



Keno Responsible Gambling Code of Conduct Victoria

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1. Our Commitment to Responsible Play

Keno (Vic) Pty Ltd ("we / us") is committed to promoting harm minimisation and safer gambling. We do this by supporting our customers with information, resources and customer care programs which empower our customers to make informed decisions about their game play.

We offer Keno online and in Venues. This Responsible Gambling Code of Conduct ("**Code**") reflects our commitment to deliver our products with the highest levels of integrity and corporate responsibility, to operate in accordance with the relevant legislation and promote safer gambling.

We are committed to supplying Keno in a safe, secure, and friendly environment both online and in Venues. We actively strive to minimise potential harm to our customers and our employees and Venue Staff are trained to support this commitment.

2. Objective of the Code

The objective of the Code is to:

- Highlight our strong commitment to minimising gambling harm.
- Provide you with information about how we responsibly deliver Keno.
- Help you make informed choices about how you play and share the tools and services that can support you.
- Explain the steps we will take to support your participation with our Keno products and services.
- Ensure that we are compliant with our legislative and regulatory requirements.

3. Application of the Code

The Code applies to:

- Us and our employees.
- Our Agents and Venue Staff.
- Our Keno products and services operated in Victoria.

This Code is only applicable to Keno products and services provided by us. It is not relevant to any Keno products supplied by other parties to Victorian customers.

4. Review of the Code

From time to time, we may revise the Code. We gather feedback from our Agents, Venue Staff and customers through annual responsible play surveys that help us assess the effectiveness of the Code.

We may also conduct further assessments of the Code where there are significant changes in the responsible gambling environment. We aim to consider input from our customers, employees, Agents, Venue Staff, representatives from the various sectors of our operations, and representatives from gambling industry groups, gambling counselling services and community groups where applicable/appropriate, when making changes to the Code for this purpose.

5. Definitions

Agent means the person(s) who owns and operates the Venue where Keno products may be purchased by the customer.

Keno App means our Keno mobile application.

Keno Website means www.keno.com.au.

Minor means any person under 18 years of age.

Responsible Gambling Officer means the dedicated Responsible Gambling Officers at each Venue to support our commitment to responsible gambling and our desire to assist customers to make and keep a pre-commitment decision. The duties of the Responsible Gambling Officer are listed below.

- They are present during Keno operating times at the Venue.
- Provide assistance to customers to manage their gambling spend.
- Facilitate access to gambling support services for customers through Keno and/or Gambler's Help.
- Provide assistance to customers to access self-exclusion programs.

Venue means a physical place of business where Keno products may be purchased by the customer.

Venue Staff mean those employed by an Agent to sell our products.

6. Communication and Availability of the Code

We communicate and actively promote the Code in Venues and online. Our Code is available at:

- The Keno Website (www.keno.com.au).
- The Keno App.
- Any Venue where our Keno products are available for purchase.

Our Code is available in English, Arabic, Chinese, Greek, Italian, Korean and Vietnamese on the Keno Website.

If you prefer a hard copy of our Code, you can request a copy by calling our Customer Support Team on 1800 056 066 Monday to Friday, between 9:00am and 6:00pm AEST.

7. Responsible Play Information

We offer a range of responsible play information to keep you informed about the resources, tools and support available to you, your friends and family, and the wider community. Our Venues make this information available through a range of materials displayed or accessible within the Venue environment. Our resources provide information on:

- How to play responsibly.
- How to make and keep a pre-commitment decision.
- The availability of gambling support services.
- The odds of winning.
- How to lodge a complaint for a suspected sale of Keno products to Minors or for any other responsible play complaint.

We display contact information for gambling support services and responsible gambling tips via screen displays within Venues (including self-service terminals).

In addition, more information on responsible play is available on the Keno Website and Keno App including:

- The Keno Complaint Handling Charter.
- Links to local gambling support services.
- Guidelines for financial transactions and prize payments.
- Information on spend limits, self-exclusion programs, deposit limits, Take A Break and other useful tools.

We regularly review and update the information in Venues and on the Keno Website to ensure that it remains current, and information and support is easily accessible to you so that you can make informed decisions on how you play.

We will display responsible gambling messaging on all relevant material.

8. Game Information

8.1 Game Rules

We provide a comprehensive explanation of our games on the Keno Website in the following publications:

- Keno Game Guide (www.keno.com.au/keno-pdfs/VIC_Game_Guide.pdf).
- Keno Rules (www.keno.com.au/keno-rules).

8.2 Terms and Conditions

You can view the terms and conditions that are applicable to online accounts on:

- The Keno Website.
- The Keno App.

We encourage you to read the Keno Game Guide, Keno Rules and our terms and conditions (if you hold an online account) as they govern all aspects of your transactions and interactions with us.

