



**Chongie Entertainment Limited**

**Social Responsibility & Compliance Pack**

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## 1 Introduction

Chongie Entertainment Limited (“Chongie”) and all of its employees are committed to a safer gambling experience for all customers of Little Vegas.

These policies and procedures are designed to ensure that the Gambling Act 2005, the LCCP and all relevant guidance is understood and followed by all employees of Chongie.

The Social Responsibility & Compliance Pack is in addition to the following:

- The Money Laundering and Proceeds of Crime Policy
- The Customer Due Diligence and “Know Your Customer” Procedure
- The Advertising and Marketing Policy
- The Staff Guard Policy
- The CCTV Policy
- The Machine Fraud and Ratio Check Policy
- The Gambling Risk Assessment

And any other policy which Chongie may implement in order to uphold the Gambling Act 2005 and all additional guidance and legislation.

### 1.1 The Gambling Act 2005

Mandatory Licence Conditions implemented by the Gambling Act 2005 (“GA05”):

- A notice must be displayed at all entrances to AGCs stating that no person under the age of 18 years will be admitted to the premises.
- There can be no direct access between an AGC and any other premises licensed under the Act or premises with a family entertainment centre (FEC), club gaming, club machine or alcohol licensed premises gaming machine permit. (England and Wales only). There is no definition of ‘direct access’ in the Act or regulations, although licensing authorities may consider that there should be an area separating the premises concerned, such as a street or cafe, which the public go to for purposes other than gambling, for there to be no direct access.
- Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to cease gambling at any gaming machine in order to do so.

- The consumption of alcohol in AGCs is prohibited at any time during which facilities for gambling are being provided on the premises. Additionally in Scotland the sale of alcohol on the premises is specifically prohibited. A notice stating this should be displayed in a prominent place at every entrance to the premises.

## 1.2 The Licensing Objectives

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- Ensuring that gambling is conducted in a fair and open way and
- Protecting children and other vulnerable person from being harmed or exploited by gambling

## 1.3 The Licensing Conditions and Codes of Practice

The Licence conditions and codes of practice (“LCCP”) set out the requirements Chongie must meet in order to hold its operating licence. All senior employees must subscribe to the Gambling Commission news updates and regularly check the website for updates.

Section 24 of the Gambling Act 2005 sets out two types of provisions:

- Social responsibility provisions

Compliance with these is a condition of licences, therefore any breach of them by an operator may lead the Commission to review the operator’s licence with a view to suspension, revocation or the imposition of a financial penalty and would also expose the operator to the risk of prosecution

- Ordinary code provisions

These do not have the status of licence conditions but are admissible in evidence in criminal or civil proceedings and must be taken into account in any case in which the court or tribunal think them relevant and by the Commission in the exercise of its functions. Any breach of ordinary code provisions by an operator may be taken into account by the Commission on a licence review, but cannot lead to the imposition of a financial penalty

These codes consist of: Financial Requirements (including Anti Money Laundering); Protection of Children & Vulnerable People; Combating Problem Gambling; Access to Gambling by children and young persons; Information on how to gamble responsibly and help for problem gamblers; Customer Interaction; Self Exclusion; Employment of Children & Young Persons; Money lending between customers; Fair & Open provisions; Marketing;



Complaints & Disputes; Gambling Licensees' staff; Information Requirements; Primary Gambling Activity

Adult Gaming Centres must comply with the relevant sections of the LCCP and all members of staff must be familiar with, and are trained on, these sections.

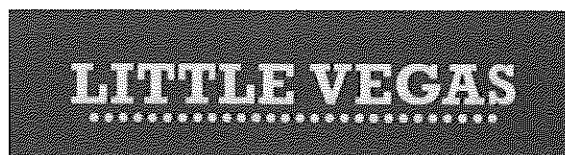
#### **1.4 The Powers of the Gambling Commission and others**

Members of staff are to co-operate at all times with the Commission's Compliance officers, Local Authority Licensing officers and the police in the proper performance of their compliance functions.

These individuals rights of entry to premises are contained in Part 15 of the Act which deals with inspection (Sections 303 to 326). A constable, enforcement officer or authorised person under the Act may enter premises for the purpose of assessing compliance or assessing whether an offence is being committed. A constable or enforcement officer can enter a premises if he reasonably suspects that an offence may be being committed or is about to be committed (Section 306). Entry may also be for the purpose of discovering whether facilities for gambling are being provided, to determine whether an operating licence or premises licence is held and to determine whether facilities are being provided in accordance with terms and conditions of an operating licence (Section 307).

Entry may also be made to assess the likely effects of activity when application has been made for a premises licence. A constable or enforcement officer may require the holder of an operating licence to produce, within a specified period, a copy of the authorisation (Section 316). Failure to comply without reasonable excuse to a request to produce a copy of the authorisation may result in an offence and be liable on summary conviction to a fine not exceeding level 2.

