Tabcorp Wagering (VIC) Pty Ltd

Responsible Gambling Code of Conduct





CONTENTS

Responsible Gambling Mission Statement	3
I. About Tabcorp	4
2. Tabcorp Wagering Responsible Gambling Code of Conduct	5
3. Our commitments	8
4. Providing you with information	.15
5. Complaints	.19
6. Responsible Gambling	.20
7. Supporting Responsible Gambling	.22
3. Definitions	.25





RESPONSIBLE GAMBLING MISSION STATEMENT

Tabcorp Wagering (VIC) Pty Ltd ("**Tabcorp Wagering Victoria**") believes that industry, government and the community have a shared responsibility to help prevent the development of gambling related problems, and to ensure that problem gambling support services are available for those individuals requiring assistance.

For the majority of people, gambling is a pleasurable leisure activity and an enjoyable form of entertainment. Tabcorp Wagering Victoria appreciates that a small proportion of people experience problems with their gambling. As a result Tabcorp Wagering Victoria has developed this Wagering Responsible Gambling Code of Conduct ("the Code") which outlines practices adopted by us when providing services to our customers. Tabcorp's Responsible Gambling message will be displayed where it is clearly visible to customers.

This Code reflects Tabcorp Wagering Victoria's commitment to our customers. We welcome feedback on our ongoing commitment to our Responsible Gambling initiatives.

David Attenborough

Managing Director
Tabcorp Wagering (VIC) Pty Ltd



1. ABOUT TABCORP

Tabcorp is Australia's premier leisure, gambling and entertainment group and one of the largest publicly listed gambling companies in the world.

Tabcorp Wagering Victoria conducts wagering activities via the internet, telephone, oncourse at metropolitan and country race meeting, sports betting at major sporting events, and via a network of agencies, licensed hotels, and clubs.

Tabcorp Wagering Victoria endeavours to:

- Minimise the negative impact of gambling for customers, their families and the wider community.
- Provide information to our customers that enables them to make informed decisions about their gambling.
- Provide our customers who have an acknowledged gambling problem with access to our voluntary Self Exclusion Program and facilitate their access to appropriate support agencies and information.
- Promote a shared understanding between individuals, communities, the gambling industry, regulators and government of responsible gambling practices and the rights and responsibilities in accordance with those practices.

The Tabcorp Wagering Victoria Responsible Gambling Code of Conduct reflects Tabcorp's commitment to delivering our wagering products with the highest levels of integrity and corporate responsibility and in accordance with all legislation across all Australian jurisdictions.



2. TABCORP WAGERING VICTORIA RESPONSIBLE GAMBLING CODE OF CONDUCT

2.1 Aim of the Code

A key aim of this Code is to provide a single document for all customers across Australia who use Tabcorp Wagering Victoria products and services.

It is designed to:

- set standards and requirements across our Wagering business to assist in the responsible delivery of gambling products across our operations and our retail network;
- ensure compliance with all Australian state and territory based legislative or regulatory obligations;
- reflect our underlying values, and our commitment to minimising the potential harm associated with gambling;
- be aligned with the Victorian Responsible Gambling Ministerial directions.

The Tabcorp Wagering Victoria Code of Conduct must be approved by the Victorian Commission for Gambling Regulation.

In some cases, there are some aspects of this Code that only apply to customers in certain states. Where this occurs, we will clearly note that the obligation is only applicable to customers in that state.

2.20bjective of the Code

Tabcorp Wagering Victoria respects the rights of our customers to enjoy our products and services. Customers must take responsibility for their own conduct, but Tabcorp Wagering Victoria also acknowledges our own responsibility to our customers to provide them with appropriate information that may assist them to manage their gambling, if they require this support.

The primary objective of this Code is to ensure a standard framework is in place across Tabcorp Wagering Victoria that ensures:

- Customers make informed decisions about gambling;
- Where customers require assistance, to facilitate their access to gambling help services;
- The maintenance of meaningful relationships with our stakeholders in order to enhance our understanding of problem gambling through liaison with community groups, governments, problem gambling counsellors, our employees and industry groups.



2.3 What this Code includes

- Our commitments to our customers in relation to responsible gambling;
- The information we will make available to inform our customers about our wagering products, responsible gambling and problem gambling counselling services;
- What we do to implement the responsible delivery of gambling across our retail network, in accordance with our commitment to the highest standards of customer care;
- How we support our customers in seeking assistance for a gambling related problem; and
- How this Code is administered.

