

**CHONGIE ENTERTAINMENT LIMITED
RESPONSIBLE GAMBLING POLICY**

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1 POLICY PURPOSE

This document has been created to detail the policies and procedures followed by Chongie Entertainment Limited in respect of social responsible gambling to meet the responsibilities and guidance outlined by the Gambling Act 2005, the Social Responsibility Code provisions of the Gambling Commission's Licence Conditions and Code of Practice (LCCP).

The Gambling Commission regulates gambling to ensure that:

- It is crime free;
- It is fair and open; and
- Children and vulnerable people are protected.

Chongie Entertainment Limited recognises the importance of social responsible gambling and regularly reviews its policies and procedures and their effectiveness to those that partake in gambling activities. Chongie Entertainment Limited also recognises the role and the powers of the Gambling Commission and is committed to be cooperative and aid the Gambling Commission in any way it can.

The third objective of the Gambling Act is to protect children and other vulnerable persons from being harmed or exploited by gambling and it is conditional on our Adult Gaming Centre licence that we have appropriate controls in place. The need to prevent young and vulnerable persons from being able to access our products and services is of paramount importance to Chongie Entertainment Limited.

It is likely that further and more detailed operational policies and procedures will be implemented in relation to specific sites once the risks of that site have been assessed.

2 OBLIGATIONS OF THE LEGISLATION

Chongie Entertainment Limited are legally obligated to follow the requirements specified by the Gambling Act 2005 and the LCCP as issued by the Gambling Commission. A key element of the legislation is the need to operate responsibly and to ensure that all of those customers engaged in gambling activities are of the legal age to gamble. A player must be 18 or over in order to engage in gambling activities and Chongie Entertainment Limited ensures it has suitable age verification policies in place.

Regarding the LCCP social responsibility code provisions, compliance with these is a condition of our Adult Gaming Centre operating licence therefore any breach of them may lead the Gambling Commission to review our licence with a view to suspension, revocation or the imposition of a financial penalty and would also expose Chongie Entertainment Limited to the risk of prosecution.

3 GOVERNANCE AND RESPONSIBILITIES

Annually the Operations and Compliance teams meet to discuss the company's commitment and policies concerning responsible gambling. It provides an oversight to ensure that responsible gambling is a fundamental part of Chongie Entertainment Limited's operations.

4 SELF EXCLUSION

Self-exclusion is recognised by the gambling industry as a way for players to control their gambling. Chongie Entertainment Limited offers a self-exclusion facility to help those customers who feel that their gambling is out of control and want our assistance to help them stop.

Chongie Entertainment Limited takes all reasonable steps to ensure that customers on the self-exclusion register are prevented from using their existing accounts or opening new accounts. Whilst on the self-exclusion register, customers also have certain obligations contained in the terms and conditions that they acknowledge when joining the self-exclusion program.

Self-Exclusion allows a customer to close their account for a specified period of 6 months, 1 year, 2 years, 5 years or indefinitely. This prevents them from gambling for a selected period of time.

During a period of self-exclusion a customer will not be able to come in and use the facilities for gambling.

5 TIME OUT

For customers who wish to take a short break from gambling Chongie Entertainment Limited offers a time-out facility.

6 PLAYER PROTECTION MEASURES

6.1 *Organisations that can help*

Chongie Entertainment Limited clearly displays posters and provides leaflets for customers which detail key organisations which can help, including Gamcare.

The following organisations also provide psychological help, professional advice and assistance in dealing with gambling addiction:

- Counselling Directory
- The National Council on Problem Gambling
- GamCare
- Gamblers Anonymous
- Gam-Anon UK and Ireland

6.2 *Preventing Underage Gambling*

Chongie Entertainment Limited implements an Age Verification policy that will:

- Use various methods to try and detect and deter children and young people from entering including U18 signage
- Provide age verification training

6.3 *Age Verification Policies*

Chongie Entertainment Limited operates a challenge 21 (or if appropriate a challenge 25) policy which requires that all customers who appear to be under 21 (or 25 if appropriate) are approached by Adult Gaming Centre staff and their age verified by the production of the appropriate valid ID document as soon as entering the premises or as soon as possible thereafter but BEFORE gambling.

Acceptable forms of documentation include:

- a) Any ID carrying the PASS logo (e.g. Citizen Card, Connexions Card) Full Driving Licence with photo card.
- b) Provisional Driving Licence with photo card or International Passport
- c) Military Identification Card

The staff must check to see that the ID is acceptable and then record the interaction.

If suitable photographic ID cannot be produced, then the customer should be politely requested to leave the premises with the incident subsequently recorded.