We can provide you with a hard copy of the Keno Rules if you prefer. To request a copy, you can ask our Venue Staff or call our Customer Support Team on 1800 056 066 Monday to Friday, between 9:00am and 6:00pm AEST.

9. Pre-Commitment Decisions

9.1 What is a Pre-Commitment?

A pre-commitment is designed to empower you, help you to manage your play and prevent gambling harm by setting limits on the amount of time you spend playing our games, or the amount of money you are prepared to spend.

9.2 Online Account Customers

We promote and encourage our online customers to set a time and money pre-commitment limit by communicating through our Venues and via the Keno Website about our pre-commitment self-management tools.

(a) How we assist you to make an online pre-commitment decision.

When you open an online Keno account with us, you will need to set a weekly online spend limit. A weekly online spend limit allows you to manage the maximum amount you can spend on your online account over a 7-day period. We encourage you to set a weekly online spend limit that is appropriate according to your own personal circumstances.

We will assist you in making a pre-commitment decision by:

- Offering you the ability to update your pre-commitment limit at any time. You can do this by:

- o Logging into your online account at any time and following the prompts.
- o Contacting our Customer Support Team on 1800 056 066 Monday to Friday, between 9:00am and 6:00pm AEST.
- o Writing to us using the 'Contact Us' page on the Keno Website (www.keno.com.au/contact-us).
- Offering you the ability to set a pre-commitment limit at any time on the Keno Website or Keno App.
- Recommending that you set a pre-commitment limit in line with your personal circumstances and what you can afford to play with.
- When reviewing online accounts belonging to customers identified as potentially experiencing gambling harm, considering previous activity, spend history and whether a spend limit has been set or other responsible gambling tools have been used to determine if further action is required. As a result, we will engage you in accordance with section 11 of this Code, including to discuss your circumstances and provide support with setting a weekly spend limit.
- Providing information on available responsible gambling tools on our dedicated Responsible Gambling pages of the Keno Website and Keno App.

(b) How we assist you to keep a pre-commitment decision.

If you have made an online pre-commitment, we will support you in keeping that pre-commitment for your online account by:

- Ensuring our technology, systems, and processes prevent you from exceeding your pre-commitment limit online.
- Allowing you to change your pre-commitment limit at any time by logging into your online account.
- Applying any requested decrease in pre-commitment limit immediately.
- Applying any requested increase in pre-commitment limit only after a 7-day waiting period.

For requests to increase your Maximum Weekly Online Spend Limit to an amount above \$10,000, please call our Customer Support Team on 1800 056 066 Monday to Friday, between 9:00am and 6:00pm AEST, who will review and assess your request.

The review and assessment of your request may include and is not limited to:

- Transaction History
- Use of Responsible Gaming Tools
- Historical spend limit requests (increases, decreases, etc.)
- Impact on ability to meet financial obligations.

9.3 Venue Customers

Our Venue Staff can help you to create and keep a pre-commitment strategy to help you manage your play. You can make a pre-commitment strategy by setting a time limit, spend limit and/or deposit limit before you play according to your own circumstances.

(a) Ways a Venue customer can set up a pre-commitment.

You can make a pre-commitment decision when playing in our Venues by:

- Deciding what games you want to play.
- Planning how long you want to play.
- Planning how much you are willing to spend and not exceeding that amount.
- Recording your pre-commitment decision, for example by making a note on your phone or telling the person you are with what that decision is.

(b) Ways a Venue customer can keep a pre-commitment.

You can keep a pre-commitment decision when playing in our Venues by:

- Keeping track of how much you have played and the amount you have spent.

- Letting a Venue Staff member know you have reached your pre-commitment limit.
- Leaving the Venue when you are about to or have reached your pre-commitment limit.

(c) Ways we will support you to keep a pre-commitment.

Venue Staff will support you to keep your pre-commitment strategy by encouraging you to make or keep a decision and provide you with information and resources. We will display signs recommending that you “set a limit and do not exceed it” at all Keno operator terminals. Our Agents and Venue Staff are trained to respond to your responsible play enquiries and identify signs that indicate you may be experiencing harm.

You can ask one of our Venue Staff members about responsible play and they will support you by:

- Referring you to the Agent's Responsible Gambling Officer.
- Encouraging you to create a limit.
- If you express that you have already created a limit, encouraging you to stick to your limit.
- Encouraging you to take a break from Keno.
- Encouraging you to participate in other Venue activities such as eating or socialising.
- Providing you with gambling support materials.
- Referring you to external gambling support services.
- Encouraging you to leave the Venue.

10. Other Responsible Gambling Tools

Responsible gambling is all about being informed, having fun and knowing your limits. To assist you, we offer a range of self-management tools as described below. You can also explore our range of tools that enable you to take control of your Keno experience via the “Tools and Strategy” section of the Responsible Gambling page on the Keno Website.