2.4The Code applies to:

- Tabcorp Wagering Victoria, and our employees;
- Our retail network and all people employed by Agents in that network; and
- Gambling services or products that we provide, including those provided through electronic facilities, within Australia.

From time to time, we may revise this Code. The updated version of the Code must be approved by the Victorian Commission for Gambling Regulation before its release. Following approval, the updated version of the Code will be available in our retail network on our Customer Information Terminals, where applicable; or on our website www.tab.com.au. We will inform our customers when we update this Code via customer newsletters and on our website.



2.5 Compliance with laws and other industry regulations

We will comply with all relevant laws within Australia relating to the provision of our wagering products and services including those relating to:

- Minors:
- The provision of credit;
- Betting Rules;
- Requirements of venues;
- The service of alcohol:
- Advertising and promotions;
- Online wagering;
- Privacy; and
- Responsible Gambling Codes of Conduct and/or Practice.

In some circumstances, there are aspects of this Code that only apply to certain customers in certain states. Where this applies, we will ensure that it is clearly noted.

2.6 Conflict with Legislation and Codes of Conduct

Where there is any conflict between this Code and any Commonwealth or State legislation or regulation, the higher standard will apply.

Furthermore, this Code is to be applied in conjunction with, and as deemed necessary, will be in addition to any other applicable industry responsible gambling codes of conduct and/or practice we adopt within local jurisdictions.

Throughout this Code, we make certain commitments to our customers. The nature of our business means that we rely on people employed in our retail network to fulfil such commitments. Outlets in our retail network are owned and operated independently of Tabcorp Wagering Victoria, and this includes TAB wagering facilities located within hotels, licensed clubs and other facilities, however Tabcorp Wagering Victoria remains responsible for providing the retail network with the tools and training to maximise compliance by these Agents with this Code.

We will use our best endeavours and take all responsible steps to ensure there is a commitment to the requirements of this Code from our Agents in the retail network and all staff employed by those Agents in the retail network.



3. OUR COMMITMENTS

Tabcorp Wagering Victoria is committed to making responsible gambling information available to our customers and employees so that our customers are able to make informed decisions regarding their entertainment choices.

3.1 Communication of this Code

We will communicate and promote this Code throughout our corporate Wagering operations, on our websites and throughout the TAB retail network. The full Code is available throughout the TAB retail network on the Customer Information Terminals. It is also available via our website, www.tab.com.au. Hard copies of the Code can be provided to any customer who telephones the TAB call centre and requests to be sent a copy.

We will provide regular reminders of the existence of this Code in any contact we have with our customers via TAB or newsletters or any other means by which we may regularly contact our customers. Tabcorp Wagering Victoria has prominent messages on its websites that our operations are governed by a Responsible Gambling Code of Conduct and a Responsible Gambling message "Gamble Responsibly".

Upon request we can make this Code available to our customers in Arabic, Chinese, Greek, Italian or Vietnamese. Requests for this Code to be made available in these other community languages should be made to Tabcorp Wagering via email at RGwagering@tabcorp.com.au or by contacting the General Manager, Regulatory and Compliance on 02 9218 1780.

3.2 Review of this Code

A review of compliance with this Code (including compliance with this Code by our retail network) will be undertaken by the Tabcorp Regulatory and Compliance team on an annual basis. The Regulatory and Compliance report will be provided to the Tabcorp Wagering Risk and Compliance Committee and this Committee will manage any required changes to this Code.

This process will incorporate engagement with our customers, employees, representatives from gambling industry groups, problem gambling counselling services and community groups.

We will also conduct a further assessment of this Code on an as needs basis where there are significant changes in the Responsible Gambling environment. We will consult with our customers, employees, representatives from the various sectors of our operations,



and representatives from gambling industry groups, problem gambling counselling services and community groups prior to making changes to this Code.

3.3 Information on request to interested stakeholders

We will provide information on request regarding this Code to interested stakeholders, including relevant community groups and agencies, governments, regulators, problem gambling counsellors and industry groups.

3.4Tabcorp Wagering Victoria Policies and Procedures

Tabcorp Wagering Victoria ensures that all employees and the Tabcorp retail network is provided with compliance tools, information and training that supports this Code, and the responsible delivery of our wagering products and services.

These include operational policies and processes, clear lines of accountability for compliance with the Code, reporting mechanisms to report breaches of the Code and follow-up procedures for dealing with responsible gambling issues. We will also monitor the implementation and ongoing management of this Code throughout Tabcorp Wagering Victoria and the Tabcorp retail network.

