



***SAFER
GAMBLING
CODE OF CONDUCT***

Version 3 – 16 August 2024

OUR COMMITMENT TO SAFER GAMBLING

Tabcorp VIC Pty Ltd (“**we/us**”) is committed to delivering wagering products and services in a way that prevents and minimises harm to our customers and their families and friends.

We seek to normalise safer gambling through the design of our products and services, the use of our safer gambling tools by our customers and the behaviour of our employees and agents.

We aim to empower and support our customers to make informed decisions about how they gamble.

Our employees and TAB Venue staff will have the support, skills and knowledge they need to implement these commitments.

We will work with gambling harm prevention experts and services to enhance our harm prevention measures and performance.

We will respond to complaints by our customers in a fair and efficient manner.

This Safer Gambling Code of Conduct (“**Code**”) sets out these commitments in more detail.

Our Player Safety Promise

Caring for our customers is at the heart of what we do.

That means acknowledging that while our wagering products and services are enjoyed by most of our customers as a form of entertainment, they can also negatively impact or harm our customers, the people that care for them and the community.

So, we’re raising the game and committing to a Player Safety Promise designed to prevent and minimise gambling-related harm and drive better outcomes for individuals and the community.

We promise to:

- Be Transparent and Raise Awareness
- Prevent and Minimise Harm
- Monitor and Provide a Safety Net
- Continue to Learn and Build on Evidence
- Contribute and Support the Community

1. INTRODUCTION

We are part of Tabcorp Holdings Limited, a world-class diversified gambling entertainment group.

We conduct wagering:

- online;
- over the phone;
- on course at metropolitan and country race meetings in Victoria; and
- at a network of agencies, licensed venues and clubs.

We acknowledge that gambling causes some people harm and this Code sets out how we will deliver our products and services safely and in a way that minimises the harm associated with gambling.

1.1 OBJECTIVES

Our aim with the Code is to:

- provide our customers with a single document that outlines how we safely deliver our products and services;
- demonstrate our strong commitment to minimising the potential harm associated with gambling and promote safer gambling;
- empower and enable our customers to make informed decisions about gambling, as well as facilitating access to tools to manage their gambling or gambling help services where assistance is required; and
- ensure we comply with any relevant legislative and regulatory obligations, including the Victorian Responsible Gambling Code of Conduct Ministerial Direction.

1.2 APPLICATION OF THE CODE

The Code applies to:

- us and our employees;
- our TAB Venues and all people employed by these venues that are responsible for providing our wagering services; and
- gambling services or products provided by us, including those provided online within Australia.

1.3 REVIEW OF THE CODE

We regularly review our compliance with the Code (including compliance within our TAB Venues). We will seek and consider feedback from key stakeholders, including TAB Venue staff, agents, customers, employees, and gambling help service providers about the effectiveness of the Code.

The Code may also be updated from time to time taking into account the feedback we receive and advances in research relating to gambling harm and the responsible service of gambling.

We will provide a copy of the updated Code to the Victorian gambling regulator before publishing.

1.4 KEY DEFINITIONS

- **TAB App** means the TAB mobile application.
- **TAB Venue** under the Code is an agency, licensed venue or racing club in Victoria where our services and products are sold.
- **TAB Website** means the TAB website at www.tab.com.au.

2. COMMUNICATION AND AVAILABILITY OF THE CODE

We communicate and actively promote the Code and where to find it on signage across our TAB Venues and on our TAB Website and TAB App.

The Code is available at:

- the TAB Website www.tab.com.au;
- the TAB Safer Gambling Website www.responsiblegambling.tab.com.au;
- Tabcorp's Website www.tabcorp.com.au;
- the TAB App; and
- TAB Venues.

The Code is available in English and is also translated into Italian, Arabic, Chinese (Traditional and Simplified), Turkish, Greek, Vietnamese and Spanish. Translated versions of the Code are available online and in TAB Venues.

You can ask for a printed copy of the Code by phoning our Customer Service Centre on 131 802 or at a TAB Venue.

3. RETAIL COMPLIANCE WITH THE CODE

TAB Venues and their staff who provide wagering services must comply with the requirements set out in this Code.

In order to ensure TAB Venue compliance, we will:

- provide TAB Venues with the support, tools, information and training necessary to implement the Code and to ensure the safer delivery of our wagering products and services;
- conduct regular compliance checks and as soon as possible after a safer gambling incident or where there has been non-compliance with the Code or other legal obligation;
- investigate all safer gambling incidents, and breaches of the Code, or other legal obligations, by TAB Venues; and
- take action against non-compliant TAB Venues. Actions that may be taken include a requirement to undertake additional training, disciplinary action (a financial penalty or suspension) and, in the most serious cases, termination of the TAB Venue agreement.

4. SAFER GAMBLING MESSAGES

We include safer gambling messages on all gambling-related promotional marketing materials, and on communications we send to our customers in line with the National Consumer Protection Framework for Online Wagering. We also ensure that our advertising materials comply with any other legal requirements, including the consumer protection requirements of Ministerial Directions such as the Ministerial Direction dated 24 March 2023.

We will always have safer gambling messaging on the TAB Website and signage throughout the TAB Venues. We will also actively promote safer gambling messages on our TAB Website and TAB App.

5. SAFER GAMBLING AND GAMBLING PRODUCT INFORMATION

5.1 AVAILABLE INFORMATION

We provide a range of safer gambling information so our customers, their families, and the community are informed about our safer gambling practices and so our customers are aware of our wagering products and services.