Section 317 sets out powers of the constable, enforcement office or authorised person and include inspection of any part of the premises or any machine on anything on the premises, questioning any person, access to written or electronic records, remove or retain evidence of committing an offence or breach of terms and conditions. Section 20 provides that the power of inspection must be exercised only at a reasonable time. The enforcement officer or authorised person must provide evidence of his identify and authority (Section 321). Section 323 provides that a constable, enforcement officer or authorised person may use reasonable force to enter a premises. Section 326 provides that it is an offence to obstruct a constable, enforcement officer or authorised person in carrying out their duties.



## **2 Social Responsibility**

### **2.1 Promotion of Socially Responsible Gambling**

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

### **2.2 Problem Gambling and the Provision of Information**

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

- Time and spend indicators: amount and frequency of time and deposits, time of day, large losses.
- Customer contact: information or hints from customers, frequent complaints, or signs of distress.
- Play indicators: chasing losses, erratic gaming patterns and product choice.
- A 'big win': high staking following a win could hide or even lead to harmful behaviour.

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

- Finding it hard to manage or stop gambling – customer may make a comment regarding this.
- Signs of agitation, distress or aggression: Customers may target aggression at customer support staff following a loss. Staff will be trained on how to deal with aggressive customers and how to diffuse situations.
- Player informs staff member that their main goal is to win a specific amount of money at which point they will leave.
- Customer contacts Chongie management regularly to express dissatisfaction with gaming outcomes and overall gameplay.

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

- The customer must be tactfully referred to GamCare by the appropriate member of



staff.

- The customer's details must be logged for the purposes of possible exclusion from future participation, should any similar incidents re-occur.
- All written and verbal communication between staff and suspected problem gamblers must be monitored and approved by senior management.

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

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

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

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

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

### **2.3 Customer Interaction**

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

Chongie follows the Identify- Interact- Evaluate framework to ensure compliance and to





protect its customers.

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

### *Identify*

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

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

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

### *Interact*

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

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

The member of staff, if they think it necessary, will explain the various management tools in place such as self-exclusion, and will provide information on GamCare.

### *Evaluate*

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



The result of a customer interaction may be that the customer is allowed to continue, the customer self-excludes or uses a different tool, or the customer is barred.

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

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

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

A flow chart of how Customer Interaction works is at section 8.3.

## 2.4 Self-Exclusion

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

Chongie takes all reasonable steps to ensure that customers on the self-exclusion register are prevented from entering the premises. Whilst on the self-exclusion register, customers also have certain obligations contained in the terms and conditions that they acknowledge when joining the self-exclusion program.

### *What happens*

- When a customer has requested that they be refused entry to our premises, the customer and the appointed manager will formally acknowledge and document the request on a self-exclusion request form, or directly on the web-based AGC national self-exclusion scheme. This will be preceded by a meaningful discussion about the terms and conditions applicable to the scheme and will include other options available to assist a person having a gambling disorder, including being signposted to counselling and support services. A copy of the terms and conditions will be signed by the excluder as acknowledgement of understanding and consent. Customers are given the opportunity of discussing self-exclusion in private where possible.
- Photo identification and signature of the excluder is required for self-exclusion agreements except where an alternative means of identification is at least as effective. Photographs, preferably of the passport style, should be full-faced and a good likeness both initially and throughout the duration of the self-exclusion agreement.

- The Duty Manager will offer the exclusion for a minimum duration of not less than six months, nor more than twelve months; the customer thereafter may request to extend the length of the self-exclusion for one or more further periods of at least six months.
- Chongie will not allow the excluder admittance to the premises during the term of the self-exclusion agreement.
- It is made clear to the customer that they may not revoke the self-exclusion during the agreed period and that if found either in the gambling area or attempting to gamble they will be asked to leave.
- Members of staff must be alert to self-excluded individuals attempting to breach agreements and instances of them getting another person to gamble on their behalf. It is a requirement that staff regularly pay heed to self-exclusion agreement records that are currently active (particularly photographs) in order to stay alert to the identity of those excluded in the locality of the premises.
- Self-excluders have the opportunity of also excluding from other premises owned by Chongie without necessarily having to enter areas licenced for gambling. Where the self-exclusion agreement is extended to other premises we will consider any specific requests made by a customer in setting the bounds of the exclusion area.

Chongie will offer customers with whom they enter into a self-exclusion agreement in respect of facilities for any kind of gambling we offer, the ability to exclude from facilities for the same kind of gambling offered in our locality by any other holder of an operating licence to whom this provision applies, by participating in one or more available multi-operator self-exclusion schemes.

A self-exclusion log is maintained on the premises for recording detail of those currently excluded in addition to records stored digitally.

Those self-excluded are removed from any marketing databases held by Chongie within two days of receiving the completed self-exclusion form, but we will take all reasonable steps to prevent details being knowingly sent as soon as practicable.