10.1 Online Account Self-Exclusion Program

You can exclude yourself permanently from playing our games through your online account by:

- accessing the self-exclusion tool when logged into your online account on The Keno Website; or
- calling our Customer Contact Team on 1800 056 066 Monday to Friday between 9:00am and 6:00pm AEST.

Once your self-exclusion request has been processed, we will permanently exclude your online account and return any funds we hold in that account to you (subject to our account terms and conditions).

Our account terms and conditions prohibit an excluded customer from opening a new account. If we become aware that you have opened a new account after you have self-excluded, we will close it, and any entries will be disqualified.

10.2 Online Take A Break

We encourage you to take note of how long you are spending gambling online. The Take A Break feature

allows you to temporarily suspend your online account, removing your ability to play Keno online, for between 1 and 180 days.

During the break:

- your account will be removed from our marketing lists; and
- you will be unable to access your online account or any associated features.

After the expiration of your chosen break period, the suspension on your online account will be removed at the next login.

10.3 Online Deposit Limits

We offer you the ability to set an online deposit limit to manage the maximum amount which can be deposited into your online account within a set period. You are encouraged to set an online deposit limit in line with your personal circumstances. The amount you set should be affordable in the context of your income and other living expenses. If you find you are spending too much on gambling, you can reduce the online deposit limit at any time. We will invite you to set an online deposit limit when you open an online account.

You may choose to set an online deposit limit or change your online deposit limit at any time by:

- Logging into your online account and following the prompts; or
- Contacting our Customer Support Team on 1800 056 066 Monday to Friday between 9:00am and 6:00pm AEST; or
- Writing to us using the 'Contact Us' page on the Keno Website (www.keno.com.au/contact-us).

We will apply any requested decrease in online deposit limit immediately, and any requested increase in online deposit limit only after a 7-day waiting period. The benefits of setting an online deposit limit include helping you to:

- Set a budget and control the amount of money deposited from your personal funds that you can afford to play with.
- Gamble with money set aside only for gambling and not for other bills, to help you to continue to gamble responsibly.

10.4 Unsubscribe from Marketing Material

We automatically change your online account marketing preference settings to opt- out if your online account is self-excluded (see section **10.1** of this Code) or when you use our Take A Break feature (see section **10.4** of this Code). Alternatively, you can choose to be opted out of receiving our communications at any time by calling our Customer Support Team on 1800 056 066 Monday to Friday between 9:00am and 6:00pm AEST.

You can also choose how we communicate with you by logging into your online account and following the prompts or opt out of our marketing communications at any time using the unsubscribe link provided in those communications.

10.5 Transaction History and Online Statements

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

You can review up to 12 months of transactions made through your online account via the Keno Website or Keno App. These transactions are presented in a list form, so you can see the dates and amounts of money spent on each transaction. We encourage you to consider these transactions based on your income and other living expenses.

For a list of transactions extending beyond 12 months, you can contact the Customer Support Team on 1800 056 066 Monday to Friday between 9:00am and 6:00pm AEST.

10.6 Closing an Online Account

If you no longer wish to gamble, you can close your online account. You may close your account at any time by:

- Logging into your online account and following the prompts; or
- Contacting our Customer Support Team on 1800 056 066 Monday to Friday between 9:00am and 6:00pm AEST; or
- Writing to us using the 'Contact Us' page on the Keno Website (www.keno.com.au/contact-us).

We will process your request to close your account as soon as practicable and after all outstanding entries have completed.

After online account closure, you will no longer be able to log in or access any features of your online account.

We will pay any winnings from pending games or other funds that we hold in your account to you via bank transfer or by cheque to your registered address.

10.7 Proactive Monitoring Program

We proactively oversee online account activity and spend via analytics and active account monitoring to identify whether you or any of our customers may be at risk of experiencing harm.

Changes in online behaviours that we look for because they can be signs that you may be experiencing gambling harm include:

- Changes in deposit behaviours – frequency, intensity, variability, and trajectory of money deposited.
- Changes in betting behaviours – frequency, intensity, variability, and trajectory of bets and bet size.
- Changes in gambling patterns, e.g., betting on different events, betting at different times.
- Changes in player controls - frequency, intensity, variability, and trajectory of gambling player controls (i.e., online deposit limit, online spend limit).
- A significant increase in the amount of time spent playing (including gambling for more than three hours without a break).
- A change in an online pre-commitment limit that you have previously set.
- Frequently closing and re-opening your account.