Our commitment to the safer provision of wagering means that we want to empower customers to make informed decisions about their gambling. This includes how much they spend and how much time they devote to gambling, taking into account their personal circumstances and financial means.

This includes information about:

- this Code;
- the betting rules that govern our totalisator, sports betting, and Trackside products;
- our products and services and accompanying explanatory material;
- how customers can manage their gambling by making and keeping a pre-commitment decision;
- how customers can utilise other safer gambling tools to manage their gambling;
- how customers can self-exclude online and in our TAB Venues;
- gambling support services available for individuals and/or their families to obtain assistance to manage a gambling problem;
- the prohibition of gambling by minors;
- the prohibition of the provision of credit for gambling; and
- complaint resolution mechanisms.

5.2 WHERE YOU CAN FIND THE INFORMATION

We have safer gambling information publicly available on our dedicated TAB Safer Gambling Website at responsiblegambling.tab.com.au, on posters and brochures throughout TAB Venues or by calling the our Customer Service Centre on 131 802.

TAB Venues must display safer gambling signage at all points where bets are accepted.

Our betting rules and product information is available on the TAB Website and throughout TAB Venues. You can read our account terms, which include terms and conditions of promotional offers, on the TAB Website. When we have specific promotional offers, we will include the applicable terms and conditions.

You can also call our Customer Service Centre on 131 802 for assistance.

6. PRE-COMMITMENT DECISIONS

6.1 WHAT IS PRE-COMMITMENT?

Pre-commitment is a tool that customers can use to manage their gambling and prevent gambling harm. It involves customers setting a limit before they start gambling. This limit can be time and/or money based i.e. 'pre-committing' how much time and money you are prepared to spend before you start gambling.

Pre-commitment decisions are individual to each customer and customers should set limits in accordance with their personal circumstances.

6.2 RETAIL CUSTOMERS

We promote and encourage all retail customers to set a time and money limit by displaying signage about how to set and keep limits in our TAB Venues.

Information is also available on the TAB Safer Gambling Website: responsiblegambling.tab.com.au.

How to make a pre-commitment decision

You can make a pre-commitment decision when betting in retail by:

- making a plan for your gambling – how much will you bet and deposit, and how long will you be in the TAB Venue;
- setting a budget for your gambling spending;
- deciding what you want to bet on – for example, if you will only be betting on horse racing;
- planning ahead about how you will be placing bets. If you will only be betting in cash, then only take the cash amount you plan to bet with and leave any bank cards at home;
- going to TAB Venues that have other activities that you can engage in; or
- plan for how to put aside funds when collecting any dividends.

Some strategies you can use to record your pre-commitment decision include:

- making a note in your phone on what your pre-commitment decision is;
- telling the person you are with that you have made a pre-commitment decision and sharing those details with that person;
- if you have set a time limit to be in the TAB Venue, setting an alarm on your phone so you are alerted to when you have been in the TAB Venue for that period of time;
- making a note of the time that you arrived at the TAB Venue and keeping track of time; and
- telling a TAB Venue staff member that you have set a pre-commitment decision.

If you have a TAB account, you can set up pre-commitment deposit limit on your TAB account and transact using your account while you are in a TAB Venue. You will not be able to deposit in excess of the pre-commitment deposit limit that you have set on your account.

How to keep a pre-commitment decision

You can keep a pre-commitment decision when betting in retail by:

- keeping track of how much you have bet including using bet slips;
- use the time displayed in the TAB Venue to keep track of the passage of time;
- if you have set an alarm on your phone, leaving the TAB Venue or TAB service area when this alarm sounds;
- letting a TAB staff member know you have reached your pre-commitment decision limit and they will refuse to place any more of your bets and encourage you to leave the TAB Venue or TAB service area; and
- leaving the TAB Venue or TAB service area when you are about to or have reached your pre-commitment decision limit.

If you have a TAB account and have set up a pre-commitment limit, you can bet in a TAB Venue using your TAB Account and the deposit limit will be apply in line with your pre-commitment decision.

How we support your pre-commitment decision

TAB Venues and their staff are trained to support you to make and keep your pre-commitment decisions. We will have proactive conversations with you about how to make and keep your pre-commitment decision. They will also have these discussions with any family members or friends who are concerned about your betting behaviour.

We train TAB Venues and their staff to recognise potential signs that you could be overspending or losing control, and that may need to make or keep a pre-commitment decision. The potential signs we look for include:

- gambling every day or finding it hard to stop at closing time;
- gambling for long periods i.e. for three hours or more without a break;
- gambling right through normal meal times;
- avoiding contact while gambling, communicating very little and barely reacting to events going on around them;
- increasing spending;
- trying to borrow money from TAB Venue staff or other customers;
- continuing to gamble with the proceeds of large wins; and
- displaying signs of distress or anger.

When TAB Venue staff identify customers with these behaviours, they must assess the customer's circumstances by speaking directly with the customer. To support these customers, TAB Venue staff will take a range of actions:

1. ask the customer if they have set any pre-commitment limits;
2. provide the customer with information about pre-commitment limits and how to set one;
3. encourage the customer to set a time and money limit;
4. encourage the customer to take a break from gambling by leaving the TAB service area and participating in other venue activities or taking a refreshment or lunch break;
5. encourage the customer to take a break from gambling by leaving the venue;
6. provide information about TABCare (our retail self-exclusion program in Victoria);
7. provide information on available gambling support services and facilitating access to a service where required.