Challenge 21/25 signage should be positioned on or close to the entrance/exit door, upon the counter and displayed in conjunction with existing signage.

The Gambling Commission and Local Licensing Authority may conduct underage test entries to assess whether or not Chongie Entertainment Limited's Adult Gaming Centre's are allowing under- 18's to enter or gamble on the premises.

If at any time staff are informed that they have been the subject of an underage test by the Gambling Commission and/or the Local Licensing Authority, this is immediately reported to the Operations Manager and Compliance Team.

All age verification test failures are fully investigated by the Operations Manager and/or the Compliance Team. Performance is constantly monitored and further training may be given to staff if necessary to react to developing risks in particular areas.

7. CUSTOMER INTERACTION

The company recognises its responsibilities and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice listed under the Social Responsibility Code 3.4.1.

Chongie Entertainment Limited ensures that staff have access to all relevant sources of information and policies to ensure effective decision making, in order to guide and deliver effective customer interactions, including information to assist in identifying at risk customers whom;

- may not be displaying obvious signs of, or overt behaviour associated with, problem gambling
- are designated as 'high value', 'VIP' or equivalent
- are demonstrating signs of agitation, distress, intimidation, aggression or other behaviours that may inhibit customer interaction

Chongie Entertainment Limited, where circumstances allow and subject to player confidentiality, shares experience and deliver good practice across the full range of social responsibility requirements for customer interaction with other operators.

Chongie Entertainment Limited keeps a record of customer interactions, and where an interaction has been ruled out, the reasons for this.

Chongie Entertainment Limited provides training to staff on their responsibilities for customer interaction which, for relevant staff, will include induction training and refresher training.

In the event that a suspected problem gambler enters an AGC and wishes to participate in gambling:

- The customer must be tactfully referred to GamCare by the appropriate customer services manager.
- The customer's details must be logged for the purposes of possible exclusion from future participation, should any similar incidents re-occur.
- All written and verbal communication between staff and suspected problem gamblers must be monitored and approved by a customer services manager.

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

- Any requests for any increases excess of the recommended maximums or limits previously set (see "Customer Interaction" later) must be tactfully refused.
- The customer must be tactfully referred to GamCare, by the appropriate customer services manager.
- The customer's details must be logged for the purposes of possible exclusion from future participation, should any similar incidents re-occur.
- All written and verbal communications between staff and the suspected problem gambler should be monitored and approved by the customer services manager.

7.1 Recognising Behaviours of a Problem Gambler

Chongie Entertainment Limited monitors customer activity and uses a range of indicators to identify potential gambling. These include:

- Time and spend indicators: amount and frequency of time and deposits, time of day, large losses.
- Account indicators: cancelled withdrawals, failed deposits, multiple payment methods.
- Use of responsible gambling tools: changing deposit limits, trying to stop reversing withdrawals, previous self-exclusions or previous customer interactions.
- Customer contact: information or hints from customers, frequent complaints, requests for bonuses following losses, or signs of distress.
- Play indicators: chasing losses, erratic gaming patterns and product choice.
- A 'big win': high staking following a win could hide or even lead to harmful behaviour.

A player may give some signals that they have a gambling problem while communicating with members of staff. A problem gambler may display some of the following signs:

- Finding it hard to manage or stop gambling – customer may make a comment regarding this.
- Signs of agitation, distress or aggression: Customers may target aggression at customer support staff following a loss. Staff will be trained on how to deal with aggressive customers and how to diffuse situations.
- Players asking constantly for bonuses or free spins claiming that they have lost a significant amount of money and need a bonus in order to deposit anything further.
- Player informs Support that their main goal is to win a specific amount of money at which point they will leave.
- Customer contacts supports agents regularly to express dissatisfaction with gaming outcomes and overall gameplay.

7.2 Engaging with the customer

Chongie Entertainment Limited recognises the importance to identify any customers where there may be problems early and pro-actively reach out and offer support.

Mechanisms must be established to ensure that appropriate and ongoing responsible gambling training is provided to all staff.

Should a staff member feel that a player's behaviour may indicate problem gambling, they should engage with the customer by asking questions such as:

- Do you feel that your gambling spends are controlled?
- Do you acknowledge that your activity may result in losses and can withstand these losses?
- When you lose, do you feel you the need to return as soon as possible to win back your losses?
- Do you ever borrow to finance your gambling?

The staff member must then follow up on the interaction, for example by offering the self-exclusion feature.

7.3 *Evaluate*

Chongie Entertainment Limited understands that evaluation of customer interactions is important to understand the impact they have had and to help ensure customers are getting the right help and support.