Additionally, Venue Staff will monitor for the following behaviours if you are playing in a Venue:

- Expressing guilt or remorse for gambling.
- Making remarks which indicate significant overspending.
- Admitting to being intoxicated or under the influence of drugs.
- Showing signs of distress, such as crying or swearing.
- Repeatedly commenting about family problems.
- Showing concern about losses and payouts.
- Indicating you need a break from gambling.
- Disclosing that you are experiencing gambling harm.
- Thinking you can control outcomes.
- Accusing of changing payouts or rigging the system.
- Verbally abusing staff.
- Threats to property and staff.
- Seeking or exploring customer player controls.
- Repeatedly self-excluding from gambling.

If we find you are displaying signs of harm from Venue or online play we will take reasonable steps to support you, which includes:

- Sending you information on responsible gambling and our self-management tools.
- Supplying you with information and contact details to access gambling help support services.
- Helping you set an account limit or with self-exclusion.

- Calling you to engage in a conversation about your play.
- Proactively suspending or closing your account.

More information about how we might reach out to you can be found in section **11** of this Code.

11. Interaction with our Customers and Concerned Persons

We are committed to providing you with a safe, secure and friendly environment in which to play Keno.

11.1 Online Play

We have a proactive monitoring program that oversees your online account activity. We monitor several activities that may indicate that you are at risk of gambling harm when accessing our products online as follows:

- Indicators of potential distress in your gambling activity (including changes in frequency, intensity and variability in time played, game types, stake amounts, losses, deposits and other activity).
- Your player account transactions, including setting of limits, deposits, failed deposits, withdrawals, re-investment of winnings, enquiries and complaints.
- The length of time you engage with our products and services (to identify if you have been gambling for three hours or more without a break).
- Your engagement with communications from us, such as telephone, email, chat and “in-app” channels.

If we see signs or behaviours that may indicate harmful behaviour related to your gambling, either through our monitoring or during your contact with us, we will act.

Specifically, as part of our process, we will send you an email and/or SMS with information about:

- our responsible gambling tools (these details are also set out in section **9** and **10** of this Code); and
- available gambling support services (these details are also set out in section **13** of this Code).

We provide this information to help you access support to manage or control your gambling, to address a potential risk of gambling harm.

If we believe that you may be experiencing gambling harm, then instead of or in addition to us sending you an email and/or SMS, we will:

- suspend your online account; and
- request that you call us.

Your online account will remain suspended until you call us.

When you call us, the content of the call will be specific to you, and we will:

- share with you what led us to suspend your online account;
- ask you a series of questions to help us understand your individual circumstances;
- provide information about our responsible gambling tools (these details are also set out in sections **9** and **10** of this Code);
- provide information about available gambling support services (these details are also set out in section **13** of this Code); and
- facilitate access to available gambling support services (if required).

Depending on the outcome of this process, we may suspend or permanently close your account. For example, we will take this action if you ask us to, or if we believe this is necessary based on the information you provide to us during the call.

When we suspend or permanently close your account for responsible gambling reasons, you will be unable to reopen that account and be classified as “excluded”. Our account terms and conditions prohibit an excluded customer from opening a new account. If we become aware that you have opened a new

account after we have suspended or closed your account for responsible gambling reasons, we will close it and any entries will be disqualified. Any funds held in your account on suspension or closure will be managed in accordance with the standard account closure processes available at www.keno.com.au/terms/vic-keno-account-terms-and-conditions-and-keno-app-terms-of-use. We will maintain a record of your account in accordance with regulatory requirements.

We train our customer-facing employees in how to identify customer behaviours that indicate gambling harm. Where these indicators are identified, our employees are trained in how to assist the customer and escalate the matter to the right team.

11.2 Venue Play

Our Agents and Venue Staff are trained in identifying behaviours that may indicate signs of gambling harm and will be on the lookout for these in our Venues where you play Keno. If they notice any of the following behaviours, they will interact with you:

- If it is perceived that you are gambling every day or finding it difficult to stop gambling at closing time.
- If you are displaying aggressive, anti-social or emotional behaviour while gambling.
- If you are engaging in gambling for extended periods (known as "extended gambling" i.e., gambling for three hours or more without a break).
- If you are avoiding contact while gambling, communicating very little with anyone else, barely reacting to events going on around you.
- If you are continuing to gamble with the proceeds of large wins.
- If you are requesting self-exclusion, and/or disclosing a gambling related problem to us or to someone else.
- If it looks like you are gambling to win money, not just for fun.
- If it looks like you are gambling to win back money lost by gambling.
- If it looks like you are borrowing money to gamble, or if you are attempting to borrow money from Venue Staff.
- If you are arguing with family and friends about gambling.
- If they notice that you are gambling for longer periods of time than you said you originally planned.
- If you are gambling until it looks like every dollar is gone.
- If it looks like you are trying to increase the excitement of gambling by purchasing bigger bets.
- If it looks like you are breaking the law to get money to gamble.