At the end of the self-exclusion period, the exclusion will remain in place for a further six months, unless the customer takes positive action in order to gamble again. At the end of the exclusion period, the Manager and customer will, together, review the terms of agreement either by telephone or in person. The review process is recorded on a self-exclusion review form.

Where a customer chooses not to extend the self-exclusion and makes a positive request to begin gambling again, the customer is offered a 24-hour 'cooling off' period before being allowed access to the gambling facilities.

Chongie retains self-exclusion records for the length of the agreement plus a further 6



months.



### **3 Children and Vulnerable Persons**

#### **3.1 Access to Gambling**

Chongie implements age verification procedures that use various methods to try and detect and deter children and young people from entering including U18 signage.

The premises themselves have been designed to ensure staff on the floor can see who is accessing the premises and floor staff must be vigilant. Specific risks have been considered in the Local Area Risk Assessment.

#### **3.2 Challenge 25**

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

Acceptable forms of documentation include:

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

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

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

Challenge 25 signage is positioned on or close to the entrance/exit door and displayed in conjunction with existing signage.

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

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

All age verification test failures are fully investigated by the Operations Manager and/or the Compliance Officer. Performance is constantly monitored and further training may be given



to staff if necessary to react to developing risks in particular areas.

Chongie does not deliberately provide facilities for gambling in such a way as to appeal particularly to children or young people, for example by reflecting or being associated with youth culture.

If a person over the age of 18 knowingly allows a child under the age of 18 in to the Adult Gaming Centre that person and the child will be banned for 6 months (the names and details will be recorded on a written form which will be filed at the unit).

This should be reported to the Premises Manager for that site, who will then complete the "ban log" and report and retain for future use/inspection.

If an employee of Chongie becomes aware that a child or young person is using or has used facilities for gambling provided in reliance on the licence, they shall ensure that:

- Any money paid in respect of the use of those facilities (whether by way of fee, stake or otherwise) by the child or young person is returned as soon as is reasonably practicable; and
- Any prize must not be given to the child or young person.

This should be reported to the Premises Manager for that site, who will then complete the ban log and report to the Operations Manager in writing.

Any member of staff who knowingly allows access to a person under the age of 18 will be subject to disciplinary action.

### **3.3 Employment of Children and Young Persons**

Licencees who employ children and young persons should be aware that it is an offence: -

- a) to employ them to provide gambling facilities in an Adult Gaming Centre
- b) for their contract of employment to require them or permit them to perform functions in respect any gambling machine in an Adult Gaming Centre
- c) to employ a child to perform any function in an Adult Gaming Centre where facilities are being provided to play gaming machines

Chongie will not employ and person under the age of 18 years

## **4 Crime and Disorder**

### **4.1 Money Laundering and Proceeds of Crime**

Chongie maintains a separate ML and POCA policy which is available to all staff.

### **4.2 Suspicious Activity Reports**

All employees are aware of where the SAR forms are located, how to complete them and how to submit them to the Operations Manager.

POCA requires SARs to be raised to the NCA in the event of knowledge or suspicion of the use of the proceeds of crime.

A SAR will be raised with the NCA by the Operations Manager as soon as is reasonably practicable where suspicion is held that the customer is engaged in money laundering.

If the level of concern leading to the SAR is maintained in future transactions or has increased thereafter, then further SARs will be considered.

Wherever knowledge or suspicion exists, the Operations Manager will make an assessment with regards to the continuation of the customer relationship. This decision is made with awareness of the potential offences under POCA if transactions are allowed to continue where knowledge or suspicion exists.

In accordance with Gambling Commission guidance, advice may be sought from the NCA around the most effective approach in respect of terminating a customer relationship.

Where a relationship is terminated, steps will be taken to uphold this as effectively as possible.

Further information is contained in the ML and POCA policy.

### **4.3 Cash Handling**

All members of relevant staff are trained specifically on cash handling and in particular with regard to security, accounting practices and record keeping in respect of:

- (i) Monetary stakes introduced to machines (gross takings),
- (ii) Money introduced to re-float machines
- (iii) Token transactions



(iv) Customer refunds due to machine malfunctions.

(v) Money removed from machines (net takings)

#### *Sign Off Keys*

No keys are to be handed to anybody without checking ID. The person who hands over the keys will be held responsible. All visiting engineers need to sign in.

#### *Cash Collection*

Cash is collected daily and stored in a safe. The external cash collection will take place every 7-10 days and the Operations Manager will be present.

#### *Empty of Machines*

The empty of machines needs to be carried out ideally when there are no customers in the unit.

Once each machine/terminal has been emptied/re-floated the keys need to be locked away again in the safe.

#### *Cash Reconciliation*

The Premises Manager is responsible for this and any discrepancies / variances will be recorded as cash losses and investigated as necessary.

All accounting procedures will be recorded by senior management.