3.5Training

Tabcorp Wagering Victoria requires all employees, Agents and their employees to understand the commitments and provisions of this Code and applicable regulations. We aim to ensure that all employees, Agents and their employees:

- Are equipped to deliver our wagering products and services to customers in accordance with this Code;
- Understand the possible behavioural indicators of problem gambling;
- Are equipped to maintain appropriate records of incidents occurring within their outlet; and
- Have the skills to deal with customers sensitively.

We require all Tabcorp employees, Agents and their employees to be trained in Responsible Gambling or take part in a Communications Program regarding our wagering products and services. The training and the Communications Program includes information on Responsible Gambling matters, including our Self Exclusion Programs and requires employees to understand the gambling support and counselling services available to customers, including applicable contact details.



All employees are trained in Responsible Gambling matters, this Code and the Tabcorp Wagering Self Exclusion Program via the Tabcorp Wagering Induction Program. Some employees involved in selling our gambling products undertake further targeted Responsible Gambling training.

Tabcorp Wagering Victoria provides refresher training to all staff at least once every 12 months and includes responsible gambling material in employee newsletters and magazines and displays responsible gambling material in the workplace to remind staff of Responsible Gambling policies and their responsibilities.

Agents and their employees are required to attend TAB Accreditation training. Tabcorp Wagering manages TAB Operator and TAB Licensed Venue Manager Accreditation Training Programs. Training in Responsible Gambling matters, this Code and the Tabcorp Wagering Self Exclusion Program forms an integral component of these training programs.

3.6 Key Performance Indicators

All employees that engage with customers have Responsible Gambling requirements as part of their Key Performance Indicators. At quarterly intervals, they are assessed by their manager against these Indicators.

Tabcorp Wagering's Shine Awards carry a category of "Responsible Gambling". Employees are encouraged to nominate other employees for a Shine Award who has demonstrated a commitment to Responsible Gambling.

In the retail network, the Agency agreement between the Agent and Tabcorp Wagering Victoria requires a commitment to Responsible Gambling measures. Responsible Gambling breaches have a zero tolerance approach and Agency agreements can be terminated for breach of Responsible Gambling obligations.

3.7 Indicators of Problem Gambling by employees or customers

Tabcorp Wagering Victoria employees, Agents and their employees are trained in identifying behaviours that may indicate a customer has a problem with their gambling. Where an employee, Agent, their employee or customers are exhibiting or displaying observable signs of distress, or behaviour indicating a problem with their gambling, we:

- Ensure that they are provided with information on access to support services;
- Provide information to them Tabcorp Wagering's self exclusion program BetCare;
- Consider involuntary exclusion from our products and services;



- In the case of employees, Agents, and their employees, provide them with access to our Employee Assistance Line, managed by an external and independent professional counselling service;
- Support them in a sensitive and appropriate manner.

Signs that an employee, Agent, their employee or a customer requires assistance may include:

- Requests for self-exclusion, or self disclosure of a gambling related problem;
- Aggressive and anti-social behaviour, such as physical or verbal abuse;
 and
- Requests to borrow money for gambling related purposes.

Employees, Agents and their employees are not trained to make assessments as to whether an individual is or is not a problem gambler, but must be aware of and respond to such indicators of distress in a sensitive manner.

We require that action taken in such circumstances be recorded by employees in the retail network in an appropriately maintained Responsible Gambling incident register.

3.8Tabcorp Employee Gambling policy

All employees of Tabcorp Wagering Victoria are required to comply with the Tabcorp Gambling Employee Policy. Adherence to this policy is a strict requirement of employment or contract with Tabcorp. Non-compliance is treated as a serious breach of a key policy, providing the MD Wagering with the power to discipline the employee, terminate the employment of the employee or terminate the contract of the contractor.

The policy places a range of restrictions on the ability of our employees to participate or otherwise engage in wagering activities operated by us whether on or off duty. This includes not permitting our employees to take part in totalisator betting whilst on-duty (unless authorised by the MD Wagering under the Tabcorp Wagering Exception Process as part of an employees' official duties). In the case of fixed odds betting, Wagering employees cannot bet at any time whether they are on or off duty.

It is expected that senior employees will request their immediate family not to engage in betting on fixed odds products and services.

All employees in the retail network, including Agents are prohibited from gambling with Tabcorp, or any other provider while on duty (including rostered breaks) or at any time on their premises.