A monthly review of customer interactions should be carried out with considerations to the following points:

- Did the customer start using gambling management tools?
- Did the customer read the responsible gambling information?
- Was there a positive change in behaviour? Did the customer's gambling seem to change after the interaction?

7.4 *VIP*

Chongie Entertainment Limited is aware that some problem gambling indicators, such as high staking, can look similar to VIP and high-value customer activity.

VIP accounts, if they are in operation, must be closely monitored by a VIP manager and careful consideration, including a responsible gambling check, is applied when upgrading a customer to VIP status.

7.4 *Keeping Alcohol out*

Chongie Entertainment Limited will implement clear rules and guidelines on the consumption and influence of alcohol. At all sites, individuals who are deemed to be under the influence of excessive alcohol will be prevented from entering the premises. Staff will all be trained on the signs to look out for and how to deal with such a scenario.

Under no circumstances should customers be served alcohol drinks on site, nor should they bring alcoholic drinks onto the premises to be consumed. Customers will be approached to either leave the premises or stop drinking on site immediately.

8. PRODUCTS AND RISK MITIGATION

Chongie Entertainment Limited intends to provide Adult Gaming Centre facilities in the UK.

To identify and manage the risks associated with the above products, Chongie Entertainment Limited applies controls in four broad ways.

RISK TRIGGERS: Training key staff to be aware of risk triggers which may be indicative of problem gambling issues to be used in the products provided to customers.

CUSTOMER MONITORING: Providing facilities for customer monitoring, allowing staff to log customer information, transactions and emerging concerns.

SYSTEM CONTROLS: Implementing controls to mitigate areas of potential risk.

PROACTIVE ANALYSIS: Carrying out proactive analysis of purchasing activity to help detect problem gambling issues. This is supported by record keeping and monitoring.

8.1 Risk Triggers

Considering the above product type, there are different types of activity or customer behaviours which could lead to cause for concern leading to the possible formulation of knowledge or suspicion that an individual has problem gambling issues.

These behaviours may be identified by any employee of Chongie Entertainment Limited.

This policy aims to protect vulnerable persons from being harmed and/or exploited by gambling and to identify where a customer may be showing signs of problem gambling. All staff are trained to deal with any scenarios relating to problem gambling.

9 STAFF TRAINING AND SUPPORT

Chongie Entertainment Limited are committed to ensuring that all key staff understand their responsibilities in respect of responsible gambling and this policy, and in particular the triggers to be alert to and the requirement to report concerns, knowledge, or suspicion to the Compliance Team.

All staff are required to complete compliance and social responsibility training which covers responsible gambling areas such as underage gambling and our Age Verification, Think 21 policy, customer interactions, physical and behavioural risk triggers, self-exclusions and other responsible gambling tools like setting time and spend limits on Electronic Gaming Machines (EGMs).

Staff are also advised that if they need support following a difficult conversation regarding gambling addiction or if they think they may have a gambling problem and need support they can contact GamCare either with a manager present or in confidence.

Refresher training is held every 12 months and new starters are trained upon induction. Ad hoc training sessions may be provided to react to developing risks in particular areas.

10 RESPONSIBLE MARKETING

Chongie Entertainment Limited's marketing team ensures that promotional material is developed in a socially responsible manner, particularly to protect young or vulnerable persons from being harmed or exploited by advertising and in accordance with the following provisions:

- The Gambling Commission's LCCP;
- Committee of Advertising Practice (CAP) code.

11 CONTRIBUTING TO COMBATING PROBLEM GAMBLING

Chongie Entertainment Limited makes a contribution to problem gambling charities on an annual basis.

This supports research into the prevention and treatment of problem gambling, the risks of gambling and how to gamble safely and the identification and treatment of problem gamblers.

All Adult Gaming Centre leaflets and marketing materials reference GamCare's website (www.gamcare.org.uk) and all Adult Gaming Centres must display posters and "please gamble responsibly" leaflets providing information and contact details for GamCare. This information is positioned next to gaming machines, at the counter, each entrance/exit and in at least one other discreet area as agreed with the Operations Manager.

12 MONITORING THE POLICY

To ensure that the policy continues to be fit for purpose:

Chongie Entertainment Limited are committed to carrying out an ongoing risk assessment of this Social Responsible Gambling policy tailoring it and any training around new products and newly identified risks as appropriate.

In the course of day to day activities and in reaction to any responsible gambling cases, Chongie Entertainment Limited will continue to seek best practices and new techniques to improve the processes and procedures in place.

This policy is subject to review following any new guidance published by the Gambling Commission.