## **4.4 Keeping Alcohol Out**

Chongie implements clear rules and guidelines on the consumption and influence of alcohol.

#### *Individuals under the influence of alcohol on entry*

- In all our sites individuals who are deemed to be under the influence of excessive alcohol should be prevented from entering any of our premises.
- When such a situation occurs the member of staff should politely refuse entry to the site on the grounds of being under the influence of alcohol and ask the individual to leave the premises.
- Should the individual resist or refrain from leaving the premises in the first instance a Premises Manager should be called. They should also request that the individual leave the premises immediately. If an individual fails to leave the premises or becomes a nuisance that cannot be dealt with by the staff on duty the police should





be called to assist.

- All incidents should be recorded fully on the premises log.

#### *Alcohol consumption on site*

- Under no circumstances should customers be served alcoholic drinks on site, nor should they bring alcoholic drinks onto the premises to be consumed.

### **4.5 Dealing with Aggressive Customers**

Violence and aggression are used to show distress and dominance. Whilst there are some individuals for whom such behaviour is normal, members of staff must be extremely cautious of treating such behaviour as normal.

Staff must be aware of any signs of aggression including, but not limited to:

- Tensed muscles or sweating
- Twitching muscles, particularly in the face
- Pacing
- Changes in voice (pitch, volume)
- Language, obscenities, threats
- Facial expression
- Withdrawn or upset
- Carrying a weapon or suspected weapon

In the event a member of staff comes across a customer displaying signs of aggression or violence they should:

- Listen to the customers views or complaints
- Try to understand what their problem is and discuss it with them
- See if they can resolve the situation by taking any actions needed

Staff should be cautious in their approach and ensure they do not adopt a confrontational approach and are aware of how they can contact a another member of staff if necessary.



## 5 Fair and Open

### 5.1 General Terms and Conditions

Chongie utilise and comply with BACTAs general Terms and Conditions and all relevant sections of the LCCP

### 5.2 Complaints Procedure

*Chongie Entertainment Limited is committed to providing excellent levels of service and are constantly striving to meet the expectations of customers, and welcome feedback where services can be improved or where expectations have not been met.*

*Issues of concern can usually be resolved by discussing the matter with a member of the team within one of the Adult Gaming Centres. A database record will be completed at the time of the contact, detailing your contact details, which team member dealt with the issue, the nature of the complaint and how the complaint was resolved. A copy of this complaints procedure will be provided to customers upon request, or whenever they make a complaint.*

*However, we recognise that sometimes it may not be appropriate to contact us in this way, or you may feel your concerns have not been properly addressed internally after talking to the team. Where this is the case, we actively encourage our customers to use our Complaints Procedure so that issues and concerns can be raised with management and addressed appropriately. This document explains how the Complaints Procedure works, what you need to do and what you can expect.*

*There are two levels – Complaints Co-ordinator and Lead Contact of the Adult Gaming Centre.*

#### *Level 1 – Complaints Co-Ordinator*

*If Chongie Entertainment Limited haven't reasonably met your expectations or you wish to make a complaint relating to services you should write or e-mail in the first instance to the Complaints Co-ordinator, who will be the General Manager of the premises*

*Please put in the subject line 'FAO: Complaints Co-ordinator'.*

*In expressing concerns it is helpful to include all relevant details such as nature of complaint, date, people contacted and the other circumstances relating to your complaint. This helps to quickly and fully understand the nature of the complaint and begin investigations. Once the Complaints Co-ordinator acknowledges receipt of your letter or email in writing within 48 hours, he will also provide a copy of this complaints policy. You can normally expect a full written response within 10 working days of this acknowledgement. His aim is to resolve the*

*complaint to your complete satisfaction at this level.*

*Level 2 - Lead contact of the Adult Gaming Centre.*

*If, after receiving our response at the 1st level you feel that your concerns have not been fully addressed you can ask for your complaint to be referred to the lead contact in relation to the services provided. Please contact Dobromir Baltadzhiev. You can normally expect a full written response to your complaint within 10 working days of acknowledgement of the complaint reaching the 2nd level.*

*It may be necessary for additional information to be sought from an external source. When this is necessary, it may not be possible to respond to your complaint within 10 working days and the Lead contact of the Adult Gaming Centre will contact you again. He will explain the reasons for asking for a time extension and seek your approval.*

*Chongie Entertainment Limited understand the need for ADR provisions to be in place and therefore intend to contract with a Gambling Commission approved ADR provider.*

### **5.3 Marketing and Promotional guidelines**

Chongie has an Advertising and Media Policy which is available to all staff.