Licensed venues owned and operated independently of Tabcorp have policies that strictly prohibit gambling by employees whilst on duty (including rostered breaks). We encourage these venues to also have in place policies relating to the participation of employees in gambling products at their venue during off-duty periods.



3.9 Emerging technology and new products

Prior to the introduction of relevant new wagering products or services, including those which make use of emerging technology, Tabcorp Wagering Victoria will assess their likely impact on gambling behaviours in accordance with our commitment to Responsible Gambling.

All new wagering products and services, all marketing and all advertising is assessed by Tabcorp Wagering Victoria for Responsible Gambling impact, prior to release to the market.

3.10 Advertising, Marketing and Promotions

In compliance with the Tabcorp Wagering Victoria Marketing Sign off Program, Tabcorp Wagering ensures that any advertising, marketing or promotion:

- Complies 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;
- Are in good taste (given prevailing community standards) and are not offensive or indecent;
- Are factually correct, accurate and truthful;
- Are not false, misleading or deceptive, and do not misrepresent the probability of winning or financial gain;
- Is not intentionally directed, expressly or indirectly, to vulnerable or disadvantaged groups and minors;
- Will not be aimed at or designed to appeal to minors and do not appear in conjunction with an offer, event or facility advertisement that pertains to minors;
- Do not promote the consumption of alcohol while gambling and does not associate gambling with alcohol;
- Do not offer any rewards, inducement or vouchers that encourage customers to bet more frequently;
- Have the consent of any person identified as winning a prize prior to publication;
- Is socially responsible;
- Does not promote gambling as a means of funding routine household purchases or costs of living or for relieving financial or personal difficulties;
- Does not create an impression that gambling is a reasonable strategy for financial betterment;



- Does not promote gambling as a means of enhancing social standing or employment, social or sexual prospects;
- Does 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;
- Does not state or imply that a player's skill can influence the outcome of a gambling activity;
- Does not exaggerate the connection between the gambling activity and the use to which the gambler's profits may be put.

In South Australia, Tabcorp Wagering Victoria has specific obligations to South Australian customers when advertising and marketing our products and services. In that State, all advertising and marketing will include either the South Australian condensed or expanded warning message. The condensed warning message is Gamble Responsibly.

The expanded warning messages are

- Don't chase your losses. Walk away. Gamble responsibly.
- Don't let the game play you. Stay in control. Gamble responsibly.
- Stay in control. Leave before you lose it. Gamble responsibly.
- You know the score. Stay in control. Gamble responsibly.
- Know when to stop. Don't go over the top. Gamble responsibly.
- Think of the people who need your support. Gamble responsibly.

Where the expanded warning messages are used, they will be used for at least 6 months and rotated over a three year period.

In South Australia, we will not advertise our products or services on radio between 6am and 8.30am Monday to Friday and on television between 4pm and 7.30pm Monday to Friday.

In Queensland Tabcorp Wagering Victoria have specific obligations to Queensland customers when advertising and marketing our products and services. In that state, we will ensure that positive responsible gambling messages are incorporated in our advertising and promotions and the Queensland Gambling Helpline Logo and telephone number is displayed.

The positive responsible gambling message is Gamble Responsibly.

In Western Australia Tabcorp Wagering Victoria have specific obligations to Western Australian customers when advertising and marketing our products and services. In that state, we will ensure our advertisements include:



- The telephone number for the national problem gambling helpline; and
- Details of the national on-line counselling website.

In New South Wales Tabcorp Wagering Victoria have specific obligations to New South Wales customers when advertising and marketing our products and services. In that State, we will ensure our advertisements include:

- Gambling information and Warnings Think! About your choices Call Gambling Help;
- The telephone number for Gambling Help; and
- The Gambling help website address.

Tabcorp Wagering Victoria ensures that we comply with our obligations for responsible advertising and promotions by:

- Assessing each Australian jurisdiction's requirements when advertising our products and services and produce Advertising Checklists to be used by Tabcorp Wagering Victoria employees;
- We communicate information to our employees regarding our responsible advertising and promotions obligations through dedicated compliance newsletters;
- We train all Tabcorp Wagering Victoria employees in our responsible advertising and promotions obligations through both our induction training and ongoing Marketing training;
- We ensure that our self-excluded patrons do not receive correspondence or promotional material relating to our products or services;
- We operate in accordance with the Tabcorp Wagering Victoria Marketing Sign
 off Program that has measures in place to ensure that our advertising and
 promotions comply with these commitments. All advertising and marketing must
 be signed off by the General Manager Marketing; General Manager Regulatory
 and Compliance and a member of the Tabcorp Wagering Legal Team before it
 is released to market.