Where a customer has made a pre-commitment decision by setting a time and money limit, TAB Venue staff will support the customer to keep their pre-commitment by:

1. encouraging them to keep to their pre-commitment decision;
2. providing the customer with strategies to keep to their pre-commitment decision; and
3. refusing service when a customer tells the TAB Venue staff member that they have exceeded the time and money limits that they have set.

If you already have a TAB account, TAB Venue staff will encourage you to use the available tools on your TAB account to set and keep your pre-commitment decisions.

6.3 ACCOUNT CUSTOMERS

We promote and encourage all account customers to set a pre-commitment deposit limit. A pre-commitment deposit limit allows you to limit the maximum amount they can deposit into their account over a set time period. We offer you a choice of time periods. For example, this could be a daily, weekly, or monthly limit.

You can set or change your pre-commitment decisions by logging onto your TAB account either on the TAB App or on the TAB Website. Our TAB Customer Service Centre is available on 131 802 to help you in making a pre-commitment decision.

We will assist you to make a pre-commitment decision by:

- requiring all account customers to set a deposit limit or specifically opt out of setting a deposit limit when opening an account with us;

- actively promoting setting a deposit limit on our TAB Website and TAB App as well as in emails to you;
- offering you the ability to set up a deposit limit at any time by logging into your TAB account online;
- advising you to set a deposit limit in line with your personal circumstances and what you can afford to bet with - our Customer Service Centre and Safer Gambling teams are available to assist you in setting a deposit limit;
- when reviewing accounts belonging to customers identified as potentially experiencing gambling harm, our TAB Safer Gambling team will review your previous deposit activity, betting history and whether you have set a deposit limit or used other safer gambling tools to determine if further action is required. This may include a call to discuss your specific behaviour and circumstances and provide advice on setting a deposit limit;
- when speaking with customers experiencing gambling harm, our TAB Safer Gambling team will encourage you to set a limit, provide advice on an appropriate limit to set and will set the limit for you if you agree;
- our TAB Safer Gambling team undertakes monitoring over increases to customer deposit limits to identify whether any increases require a call with the customer; and
- providing you with a prompt annually when you log into your TAB account to set a deposit limit or update your deposit limit if you've already set one. You will not be able to access other features on your account until you have responded to this prompt.

If you have made a pre-commitment decision, we will help you keep to your pre-commitment decision by doing the following:

- We will prevent you from depositing into your TAB account when you reach your deposit limit.
- We allow you to change your deposit limit at any time by logging into your TAB account online. Any decrease to the limit is effective immediately. Any increase will only take effect after 7 days. This provides you with time to change your mind – we call it a 'cooling off' period.
- We will remind you annually to review your deposit limit.

You can find additional information on what a pre-commitment deposit limit is, the benefits of setting a limit, and how to set one, on the TAB Safer Gambling Website at responsiblegambling.tab.com.au and by logging onto your TAB account.

7. SAFER GAMBLING TOOLS

In addition to pre-commitment deposit limits, there are other safer gambling tools that empower and support you to manage your gambling, and to gamble safely. We actively promote the following tools on our TAB Website, TAB App and through our Customer Service Centre.

SAFER GAMBLING TOOL	DESCRIPTION
TAKE A BREAK	You can take a break from your account for a certain time period. You have a choice of different time periods.

SAFER GAMBLING TOOL	DESCRIPTION
	During this time, you will not be able to access your account or receive any marketing or promotional material.
CREDIT/DEBIT CARD LIMITS	You can limit the daily amount you can deposit into your account via credit and/or debit card.
ACTIVITY AND BETTING STATEMENTS	<p>We provide all TAB account customers with a monthly activity statement for months where they have had account transactions. The activity statement will set out your total deposits, withdrawals, spend, wins, and losses for the month, as well as your net win or loss for that time. The statement also provides an overview of your net win or loss of the last six months. We also provide you with a detailed listing of each of your transactions for the month.</p> <p>You can access both the activity statement and transaction history at any time through your account on the TAB Website and TAB App or by contacting the Customer Service Centre.</p> <p>You can review up to 7 years of transaction history and activity statements on the TAB Website and TAB App or by contacting the Customer Service Centre.</p>
UNSUBSCRIBE FROM MARKETING	You can opt out of receiving marketing and promotional emails and messages.
ONLINE ACCOUNT CLOSURE	<p>You can easily close your account online via the TAB Website, TAB App or by calling the TAB Customer Service Centre on 131 802.</p> <p>Once the request is processed, we will close your account and remaining funds are returned to you (once pending bets have been finalised).</p>

8. SELF-EXCLUSION PROGRAMS

8.1 WHAT IS SELF-EXCLUSION

Self-exclusion is a tool customers can use to help them stop gambling. We offer retail and online self-exclusion programs. Using these programs, allows you to exclude yourself from your TAB account, TAB Venues or both.

8.2 RETAIL

We operate and manage a retail self-exclusion program called TABCare in Victoria. TABCare allows you to exclude yourself from gambling at selected venues and from gambling online. Participation in the program is voluntary and on a good faith basis.

We have a TABCare Brochure on our TAB Safer Gambling Website

<https://responsiblegambling.tab.com.au/help> which contains information about potential gambling harm indicators, and information about the TABCare program, including how to join.

This information is also available by contacting a TAB Venue or our Customer Service Centre on 131 802.

You can speak to the dedicated TABCare team for additional information on how to access the TABCare program, including what self-exclusion is, how to apply for self-exclusion, what happens

during self-exclusion, what information and documents you must provide, and contact information for gambling support services. Staff working in TAB Venues will also provide you with TABCare information if you are seeking to self-exclude.