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

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

## 6 Recording and Reporting Requirements

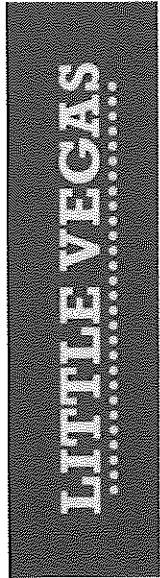
### 6.1 General Reporting Requirements

Chongie acknowledges its obligation to ensure that staff openly co-operate with the Gambling Commission in the proper performance of their compliance functions and that they are made aware of those officers' rights of entry to premises contained under Part 15 of the Gambling Act 2005 and that:

- they must provide the Gambling Commission with any information that the Commission would reasonably need to be aware of in exercising its regulatory functions or suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code of practice provision having the effect of a licence condition. Changes in key circumstances must be reported within five days of their occurrence in accordance with the terms set out in the Operating Licence.
- Chongie must provide the Gambling Commission with such information as the Commission may require from time to time about the use of facilities provided such as:
  - (i) the numbers of people making use of the facilities and the frequency of such use;
  - (ii) the range of gambling activities provided by the licensee and the number of staff employed in connection with them; and
  - (iii) the licensee's policies in relation to, and experience of, problem gambling.
- Chongie must submit a Regulatory Return to the Gambling Commission containing such information as the Commission may require from time to time, and provide evidence that the terms on which gambling is offered are not unfair under the Unfair Terms in Consumer Contracts Regulations 1999 and, where applicable, meet the reasonableness test under the Unfair Contract Terms Act 1977.
- The Appointed Manager will be informed immediately a Gambling Commission Enforcement Officer properly identifies himself on the premises, and will attend to the Officer without undue delay. Staff will co-operate at all times with the Commission's Enforcement Officers.
- Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

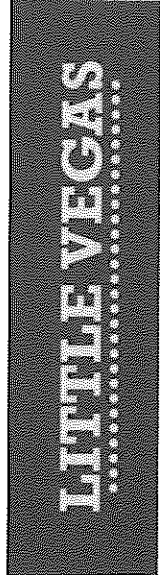
**6.2 Challenge 25 Register**

|    | Name and other details | Date of Challenge | Signed | Print Name | Any other comments |
|----|------------------------|-------------------|--------|------------|--------------------|
| 1  |                        |                   |        |            |                    |
| 2  |                        |                   |        |            |                    |
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| 10 |                        |                   |        |            |                    |



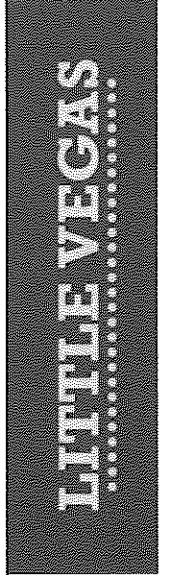
**6.3 Self-Exclusion Register**

|    | Name and other details | Date of exclusion | Expiry of Ban | Signed | Print Name | Breaches of self exclusion by self excluded member | Date of when self excluded has opted and declared to return to gambling |
|----|------------------------|-------------------|---------------|--------|------------|--|---|
| 1  |                        |                   |               |        |            |  |   |
| 2  |                        |                   |               |        |            |  |   |
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| 8  |                        |                   |               |        |            |  |   |
| 9  |                        |                   |               |        |            |  |   |
| 10 |                        |                   |               |        |            |  |   |



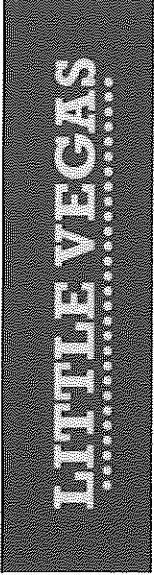
**6.4 Customer Interaction**

|    | Name and other details | Date | Observation | Action | Outcome | Signed | Print Name |
|----|------------------------|------|-------------|--------|---------|--------|------------|
| 1  |                        |      |             |        |         |        |            |
| 2  |                        |      |             |        |         |        |            |
| 3  |                        |      |             |        |         |        |            |
| 4  |                        |      |             |        |         |        |            |
| 5  |                        |      |             |        |         |        |            |
| 6  |                        |      |             |        |         |        |            |
| 7  |                        |      |             |        |         |        |            |
| 8  |                        |      |             |        |         |        |            |
| 9  |                        |      |             |        |         |        |            |
| 10 |                        |      |             |        |         |        |            |



**6.5 SARS Register**

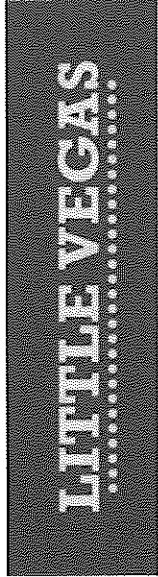
|    | Form Name | Date of Form | Submitted | Signed | Print Name | Any other comments |
|----|-----------|--------------|-----------|--------|------------|--------------------|
| 1  |           |              |           |        |            |                    |
| 2  |           |              |           |        |            |                    |
| 3  |           |              |           |        |            |                    |
| 4  |           |              |           |        |            |                    |
| 5  |           |              |           |        |            |                    |
| 6  |           |              |           |        |            |                    |
| 7  |           |              |           |        |            |                    |
| 8  |           |              |           |        |            |                    |
| 9  |           |              |           |        |            |                    |
| 10 |           |              |           |        |            |                    |