If any of the above behaviours are observed, or you ask a Venue Staff member for assistance with a responsible gambling problem, they will support you by:

- Encouraging you to set a time and spend limit for your Keno play according to your personal circumstances if required; and
- Directing you to the Venue's responsible gambling officer who will:
 - o provide information on available gambling support services (these details are also set out in section **13** of this Code); and
 - o assist you to access gambling support services if you require it.

Venue Staff will decline service if they believe that you are under the influence of substances such as alcohol.

Venue Staff have a responsibility to assist you in a way that is helpful and consistent with our commitment to this Code when you are playing Keno. We prohibit all our Venue employees, contractors and other staff from engaging in the following behaviour:

- Encouraging or affirming customer superstitions about gambling.
- Encouraging or inducing a person to gamble intensively or for long periods (i.e., for more than three hours) without a break.
- Encouraging or inducing customers to withdraw funds from a cash facility for the purposes of gambling.

- Encouraging or inducing a person to continue to purchase entries, when the customer is showing one or more of the behavioural indicators associated with gambling harm.
- Discouraging a person from leaving the Venue to stop gambling.
- Discouraging a person from seeking help from a gambling support service.

If you see any Venue Staff engaging in this kind of behaviour, please contact us and we will investigate it.

11.3 Need Assistance? Contact Us

We can be contacted by our customers, their families, their community or any other person by calling our Customer Support Team on 1800 056 066 Monday to Friday between 9:00am and 6:00pm AEST.

If you contact us, we can help you by:

- Supplying information and contact details for gambling support services.
- Removing you from our membership program.
- Stopping you from receiving direct marketing from us (including emails and SMS).
- Offering advice on spend and deposit limits and other useful tools.
- Helping you with online self-exclusion.

If English is not your first language, our Customer Support Team can connect you to a national translation service during your call to help with translation.

We respect and protect your privacy. Our privacy policy is available on the Keno Website (<https://www.keno.com.au/articles/privacy>).

12. Staff Gambling Policy (Interaction with Staff)

12.1 Employee Product Play Policy

Compliance with our Employee Product Play Policy is mandatory for all employees and contractors. Failure to comply with our policy constitutes a serious breach and may lead to disciplinary action including termination of employment or contractor agreement.

Our Employee Product Play Policy outlines our commitment to deliver our products and services with honesty and integrity. It also details the restrictions on our employees and contractors when they participate in gambling activities operated by us.

12.2 Venue Gambling Policy

Venue Staff are not permitted to play Keno while on duty (including rostered breaks) unless they are required to do so to perform their normal work duties. Agents have policies that prohibit gambling by Venue Staff whilst on duty (including rostered breaks). We encourage Agents to also have in place policies relating to the participation of employees in gambling products at their Venue during off-duty periods.

12.3 Providing Assistance to Staff

Ensuring the well-being of our employees, Agents and Venue Staff is our top priority. If an employee, Agent or Venue Staff member asks for help, displays signs of gambling harm, or has difficulty managing their gambling (including by displaying any of the indicators listed in section **11.1** of this Code (online play) or **11.2** of this Code (Venue play), we will support them by:

- providing information on responsible play tools and resources, including setting a spend limit or deposit limit and closing their online account;
- encouraging them to utilise our self-exclusion program;
- referring them to our Customer Support Team; and
- referring them to gambling support services.

We encourage our employees and Venue Staff to reach out if they need help and we will support them in a private and confidential manner with respect for their privacy.

Our Agents and Venue Staff are trained in identifying behaviours that may indicate a fellow staff member may be experiencing gambling harm and will be on the lookout for these in our Venues. This includes the indicators listed in section **11.2** of this Code.

13. Gambling Help Support Services

If playing Keno is no longer fun for you or you are concerned about someone close to you, help is available. We interact with a range of organisations that provide free and confidential support for you, your family, and friends. These services include counselling, support groups, information and referrals, and help with self-exclusion. We encourage you to reach out to these support services if you feel you need support.

13.1 Available Gambling Support Services

We will often refer customers to the gambling support services below on an ad-hoc basis if we (or Venue Staff) form the view that a person's gambling may be harming them or their loved ones.

- National Gambling Helpline **1800 858 858**
- Gamblers Help (www.gamblershelp.com.au)
- Gamblers Help Youth Hotline for under 25s **1800 262 376**
- Gambling Help Interpreter Service 131 450
- Gamblers Anonymous (www.gaaustralia.org.au)
- Relationships Australian **1300 364 277** (www.relationships.org.au)
- Lifeline Helpline **13 11 14**

If you contact one of these services, they can provide you with free information, advice, and support. They can also direct you to the best service provider for your specific circumstances.