We have policies and procedures in place as part of the TABCare program, which detail the operation of the TABCare program.

OVERVIEW OF TABCARE

1. All TAB agencies and licensed venues participate in the TABCare program.
2. You can choose to be excluded from up to 15 agencies and 15 licensed venues ("Nominated Outlets") across Victoria.
3. You can nominate to be self-excluded for a period of 6, 12, 18 or 24 months.
4. Once we receive your application, TABCare will contact you to discuss your reasons for excluding, review the period and locations you have selected and provide you with contact details of gambling support services.
5. Staff working in Nominated Outlets must actively monitor for any self-excluded customers. They will ask you to leave the gambling area. We also request that self-excluded customers entering a Nominated Outlet identify themselves to staff who can assist them to not breach their self-exclusion status.
6. If you breach your self-exclusion status, the relevant venue must report this to us.
7. Your account is suspended during your nominated self-exclusion period.
8. TABCare will contact you prior to your self-exclusion period ending to advise you of your self-exclusion expiry and provide information on extending your self-exclusion period if you choose. If you have chosen to self-exclude for more than 6 months you will need to acknowledge your exclusion expiry, otherwise we will extend your self-exclusion period by 6 months and remind you again at the end of the extension of your exclusion period.
9. We will request a new photo from you every two years to ensure that staff are monitoring for any self-excluded customers using up-to-date photos.
10. We will not send any advertising or marketing to you once you are self-excluded.
11. If you ask to revoke your self-exclusion during your nominated self-exclusion period, you must provide us with a letter of assessment from a Victorian or New South Wales based gambling counselling service provider showing that you have sought assistance for your gambling problem.

Further information regarding TABCare can be obtained:

- via phone:** 1800 882 876
via email: TABcare@tabcorp.com.au
online: <https://responsiblegambling.tab.com.au/help>
in person: At any TAB Venue

8.3 ACCOUNT

You can self-exclude from your account via the TAB Website, the TAB App or by calling our Customer Service Centre on 131 802. Once processed, we close your account and return your remaining funds (once pending bets have been finalised).

Once your account is closed for self-exclusion, your details will be blocked to prevent you from using your details to open future accounts with us. We also check for where accounts might be opened using similar details as self-excluded customers.

We will not send any advertising or marketing to you when you are self-excluded.

If you request to revoke your online self-exclusion, you must provide us with a letter of assessment from a Victorian or New South Wales based gambling counselling service provider showing that you have sought assistance for your gambling problem.

If you want to self-exclude from all Australian online wagering services, you can also register on BetStop - the National Self-Exclusion Register™ at www.betstop.gov.au or by calling 1800 238 786.

9. INTERACTION WITH OUR CUSTOMERS AND CONCERNED PERSONS

As the provider of services and products that can cause harm, we take a number of steps that seek to minimise the risk of harm to our customers.

This involves not encouraging customers to engage in risky betting behaviour and seeking to identify when customers are at risk of, or experiencing, harm and then taking appropriate action.

We will ensure our employees, and our TAB Venues and their staff, are equipped with the support, knowledge and skills needed to identify when a customer is at risk and how to intervene appropriately.

9.1 RETAIL INTERACTIONS

TAB Venue staff are regularly trained to identify behaviours or respond to remarks that may indicate you are having difficulty managing your gambling or suffering from gambling harm.

These may include:

Loss of control

- gambling right through normal meal times;
- finding it difficult to stop gambling at closing time;
- starts gambling when the venue opens or only stopping when the venue is closing;
- staying on to continue gambling even when friends have left; or
- making remarks to us that may indicate serious overspending.

Money seeking

- borrowing money to fund gambling;
- leaving a venue to find money to continue gambling;
- continuing to bet with winnings rather than collecting winnings;
- has run out of all money when leaving the venue; or
- showing concern to us about losses and payouts.

Intensity and duration

- gambling for long periods without a proper break;
- significant increase in spending pattern;
- Gambling on most days that the venue is open;
- gambling without reacting to what is going on in the venue; or
- telling us you need a break from gambling.

Emotional responses

- displaying signs of distress including crying;
- displaying signs of anger including swearing, becoming angry with staff; or
- telling us that you feel guilty or remorseful for gambling.

Social behaviour

- avoids contact or conversations with others;
- avoids interacting with staff;
- decline or changes in personal grooming and appearance; or
- repeatedly commenting to us that you are experiencing family problems.

Customers may also directly tell staff that they are experiencing gambling harm.

How we help you

When TAB Venue staff identify customers with these behaviours or you approach a TAB Venue staff member asking about or indicating the need for assistance, our staff members will assess the customer's circumstances by speaking directly with the customer and respond by taking a range of actions:

1. encouraging you to take a break from gambling by leaving the TAB service area participating in other venue activities or having a refreshment or lunch break;
2. encouraging you to take a break from gambling by leaving the TAB Venue, or moving to another section of the venue that is away from the TAB service area;
3. providing you with information on our Safer Gambling tools and services, including pre-commitment limits;
4. providing you with information on how to access gambling support services and facilitate access to these services if required; and
5. providing you with information about TABCare (our retail self-exclusion program in Victoria).

TAB Venue staff will respond and support you in a private, sensitive, confidential and appropriate manner, however they are not trained to provide counselling. TAB Venue staff will interact with you in a manner that respects your privacy, making sure other customers cannot overhear any conversation.

If TAB Venue staff believe you are displaying signs of distress, they are required to refuse to serve you, including placing or paying out your bets.