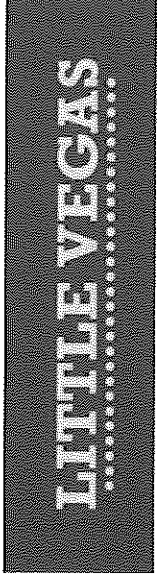
6.6 Staff Training

|    | Staff Name | Date of Training | Trainer | Training covered | Signed | Print Name | Any other comments |
|----|------------|------------------|---------|------------------|--------|------------|--------------------|
| 1  |            |                  |         |                  |        |            |                    |
| 2  |            |                  |         |                  |        |            |                    |
| 3  |            |                  |         |                  |        |            |                    |
| 4  |            |                  |         |                  |        |            |                    |
| 5  |            |                  |         |                  |        |            |                    |
| 6  |            |                  |         |                  |        |            |                    |
| 7  |            |                  |         |                  |        |            |                    |
| 8  |            |                  |         |                  |        |            |                    |
| 9  |            |                  |         |                  |        |            |                    |
| 10 |            |                  |         |                  |        |            |                    |



**6.7 Incidents Requiring Police Attendance**

|    | Date of Incident | Description of Incident | Police attendance? | Signed | Print Name | Any other comments |
|----|------------------|-------------------------|--------------------|--------|------------|--------------------|
| 1  |                  |                         |                    |        |            |                    |
| 2  |                  |                         |                    |        |            |                    |
| 3  |                  |                         |                    |        |            |                    |
| 4  |                  |                         |                    |        |            |                    |
| 5  |                  |                         |                    |        |            |                    |
| 6  |                  |                         |                    |        |            |                    |
| 7  |                  |                         |                    |        |            |                    |
| 8  |                  |                         |                    |        |            |                    |
| 9  |                  |                         |                    |        |            |                    |
| 10 |                  |                         |                    |        |            |                    |