13.2 Interaction with Gambling Support Services

With a focus on delivering high quality customer care, we maintain strong relationships with gambling support providers, and government and industry groups. We connect with them at least quarterly by:

- Attending gambling harm networks and seminars.
- Coordinating with gambling support providers to host staff sessions on responsible gambling at least annually.
- Informal (ad hoc) and ongoing telephone, email and face to face contact with gambling support services to seek advice and feedback on our approach to responsible gambling.
- Contributing to government and industry forums across various states.
- Attending the National Association for Gambling Studies (NAGS) conference on an annual basis.
- Supporting state Gambling Harm Awareness week events.

We actively promote the annual Victorian Gambling Harm Awareness week in our Venues and online. We encourage our Venues to share campaign messages and digital content to promote Gambling Harm Awareness Week through their networks. We also encourage our customers and employees to attend events hosted by the Victorian government and gambling support services.

14. Responsible Gambling Training

Our Responsible Gambling Training Program has been developed to ensure compliance with relevant

State and Territory legislation, establish best practice in the service of Keno and to ensure the playing of Keno is enjoyable for our customers. The program focuses on education for our employees and Venue Staff, providing information and support for our customers in Venues and online, providing guidance for the design and marketing of our games and programs, all of which is encapsulated in our Responsible Gambling Codes of Conduct, applicable to each jurisdiction in which we operate.

All Agents and Venue Staff must attend responsible gambling 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, including modules on:

- How to identify and respond to signs of gambling harm.
- How to escalate responsible gambling matters.
- The Keno self-exclusion program.
- Keno products, and game rules.
- This Code.

Our Venues will operate in accordance with responsible gambling requirements. Specifically, our Venues will:

- Display information about responsible gambling at Keno point of sale locations.
- Not allow Minors to participate in Keno including the use of self-service terminals.
- Ensure entry forms and tickets contain responsible gambling messages and counselling information.
- Display the Keno Game Guide, which contains information in relation to responsible gambling and the chances of winning.
- Not offer or supply any free or discounted liquor as an inducement to participate in a game of Keno.

We provide annual responsible gambling training to all employees and include responsible gambling material in employee newsletters and communications. We display responsible gambling material in the workplace to remind employees of responsible gambling policies and their responsibilities.

We provide our Agents and Venue Staff with a range of compliance tools, information and training to support the Code, and responsible delivery of our products and services.

These tools and resources include operational policies and processes, with clear lines of accountability for Venue compliance with the Code and reporting mechanisms to report breaches of the Code. We have established procedures to manage responsible gambling issues and monitor the implementation and ongoing management of the Code online and throughout the Venue network.

We monitor our Agents' compliance with the Code through regular site testing. Site testing is conducted on a sample basis moving through Venues across the network.

In addition to the site testing, as part of the normal call activities, a check of Venue compliance is completed with a range of responsible gambling measures (including display of all required signs and information which are directly available to Venue Staff).

15. Minors

We prohibit Minors from gambling and take all reasonable steps to ensure that Minors cannot use our services.

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 an online account.

We display messages stating that Minors are not permitted to gamble in our Venues and on our Website.

15.1 Online Accounts

Before opening an online account, you must provide a date of birth and confirm you are at least 18 years of age. Our online customers must complete an identification process to confirm they are at least 18 years of age in accordance with our terms and conditions applicable to online accounts. Failure to do so will result in the online account having limited functionality and/or being suspended.

If you are a Minor, the Keno App will not display for you in the Apple App Store or Google Play Store, and you will not be able to download the app.

We specify in our online account terms and conditions that Minors cannot bet with us and place obligations on you to not allow Minors to access your online account or disclose your security details.

If we find that a person under the age of 18 years of age has opened or is accessing an online account we will immediately close the account and report the matter to the Victorian gambling regulator.

If you have an online account and a Minor has access to the device you use to access our Keno Website or the Keno App, we encourage you to download and install child protection software packages. This software may help prevent the Keno Website or the Keno App being accessed by Minors.

15.2 Venues

Venues have processes in place for checking the identification of persons seeking to purchase entries or claim prizes, to ensure that only persons 18 years and over participate in Keno.

There is no general prohibition on Minors entering a Venue. However, our staff will ask you for proof of age if they are uncertain if you are of at least 18 years of age when purchasing Keno products. If you cannot provide photo identification, we will ask you to vacate the area where Keno is sold (i.e., to leave the self-service terminal or operator terminal as the case maybe).

Our Venues display "Minors" signage at all places where bets are placed and, if applicable, where ATM or EFTPOS machines are situated.

If you are concerned about someone under 18 years of age potentially accessing our products in our Venues or online, we encourage you to let us know by:

- Approaching Venue Staff.
- Calling our Customer Support team on 1800 056 066 Monday to Friday, between 9:00am and 6:00pm AEST.
- Contacting us through the "Contact Us" page of our website (<https://www.keno.com.au/contact-us>).