TAB Venues and their staff must not:

- encourage or affirm customer superstitions about gambling;
- encourage excessive gambling or provide incentives to continue gambling;
- encourage or induce a person from gambling intensively or for long periods without a break;
- encourage or induce customers to withdraw funds from a cash facility for the purposes of gambling;
- encourage or induce a person to continue to place bets, when the customer is showing one or more behavioural indicators associated with gambling harm;
- discourage a person from leaving the venue in order to stop gambling; and
- discourage a person from seeking help from a gambling support service.

We regularly assess and maintain the information publicly available on the TAB Website and the TAB Safer Gambling Website, to ensure the information and support needed by our customers, their families, community or other persons is up-to-date and accessible.

9.2 ACCOUNT INTERACTIONS

We actively monitor your account deposit and betting behaviours using systems and tools to identify customers at risk of gambling harm.

Examples of behaviours that may indicate gambling harm are:

- changes in deposit behaviours – frequency, amount, escalating sums of money deposited;
- changes in betting behaviours – average bet size, frequency, number of bets;
- changes in gambling patterns, e.g. betting on different events, betting at different times;
- gambling for extended periods of time;
- admitting being drunk or under the influence of drugs;
- showing signs of distress such as crying or anger;
- expressing guilt or remorse for gambling;
- making remarks that may indicate serious overspending;
- repeatedly commenting about family problems;
- showing concern about losses and payouts;
- indicating they need a break from gambling;
- frequently closing and re-opening their account; and
- disclosing that they are experiencing gambling harm.

Our Safer Gambling Team has a range of interventions in place for when these behaviours are identified.

How the Safer Gambling Team intervenes is specific to your behaviour and circumstances. Steps that the team may take include:

1. sending you an email and/or SMS with information about our safer gambling tools including self-exclusion;
2. sending you an email and/or SMS with information about available gambling support services;
3. reviewing your account to see if we need to take further action. This includes looking at previous interactions, betting activity, deposit activity, withdrawal activity and whether you have previously used any of our safer gambling tools;
4. calling you - what the call covers will be specific to you and will include a discussion about what we've observed including potential indicators of gambling harm, understanding your individual circumstances and providing information about safer gambling tools including pre-commitment deposit limits, self-exclusion, and gambling support services;
5. where we cannot contact you for a safer gambling call, we will proactively freeze your accounts; and
6. proactively closing your accounts.

If you advise us that you are experiencing severe gambling harm, we will immediately close your account. When we close your account, our systems will prevent you from opening future accounts using the same details. We also check for where accounts are opened using similar details as customers who have had their accounts closed.

We train our staff who interact directly with our customers how to identify customer behaviours that indicate gambling harm. Where these indicators are identified, our staff are trained how to appropriately manage the customer and escalate the matter to our Safer Gambling Team.

Our Safer Gambling Team can be contacted by our customers, their families, their community or any other person:

via email: RGwagering@tabcorp.com.au

via phone: 02 9218 1111

We regularly assess and maintain the information on the TAB Website and the TAB App, to ensure the information and support you need is up-to-date and accessible.

9.3 WHO TO APPROACH IF YOU ARE CONCERNED ABOUT SOMEONE

We encourage those who have a concern about a family member or friend's gambling to contact us through:

- our Safer Gambling Team on:
via email: RGwagering@tabcorp.com.au
via phone: 02 9218 1111
- our Customer Service Centre on 131 802; or
- at any of our TAB Venues.

Our Safer Gambling Team will advise you of how they can assist and give you information about support services available.

10. INTERACTION WITH STAFF

We acknowledge that people who work in the gambling industry can be at heightened risk of gambling harm. We also understand that gambling at work can create integrity risks for the employee and for our business.

For these reasons, we have policies on employee gambling, which must be complied with by all employees, our TAB Venues and their staff.

10.1 EMPLOYEE GAMBLING POLICY

All employees or contractors must comply with our Employee Gambling Policy. This is a strict requirement for our employees and contractors. Non-compliance is a serious breach and may mean that an employee is disciplined or has their employment terminated, or a contractor has their contract terminated.

The policy places a range of restrictions on team members participating or otherwise engaging in wagering activities operated by Tabcorp.

10.2 VICTORIAN VENUES GAMBLING POLICY

TAB agencies: All staff including agents and their staff are prohibited from gambling at any time at the agency where they are employed or anywhere whilst on duty, including rostered, paid and unpaid breaks.

TAB licensed venues: All licensees of TAB Venues are only permitted to gamble at their venue via a digital channel, and only when off duty.

TAB licensed venue staff: All staff are prohibited from gambling at any location while on duty, including rostered, paid and unpaid breaks.

Licensed venues owned and operated independently of us may place additional restrictions on their employees gambling at their venue.

10.3 PROVIDING INFORMATION AND ASSISTANCE TO STAFF

Where an employee, including a venue staff member is exhibiting or displaying observable signs of gambling harm, or behaviour indicating difficulties managing their gambling, we will provide information on:

- Safer Gambling tools and services;
- how to access gambling support services and facilitate access to such services if required; and
- TABCare.

We will support our staff in a private, sensitive, confidential and appropriate manner. We will interact with staff in a manner that respects the staff member's right to privacy, for example taking steps to make sure any conversations are sensitively handled.

11. SAFER GAMBLING TRAINING

In order to ensure our employees deliver our products and services in a safer manner and can identify when a customer may be experiencing gambling harm, we require all employees, TAB Venues and their staff to undertake mandatory compliance training.

For all corporate staff – Safer Gambling Training when they start their employment and as part of our annual mandatory compliance training program.