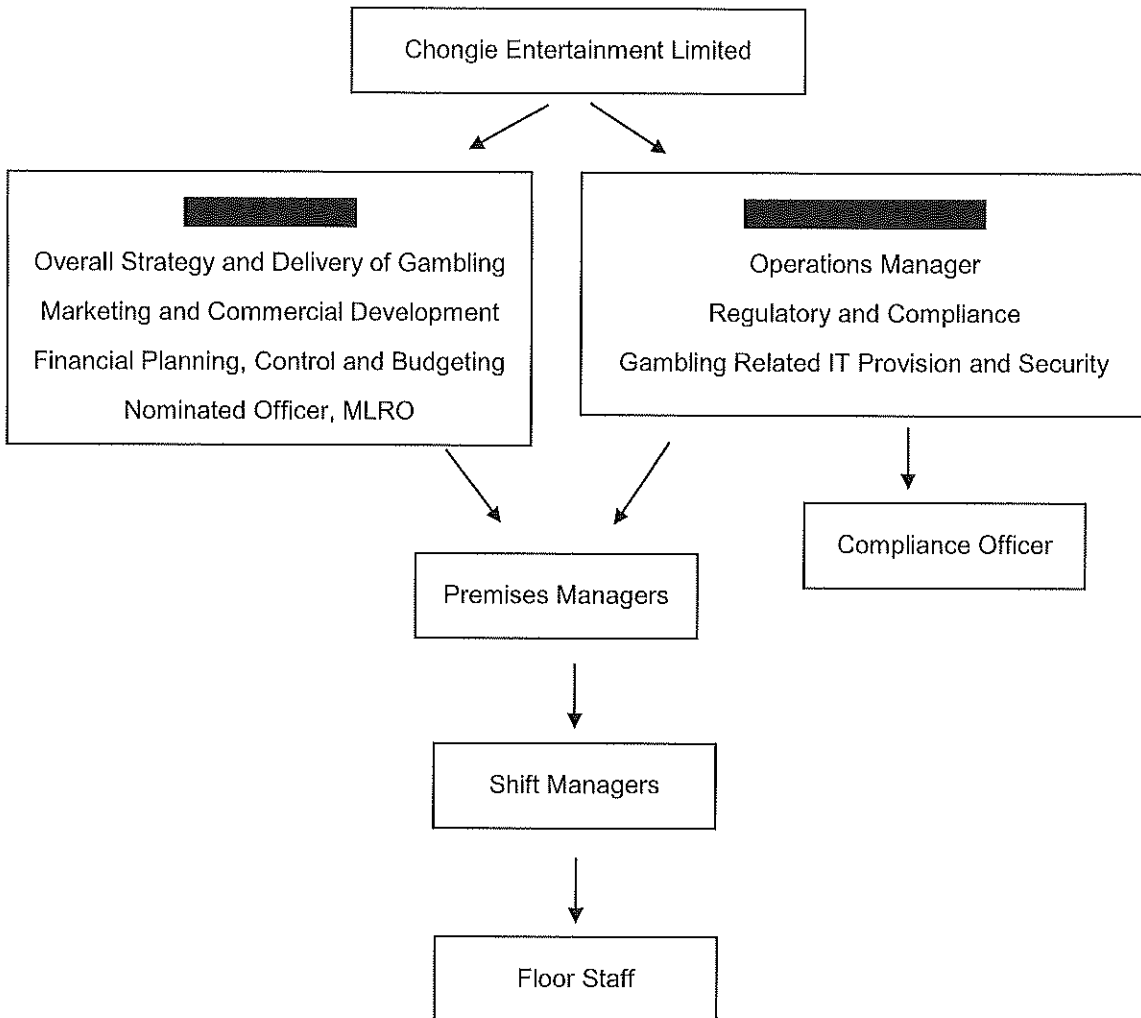


## 7 Training

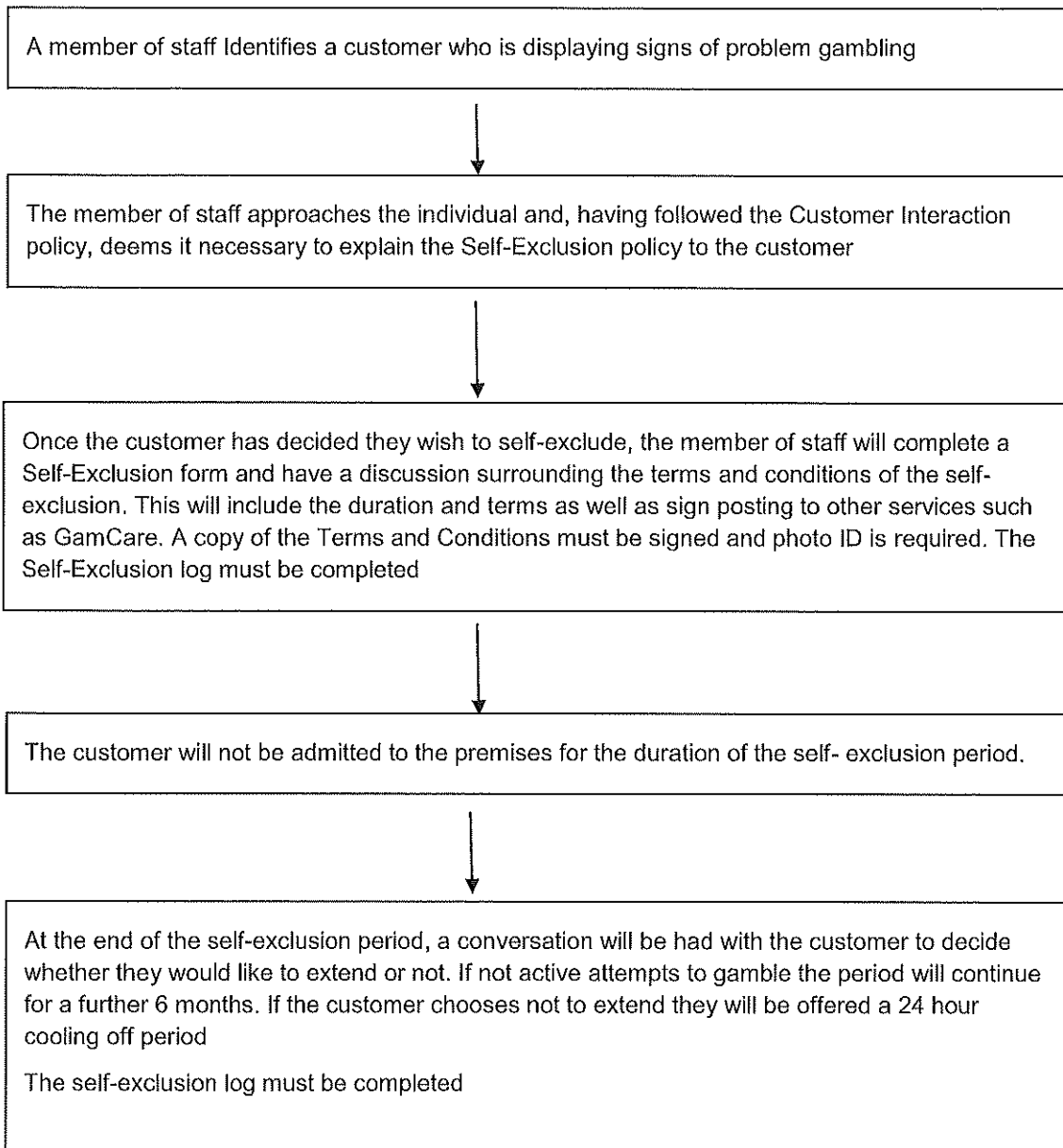
- 7.1 All members of staff receive full training on the Compliance Pack and all other Policies and Procedures of Chongie.
- 7.2 All members of staff will complete training on starting and at annual refreshers.
- 7.3 All training will be recorded in the training Record.
- 7.4 Training is carried out by the [REDACTED], Operations Manager or an external Consultant.

