# The Lott and Play For Purpose

Responsible Gambling Code of Conduct for Community and Charity Raffles

TattsTech Pty Ltd ABN 31 133 789 241

HAVE FUN & PLAY RESPONSIBLY





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# 1. Our Commitment to Responsible Gambling

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

We actively strive to minimise potential harm to our customers and our employees are trained to support this commitment.

This Responsible Gambling Code of Conduct for Community and Charity Raffles (the **Code**) reflects our commitment to deliver the charity raffle products available on thelott.com and The Lott app (**Digital Channels**) with high levels of integrity and corporate responsibility, to operate in accordance with the relevant legislation and promote safer gambling.

It is a requirement of our commercial raffle organiser's licence in Victoria that we have and comply with this Code. We are, however, pleased to extend the responsible play tools and services outlined in this Code to customers who purchase charity raffle products on our Digital Channels wherever you reside.

# 2. Introduction

Play For Purpose is a not-for-profit community raffle conducted by the 50-50 Foundation Limited as trustee for the 50-50 Foundation (the Foundation). The Foundation is registered as a charity with the Australia Charities and Not-for-profits Commission and partners with charities and grassroots sporting clubs to help them fundraise.

We provide resources and financial support to every Play For Purpose raffle. Account holders of The Lott can purchase Play For Purpose raffle tickets directly through The Lott's Digital Channels.

The Lott is also a channel masterbrand and the official home of Australia's lotteries conducted by Tatts, NSW Lotteries, Golden Casket, and SA Lotteries. These public lottery operators conduct lotteries across Australia (excluding WA) and provide a Responsible Play program developed to ensure compliance with relevant state and territory regulations that relate to public lotteries and establish best practice in service of lotteries. Like Play For Purpose raffle tickets, account holders can purchase entries in public lotteries directly through The Lott's Digital Channels.

For most people, participating in charity raffles is fun and entertaining. Charity raffles are rarely associated with causing problem gambling. Notwithstanding this, we have developed the Code as a guide for the responsible service delivery and commitment the community can expect from us when you purchase Play for Purpose through The Lott's Digital Channels.

If you are purchasing Play For Purpose directly from the Foundation, this Code does not apply to you.

### 2.1 Objectives of the Code

The purpose of this Code is to:

- Highlight our commitment to minimising gambling harm.
- Provide you with information about how we responsibly deliver Play For Purpose through The Lott's Digital Channels.
- Help you make informed choices about how you play and share the tools and services that can support you.
- · Explain the steps we will take to support your participation with Play For Purpose.

### 2.2 Application of the Code

The Code applies to:

- The Lottery Corporation Limited and its employees
- Our promotion of Play For Purpose (and any other charity raffle we promote)
- Purchasing of Play For Purpose (and any other charity raffle we promote) through our The Lott's Digital Channels only

### 2.3 Review of the Code

We conduct regular reviews of our compliance with the Code. We gather feedback from our employees and from you, our customers, which help us assess the effectiveness of the Code.

### 2.4 Definitions

Minor means a person who is under 18 years of age.

RPLO means The Lott Responsible Play Liaison Officer.

**The Lott App** means The Lott mobile application.

The Lott Website means www.thelott.com.

# 3. Communication and Availability of the Code

We communicate and actively promote the Code, which is available:

- at www.thelott.com/about/responsible-play.
- by phoning 1300 138 132 or (07) 3340 6125 Monday to Friday, between 9:00am and 6:00pm AEST.

### 3.1 Responsible Gambling Information

We offer a range of responsible play information to keep you informed about the resources, tools and support available to you, your friends and family, and the wider community

Information on responsible play is available on The Lott Website including:

- The Responsible Play sign
- · The Complaint Handling Charter
- Links to local gambling support services
- Guidelines for financial transactions and prize payments
- · Information on self-exclusion programs, and other useful tools

We regularly review and update the information on The Lott Website to ensure that it remains current and is easily accessible to you so that you can make informed decisions on how you play.

# 3.2 Responsible Gambling Message

We are committed to assisting the organisation of and sale of tickets in Play For Purpose responsibly to support community and charitable organisations. Our responsible play message will be displayed on The Lott's Play For Purpose landing page and on material we develop for the promotion and conduct of the Play For Purpose raffle.

# 4. Game Information

We provide a comprehensive explanation of how to play Play For Purpose at thelott.com/about/community/play-for-purpose. The Play For Purpose terms and conditions are available at that landing page.