3.11 Privacy

Tabcorp Wagering Victoria is bound by the Privacy Act 1988 and acts in accordance with this Act. Tabcorp Wagering Victoria has systems and processes in place that ensure our compliance with the National Privacy Principles.



"You know the score. Stay in control. Gamble Responsibly". August 2010

Tabcorp Wagering Victoria respect and protect the privacy of our customers. The Tabcorp Wagering Privacy Policy is available on our website **www.tab.com.au**.



4. PROVIDING OUR CUSTOMERS WITH INFORMATION

4.1 Information available to customers to assist their understanding of our products:

- This Code:
- Betting Rules;
- Our Products and Services and accompanying explanatory material, such as our "Racing Guides" (available from www.tab.com.au);
- Our Self-Exclusion Programs; and
- Complaint Resolution Mechanisms.

4.2 Product and Service Information

The decision to gamble lies with the individual and represents a choice. However, to make that choice responsibly, our customers need the opportunity to be informed about our wagering products and services.

We will make available information on our wagering products and services so that customers are able to make informed decisions and choose whether to gamble or not, consistent with their personal preferences and individual circumstances.

Customers can locate information on Tabcorp Wagering products and services via www.tab.com.au or by calling the Tabcorp Wagering Call Centre.

4.3 Purchasing Bets and Payment of winnings

In compliance with applicable legislation, all bets must be paid for at the time of purchase.

All winnings are paid by Tabcorp Wagering Victoria in accordance with applicable regulations, industry codes or policies and our Betting Rules. Tabcorp Wagering Victoria recommends that customers in TAB outlets collect large winnings by cheque.

Payments for winning bets placed with us through an electronic wagering facility (for example, your TAB account) will be credited to the customers betting account as soon as the result is confirmed.



4.4 Information available when you place a bet

Each TAB outlet has a copy of the betting rules relating to racing, sports betting and our Trackside Product that is available to customers. These Betting Rules are also available on the Customer Information Terminals found within each outlet in the retail network. Alternatively, they are available at www.tab.com.au or if customers prefer, they can call the TAB Call Centre and a copy of the Betting Rules can be posted to customers.

Upon request we can provide Tabcorp Wagering Victoria customers with an account statement that provides them with information related to their wagering account history, including winnings and losses. Information relating to a customer's account history is available for a period of up to 90 days from the date of the original transaction, customers can access a statement by logging in to "My Account" via either www.tab.com.au, or if customers prefer, they can call the Tabcorp Wagering Call Centre and make this request.

For South Australian customers we will provide a statement every calendar month where more than one gambling transaction is made.

Tabcorp Wagering Victoria has specific obligations to South Australian customers when they request an account statement and these are detailed below at clause 4.6.

4.5 Intoxication

Tabcorp Wagering Victoria takes all reasonable steps to ensure that our products and services are not available to intoxicated customers. All customer facing employees, including those in the retail network, have been trained in their obligations not to provide service to intoxicated customers. Our retail network also carries signs stating that Tabcorp Wagering Victoria will not provide service to intoxicated patrons.





4.6 Gambling limits

Tabcorp Wagering Victoria provides access in its retail network, on the internet and via our call centre to information that assists customers to identify the triggers that can lead to overspending on gambling.

These include:

- Gambling to avoid dealing with problems or disappointments
- Skipping work or study to gamble
- Spending more time gambling than with family and friends
- Thinking about gambling every day
- Gambling to win money, not just for fun
- Gambling to win back money lost by gambling
- Feeling depressed because of gambling
- Lying or keeping secrets about gambling
- Borrowing money to gamble
- Arguing with family and friends about gambling
- Gambling for longer periods of time than originally planned
- Gambling until every dollar is gone
- Losing sleep due to thinking about gambling
- Not paying bills and using the money for gambling instead
- Trying to stop gambling, but can't.
- Becoming moody when trying to stop or cut down on gambling



_ _____

- Trying to increase the excitement of gambling by placing bigger bets
- Breaking the law to get money to gamble

Tabcorp Wagering Victoria encourages any customers displaying these signs to contact Gamblers Help Free Call 1800 858 858 or take steps to join BetCare Tabcorp's Self Exclusion Program.