16. Gambling Environment

We are committed to delivering our products and services with honesty and integrity with a focus on quality customer care. Our program promotes responsible gambling both online and in our Venues, and we discourage customers from engaging in extended play.

16.1 Responsible Gambling Message

We display responsible gambling messaging in our Venues, and on our Website. We also embed responsible play messages within our marketing and promotional materials, including communications sent to our customers.

16.2 Online

We proactively oversee online account activity using a range of analytical tools to identify customers who may be at risk of gambling harm.

If you are identified as displaying signs of engaging in extended and intensive gambling (the full list of indicators is set out in section **11.1** of this Code) we will intervene and take action which may include, but is not limited to:

- Sending you an email and/or SMS with information about responsible play and our responsible gambling tools;
- Providing you with information and contact details about gambling support services;
- Helping you set an account limit or with self-exclusion;
- Reviewing your accounts to determine whether additional interventions are required, which includes:
 - o Reviewing previous interactions;

- o Betting activity, deposit activity and withdrawal activity; and
- o Whether the customer has previously utilised responsible gambling tools.
- Calling you to engage in a conversation about your play.
- Proactively suspending or closing your account.
- notifying you if you have been playing online for an extended period of time.

When we suspend or close your account for responsible gambling reasons, your account will be removed from our marketing send lists and will be classified as “excluded”. Our account terms and conditions prohibit an excluded customer from opening a new account. **We have processes in place to undertake checks when contacted by customers to see if account(s) have been opened using similar details as customers who have an excluded account.** If we become aware that you have opened a new account after we suspend or close your account for responsible gambling reasons, we will close it, and any entries will be disqualified.

16.3 Venues

Our Venue Staff will encourage you to take breaks from gambling and discourage you from engaging in extended gambling (defined as gambling for three hours or more without a break) or intensive gambling. This encouragement may be an announcement about a staged event, or through direct interaction with you. Types of staged events may include:

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

We are committed to you being aware of the passage of time when you are in a Venue including by the following means:

- We place clocks in all major areas of each Venue so that you can keep aware of the passage of time.
- Our Venue Staff will mention the time when making announcements about Venue activities.
- Where a customer is purchasing entries at a terminal operated by Venue Staff, a customer can use these interactions to be aware of the passage of time.
- Our Keno tickets have the time of purchase printed on them.
- We provide Agents and Venue Staff with quarterly reminders of their obligations to ensure they manage and monitor their environment for customers who have engaged in play in their Venue for lengthy periods of time.
- We encourage Agents and Venue Staff to speak directly with such customers to ensure they are aware of the passage of time.

We require our Agents to display responsible gambling messages and make available information for gambling support services for individuals and/or their families as to where to obtain assistance on responsible play. Some of these signs are required by law, and some are created by us and displayed within the Venue.

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

17. Financial Transactions

We do not provide credit, lend money, or accept cheques for the purchase of Keno products. We also will not cash cheques from customers, including the cashing of cheques for the purpose of playing Keno, or provide a cheque cashing facility at our Venues. The Payout Limit sign outlines these restrictions and is displayed in all Venues.

In keeping with their Agency Agreement with us, Agents and their staff may only pay prizes in cash up to their nominated maximum Keno Cash Payout limit of \$9,999, with the discretion to reduce this to \$1000.

Any remaining balance will be paid via cheque issued by us or deposited into your nominated bank account. The method of payment is at our discretion. Venues are not permitted to issue cash cheques.

18. Responsible Advertising and Promotions

18.1 Advertising, Marketing and Promotional Material

We strive to ensure our marketing and promotional material, new products, and changes to existing products:

- Comply with the advertising Code of Ethics adopted by the Australian Association of National Advertisers.
- Do not represent an irresponsible trading practice or portray actions that may seem socially irresponsible.
- Are not directed at or likely to appeal (in terms of style, tone, content, medium, location or any other factors) primarily to Minors, including suggesting that Minors can take part in Keno;
- Are factually correct, accurate and truthful.
- Are not false, misleading, deceptive or contravene regulatory requirements.
- Do not misrepresent the probability of winning or suggest that winning will be a definite outcome of participation in Keno.
- Do not include misleading statements about odds or prizes.
- Do not give the impression that playing Keno is a reasonable strategy for financial attainment or will improve a person's financial prospects.
- Do not offend prevailing community standards and are in a manner that reflects decency, dignity, and good taste and per the Commercial Television Industry Code of Practice.
- Are not discriminatory or appear to be patronising to any particular group.
- Do not target vulnerable or disadvantaged groups including players who have opted out of receiving promotional material and including where people may not have the ability to fully understand the information, such as refugees or people with intellectual disabilities.
- Do not appear in conjunction with an offer, event or facility advertisement that pertains to Minors.
- Do not target or is not provided to excluded persons.
- Do not publish anything which identifies customers who have won a prize without prior consent.
- Do not violate the confidentiality of information relating to, or the privacy of customers without their consent.
- Do not depict or promote the consumption of alcohol while buying a Keno product.
- Do not encourage anyone to contravene any laws.
- Do not suggest that skill can influence games that are games of chance.
- Do not encourage excessive or reckless playing.
- Do not offer any credit, rewards or vouchers to a person as an inducement to open an online account or refer another person to open an online 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 customer to keep their online account open after a request has been submitted to close it.
- 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 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 gambling.
- Do not exaggerate the connection between the gambling activity and the use to which the gambler's profits may be put.