Certain Play For Purpose terms and conditions are also printed on tickets and on material designed to promote Play For Purpose.

# 5. Responsible Gambling Tools

When playing Play For Purpose through The Lott's Digital Channels, you will have access to all the responsible gambling tools available to public lotteries except for weekly spend limits. When you set a weekly spend limit, it currently applies to public lotteries spend only and not to any Play For Purpose entries. Further information about the responsible gambling tools available to you when playing Play For Purpose is set out below.

### 5.1 Online Account Self-Exclusion

You can exclude yourself from accessing your online account with The Lott via our Digital Channels or through our Responsible Play Liaison Officers, who can be contacted on 1300 138 132 or (07) 3340 6125 Monday to Friday, between 9:00am and 6:00pm AEST.

Once your self-exclusion request has been processed, we will block your access to your account for a minimum of six months. You will need to make a request to our Customer Support Team to have any account funds returned to you. When your account is self-excluded, you will not be able to log into it and we will remove your account from our marketing lists. If you attempt to open a new account with The Lott after you have self-excluded, you will be doing so in breach of The Lott account terms and conditions.

After the self-exclusion period has ended, your account will not be automatically reactivated. You will need to provide a written request to our Customer Support Team once the exclusion period ends to request access to your account. You may be required to first verify in a manner determined by us, your capacity to manage spend and participation.

If you self-exclude on three occasions, we will close your account permanently.

# 5.2 Opt-Out of Marketing Communications

We automatically change your online account marketing preference settings to "opt out" when your online account is self-excluded. Alternatively, you can choose to be opted out of receiving our communications at any time by calling our Responsible Play Liaison Officers on 1300 138 132 or (07) 3340 6125 Monday to Friday between 9:00am and 6:00pm AEST.

You can also choose how we communicate with you via the "My Settings > Communication Preferences" section of your account with The Lott or opt out of our marketing communications at any time using the unsubscribe link provided in those communications.

# 6. Interaction with Customers and Concerned Persons

We are committed to providing our customers with a safer, secure, and friendly environment in which to play Play For Purpose. If entering our community raffles is no longer fun for you, or you are concerned about someone close to you, help is always at hand.

We proactively oversee online account activity using a range of analytical tools to identify customers who may be at risk of gambling harm. We also use a contact framework to communicate with players about their play behaviour. Our program draws on academic research on behavioural science related to gambling, to improve our ability to encourage responsible play and minimise the potential for harm. We monitor several activities that may indicate you are at risk of gambling harm when accessing our products online as follows:

- Changes in deposit behaviours frequency (e.g., how often you deposit funds), intensity (e.g., the rate of your deposits), variability (e.g., change in deposit amounts), and trajectory (e.g., increasing deposit amounts over time) of money deposited.
- Changes in purchasing behaviours frequency, intensity, variability, and trajectory of purchases and entry type and size.
- · Changes in gambling patterns, e.g., purchasing different products, purchasing at different times.
- Changes in player controls frequency, intensity, variability, and trajectory of gambling player controls (i.e., weekly spend limit).
- Time spent gambling.

Examples of behaviours that may indicate gambling harm to us if you contact us about your online play are:

- · Admitting being drunk or under the influence of drugs.
- Showing signs of distress, such as crying or swearing.
- 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 you need a break from gambling.
- Frequently closing and re-opening your account.
- · Disclosing that you are experiencing gambling harm.
- Thinking you can control the outcome of games.
- Accusations of changing payouts or rigging the system.
- · Verbally abusing staff.
- Threats to property and staff.
- Seeking or exploring customer player controls.
- · Repeatedly self-excluding from gambling.

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

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

- our responsible gambling tools (these details are also set out in section 5 of this Code), and
- · available gambling support services (these details are also set out in section 8 of this Code).

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

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

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

Your account will remain suspended until you call us.

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

- · share with you what led us to suspend your account;
- · ask you a series of questions to help us understand your individual circumstances;
- provide information about responsible gambling tools (these details are also set out in section 5 of this Code);
- provide information about available gambling support services (these details are also set out in section **8** of this Code); and
- facilitate access to available gambling support services (if required).

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

Any funds held in your account on closure will be managed in accordance with the standard account closure processes available at: https://www.thelott.com/about/terms-and-conditions. We will maintain a record of your account in accordance with regulatory requirements.

### 6.1 Need Assistance? Contact Us

We can be contacted by our customers, their families, their community, or any other person by the following means:

Email: customersupport@thelotterycorporation.com.