In supporting Tabcorp Wagering Victoria's commitment to Responsible Gambling and our desire to assist customers to make a pre-commitment decision, Tabcorp Wagering's retail outlets and venues have dedicated Responsible Gambling Officers who:

- are present during business operations
- can assist customers to manage their gambling spend
- facilitate customers to access gambling support services or
- Tabcorp Wagering's voluntary self exclusion program BetCare

Tabcorp Wagering Victoria has options available to customers to manage their gambling spend, for example customers have ready and easy access to betting statements that record:

- all bets
- all winning dividends
- account balance
- deposits made and where made (for example, retail outlet, Australia Post, online)
- method of bet placed (for example, telephone, online, retail outlet)
- method of withdrawal

From 16 August 2012 Tabcorp Wagering Victoria will in accordance with South Australian legislative requirements, offer South Australian account customers the ability to apply gambling limits on their accounts.

4.7 Information available to South Australian customers when opening an account or requesting an account statement

For South Australian customers, during the account establishment process or when requesting an account statement, Tabcorp Wagering Victoria will state to South Australian customers that:

- Our operations are governed by a Code of Conduct;
- An expanded warning message rotated every 6 months; and,
- Provide verbal information on how to access our Responsible Gambling materials.



5. COMPLAINTS

5.1 Complaints and Resolution Mechanism

If customers have a concern with Tabcorp Wagering Victoria's Responsible Gambling Code of Conduct, and wishes to raise a complaint we encourage our customers to tell us. We have a formal Complaint Management Policy in place to ensure that our customer's complaints are addressed appropriately.

In accordance with the following Complaint Resolution Policy complaints should be addressed to the General Manager Regulatory and Compliance, either:

In writing: GPO 4168 SYDNEY NSW 2001 Via email: RGwagering@tabcorp.com.au

Via phone: 02 9218 1780

The General Manager Regulatory and Compliance will:

- If customers make their complaint in writing or by email, acknowledge the customer's complaint in writing or by email within 5 working days of its receipt.
- If customers make the complaint via the telephone, acknowledge the customer's complaint at the time they make the complaint.
- Investigate the customer's complaint and advise the customer of the outcome of their complaint within twenty working days.
- If a customer's complaint cannot be resolved within 14 working days, the customer will be informed of the new timeframe for resolution.
- Ensure either Tabcorp Wagering's Responsible Gambling Complaint Register is updated.

We will provide customers with the outcome of their complaint in the most appropriate manner, taking into account how they first contacted us or how the customer wishes to be contacted. For instance, if a customer contacted us by telephone, we will provide information to the customer regarding the outcome of their complaint by telephoning them.

If a customer is not satisfied with the General Manager Regulatory and Compliance's decision regarding their complaint, they can appeal the decision in writing to:

Managing Director, Wagering Tabcorp Holdings GPO Box 4168 SYDNEY NSW 2001

The scope of complaints should be limited to alleged breaches of this Code.



In the event that the customer remains dissatisfied with Tabcorp Wagering Victoria's decision regarding their complaint, an independent review of the decisions made by Tabcorp Wagering Victoria will be undertaken at Tabcorp Wagering Victoria's expense.

6. RESPONSIBLE GAMBLING

6.1 Minors

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, have an account with us or to be registered on our online wagering websites. We strictly prohibit minors from gambling.

Tabcorp Wagering Victoria will take all reasonable steps to ensure that minors cannot use our services. Before opening an account with us, customers must provide a date of birth and assert that they are over the age of 18.

The Tabcorp Wagering Victoria retail network must display signage stating that minors are not permitted to gamble.

We also have appropriate warnings on our websites stating that minors are not allowed to wager online and cannot be registered with us.

Our terms and conditions state that minors cannot bet with us and place obligations on our customers not to allow minors to bet via their accounts or disclose their security details.

The retail network has processes in place for checking the identification of persons seeking to purchase bets or collect dividends, to ensure that only persons 18 years participate in wagering activities. All TAB outlets carry "minors" signage at all places where bets are placed and, if applicable, where ATM or EFTPOS machines are situated. There is no general prohibition on minors entering a TAB outlet.

If we determine that a customer has opened an account with Tabcorp Wagering Victoria and they are under the age of 18, or that a person is allowing a minor to bet using their account, we will immediately close those accounts and report the matter to the Tabcorp Wagering's Risk and Compliance Committee.

Tabcorp Wagering Victoria will report any breaches of our policies regarding minors betting with us to the applicable state regulator where the alleged breach occurred.

