, should any similar incidents re-occur.

(d) All written and verbal communications between personnel and the suspected problem gambler should be monitored and approved by the by the manager.

4.3. Self-excluders from gambling

4.3.1. Customers will be given the opportunity to self-exclude in person, so as to ensure their identity.

4.3.2. The Operator will ensure that self-excluders from gambling:

(a) are given the opportunity either to self-exclude immediately without

any cooling off period or to consider self-exclusion further — for example, in order to discuss with problem gambling groups such as GamCare.

(b) are excluded from all future gambling related activity or marketing of gambling related products within 2 days of receiving the completed self-exclusion notification.

(C) will not receive any future gambling-related marketing materials.

(d) self-exclude for a minimum of 6 months up to at least a period of 5 years.

4.4. Other vulnerable people

4.4.1 The Operator is committed to ensuring that any marketing material is not knowingly sent to other vulnerable people.

4.4.2. The Operator will politely refuse to accept any new or subsequent business entries from people who have been discovered to be vulnerable or are suspected of being vulnerable, typically by recommending that the customer speaks with a carer or family member, before proceeding with the gambling transaction.

5. The promotion of socially responsible gambling

5.1. Information on how to gamble responsibly and help for problem gamblers

5.1 .1. The Operator is committed to ensuring that information about responsible gambling and accessing information and help in respect of problem gambling is readily available to all. The business rules and any business marketing and promotional literature, including any business-based invitation to purchase tickets will, as far as is reasonably possible, advertise the GamCare logo.

5.1.2. GamCare is a registered charity and has become the leading authority on the provision of counseling, advice and practical help in addressing the social impact of gambling in the UK. GamCare takes a non-judgmental approach to gambling. They do not wish to restrict the choices or opportunities for anyone to operate or engage in gambling that are available legally and operated responsibly, but do strive to develop strategies that will:

(a) improve understanding of the social impact of gambling.

(b) promote a responsible approach to gambling.

(c) address the needs of those adversely affected by a gambling dependency.

5.1.3. GamCare operates a national telephone helpline for anyone affected by a gambling problem and operates a network of both face-to-face and online counselling and support services. Additionally, GamCare works to support the development and implementation of responsible practice by the gambling industry.

5.1 .4. The Operator will ensure that all personnel associated with the Operator's gambling business are made aware that advice is available to customers as well as themselves from GamCare regarding socially responsible gambling and gambling dependency.

6. Ensuring that gambling is conducted in a fair and open way

6.1. All of The Operator's business campaigns will be conducted in accordance with The Operator's business rules. These rules will be permanently available to all prospective and actual business on site and will be provided in writing, upon request.

6.2. The Operator will notify its customers of changes to the terms and conditions before they come into effect.

7. Access to premises

7.1. The Operator will ensure that all employees and any contractors or agents associated with The Operator's business are made aware that:

(a) they must co-operate with the Gambling Commission's enforcement officers in the proper performance of their compliance functions.

(b) the Gambling Commission's enforcement officers have rights of entry to premises, as contained in Part 15 of the Gambling Act 2005.

8. Information requirements

8.1. The Operator will make all reasonable efforts to ensure that the Gambling Commission is provided with any information that they know relates to or suspect may relate to an offence under the Gambling Act 2005, including an offence resulting from a breach of a licence condition or a code provision having the effect of a licence condition.

8.2. The Operator will make all reasonable efforts to ensure that all key events as defined in the Gambling Commission's Licence Conditions and Codes of Practice are reported to the Gambling Commission within five working days of the licensee becoming aware of the events occurrence.

8.3. The Operator will make available to the Gambling Commission such information as the commission may require about the use made of facilities provided in accordance with The Operator operating licence, the manner in which gambling authorized by the licence is provided and the manner in which the licensee's business in relation to that gambling is carried out, including in particular information about:

(a) the numbers of people making use of the facilities and the frequency of such use, inclusive of changes in the number of personnel where those changes have a material impact on The Operator gambling business.

(b) the range of gambling activities provided by The Operator and the numbers of personnel employed in connection with them.

(c) the licensee's policies in relation to and experiences of, problem gambling.

8.4. The Operator will complete and submit the following returns to the Gambling Commission, within the following time periods:

(a) Regulatory returns, within 42 days of the end of each of The Operator's annual period which is currently within 42 days of the end of March, each year.

9. Marketing

9.1. The Operator will comply with the advertising codes of practice that apply to the form and media in which it advertises its gambling facilities or services and will apply the principles included within these codes of practice for media not explicitly covered.

10. Complaints

10.1. The Operator will implement a Complaints Procedure which will be made available to all potential or actual customers upon request (see overleaf).

Business Complaints Procedure

Any complaints regarding The Operator's business can be made directly to The Operator in writing to 131 Victoria Road, Aldershot, Hampshire GU11 1JW

The Operator undertakes to:

- Make this Complaints and Disputes Procedure available to a potential or actual customer upon request
- Endeavour to resolve complaints as promptly and amicably as possible
- Maintain a record of all complaints and the correspondence related to them.

Complaints will then be handled using the following three stage procedure:

Stage one

The complaint will be acknowledged within 3 working days of its receipt. We will carry out a full investigation (provided the complaint is made to us within three months of the incident) and respond fully within 10 working days via your preferred method of contact. A formal record of the complaint will be kept in accordance with the Gambling Commission's reporting purposes.

Stage two

If the complaint is not satisfactorily resolved, the matter will be escalated to The Operator's director.

Every complaint will be taken seriously and fully considered by The Operator in order that a satisfactory resolution can be achieved.

Stage three

In the event that a satisfactory outcome can still not be reached, the matter will be dealt with by an independent third party. The outcome of independent intervention will be reported to the Gambling Commission.

Business Rules

1. The business is promoted by The Operator representatives.
2. The Operator Limited is licensed by the Gambling Commission under the 2005 Gambling Act.
3. The Operator's business is open to customers aged 18 or over. No person under this age is allowed by law to enter The Operator's business. Any person found to be under 18 years of age will have their stake returned and automatically forfeits the right to any prize. If prizes have already been paid out, all reasonable attempts will be made to recover them.
4. The Operator supports responsible gambling. If you feel you have a problem with gambling please visit GamCare's website for help and advice at www.gamcare.org.uk, or contact the GamCare National Helpline on 0808 8020 133. Lines are open 8am to midnight.
5. Any complaints regarding the gambling services provided can be made directly to The Operator. Complaints will be handled in line with The Operator's business complaints procedure found within The Operator's Gambling Policy and Procedure.
6. The Operator reserves the right without notice or reason to cancel or refuse entry to the business.
7. The Operator reserves the right without notice or reason to cancel or change any marketing or promotions.