Phone: 1300 138 132 or (07) 3340 6125 Monday to Friday between 9:00am and 6:00pm AEST, to speak to a Responsible Play Liaison Officer.

If you contact us, we can help you by:

- · Supplying information and contact details for gambling support services.
- · Removing you from our membership program.
- Stopping you from receiving direct marketing from us (including emails and SMS).
- · Offering information on tools available to you.
- · Helping you with online self-exclusion.

If English is not your first language, our Responsible Play Liaison Officers can connect you to a national translation service during your call to help with translation.

# 7. Supporting our Employees

# 7.1 Employee Product Play Policy

Compliance with our Employee Product Play Policy is mandatory for all employees and contractors. Failure to comply with our policy may lead to disciplinary action including termination of employment or contractor agreement. Our Employee Product Play Policy outlines our commitment to deliver our products and services with honesty and integrity. It also details the restrictions on our employees and contractors when they participate in lottery activities operated by us.

# 7.2 Information and Assistance to Employees

Ensuring the well-being of our employees is our top priority. If a staff member asks for help, displays signs of gambling harm, or has difficulty managing their gambling (including by displaying any of the indicators listed in section **6** of this Code), we will support them by:

- · Providing information on responsible play tools and resources, and closing their account
- Encouraging them to utilise our self-exclusion program
- Referring them to our Responsible Play Liaison Officers
- · Referring them to gambling support services

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

# 8. Gambling Support Services

We maintain strong relationships with gambling support providers and government and industry groups, as part of our commitment to delivering high quality customer care. We connect with them at least quarterly by:

- Attending gambling harm networks and seminars.
- Coordinating with gambling support providers to host staff sessions on responsible play.
- Informal and ongoing telephone, email, and face to face contact with gambling support services to seek advice and feedback on the effectiveness of the Code and our Responsible Play Program.
- · Contributing to government and industry forums across various states.
- Attending the National Association for Gambling Studies (NAGS) conference annually.
- Supporting state gambling harm awareness weeks.

If entering community raffles on The Lott's Digital Channels is no longer fun for you or you are concerned about someone close to you, help is available. The following services offer a range of free and confidential support for you, your family, and friends including counselling, support groups, information, and referrals, and help with self-exclusion.

Available Gambling Support Services:

- National Gambling Helpline 1800 858 858
- Gamblers Help (<u>www.gamblershelp.com.au</u>)
- · Gamblers Anonymous (www.gaaustralia.org.au)
- · Lifeline Helpline 13 11 14

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

# 9. Responsible Play Program and Training

We are pleased to extend most elements of The Lott's Responsible Play Program to Play For Purpose when it is purchased on The Lott's Digital Channels.

The program focuses on education for employees, providing information and support for our customers, and providing guidance for the design and marketing of all products we promote.

All employees must comply with the requirements of the program, which is currently certified under the World Lottery Association's Responsible Gaming Framework.

Employees complete responsible gambling training as part of their onboarding and must complete ongoing annual training. The comprehensive training modules are tailored to suit various roles including all staff, specialist roles, and advertising and marketing.

The specialist responsible gambling training module equips employees with information on:

- · How to identify signs of potential gambling harm
- How to respond to signs of gambling harm
- Availability of responsible play tools and self-exclusion
- Accessing gambling support services
- · How to raise concerns about gambling harm

# 10. Minors

You must be over 18 years of age to register for an account on The Lott's Digital Channels.

You must complete an identity verification process to confirm you are at least 18 years of age. Before we can process your first withdrawal from an online account, you must verify the information you provided during your registration. We will suspend or close unverified accounts in line with our terms and conditions.

If we find that a person under 18 years of age has opened, or is accessing an online account, we will close the account immediately. If you are concerned about someone under 18 years of age potentially accessing The Lott's Digital Channels, you can reach out to us by calling our Customer Support Team on 131 868.

We also display 18+ messaging on our Digital Channels.

# 11. The Gambling Environment

We are dedicated to delivering our products with high standards of integrity and credibility with a focus on customer care. We discourage customers from engaging in extended gambling (for example, gambling for three hours or more without a break) or intensive play.

Responsible play messaging is displayed in The Lott's Digital Channels. We also embed responsible play messages within marketing and promotional materials, including communications sent to our customers.

### 11.1 Online Account

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

If we find you are displaying signs of harm from online play, or we see you engaging in extended gambling (defined as gambling for three hours or more without a break) we will take all reasonable steps to support you which includes the action listed in section 6 of this Code.