If you have an account with Tabcorp Wagering Victoria and your children have access to the computer you use to access the www.tab.com.au website, we encourage customers to download and install one of the popular child protection software packages, such as Net Nanny or Cyber Patrol. This software will help prevent our websites being accessed by children.





6.2The Gambling Environment

Tabcorp Wagering Victoria Retail outlets have in place television screens that allow customers to view televised races. These races are scheduled throughout the day. Customers can use these scheduled races to ensure that they are aware of the passing of time.

In addition, Agents and their employees are provided with quarterly reminders of their obligations to ensure that they manage and monitor their environment for customers who have been in their outlet for lengthy periods of time. Agents and their employees are encouraged to speak directly with such customers to ensure they are aware of the passage of time.



7. SUPPORTING RESPONSIBLE GAMBLING

7.1 Working with the community

In pursuit of the highest standards of customer care, and to strengthen our understanding of problem gambling, we liaise formally on a quarterly basis, or more frequently as required or as appropriate, with problem gambling related support services, community groups, and all relevant tiers of government and industry groups.

The process through which we liaise or initiate contact with problem gambling related support services, community groups, and all relevant tiers of government and industry groups is as follows:

- Informal and ongoing telephone and e-mail contact to seek their advice and feedback in reference to our self exclusion program, referral program and Responsible Gambling Code;
- Formal telephone and email contact to seek advice and feedback regarding our Responsible Gambling Code (as per our obligation to undertake an Annual Review of our Responsible Gambling Code).
- Tabcorp Wagering's Responsible Gambling Manager attends, presents and liaises at problem gambling counselling forums across Victoria throughout the year and also attends the National Association for Gambling Studies (NAGS) conference on an annual basis.

The Victorian Problem Gambling organisations which we will liaise with will include but is not limited to Gamblers Help, Salvation Army and other organisations that may fall under the umbrella of problem gambling counsellors.

7.2 Support services

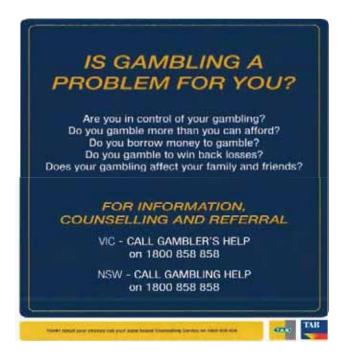
Within the retail network, we require a senior employee (preferably the Agent) to act as a contact point for information on problem gambling support services and matters related to responsible gambling.

The Tabcorp Wagering Victoria retail network displays responsible gambling messages and makes available information for gambling support services for individuals and/or their families as to where to obtain assistance to manage a gambling problem. Some of these signs are required by law, and some are created by Tabcorp Wagering and displayed voluntarily within the retail network. The information and messages available will be reviewed and updated on a bi-annual basis.

Responsible Gambling signage is displayed at all points where bets are accepted and, if the outlet has an ATM or EFT POS facility, Responsible Gambling signage will be displayed at that point.



We make available on <u>www.tab.com.au</u> information on responsible gambling and where and how to seek assistance with a gambling related problem.



7.3Tabcorp Wagering Victoria's Voluntary Self-Exclusion program - BetCare

Tabcorp Wagering Victoria manages a voluntary self-exclusion program, BetCare. BetCare is a key component of Tabcorp Wagering Victoria's Responsible Gambling strategy. All outlets (including all licensed venues) in the TAB retail network must participate in the BetCare program

BetCare is a voluntary scheme managed by Tabcorp Wagering Victoria and is designed to assist customers who have an acknowledged gambling problem.

Customers can be excluded from up to 15 TAB Agencies and licensed venues in Victoria. The initial period of self-exclusion is a minimum of six months to an indefinite period of time.

Tabcorp Wagering Victoria makes available, upon request:

- Information on how to access the self exclusion program, including what is involved with self-exclusion, how to apply, what procedures are involved, what information and documents customers must provide, and contact information for problem gambling support services;
- Upon request we will also enable customers to exclude themselves from our products and services via our telephone and Internet facilities.



Tabcorp Wagering Victoria also removes self excluded people from our promotional mailing databases.

Tabcorp Wagering Victoria ensures that every approach by a customer about self-exclusion over the telephone or Internet is responded to within 24 hours of an approach being made.