For corporate staff that interact directly with customers – Additional specialist Safer Gambling training, which includes:

- how to identify potential indicators of gambling harm;
- how to intervene and address indicators of gambling harm that have been identified, including providing information on our safer gambling tools and services, providing information about our online and retail self-exclusion programs, providing information about gambling help services and proactively suspending or closing an account; and
- how to escalate gambling harm concerns to the Safer Gambling Team.

For TAB Venue staff – Safer Gambling training when they start their TAB duties and as part of mandatory annual compliance training. This training includes:

- how to identify potential indicators of gambling harm in retail customers;
- how to intervene and address indicators of gambling harm that have been identified, including providing information on our safer gambling tools and services, providing information about our online and retail self-exclusion programs and providing information about gambling help services;
- the requirements regarding intoxication and prohibition of minors betting; and
- how to escalate any concerns to TAB.

TAB Venues are provided with regular reminders of their safer gambling obligations, along with safer gambling manuals.

12. GAMBLING SUPPORT SERVICES

12.1 HOW WE INTERACT WITH THE SERVICES

In line with our commitment to safer gambling and to enhance our understanding of gambling harm, we liaise with a range of gambling related support services and stakeholders at least once every 3 months.

These organisations may include Lifeline, Gambler's Help, Gamble Aware, Relationships Australia, Financial Counselling Australia and other support service providers.

We liaise with gambling-related support services and stakeholders through:

- informal and ongoing telephone and email contact to seek their advice and feedback including e.g., in reference to our safer gambling improvement initiatives, our self-exclusion programs and the Code;
- formal telephone and email contact to seek feedback regarding the effectiveness of the Code as part of our regular review of the Code; and
- attendance at the annual National Association for Gambling Studies Conference.

We also attend, present and liaise at gambling harm counselling forums across Victoria throughout the year where possible.

We actively promote Victorian Gambling Harm Awareness week in our TAB Venues and other digital content.

12.2 AVAILABLE GAMBLING SUPPORT SERVICES

We provide customers identified as requiring support with information about the below gambling support services.

Customers, their families, their community, or any other person can reach out to these services.

- **National Gambling Helpline** 1800 858 858 (*available 24 hours a day, 7 days a week*)
- **Gambler's Help** 1800 858 858 <https://www.gamblinghelponline.org.au/>
- **Gambler's Help Youth Hotline for under 25s** 1800 262 376
- **Gambling Helpline Interpreter Service** 131 450
- **Gambler's Anonymous** <https://gaaustralia.org.au/>
- **Relationships Australia** 1300 364 277 <https://relationships.org.au/>
- **Lifeline** 13 11 14 <https://www.lifeline.org.au/>

We also offer referrals to a range of independent support services.

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. MINORS

We are committed to ensuring that minors are not permitted to gamble online or at a TAB Venue.

We strictly prohibit people under 18 years old from gambling and take all reasonable steps to ensure that minors cannot use our wagering products and services, including having a TAB account.

13.1 RETAIL

We require TAB Venues and their staff to ensure minors do not purchase our gambling products and services by:

1. Displaying signage stating minors are not permitted to gamble.
2. Requiring TAB Venue staff to ask you for proof of age if you look less than 25 years old. This is for all wagering transactions (at the counter or through a self-service terminal) including collection of dividends. If relevant verification cannot be produced, service is refused and you will be requested to leave the agency or TAB service area. The staff member must not return any ticket to a minor or someone they suspect to be a minor.

3. Monitor self-service terminals (through direct line of sight or continuous CCTV footage) to ensure they are not used by minors.
4. Refusing to place bets or allow the collection of dividends if they know the person is acting on behalf of a minor.
5. Ensuring our self-service terminals are placed at least 2 metres away from all entrances and exits to ensure that they can be effectively monitored. Additionally, any self-service terminals located more than 5 metres away from the operator location are restricted to only accept vouchers.
6. Requiring customers to confirm they are over 18 before they can place a bet when using our self-service terminals.
7. Providing TAB Venue staff with access to remotely disable a self-service terminal from their operator terminal if they see a self-service terminal being misused, for example by someone that could be a minor.
8. Requiring TAB Venue staff to escalate all potential instances of a minor betting to TAB.

We require all minors to be accompanied by a parent or guardian when entering an agency or TAB service area. TAB Venue staff will ask any unaccompanied minors near wagering facilities to leave the area.

13.2 ACCOUNT

We will take steps to ensure minors do not open a TAB account. These include but are not limited to the following steps:

1. We require customers setting up an account to confirm their identity and that they are over 18 years old. Accounts not verified in accordance with regulatory timeframes are automatically frozen and prevented from transacting.
2. We have appropriate warnings on our TAB Website and TAB App that minors are not allowed to open an account or gamble with us.
3. Our account terms and conditions state that minors cannot gamble with us and place obligations on our customers not to allow minors to bet via their accounts or to disclose their security details to a minor.

If we determine an individual has opened an account with us and they are under 18, or that a person is allowing a minor to bet using their account, the account will be closed immediately.

We report any instances of minors betting to the Victorian gambling regulator.

13.3 WHAT TO DO IF YOU ARE CONCERNED ABOUT A MINOR

You can reach out to us if you are concerned about someone under 18 potentially gambling by visiting a TAB Venue or contacting our Safer Gambling Team on RGwagering@tabcorp.com.au or (02) 9218 1111 or calling our Customer Service Centre on 131 802.

14. THE GAMBLING ENVIRONMENT

14.1 RETAIL

We are aware that sometimes our customers can lose track of time while they are in a TAB Venue. This can result in them staying longer, or spending more on gambling, than intended.