When we suspend or close your account, we will remove your account from our marketing communications lists. If we permanently close your account for a responsible gambling reason and you attempt to open a new account, you will be doing so in breach of The Lott account terms and conditions. We will take reasonable steps to identify and close any new accounts you attempt to create.

# 12. Financial Transactions

We do not provide credit or lend money or accept cheques for community raffle entries.

We will only accept payment for raffle entries via credit cards or electronic funds transfer. We do not accept customer cheques as payment or allow you to cash cheques.

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

The Play For Purpose raffle is conducted in accordance with applicable permits, regulations and terms and conditions. The Play For Purpose terms and conditions are available at: thelott.com/play-for-purpose/play.

# 13. Responsible Advertising and Promotions

# 13.1 Advertising, Marketing and Promotions

We create co-branded The Lott and Play For Purpose marketing and promotional material. When we do this, we:

- Comply with the advertising Code of Ethics adopted by the Australian Association of National Advertisers.
- Do not represent an irresponsible trading practice or portray actions that may seem socially irresponsible.
- Are not directed at or likely to appeal (in terms of style, tone, content, medium, location or any other factors) primarily to Minors, including suggesting that Minors can take part in community raffles.
- · Are not false, misleading, deceptive or contravene regulatory requirements.
- Do not implicitly or explicitly misrepresent the probability of winning a prize or suggest that winning will be a definite outcome of participation in a community raffle.
- Do not include misleading statements about odds or prizes.
- Do not give the impression that buying raffle tickets is a reasonable strategy for financial attainment or will definitely improve a person's financial prospects.
- Do not offend prevailing community standards and are in a manner that reflects decency, dignity, and good taste per the Commercial Television Industry Code of Practice.
- · Are not discriminatory or appear to be patronising to any particular group.
- Do not target vulnerable or disadvantaged groups including players who have opted out of

receiving promotional material and including where people may not have the ability to fully understand the information, such as refugees or people with intellectual disabilities.

- Do not target and are not provided to excluded persons.
- Do not publish anything which identifies customers who have won a prize without prior consent.
- Do not violate the confidentiality of information relating to, or the privacy of customers without their consent.
- · Do not depict or promote the consumption of alcohol while buying a raffle ticket.
- · Do not encourage anyone to contravene any laws.
- Do not suggest that skill can influence games that are games of chance.
- Do not encourage excessive or reckless playing.

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

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

# 14. Customer Complaints

If you have a complaint about our Code, we encourage you to tell us.

Our Complaint Handling Charter details the process for you to make a complaint about the operation of, or compliance with, the Code.

You can make a complaint to us in person, by phone, letter, or email:

Complaints at The Lott

Locked Bag 1, SPRING HILL, QLD 4004

Phone: 131 868 (Monday to Friday, between 9:00am and 6:00pm AEST)

Email: customersupport@thelott.com

# 14.1 How will we Manage your Complaint?

If you make a complaint to us in person by phone, we may ask you to send details of your complaint in writing.

Upon receipt, we will investigate and respond to your written complaint within 21 days. We aim to investigate non-written complaints within a reasonable time and consider the nature and complexity of the complaint.

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

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

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

If you would like to request a review of the internal decision, we will refer your complaint to a member of a panel of independent mediators, such as the Institute of Arbitrators and Mediators Australia, for either a determination from an arbitrator based on submitted paperwork or to arrange mediation. Costs of this process will be shared equally by us and you, unless otherwise agreed or as determined by the arbitrator.

We record complaints made in relation to the operation of this Code. We make this information available to the relevant regulatory bodies on request and keep records for seven years per our record-keeping obligations.

### **HAVE FUN & PLAY** RESPONSIBLY

Help is close at hand Call GambleAware or Gamblers Help 1800 858 858 gambleaware.nsw.gov.au

**Head Office**Locked Bag 1, Spring Hill, QLD 4004 thelott.com Customers 131 868 Retailers 132 315



Tattersall's Sweeps Pty Ltd ABN 99 081 925 662 Tatts NT Lotteries Pty Ltd ABN 18 146 244 984



New South Wales Lotteries Corporation Pty Limited ABN 27 410 374 474 ACN 142 890 195



Golden Casket Lottery Corporation Limited ABN 27 078 785 449



Tatt's Lotteries SA Pty Ltd ABN 41 146 245 007