

## **Responsible Gambling Policy**

### **Dalmoon Limited (*The Operator*)**

#### **General**

- The Operator is committed to endorsing responsible gambling as well as promoting the awareness of problem gambling and improving prevention, intervention and treatment.
- The Operator believes it is their responsibility to the customers, to ensure that they enjoy their gambling experience in the premises, while remaining fully aware of the social and financial harms associated with problem gambling.
- In order to assist the players in gambling responsibly, The Operator ensures that all members of the team receive responsible gambling awareness training.
- The Operator will ensure that sufficient employees are on duty at all times.
- Bets will only be accepted by a person employed by The Operator or by modern betting terminals.
- The Operator will source all gaming equipment from a supplier licensed by the Gambling Commission and will ensure that the equipment supplied complies with the Technical Standards.

#### **Age Restriction**

- No one under the age of 18 is to be admitted to any part of the Operator's premises.
- Any potentially underage customers (somebody who looks under 25) will be challenged (whether or not with an older person/parent etc) immediately as they seek to enter the Operators premises and will be asked to produce acceptable forms of identification.
- Acceptable forms of identification will be originals of photographic documents, which also include date of birth (e.g. photographic driving licence or passport), and which are current (i.e. not expired) and have not been tampered with.
- The Operator will consider permanent exclusion for adults who seek to bring in children more than once, having been made aware of the age restriction.
- Where particular under age individuals make repeated attempts to enter the Operator's premises contrary to the age restriction, the site supervisors will report the fact to the Operator or to senior management who will

consider reporting the offence to the Police and the Gambling Commission and make available information on problem gambling.

### **Information on How to Gamble Responsibly and Help for Problem Gamblers**

- Leaflets about and help for problem gambling are to be made available in the machine areas and adjacent to the cash desks in prominent locations, as well as posters displayed on the premises.
- Leaflets and other material relating to the above will comply with the Gambling Commission Code of Practice.
- Such information will be made available to employees.

### **Customer Interaction**

- All employees will be trained to recognise the signs of problem gambling.
- Such signs of problem gambling shall be reported to the Operator and the senior management who will initiate customer interaction if the Operator agrees that the signs warrant such action.
- If such signs persist after customer interaction has taken place the Operator will refuse service on that day. If such signs persist on subsequent visits the Operator will invite the customer to self-exclude him/herself or bar them from the premises for six months.
- Details of those barred, for whatever reason will be recorded in the site log book in sufficient detail to enable the individual to be identified. The site supervisor will ensure that members of employees check the log book at the start of each shift.

### **Self-Exclusion**

- Any customer who wishes to self-exclude themselves will be provided with the opportunity of discussing the matter with the Operator or the senior management in private.
- The Operator is a part of IHL Smart Exclusion Scheme
- Any customers who self-exclude themselves shall have their details recorded in the log book in sufficient detail to enable the individual to be identified and the site supervisor will ensure that members of employees check the log book at the start of each shift. The customer will be given the option to self-exclude via the SmartExclusion tablet, if they do not wish to be part of the IHL scheme they will; be able to complete a paper form and will need to provide a photograph.

- Customers who wish to self-exclude themselves will be advised that they will be excluded from the Operator's premises.
- Any self-exclusion period will be for a minimum of six months and a maximum of 12 months.
- No cooling off period is required before self-exclusion can take place.
- The self-exclusion will continue after six months unless the customer chooses to gamble again.
- No marketing material will be sent to a self-excluded customer or customer who is barred unless and until they choose to gamble again, regardless of the initial length of self-exclusion/barring.
- At the end of a self-exclusion or barring period if a customer makes a positive request to gamble again he/she will be given a further day as a cooling off period and will therefore not be permitted to gamble immediately. The Operator or the senior management will explain to the customer the reason for the cooling off period (to check customer has considered his/her decision and allow them to consider the implications).
- Because of the problem of verifying identification, customers will not be permitted to exclude themselves by telephone or post.
- All employees will be vigilant against any self-excluded customer having somebody else gamble on their behalf. Employees will be trained to be watchful over any known friends, family and acquaintances of self-excluded individuals and where possible try to ascertain whether or not they are gambling on behalf of a self-excluded person. In this instance it will be explained to the individual that this must cease with immediate effect and it will be noted in the interaction log and all employees made aware so that it can be kept an eye on.

## **Employment**

- No employees under the age of 18 will be employed.

## **Cash Handling**

- Machine emptying by two or more members of employees/management and cash checked by the Operator.
- Machine floats to be checked monthly.
- All refunds to be verified and checked by senior management.
- Cash floats on the Operator's premises to be checked monthly.
- Banking is to be by security company collection or by the Operator or two or more members of employees going to the bank.

- The Operator has a policy whereby it does not accept credit cards and will not hold any customer funds.
- The Operator will appoint a member of employees whose duty it is to take overall responsibility for the anti-money laundering procedures.

## **Operation**

- The Operator will make available to customers the rules as well as the fair and open provisions.
- Adequate supervision of premises by employees at all times.
- CCTV tapes/images to be monitored on a random basis.
- Employees trained to identify unusual playing habits, including duration of play, playing in groups and other unusual behaviour, suggesting money laundering and/or tampering with machines.
- All claims of faulty machines and refunds to be verified by a member of employees.
- Employees trained to be vigilant to prevent customers lending money to others, to gamble or, customers seeking to produce a loan from other customers.
- Employees trained to be vigilant and report any evidence of money lending in the premises. The Operator or the site supervisor will intervene and prevent further instances taking place. Any individual who repeatedly or systematically lends money to other customers will be barred from the Operator's premises.
- Those who cause disorder within the Operator's premises or cause disorder outside which the employees become aware of will be warned by the Operator or the senior management about their behaviour. If it persists the Operator will consider barring the customer and/or making the police aware of the incidents.
- Any customer who appears to be under the influence of drugs or alcohol will be approached by employees and asked to leave immediately. If a customer persistently seeks to enter in such a condition the Operator or the senior management will bar them and/or make the police aware of the incidents.

## **Transparency**

Each machine to be checked, before coming into use, that the agreed minimum payout is clearly displayed and that the machine is set to payout at such a rate or more.

- Payout rates to be checked at least every twelve weeks to ensure the specified minimum payout rate is exceeded.
- The winning combinations shall be clearly shown on the front of the machine together with the payout resulting.
- Customers are always to be permitted to exchange cash for notes.

### **Marketing & Advertising**

- Any reward or incentive is not to be dependent on the length of time, the amount or the frequency with which the customer gambles.
- As well as meeting statutory requirements such material will not suggest or imply that gambling is a means of getting out of financial difficulty.
- Marketing and advertising will not be directed at those aged under 18 in terms of the medium, presentation, content or context.
- All advertising, marketing and promotional material will carry a reference to the need to keep gambling under control.

### **Promoting Research & Education**

- The Operator is committed to promote socially responsible gambling.
- An annual contribution will be made to promote research into the prevention and treatment of problem gambling, to assist public education on the risks of gambling and how to gamble safely in addition to the measures set out above to identify and assist problem gamblers to seek help and/or treatment.

### **Complaints**

- The Operator uses the ADR Group as its Alternative Dispute Resolution for Consumer Disputes
- In the event of a complaint about the conduct of the licensed activities or a dispute about the outcome of a customer's gambling, the Operator will:
  - Keep a record of such complaints and disputes (unless they are considered to be trivial).
  - Advise the customer of the complaints procedure.
  - Ensure that site supervisors notify the Operator of such complaints.
  - Ensure that customers are made aware of the ability to have a dispute dealt with by the ADR Group.