We are committed to you being aware of the passage of time when you are in a TAB Venue. To do this, we have the following in place:

1. Customers can check the time in several ways:

- the time is displayed on electronic TAB information display screens in TAB Venues;
 - the self-service terminals display the time of the races and other events; and
 - by asking TAB Venue staff.
2. Customers placing bets on a self-service terminal will be able to judge the passage of time using the information on the self-service terminal, like the race times.
 3. Where a customer is placing bets on a terminal operated by a TAB Venue staff, a customer can use these interactions to be aware of the passage of time. TAB Venue staff will actively monitor for customers are in their venue or using wagering terminals for lengthy periods of time and/or have engaged in extended and intensive gambling. For example, if you have been gambling for long periods i.e. for three hours or more without a break.
 4. All bet tickets and vouchers have the time of the purchase or issue printed on them.

If you are identified as displaying signs of potential gambling harm (the full list of indicators is set out in section 9.1), TAB Venue staff will discourage you from engaging in extended and intensive gambling including by:

1. speaking directly to you to make you aware of the passage of time;
2. encouraging you to take a break from gambling; and
3. providing you with information on available gambling support services.

You will be refused service of gambling products if the TAB Venue staff's view is that you are experiencing gambling related distress.

14.2 ACCOUNT

We are also committed to ensuring our online customers are aware of the passage of time. To help them do this we have the following in place:

- The TAB Website and TAB App contain information on upcoming scheduled racing and sports events. You can use this information to ensure you are aware of the passage of time.
- We actively monitor betting behaviours using a number of systems and tools to identify customers engaging in extended and intensive gambling. For example, if you are betting for extended periods of time.

If you're identified as displaying signs of engaging in extended and intensive gambling (the full list of indicators is set out in section 9.2), our Safer Gambling Team will intervene and take action which may include, but is not limited to:

1. sending you an email and/or SMS with information about our safer gambling tools including self-exclusion;
2. providing you with information about available gambling support services;
3. reviewing your accounts to determine whether additional interventions are required - this includes reviewing previous interactions, betting activity, deposit activity, withdrawal activity and whether the customer has previously utilised safer gambling tools;
4. calling you;
5. proactively freezing your accounts; and
6. proactively closing your accounts.

When we freeze or close your account due to advice from the Safer Gambling team, you will stop receiving marketing material. If we close your account for a safer gambling reason, we will put blocks in place to prevent you from opening future accounts with us using the same details. We also check for where accounts are opened using similar details as customers who have had their accounts closed.

15. INTOXICATION

We will not allow you to use our wagering products and services if we become aware that you are intoxicated or under the influence of drugs. All customer-facing employees, including those in TAB Venues, have been trained to identify signs of intoxication or where someone is under the influence of drugs and refuse service, including proactively freezing your TAB account.

16. FINANCIAL TRANSACTIONS

You must pay for bets when purchased. We do not provide credit or lend money for gambling.

We do not accept customer cheques as payment or allow you to cash cheques. You will be informed about this restriction if you present a cheque.

All winnings are paid (at the discretion of the TAB Venue) either in cash, by cheque, betting voucher, or by crediting the winnings to a TAB account or EFTPOS debit card in accordance with applicable regulations, industry codes or policies and our betting rules. The betting rules are available on the TAB Website and throughout TAB Venues.

We will use best reasonable endeavours to make payments for winning bets placed with us through your account to your betting account as soon as the official result is confirmed.

17. SAFER ADVERTISING AND PROMOTIONS

17.1 ADVERTISING, MARKETING AND PROMOTIONS

We ensure advertising and promotions permitted under the Gambling Regulation Act 2003 (VIC) related to gambling will:

- comply with all applicable Commonwealth and State laws, regulations and codes relating to the advertising or promotion of wagering products, including the advertising code of ethics adopted by the Australian Association of National Advertisers;
- not be false, misleading or deceptive about odds, prizes or the chances of winning, and not misrepresent the probability of winning or financial gain;
- 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;
- not state or imply that a player's skill can influence the outcome of a gambling activity, where it cannot be factually substantiated;
- be correct, accurate and truthful;
- require the consent of any person identified as winning a prize prior to publishing their name;
- be in good taste (given prevailing community standards) and not be offensive or indecent in nature;
- be socially responsible;
- not create an impression that gambling is a reasonable strategy for financial betterment;
- not promote gambling as a means of funding routine household purchases, cost of living, nor relieving financial or personal difficulties;
- not promote the consumption of alcohol while gambling and does not associate gambling with alcohol;
- not be intentionally directed, expressly or indirectly, to vulnerable or disadvantaged groups and minors;

- not be aimed at or designed to appeal to minors and does not appear in conjunction with an offer, event or venue advertisement that pertains to minors;
- not offer any rewards, inducement or vouchers that encourage customers to bet more frequently;
- not promote gambling as a means of enhancing social standing or employment, social or sexual prospects; and
- not exaggerate the connection between the gambling activity and the use to which the gambler's profits may be put.