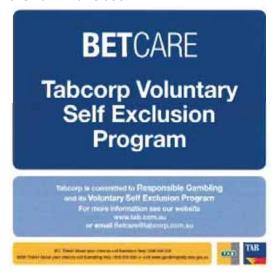
Tabcorp Wagering Victoria ensures that if an approach is made by telephone and the customer states that they require assistance with their language, Tabcorp Wagering Victoria will provide a translation service during the application process.

BetCare allows for the provision for immediate referral of any customer that requests it to their state-based counseling service.

Where a customer requests revocation of their self excluded status, customers are required to assert that they have taken steps to seek assistance for their gambling problem. Where a customer has requested an indefinite exclusion and later wishes to revoke their "indefinite status", these customers must present to Tabcorp Wagering Victoria a notice from a registered gambling counselling facility stating that the person may re-commence to hold an account with Tabcorp Wagering Victoria. Other customers must either present this notice from a registered gambling counselling facility or sign a Deed of Release acknowledging that they have sought assistance for their gambling problem.

Tabcorp Wagering Victoria has comprehensive policies and procedures in place for BetCare, such as, incident reporting (that is, if a customer breaches their self exclusion status, employees in the retail network are obliged to report this to Tabcorp Wagering), storage of data and the identification and management of self excluded patrons.

Tabcorp Wagering's Regulatory and Compliance team evaluates and reviews the operation of BetCare on a bi-annual basis.





Information regarding BetCare can be obtained:

- By telephone: BetCare 1800 882 876 or TAB Customer Service 131 802
- By email: betcare@tabcorp.com.au
- By internet: www.tab.com.au/betcare
- At retail outlets: All TAB outlets can assist customers with information

Tabcorp Wagering Victoria is committed to its Responsible Gambling Code.
For more information see our website

www.tab.com.au or email

RGWagering@tabcorp.com.au

Gamblers Help counselling services can be reached by calling 1800 858 858



8. DEFINITIONS

Code	Code means this Tabcorp Wagering Victoria Responsible Gambling Code as adopted by us on the Commencement Date.
Commencement date	Commencement date is the date from which we formally announce we have adopted this Code and, in relation to any subsequent amendments made to this Code, means the date from which we publicly announce we have adopted those amendments.
Electronic facility	Electronic facility is a facility through which we offer our wagering products and services electronically, including through the Internet or telephone.
Gambling	Gambling involves staking money on wagering products and services including online, wagering facilities.
Gambling Account	Gambling account is an account set up with us to conduct online or telephone wagering.
Minor	Minor - person under the age of 18 years.
Odds	Odds - the theoretical likelihood of a particular outcome or event occurring.
Online wagering website	Online wagering website - a website we own, manage or operate, through which our wagering products and services are offered including www.tab.com.au .
Problem gambling	Problem gambling occurs when there is a lack of control over gambling, particularly the scope and frequency of gambling and the amount of recreational time spent gambling.
	The negative impacts may include:
	 Extreme financial losses relative to their sources of income;
	 Adverse personal affect on the customer, his or her family and friends;
	 Adverse affect on employers and work performance.
Problem gambling support services	Problem gambling support services refers to trained professionals, such as psychologists, counsellors and social workers, who provide confidential counselling to individuals and/or their families in relation to a gambling related problem. Such services



	may include Gambler's Help, Lifeline and other related agencies.
Responsible gambling	Responsible gambling occurs in a regulated environment where the potential for harm associated with gambling is minimised and people make informed decisions about their participation in gambling. Responsible gambling occurs as a result of the collective actions and shared ownership of individuals, communities, the gambling industry and the government to achieve outcomes that are socially responsible and responsive to the concerns of the broader community.
Retail Network	Venue - a venue or outlet (whether or not owned, operated or managed by us) through which our wagering products and/or services are offered or distributed including:
	 Hotels, licensed clubs; and agencies;
	On course wagering distribution channels; and
	TAB outlets.
Voluntary self exclusion	Voluntary self-exclusion - a customer initiated prohibition from specific gambling products, services or venues.
Wagering product or service	Wagering product or service - any gambling activity or scheme authorised under a wagering law.
Wager or wagering	Wager or wagering - placing a bet on the outcome of a racing, sporting or other event at a venue or through an electronic facility.
We, us and our	We, us and our refers to Tabcorp Wagering Victoria.
Winnings	Winnings - the amount of money won on a wagering product or service.
You and your	You and your - a person to whom we provide a wagering product.



.

"You know the score. Stay in control. Gamble Responsibly". August 2010