## 8 Appendices

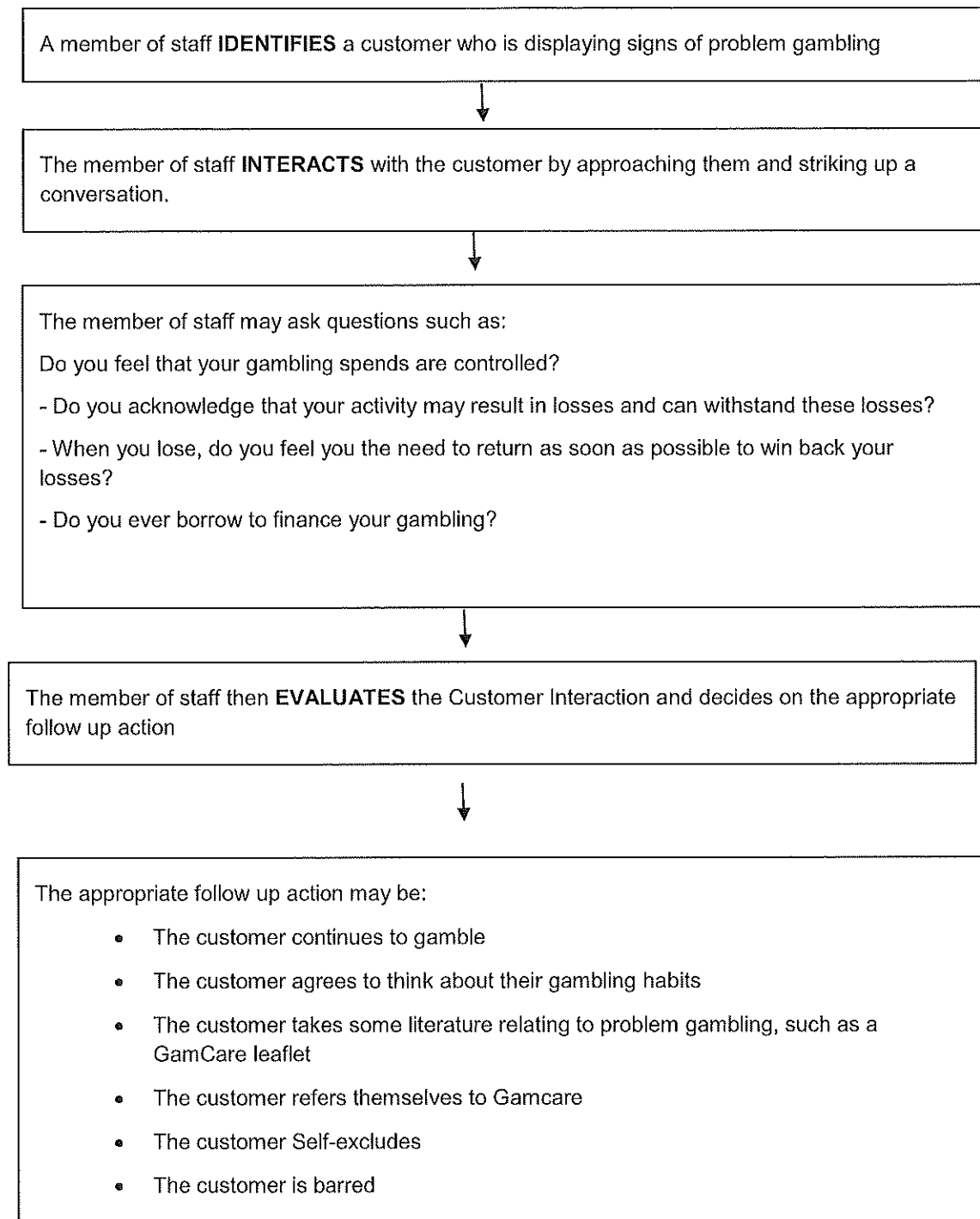
### 8.1 Management



## 8.2 Self-Exclusion Flow Chart



### 8.3 Customer Interaction Flow Chart



**9 Monitoring**

To ensure that the policies and procedures continues to be fit for purpose:

Chongie are committed to carrying out an ongoing risk assessment of its policies and procedures, tailoring them to and any training around new products and newly identified risks as appropriate.

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

| Reviewed By | Reviewed On | Next Review |
|-------------|-------------|-------------|
|             |             |             |
|             |             |             |
|             |             |             |
|             |             |             |
|             |             |             |