17.2 HOW WE COMPLY WITH ADVERTISING REQUIREMENTS

To ensure that our advertising, marketing and promotions comply with the relevant requirements and do not encourage customers to gamble excessively or beyond their means:

- We make sure that all advertising and marketing includes safer gambling messages in accordance with relevant legislation.
- When we send you direct marketing, we include information on how you can opt out of receiving direct marketing.
- We document the safer advertising and promotions obligations in our internal Marketing Guidelines, which are provided to all team members involved in marketing and advertising.
- We train all marketing team members at the start of their employment on their safer advertising and promotions obligations and conduct mandatory annual refresher training.
- We place all self-excluded customers and customers using the Take a Break function on a list to make sure they do not receive any marketing and advertising.
- We have processes in place to review our advertising and marketing material before it is seen by the general public. This includes the review of advertising and marketing by a Senior Marketing Manager, along with our Legal and Safer Gambling team, where relevant.
- Our Marketing team undertakes monthly quality assurance to ensure that our marketing processes are adhered to by marketing team members.
- The effectiveness of marketing controls is assessed annually by our Risk team.

We will not release new products or change our existing products without assessing their potential impact on customers vulnerable to gambling harm. Our Safer Gambling team performs an assessment over all new products or services to ensure that they do not:

- appeal to minors;
- expose minors to gambling;
- encourage customers to bet more frequently than usual;
- encourage customers to bet for longer periods of time than usual;
- encourage customers to bet more than they normally would;
- encourage customers to bet beyond their means;
- increase the chance of impulsive decision making; and
- normalise gambling.

The outcome of the assessment determines if and how the product or service is released.

18. CUSTOMER LOYALTY SCHEME INFORMATION

From time to time, we will send and communicate to our customers marketing offers and promotions. These may include bonus bet offers, deposit match offers, competitions and invitations to attend

experiences like race days. We will not send offers to customers that are self-excluded or using the Take a Break function.

These offers and promotions are made as a way to attract and retain customers, promote certain sporting and racing events, promote a new product or promote a certain product e.g. pari-mutuel betting.

Some offers and promotions will be made available to all customers, whilst other offers and promotions will be personalised to customers. Customers are selected for personalised offers and promotions based on a number of different factors including their previous betting history, their betting preferences and their betting location. Offers and promotions may expire if they are not used within the set timeframes.

To ensure customers clearly understand the offers and promotions are available to them:

- we clearly communicate any offers or promotions available to customers via email, SMS or verbally;
- we provide customers with information on any terms and conditions associated with the offer or promotion. For example, if there are any time periods that apply, if there are any eligibility requirements, if there are any conditions of entry for a competition, how to enter etc;
- customers can access information about available offers and promotions, including their available bonus bets at any time by logging into their TAB account online;
- customers can access the terms and conditions that apply to our promotions on the TAB Website and App; and
- customers can contact our Customer Service Centre on 131 802 if they have any queries about our offers and promotions.

You can opt-out of receiving direct marketing from us at any time.

We do not offer a system that tracks a person's expenditure on a gambling product and rewards that expenditure with bonus, loyalty or reward points. We previously offered a TAB Rewards program that involved an accruing points system. This program is currently not operational, and we do not offer a structured customer loyalty program.

19. COMPLAINTS

19.1 GENERAL COMPLAINTS

You can make a complaint to us either online, by contacting the Customer Service Centre on 131 802 or by post. We have detailed the process for customer complaints on the TAB Website.

<https://help.tab.com.au/s/article/Submitting-a-Complaint>

Complaints about wagering matters can also be directed to the Victorian gambling regulator as an independent body for investigation and resolution via their website <https://www.vgccc.vic.gov.au/i-want/complaints>.

19.2 COMPLAINTS ABOUT THE CODE COMPLIANCE

You can raise a complaint about the Code by contacting our Safer Gambling Team via:

email: RGwagering@tabcorp.com.au

post: GPO 4168 SYDNEY NSW 2001

phone: 02 9218 1111

If you call with a complaint, we may ask you for details of the complaint in writing.

19.3 HOW WE MANAGE COMPLAINTS ABOUT OUR COMPLIANCE AND OPERATION OF THE CODE

We have a formal complaint management policy and process in place to ensure that customer complaints are reviewed and addressed appropriately.

When we receive a complaint from you, our Safer Gambling Team will:

1. Acknowledge written or email complaints in writing or by email within 5 working days of receiving the complaint.
2. Review and investigate the complaint. This includes reviewing the information provided, as well as other relevant information such as your betting history or your previous interactions with us.
3. Advise you of the review outcome within 21 days. If we are unable to finalise the review within 21 days, we will let you know of the new timeframe.
4. Provide you with the outcome of the complaint. Where relevant the outcome of the complaint is determined by the Complex Complaints Committee which includes senior representatives from across our business.

If the matter is resolved, no further action is taken.

You can request an internal review of the decision by sending a request in writing to complaintappeals@tabcorp.com.au. A Complaints Appeals Committee will then review the decision to make a final determination. This final determination will be provided to you within 10 working days.

If you request an independent review of this decision, we will refer the matter 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.

Costs of this process will be shared equally by us and you, unless otherwise agreed or as determined by the arbitrator.

19.4 RECORD KEEPING

We keep records of complaints, all complaints documentation and decisions in our Safer Gambling Complaints Register, held for a period of seven years. These are made available for inspection by the Minister for Consumer Affairs, Gaming and Liquor Regulation or the Victorian gambling regulator on request in accordance with our record keeping obligations and to allow the Victorian gambling regulator to monitor our compliance with the complaints process.

20. HOW WE HANDLE PERSONAL INFORMATION

We are committed to privacy, transparency and information security. To honour this commitment, we handle personal information in accordance with the *Privacy Act 1988 (Cth)* and the Australian Privacy Principles. Our Privacy Policy sets out how we handle personal information. You can access a copy of our Privacy Policy at <https://www.tabcorp.com.au/privacy>. You may also contact privacy@tabcorp.com.au with any queries or concerns.