18.2 How we Comply with These Requirements

We employ a range of processes to help ensure our marketing and promotional material, new products, and changes to existing products comply with these requirements and undertake the following measures:

- We include responsible gambling messages in our advertising and promotional material, following relevant legislation.
- We include information on how you can opt out of receiving direct marketing.
- We implement a multi-layered review process for materials which includes a review conducted by our marketing, legal and responsible gambling teams.
- We develop and supply responsible gambling checklists and guidelines for all employees involved in preparing marketing materials.
- We review new products, or changes to existing products, to assess potential impacts on customers and the community prior to release.
- We keep a list of all self-excluded customers, to ensure they do not receive any marketing or advertising communications.
- We provide annual training for employees and staff, including contractors and third parties.

Occasionally, our Agents may conduct local area marketing promotions in Venues. We provide our Venues with pre-approved templates, guidelines and tools to help meet the above requirements.

19. Loyalty and Rewards

Occasionally, we will advertise marketing offers and promotions to our customers including deposit match offers, competitions and promotional draws. We may advertise these offers and promotions by sending communications to our online customers via the Keno App, email and SMS. To ensure our customers understand the offers and promotions available to them we will:

- Provide clear and transparent information when communicating offers and promotions.
- Make available any terms and conditions associated with the offer or promotion (via email, SMS, the Keno Website and Keno App).
- Offer additional information and respond to queries about offers and promotions via our Customer Support Team on 1800 056 066 Monday to Friday, between 9:00am and 6:00pm AEST.

Loyalty and reward offers are typically paid in the form of Reward Dollars and Reward Games, which accumulate in a customer's online account. Reward Dollars are complementary Keno funds, which accrue as a balance separate to deposited funds and can be used to purchase an entry into any Keno product. Reward Games are a pre-defined ticket that Keno may offer online customers into a specific Keno product, for a nominated total entry cost, number of games and spot type.

Information and notification related to Rewards is sent directly to customers via:

- Pop-up in app upon first login following issuance or offer of a Reward.
- Email notifying customer of available Reward or offer to redeem a Reward, and sometimes SMS (where applicable).
- The 'Rewards and Offers' section of an online customers Keno Account Settings. Rewards currently available and historical rewards are viewable here, as well as current offers available to earn a Reward.

Reward Dollars and Reward Games are available for use at the time of ticket purchase, and Reward Dollars do not expire. The applicable terms and conditions can be accessed on the Keno Website (www.keno.com.au/articles/vic-keno-account-terms-and-conditions-and-keno-app-terms-of-use).

20. Customer Complaints

If you have a complaint about our Responsible Gambling Code of Conduct, we encourage you to tell us.

You can address your complaints to the following address, which is provided in accordance with our Keno Complaints Handling Charter:

KENO (VIC) Responsible Gambling Contact Officer

Locked Bag 1, Spring Hill QLD 4004

Phone: 1800 056 066 (Monday to Friday, between 9:00am and 6:00pm AEST)

Email: help@keno.com.au

If you make a complaint to us by phone, we may ask you to send details of your complaint in writing. Upon receipt, we will investigate and respond to your written complaint within 21 days. We aim to investigate non-written complaints within a reasonable time and consider the nature and complexity of the complaint.

We will keep you informed of the conclusion reached in relation to your complaint, including the reasons for that conclusion. If we resolve the matter, we will take no further action.

If you would like to request a review of the decision, we will conduct an internal independent review which may include:

- A review of all information relating to your complaint.
- A discussion with you, the subject of your complaint (if applicable) and/or staff involved with managing your complaint.

If you would like to request a review of the internal decision, we will refer your complaint to a member of a panel of independent mediators, such as the Institute of Arbitrators and Mediators Australia, for either a determination from an arbitrator based on submitted paperwork or to arrange mediation. We will share any mediation costs with you equally, unless otherwise agreed or as determined by the arbitrator. We record complaints made in relation to the operation of this Code. We make this information available to the relevant regulatory bodies on request and keep records for seven years per our record-keeping obligations.